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4 1817 N. Stewart Street, Ste. 35
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9 Special Counsel for the Nevada
10 Commission on Judicial Discipline

11
12 **BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE**
13
14 **STATE OF NEVADA**

15 IN THE MATTER OF THE HONORABLE,
16 MICHELE FIORE, Justice of the Peace;
17 Pahump Township Justice Court, Nye
18 County, State of Nevada,

Case No.: 2025-108-P

19 Respondent.

20
21 **MOTION FOR LEAVE TO REQUEST COMMISSION**
22 **TO ISSUE SUBPOENAS**

23 COMES NOW Thomas J. Donaldson, Special Counsel for the Nevada Commission on
24 Judicial Discipline (“Commission” or “NCJD”), and hereby moves for leave from the Commission
25 to request the Commission to issue subpoenas for hearing witnesses. The instant motion is made
26 pursuant to PRJDC 20 and 38.2 and based upon the following memorandum of points and authorities
27 and the pleadings and papers on file herein.

28 **Memorandum of Points and Authorities**

Both the Judge and Special Counsel may compel by subpoena the hearing attendance of witnesses, including the judge. PRJDC 20. The Commission clerk shall prepare subpoenas based on the Judge’s and the Special Counsel’s written request and information. *Id.* All subpoenas must be issued by the Commission’s Executive Director. *Id.* The Judge and Special Counsel shall file proofs of service of the subpoenas with the Commission. *Id.*

The Commission issued its Prehearing Order dated May 12, 2026, specifying, “[n]ot less than thirty (30) days before the hearing, the Parties may submit a written request for the Commission to

1 issue subpoenas for the production of documents or to compel attendance or testimony of the
2 witnesses, if any, pursuant to NRS1.466 and PRJDC 20.” Prehearing Order, p. 1 at lines 20-22. The
3 Commission issued its Order Setting Public Hearing dated June 16, 2026, scheduling the hearing in
4 this matter on October 19-22, 2026.

5 Special Counsel was appointed to this matter in April, 2026. In May and June, 2026, Special
6 Counsel identified potential witnesses in this matter, attempted to contact them and disclosed them
7 to Respondent in Special Counsel’s Discovery Disclosure dated May 28, 2026.¹ Exhibit 1 hereto.
8 Special Counsel successfully contacted Curtiss C. Kull, Robert Richardson and Jay Brown.
9 However, other than NCJD Investigator Kull, Special Counsel has not been able to confirm any of
10 the other witnesses’ appearances at the hearing in this matter.² Therefore, Special Counsel requests
11 the following subpoenas from the Commission:

12 1. Douglas Smith, FBI Officer, 1787 W Lake Mead Blvd, Las Vegas, NV, 89106,
13 to appear at the hearing to testify on Monday, October 19, 2026, at 9:00 a.m.

14 2. Jay Brown, Esq., 520 South Fourth Street, Second Floor, Las Vegas, NV, 89101,
15 to appear at the hearing to testify on Monday, October 19, 2026, at 11:00 a.m.

16 3. Thomas White, Laborer's International Union, Local 872, Business Manager,
17 Secretary/Treasurer, 2345 Red Rock St., Las Vegas, NV, 89146, to appear at the
18 hearing to testify on Monday, October 19, 2026, at 2:00 p.m.

19 4. Robert Richardson, Community Ambulance CEO, 91 Corporate Park Drive, Ste.
20 120, Henderson, NV 89704, to appear at the hearing on Tuesday, October 20, 2026,
21 at 8:00 a.m., Pacific Daylight Time.³

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24 ¹ After realizing that Respondent had not disclosed herself in her initial or supplemental
25 disclosures, Special Counsel named Respondent in his Second Supplemental Discovery Disclosure dated
26 September 25, 2026.

27 ² Investigator Kull is available to testify at any time on Monday, October 19, 2026.

28 ³ Mr. Richardson informed Special Counsel that October 16-28, 2026, he will be in Ireland,
which is eight (8) hours ahead of Las Vegas.

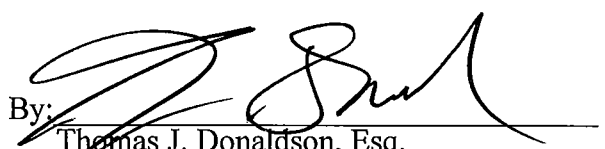
1 5. Chris Armstrong, Olympia Companies, Vice President, 11411 Southern Highlands
2 Parkway, Ste. 300, Las Vegas, NV, 89141, to appear at the hearing to testify on
3 Tuesday, October 20, 2026, at 10:00 a.m.

4 6. Hon. Joseph Lombardo, Governor of Nevada, 101 N. Carson St., Carson City,
5 NV, 89701, to appear at the hearing to testify on Tuesday, October 20, 2026, at 1
6 p.m.

7 7. Hon. Michele Fiore, Respondent, c/o Paola M. Armeni, 1700 S. Pavilion Center
8 Dr., #500, Las Vegas, NV, 89135, to appear at the hearing to testify on Tuesday,
9 October 20, 2026, at 3 p.m.

10 DATED this 28th day of September, 2026.

11 MESSING ADAM JASMINE & SHORE, LLP

12
13 By: 

14 Thomas J. Donaldson, Esq.
15 Nevada State Bar No. 5283
16 1817 N. Stewart Street, Ste. 35
17 Carson City, NV 89706
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20 tom@majlabor.com
21 Special Counsel for the Nevada
22 Commission on Judicial Discipline
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1 **DECLARATION OF SPECIAL COUNSEL THOMAS J. DONALDSON IN SUPPORT**
2 **OF MOTION FOR LEAVE TO REQUEST COMMISSION**
3 **TO ISSUE SUBPOENAS**

4 I, Thomas J. Donaldson, declare as follows:

5 1. I am currently an attorney duly licensed to practice law in the State of Nevada and
6 Special Counsel for the Nevada Commission on Judicial Discipline in the above-captioned matter.

7 2. I have personal knowledge of the facts set forth in this Declaration, except as to those
8 matters stated on information and belief, as to those matters, I believe them to be true. If called upon
9 to do so, I could and would competently testify to the facts stated herein.

10 3. I submit this Declaration in support of Special Counsel's Motion for Leave to Request
11 Commission to Issue Subpoenas attached hereto.

12 4. On April 23, 2026, the Nevada Commission on Judicial Discipline ("Commission")
13 appointed me as Special Counsel in the above-captioned matter.

14 5. In May and June, 2026, I identified potential witnesses in this matter, attempted to
15 contact them and disclosed them to Respondent in Special Counsel's Discovery Disclosure
16 ("Disclosure") dated May 28, 2026.

17 6. I successfully contacted Curtiss C. Kull, Robert Richardson and Jay Brown, all of
18 whom expressed a desire to testify at the hearing in this matter, which was not yet set by the
19 Commission at that time.

20 7. I subsequently informed Mr. Kull, Mr. Richardson and Mr. Brown of the hearing
21 dates in this matter on October 19-22, 2026.

22 8. In September, 2026, I again attempted to contact all of the witnesses in the
23 Disclosure, but was only able to speak with Mr. Kull, who confirmed his upcoming appearance at
24 the hearing in this matter on October 19, 2026.

25 9. I have not been able to confirm any of the other witnesses' appearances at the hearing
26 in this matter.

27 10. It is my belief that subpoenas issued by the Commission are the only means to assure
28 the appearances of these witnesses at the upcoming hearing.

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1 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing
2 is true and correct.

3 Executed this 28th day of September, 2026.

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5 
6 THOMAS J. DONALDSON, ESQ.
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Paola M. Armeni, Esq.
Clark Hill, PLLC
1700 S. Pavillion Center Dr., Ste. 500
Las Vegas, NV 89135
parmeni@clarkhill.com

By: Kelly Gilbert
Kelly Gilbert

EXHIBIT 1

EXHIBIT 1

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

Case No.: 2025-108-P

17 Respondent.

18 **SPECIAL COUNSEL'S DISCOVERY DISCLOSURE**

19 COMES NOW, Thomas J. Donaldson, Special Counsel for the Nevada Commission on
20 Judicial Discipline ("Commission" or "NCJD"), and pursuant to PRJDC 19.1 and the
21 Commission's Prehearing Order dated May 12, 2026, hereby discloses the following material
22 and information:

- 23 (i) The names and addresses of persons who have knowledge of facts relating to the
24 complaint against Respondent:
- 25 a. Curtiss C. Kull, Investigator, Spencer Investigations, LLC, 1325 Airmotive
26 Way, Reno, NV 89502.
 - 27 b. Joseph Lombardo, Governor, 101 N. Carson St., Carson City, NV 89701.
 - 28 c. Robert Richardson, Community Ambulance CEO, 91 Corporate Park Drive,
Ste. 120, Henderson, NV 89704.

d. Thomas White, Laborer's International Union, Local 872, Business Manager,
Secretary/Treasurer, 2345 Red Rock St., Las Vegas, NV 89146.

e. Jay Brown, Esq., 520 South Fourth Street, Second Floor, Las Vegas, NV
89101.

f. Chris Armstrong, Olympia Companies, Vice President, 11411 Southern
Highlands Parkway, Ste. 300, Las Vegas, NV 89141.

g. Douglas Smith, FBI Officer, 1787 W Lake Mead Blvd, Las Vegas, NV 89106.

(ii) Any written or recorded statements made by these persons and the substance of
any oral statements claimed to have been made by Respondent:

a. Mr. Kull prepared the Investigation Reports dated May 28, 2025, and June 3,
2025.

b. *See* Interview Summary dated May 27, 2025, of Governor Lombardo.

c. *See* Interview Summary dated June 3, 2025, of Mr. Richardson.

d. *See* summary of Mr. White's testimony in Investigation Report dated May 28,
2025.

e. *See* summary of Mr. Brown's testimony in Investigation Report dated May
28, 2025.

f. Mr. Armstrong will testify that no funds were received from Respondent for
the Alyn Beck statue.

g. Agent Smith will testify regarding the flyer/letter from Respondent soliciting
funds for the Alyn Beck statue.

(iii) Any reports or statements of experts, made in connection with the case, including
results of physical or mental examinations:

Not applicable.

(iv) Any books, papers documents, photographs or tangible objects pertaining to the
case:

a. *U.S. v. Fiore*, Superseding Criminal Indictment dated 8/20/2024.

- b. *U.S. v. Fiore*, Jury Verdict dated 10/3/2024.
- c. *U.S. v. Fiore*, Transcripts of Proceeding (Volumes 1-8).
- d. *U.S. v. Fiore*, Stipulation of Authenticity of Exhibits dated 9/9/2024.
- e. *U.S. v. Fiore*, Fiore Final Exhibit List dated 10/3/2024.
- f. *U.S. v. Fiore*, U.S. Government's Final Exhibit List dated 10/3/2024.
- g. *U.S. v. Fiore*, Fiore's Supplement to Exhibit A dated 04/28/2025.
- h. *U.S. v. Fiore*, Order Denying various motions dated 04/18/2025.
- i. NCJD Complaint dated 5/2/2025.
- j. Certified copy of NCJD Order regarding suspensions dated 5/19/2025.
- k. Investigation Report dated 5/28/2025.
- l. Interview summary of Gov. Joe Lombardo dated 5/28/2025.
- m. Gov. Joe Lombardo interview mp3 recording.
- n. Follow-up Investigation Report dated 6/3/2025.
- o. Interview summary of Robert Richardson dated 6/3/2025.
- p. Robert Richardson interview mp3 recording.
- q. NCJD Determination for Judge to Respond dated 6/6/2025.
- r. *Fiore v. NCJD*, Transcript of Oral Argument dated 3/5/2026.
- s. *Fiore v. NCJD*, Order Dismissing Appeal, Denying Petition and Affirming Interim Suspension dated 4/10/2026.
- t. Judge Michele Fiore's Response to NCJD Complaint dated 4/20/2026.
- u. Grok.com response re: Michele Fiore Fraud: Alyn Beck Statue Solicitation dated 4/20/2026.
- v. NCJD Determination for Formal Statement of Charges dated 4/22/2026.
- w. Nevada Secretary of State entity information for A Bright Present Foundation, Inc., dated 5/21/2026.

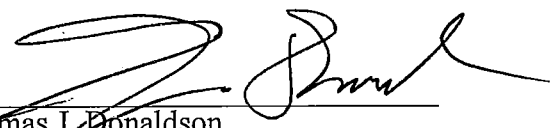
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1 Pursuant to PRJDC 19.3, the undersigned will promptly disclose any discovered
2 additional material or information that is subject to disclosure.

3 DATED: May 28, 2026.

4 MESSING ADAM JASMINE & SHORE,
5 LLP

6 By: 
7 Thomas J. Donaldson
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this SPECIAL COUNSEL'S
DISCOVERY DISCLOSURE was sent via electronic mail addressed to:

Paola M. Armeni, Esq.
Clark Hill, PLLC
1700 S. Pavilion Center Dr., Ste. 500
Las Vegas, NV 89135
parmeni@clarkhill.com

Dated this 28th day of May, 2026.

By: Kelly Gilbert
Kelly Gilbert