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10 **BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE**

11 IN THE MATTER OF THE HONORABLE,  
12 MICHELE FIORE, Justice of the Peace,  
13 Pahrump Township Justice Court, Nye  
14 County, State of Nevada,  
15 Respondent.

Case No.: 2025-108-P

16 **OPPOSITION TO RESPONDENT’S MOTION TO DISMISS**

17 COMES NOW Thomas J. Donaldson, Special Counsel for the Nevada Commission on  
18 Judicial Discipline (“Commission” or “NCJD”), and hereby opposes The Honorable Judge Michele  
19 Fiore’s Motion to Dismiss (“Motion”) filed herein on May 15, 2026. The instant opposition is made  
20 pursuant to PRJDC 38.2 and based upon the following memorandum of points and authorities and  
21 the pleadings and papers on file herein.

22 **Memorandum of Points and Authorities**

23 Contrary to Respondent’s contentions, the Commission clearly has jurisdiction over the  
24 instant matter pursuant to NRS 1.440 as recently determined by the Nevada Supreme Court in *Fiore*  
25 *v. Nev. Comm. on Judicial Discipline*, Dockets No. 89037, 90650 and 90810, pp. 3-4  
26 (April 10, 2026). Further, there are a variety of laws that Respondent violated while on the bench  
27 in violation of Canon 1, Rule 1.1 of the Revised Nevada Code of Judicial Conduct (“Code”) as  
28 alleged in Count One of the Formal Statement of Charges (“FSOC”) filed herein on April 24, 2026.  
Additionally, Respondent’s violations of the law do not promote public confidence in the  
independence, integrity and impartiality of the judiciary or avoid impropriety or the appearance of



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**II.**

**Legal Standard**

Respondent's Motion is based upon NRCPC 12(b)(1), (2) and (5) for lack of personal jurisdiction, lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted. Motion, p. 6. The complaint cannot be dismissed pursuant to N.R.C.P. 12(b)(5) for a failure to state a claim upon which relief can be granted unless it appears beyond a doubt that the plaintiff could prove no set of facts which, if accepted by the trier of fact, would entitle him to relief. *Edgar v. Wagner*, 101 Nev. 226, 699 P.2d 110 (1985), cited, *Hale v. Burkhardt*, 104 Nev. 632, at 636, 764 P.2d 866 (1988), *Marcoz v. Summa Corp.*, 106 Nev. 737, at 739, 801 P.2d 1346 (1990).

**III.**

**Legal Argument**

**A. The Commission has jurisdiction over Respondent and this matter.**

In *Fiore v. Nev. Comm. on Judicial Discipline*, Dockets No. 89037, 90650 and 90810, pp. 3-4 (April 10, 2026), Respondent argued that "[b]ecause the misconduct leading to the federal criminal action occurred before she took the bench, . . . the Commission cannot discipline her." However, the Nevada Supreme Court disagreed and held that the Commission has jurisdiction under NRS 1.440. *Id.* at 4. Of course, this holding continues to be binding upon the instant proceeding.

Four (4) factors are necessary for application of issue preclusion: (1) the issue decided in the prior litigation must be identical to the issue presented in the current action; (2) the initial ruling must have been on the merits and have become final; (3) the party against whom the judgment is asserted must have been a party or in privity with a party to the prior litigation; and (4) the issue was actually and necessarily litigated. *Five Star Capital Corp. v. Ruby*, 124 Nev. 1048, 194 P.3d 709 (2008), cited, *Bower v. Harrah's Laughlin*, 125 Nev. 470, at 481, 215 P.3d 709 (2009), *Elyousef v. O'Reilly & Ferrario, LLC*, 126 Nev. 441, at 445, 245 P.3d 547 (2010).

Here, (1) Respondent raised the identical issue of the Commission's jurisdiction over her and the instant disciplinary proceeding; (2) the Court's ruling was on the merits and has become final; (3) the parties are identical in the two (2) actions; and (4) the issue of jurisdiction was actually and necessarily litigated and determined in favor of the Commission. *Fiore v. Nev. Comm. on Judicial*

1 *Discipline*, Dockets No. 89037, 90650 and 90810, pp. 3-4 (April 10, 2026). Thus, the Commission  
2 should summarily reject Respondent's contention that the Commission lacks jurisdiction.

3 **B. The FSOC states multiple claims against Respondent.**

4 Next, the Motion states, "[t]he [FSOC] against Judge Fiore is constitutionally and legally  
5 deficient because it fails to identify the statutory grounds for discipline, fails to allege the violation  
6 of any enforceable legal duty, and improperly attempts to transform alleged pre-bench private  
7 conduct into a perpetual judicial ethics violation." Motion, p. 8 at lines 6-9. However, the FSOC  
8 provides sufficient due process to Respondent and states multiple claims against her.

9 **1. The FSOC provides due process to Respondent.**

10 The FSOC is "a document setting forth the specific acts of judicial misconduct."  
11 NRS 1.4267. Additionally, "[t]he [FSOC] must reference the relevant provisions of the [NRS], the  
12 [Code] and the Nevada Constitution and provide a clear statement of all acts and omissions which  
13 are alleged to warrant action by the Commission." PRJDC 15.

14 "Due process is satisfied by giving both parties a meaningful opportunity to present their  
15 case," by affording notice and an opportunity to be heard. *J.D. Constr. v. IBEX Int'l Grp.*, 126 Nev.  
16 366, 376, 240 P.3d 1033, 1040 (2010); *see also Dutchess Bus. Servs., Inc. v. Nev. State Bd. of*  
17 *Pharmacy*, 124 Nev. 701, 711, 191 P.3d 1159, 1166 (2008) ("Administrative bodies must follow  
18 their established procedural guidelines and give notice to the defending party of the issues on which  
19 the decision will turn and the factual material on which the agency relies for decision so that he may  
20 rebut it."). It "is the opportunity to prepare a defense that defines due process." *Dutchess Bus. Servs.*,  
21 124 Nev. at 712, 191 P.3d at 1167.

22 Here, the FSOC initially references the required legal authorities for invoking its jurisdiction  
23 in this matter. FSOC, p. 2 at lines 2-5. Next, the FSOC alleges the "specific acts" of Respondent  
24 that "warrant action by the Commission." FSOC, pp. 2-3. The FSOC then sets forth three (3)  
25 separate counts of Code violations and incorporates the factual allegations into each count. FSOC,  
26 pp. 3-4. Finally, the FSOC concludes:

27 Judge Fiore's actions constitute either knowing and deliberate violations of the Code  
28 or violations that were not knowing and deliberate. Both types of violations are  
contrary to the form, force and effect of the [Code].

1 FSOC, p. 4 at lines 18-20.

2 As the Commission well knows and Respondent and her counsel appear to know based upon  
3 the content of the Motion, NRS 1.4653 sets forth the circumstances under which a judge may be  
4 disciplined. NRS 1.4653 provides in pertinent part:

5 1. The Commission may remove a judge, publicly censure a judge or impose  
6 other forms of discipline on a judge if the Commission determines that the judge:

- 7 (a) Has committed willful misconduct.  
8 (b) Has willfully or persistently failed to perform the duties of office; or  
9 (c) Is habitually intemperate.

10 2. The Commission may publicly censure a judge or impose other forms of  
11 discipline on a judge if the Commission determines that the judge has violated one  
12 or more of the provisions of the [Code] in a manner that is not knowing or deliberate.

13 \* \* \*

14 5. As used in this section:

15 \* \* \*

16 (b) "Willful misconduct" includes:

- 17 (1) Conviction of any crime involving moral turpitude;  
18 (2) A knowing or deliberate violation of one or more of the provisions  
19 of the [Code]; and  
20 (3) A knowing or deliberate act or omission in the performance of  
21 judicial or administrative duties that:

- 22 (I) Involves fraud or bad faith or amounts to a public offense;  
23 and  
24 (II) Tends to corrupt or impair the administration of justice in  
25 a judicial proceeding.

26 The term does not include claims of error or abuse of discretion in findings  
27 of fact, legal decisions or procedural rulings unless supported by evidence of abuse  
28 of authority, a disregard for fundamental rights, an intentional disregard of the law,  
a pattern of legal error or an action taken for a purpose other than the faithful  
discharge of judicial duty.

19 Of course, given the language in the final paragraph of the FSOC, it takes no imagination  
20 simply "to connect the dots" between the allegations and the corresponding subsections of  
21 NRS 1.4654. The FSOC provides notice of the matters and evidence that the Commission will  
22 consider at the hearing in this matter, satisfying Nevada's due process requirements. However, in  
23 the unlikely event that the Commission determines that the FSOC is not sufficiently clear and  
24 concise, the undersigned Special Counsel hereby requests leave to amend the FSOC pursuant to NRS  
25 1.4267 as sought by Respondent in her Motion. Motion, p. 9 at lines 5-7.

## 26 **2. Multiple legal obligations exist.**

27 The Motion next contends that the FSOC "never identifies the underlying legal obligation  
28 Judge Fiore allegedly violated" in Count One. Motion, p. 9 at lines 9-11. While such specificity is

1 not required in the FSOC, Respondent's actions constitute violations of various provisions of Nevada  
2 law.

3 Criminal embezzlement is defined in NRS 205.300, which provides in relevant portion:

4 1. Any bailee of any money, goods or property, who converts it to his or her  
5 own use, with the intent to steal it or to defraud the owner or owners thereof and any  
6 agent, manager or clerk of any person, corporation, association or partnership, or any  
7 person with whom any money, property or effects have been deposited or entrusted,  
8 who uses or appropriates the money, property or effects or any part thereof in any  
manner or for any other purpose than that for which they were deposited or entrusted,  
is guilty of embezzlement, and shall be punished in the manner prescribed by law for  
the stealing or larceny of property of the kind and name of the money, goods,  
property or effects so taken, converted, stolen, used or appropriated.

\* \* \*

9 3. Any use of the money, goods or property by any bailee thereof, other than  
10 that for which it was borrowed, hired, deposited, carried, received or collected, is  
prima facie evidence of conversion and of intent to steal the same and defraud the  
owner or owners thereof.

11 4. The term "bailee," as used in this section, means all persons with whom  
12 any money, goods or property has been deposited, all persons to whom any goods or  
13 property has been loaned or hired, all persons to whom any goods or property has  
14 been delivered, and all persons who are, either as agent, collector or servant,  
empowered, authorized or entrusted to carry, collect or receive any money, goods or  
property of another.

15 Alternatively, civil conversion is "a distinct act of dominion wrongfully exerted over  
16 another's personal property in denial of, or inconsistent with his title or rights therein . . ." *Evans*  
17 *v. Dean Witter Reynolds, Inc.*, 116 Nev. 598, 606, 5 P.3d 1043, 1048 (2000) (quoting *Wantz v.*  
18 *Redfield*, 74 Nev. 196, 198, 326 P.2d 413, 414 (1958)). Although conversion is not excused by mere  
19 good faith, *id.*, the Nevada Supreme Court has long held that where there is genuine doubt as to the  
20 rightful ownership of property, a party may properly "resort to the judicial process" to resolve that  
21 doubt. *Wantz*, 74 Nev. at 198, 326 P.2d at 414.

22 Similarly, "[u]njust enrichment exists when the plaintiff confers a benefit on the defendant,  
23 the defendant appreciates such benefit, and there is acceptance and retention by the defendant of such  
24 benefit under circumstances such that it would be inequitable for him to retain the benefit without  
25 payment of the value thereof." *Certified Fire Prot. Inc. v. Precision Constr. Inc.*, 128 Nev. 371, 381,  
26 283 P.3d 250, 257 (2012)g (internal quotation marks omitted). Benefit "denotes any form of  
27 advantage," including but not limited to retention of money or property. *Id.* at 382, 283 P.3d at 257  
28 (internal quotation omitted).

1 Respondent's solicitation and receipt of the funds in question occurred in late 2019 and early  
2 2020. The statute of limitations had not yet elapsed on the state criminal or civil claims that could  
3 be brought against her at the time of filing the FSOC. *See* NRS 171.085 (general limitation periods  
4 for violations of NRS 205.300); NRS 171.095(1)(a) (tolling criminal statutes for concealed  
5 offenses); NRS 11.190(2)(c) (unjust enrichment); *Petersen v. Bruen*, 106 Nev. 271, 274, 792 P.2d  
6 18, 20 (1990) (civil discovery rule tolls statute of limitations until "an injured party discovers or  
7 reasonably should have discovered" the harm). Because Respondent's conduct did not become public  
8 until the fall of 2024, the statute of limitations period on these claims has not yet elapsed. As long  
9 as a victim has an enforceable right to recover funds wrongfully retained, Respondent has an ethical  
10 and legal obligation to return the money. *See, e.g.*, Canon 1, Rules 1.1 and 1.2 of the Code.

11 **3. Respondent's conduct constitutes impropriety and the appearance of impropriety.**

12 Next, Respondent's Motion asserts there is no continuing judicial ethics violation in Count  
13 Two of the FSOC and asks, "**what legal event transformed an allegedly completed pre-office**  
14 **misrepresentation into a continuing duty to repay enforceable through judicial discipline?"**  
15 Motion, p. 10 at lines 21-22 (emphasis in original). The answer is simple, when Respondent became  
16 a judicial officer on December 21, 2022, the Code attached to her and she was immediately **required**  
17 to "act at all times in a manner that promotes public confidence in the independence, integrity, and  
18 impartiality of the judiciary and [to] avoid impropriety and the appearance of impropriety." Canon 1,  
19 Rule 1.2 of the Code.

20 Here, when Respondent became a judge, she failed to notify the donors that the specific  
21 purpose of their donations was abrogated, failed to request instructions regarding alternative use of  
22 the donations and/or failed to return the donations to the donors. Then, on October 3, 2024,  
23 Respondent was found guilty by a jury of one (1) count of Conspiracy to Commit Wire Fraud (18  
24 U.S.C. § 1349) and six (6) counts of Wire Fraud (18 U.S.C. § 1343), all felonies, based upon  
25 Respondent's fraudulent use of the donations. *United States v. Fiore*, U.S. Dist. Ct. Case No. 2:24-  
26 cr-00155 (Nev. 2024). Certainly, Respondent's conduct was improper or, at a minimum, creates in  
27 reasonable minds a perception that the Judge violated the Code or engaged in other conduct that

28 ///

1 reflects adversely on the Judge's honesty, impartiality, temperament or fitness to serve as a Judge.  
2 Canon 1, Rule 1.2 of the Code, Comment 5.

3 **4. Respondent's conviction constitutes impropriety and the appearance of impropriety.**

4 Finally, Respondent claims in her Motion that her "pre-judicial conduct and a later jury  
5 verdict that, by itself, does not establish judicial misconduct" for Count Three of the FSOC. Motion,  
6 p. 11 at lines 23-24. However, Respondent fails to cite any relevant legal authority to support her  
7 contention.

8 Initially, the President's pardon of Respondent on April 23, 2025, does not preclude the  
9 Commission from considering Respondent's conduct for disciplinary purposes. In Nevada, "the  
10 effect of a pardon does not erase the historical fact of the conviction[.]" *In re Sang Man Shin*, 125  
11 Nev. 100, 110, 206 P.3d 91, 98 (2009). The Nevada Supreme Court has specifically "retreat[ed] from  
12 [its] prior decisions ... to the extent they imply that a pardon blots out guilt and erases the historical  
13 fact of the underlying conviction." *Id.* at 110, 206 P.3d at 97-98. In doing so, the Court agreed with  
14 the rationale of federal appellate courts that a pardon "does nothing more than to abolish all  
15 restrictions upon the liberty of the pardoned one," but does not eliminate or eradicate the finding  
16 of guilt. *Id.* at 107, 206 P.3d at 95 (citing *Groseclose v. Plummer*, 106 F.2d 311, 313 (9th Cir.  
17 1939)).

18 As these federal courts held, a presidential pardon does not reverse the legal conclusion of  
19 the courts. *See Nixon v. United States*, 506 U.S. 224, 232 (1993) ("a pardon is in no sense an  
20 overturning of a judgment of conviction"); *Hirschberg v. Commodity Futures Trading Comm'n*, 414  
21 F.3d 679, 682 (7th Cir. 2005) (a pardon "does not blot out guilt or expunge a judgment of  
22 conviction" (internal quotations omitted)). Nor can a pardon create a factual fiction that a guilty  
23 verdict did not occur. *United States v. Noonan*, 906 F.2d 952, 958-59 (3d Cir. 1990). Instead, a  
24 pardon "preclude[s] future *punishment* for the conviction," but does "not prohibit all *consequences*  
25 of a pardoned conviction." *Hirschberg*, 414 F.3d at 682 (emphasis in original).

26 The Nevada Supreme Court has previously rejected Respondent's argument that disciplinary  
27 action is a "punishment" as opposed to a "consequence" of her pardon. In *In re Sang Man Shin*, the  
28 Court relied upon *In re Abrams*, 689 A.2d 6 (D.C. 1997) and *Dixon v. McMullen*, 527 F. Supp. 711

1 (N.D. Tex. 1981) in support of its holding that a pardon of a criminal conviction does not “create[]  
2 a civil right” to escape the consequences associated with the underlying verdict. 125 Nev. at  
3 107-110, 206 P.3d at 96-98.

4 Those cases, cited with approval and relied upon by the Court, are dispositive of Respondent’s  
5 arguments. Specifically, in *In re Abrams*, the D.C. Court of Appeals found that an attorney was  
6 subject to discipline by the local bar association for a crime he pled guilty to, notwithstanding a  
7 subsequent presidential pardon. 689 A.2d at 9-12. The court offered the following analogy:

8 Suppose that an alcoholic surgeon performs an operation while intoxicated. He  
9 botches the surgery. The patient dies. The surgeon is convicted of manslaughter and  
10 is sentenced to imprisonment. The President grants him a full and unconditional  
11 pardon. According to *Abrams*, the surgeon now has the result, as a result of the pardon  
12 to continue to operate on other patients, without any interference from the medical  
13 licensing authorities. The proposition that the alcoholic but pardoned surgeon ...  
14 cannot be disciplined is, in our view, altogether unacceptable and even irrational...

15 *Id.* at 10-11.

16 The court went on to note that while a pardon removes “all legal punishment,” “if character  
17 is a necessary qualification and the commission of the crime would disqualify even though there had  
18 been no criminal prosecution for the crime, the fact that the criminal has been convicted and  
19 pardoned does not make him any more eligible.” *Id.* at 11 (internal quotations omitted). Similarly,  
20 in *Dixon*, the Texas federal district court reasoned that a pardon “may remove some disabilities but  
21 does not change the common-law principle that a conviction of an infamous offense is evidence of  
22 bad character.” 527 F. Supp. at 718.

23 Other jurisdictions similarly hold that a pardon does not eliminate jurisdiction for discipline  
24 by civil regulatory bodies. See *Feinstein v. State Bar of Cal.*, 248 P.2d 3, 7 (Cal. 1952) (a pardon  
25 does not automatically mean that an attorney has complied with the “essentials required of an  
26 attorney-at-law”); *Branch v. State*, 163 So. 48, 49 (Fla. 1935) (same); *Matter of Beck*, 342 N.E.2d  
27 611, 614-15 (Ind. 1976) (pardons do not nullify disbarment); *Nelson v. Commonwealth*, 109 S.W.  
28 337, 338-40 (Ky. 1908) (pardons do not restore character or fitness to practice law); *In re Kaufmann*,  
157 N.E. 730, 733 (N.Y. 1927) (a pardon does not “restore to the fellowship of the bar” if “there has  
been a failure to live up to the standards of morality and honor”); *Hankamer v. Templin*, 187 S.W.2d  
549, 550 (Tex. 1945) (pardon does not restore privilege to practice law). As these courts explain,

1 discipline is not “part of the punishment inflicted for the commission of crime,” but is instead a  
2 consequence of “misconduct ... which shows [them] to be a person unfit to engage in the practice  
3 of law.” *Branch*, 163 So. at 49.

4 Similarly, here, the Commission’s proceedings are not a punishment, but a consequence. As  
5 both the Nevada Supreme Court and other courts have held, the fact of a guilty verdict creates an  
6 appearance of impropriety that warrants discipline of public officers. *See e.g., Egan v. Jones*, 21 Nev.  
7 433, 32 P. 929, 930 (1893) (interpreting a former constitutional provision disqualifying those who  
8 are “convicted” of bribery in elections from holding public office); *State v. Nix*, 249 N.E.3d 134,  
9 142-43 (Ohio 2024) (Ohio’s judicial discipline statute disqualifies a person from holding public  
10 office upon the return of a guilty verdict). As these courts explain, “[a]fter verdict of guilty ... the  
11 presumption of innocence ceases[.]” *Campbell v. State*, 781 S.W.2d 14, 17 (Ark. 1989) (internal  
12 quotations omitted); *see also Wilson v. Goodwyn*, 522 F. Supp. 1214, 1215-16 (E.D.N.C. 1981)  
13 (same). Thus, even when a conviction is later reversed (or here, pardoned), there is too great a risk  
14 of “loss of public confidence in those who govern which inevitably accompanies the spectacle of  
15 officeholders who have been found guilty of an offense which disqualifies them for public trust, yet  
16 continue to hold the office[.]” *Campbell*, 781 S.W. 2d at 18; *see also Lubin v. Wilson*, 284 Cal. Rptr.  
17 70, 73 (Ct. App. 1991) (“The statutory scheme [precluding convicted public officials from holding  
18 office after trial court judgment] advances compelling interest for honesty, integrity and confidence  
19 of the public in government, which is greater than the convicted person’s interest in the office.”).

20 Furthermore, as noted above, the statutes of limitation against Respondent for state criminal  
21 and civil charges have not all elapsed. If the Nevada Attorney General’s office decides to file  
22 criminal charges against Respondent under NRS 205.300, NRS 205.305, and NRS 171.095, the  
23 presidential pardon is of no effect. *See* U.S. Const. Art. II § 2. Likewise, if a donor/victim decides  
24 to file a civil action for embezzlement or unjust enrichment, the presidential pardon is of no effect.  
25 *See id.* Accordingly, the pardon does not prevent the Commission from proceeding in this case.

26 Respondent resorts to claiming that the Commission’s actions related to Respondent’s  
27 suspensions underscores the lack of a consistent disciplinary theory. Motion, pp. 12-14. However,  
28 the Commission was simply complying with the applicable statutes.


1 As thoroughly explained in the Commission's Order (1) Rescinding Respondent's  
2 Suspension from the Exercise of Judicial Office without Salary pursuant to NRS 1.4675(2)(b); (2)  
3 Suspending Respondent from the Exercise of Judicial Office with Salary pursuant to NRS 1.4675(4)  
4 dated May 19, 2025 ("Order"), the Commission was complying with NRS 1.4675 and PRJDC 9,  
5 which govern the circumstances under which a judge may be **suspended with or without pay**.  
6 Clearly, the Commission's actions do not prohibit the Commission from proceeding with the FSOC  
7 under the circumstances.

8 **IV.**

9 **Conclusion**

10 Incredibly, Respondent continues to be in complete denial that she did anything wrong and  
11 that her actions **do not constitute** compliance with the law or promoting confidence in the judiciary  
12 in violation of Canon 1, Rules 1.1 and 1.2 of the Code. Respondent and her counsel conveniently  
13 recall only those few facts that are favorable to Respondent and completely disregard the  
14 Commission's Order dated May 19, 2025, and the Nevada Supreme Court's Order Dismissing  
15 Appeal, Denying Petition, and Affirming Interim Suspension dated April 10, 2026. Respondent's  
16 Motion contains no credible grounds or applicable legal basis for the Commission to dismiss the  
17 FSOC filed in this matter. Therefore, Special Counsel respectfully requests an order from the  
18 Commission denying Respondent's Motion.

19 DATED this 26<sup>th</sup> day of May, 2026.

20  
21 By:   
22 Thomas J. Donaldson  
23 Nevada State Bar No. 5283  
24 NCJD Special Counsel  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this OPPOSITION TO RESPONDENT'S MOTION TO DISMISS was sent via electronic mail and U.S. Mail, postage prepaid, addressed to:

Paola M. Armeni, Esq.  
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Dated this 26<sup>th</sup> day of May, 2026.

By: Kelly Gilbert  
Kelly Gilbert

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