



STATE OF NEVADA

BEFORE THE NEVADA COMMISSION ON ETHICS

In re **Public Employee**, Public Agency,
State of Nevada,

Advisory Opinion No. 19-068A

Public Employee. /

ABSTRACT OPINION

I. STATEMENT OF THE CASE

Public Employee ("Public Employee"), of Public Agency, State of Nevada, requested this confidential advisory opinion from the Nevada Commission on Ethics ("Commission"), regarding the propriety of Public Officer's future conduct as it relates to the Ethics in Government Law ("Ethics Law") set forth in Chapter 281A of the Nevada Revised Statutes ("NRS"). Pursuant to Section 13 of the Commission's approved regulation, LCB File No. R108-18, a quorum of the Commission considered this matter by submission, without holding an advisory-opinion hearing.¹ The Commission considered the request for an advisory opinion, information affirmed as true by Public Employee and available public information.

Public Employee sought an opinion from the Commission regarding the applicability of or relief from the strict application of the "cooling-off" requirements set forth in NRS 281A.550(5) to allow Public Employee to seek and accept employment from a potential employer ("Potential Employer"), a private firm that provides professional services to the public and to public entities, including Public Agency. Public Agency has awarded a contract to Potential Employer during the past 12-month period, which exceeds \$25,000. Public Employee was a member of the reviewing committee, which recommended Potential Employer for the contract.

After fully considering Public Employee's request, the Commission deliberated and advises that the anticipated employment with Potential Employer is within the scope of conduct prohibited by NRS 281A.550(5). However, the Commission grants relief under NRS 281A.550(6) conditioned on Public Employee not providing any services to Public Agency for one year after Public Employee's separation from public service. In addition, the Commission advises Public Employee to comply with the mandatory prohibitions of NRS 281A.410(1)(b) against providing representation or consulting services to a private person for compensation on any issue that was under consideration by the Public Agency during the term of Public Employee's public service, which provisions apply to the Potential Employer. Therefore, Public Employee may not represent or provide professional services to Potential Employer for a period of one year on any issue under consideration by the Public Agency that arose during Public Employee tenure of public service. In addition, pursuant to NRS 281A.665, the Commission provides educational guidance so Public Employee will continue to maintain the proper separation between

¹ The following Commissioners participated in this opinion: Chair Lau, Vice-Chair Weaver and Commissioners Duffrin, Gruenewald, Lowry, O'Neill and Wallin. Commissioner Yen disclosed and abstained from any participation in this matter to avoid any appearance of impropriety or bias in compliance with NRS 281A.065(5), NRS 281A.420 and Rule 2.11 of the Code of Judicial Conduct.

Public Employee's public duties and private interests and comply with the Code of Ethical Standards set forth in NRS 281A.400 in soliciting or accepting private employment.

Public Employee has elected to retain confidentiality with respect to the Commission's proceedings. Therefore, the Commission publishes this Abstract Opinion. The facts in this matter were obtained from documentary evidence provided by Public Employee and available public information. For the purposes of the conclusions offered in this opinion, the Commission's findings of fact are set forth below. Facts and circumstances that differ from those presented in the record and relied upon by the Commission may result in different findings and conclusions than those expressed in this opinion. Although the full written opinion was served on Public Employee, for confidentiality reasons, this Abstract Opinion redacts certain Findings of Fact, provides a summary of issues and removes other identifying information to protect the confidentiality of the subject.²

II. QUESTION PRESENTED

Public Employee is employed by Public Agency and requests guidance from the Commission regarding whether Public Employee may seek and accept employment with Private Employer within one year following the conclusion of Public Employee public employment. Specifically, Public Employee questions whether the one-year "cooling-off" prohibition set forth in NRS 281A.550(5) applies to Public Employee's circumstances and, if applicable, whether relief may be granted from the strict application of these provisions pursuant to NRS 281A.550(6).

III. FINDING OF FACTS

1. Public Employee is employed by Public Agency.
2. Public Employee obtained a professional license and related experience from the private sector, prior to serving the public.
3. Public Employee oversees certain professional service contracts for Public Agency and supervises associated staff and government functions relating thereto.
4. The process utilized by Public Agency to select professionals ensures objectivity in the selection process.
5. Public Employee is a licensed professional and has diligently followed the profession's ethical guidelines in refusing to accept officers from private industry that could be construed as a conflict in providing professional or public services.
6. Public Employee is not able to retire from public service or to remain unemployed in the profession for a 12-month period.
7. Public Employee has never solicited employment from a contract vendor while serving as a public employee for Public Agency but has been approached in recent years by private firms regarding employment opportunities due to Public Employee's experience, which opportunities have all been rejected.

² The Commission reserves its statutory authority should an ethics complaint be filed presenting contrary circumstances. See *In re Howard*, Comm'n Op. No. 01-36 (2002) (notwithstanding advisory opinion, public is not precluded from bringing ethics complaint) and *In re Rock*, Comm'n Op. No. 94-53 (1995) (reservation of right to review until time issue is raised).

8. Public Employee would like to separate from public employment and seek employment with the Potential Employer.
9. If NRS 281A.550 is strictly enforced, the number of professional service contracts Public Employee oversees would severely hinder job prospects in the local market. Public Employee desires to remain in Nevada based upon family commitments.
10. Potential Employer is a professional firm that offers services to both public and private clients.
11. Public Employee worked for Potential Employer prior to public service.
12. Public Agency has awarded a contract to Potential Employer during the past 12-month period exceeding \$25,000. Public Employee was on the review committee to make the recommendation on which professional firm should be awarded the contract.
13. Public Employee supervises certain staff and oversees functions associated with Potential Employer's contract performance.
14. If the Commission determines that NRS 281A.550(5) applies to Public Employee's circumstances, Public Employee seeks relief under NRS 281A.550(6) for several reasons including, without limitation, the following:
 - a) The integrity of the Public Agency can be appropriately protected by excluding Public Employee from providing any services pertaining to the existing contract with the Public Agency for the one-year "cooling-off" period.
 - b) There is a shortage of professionals in Public Employee's profession in Nevada, and Public Employee asserts there is a benefit to retain such qualified professionals in Nevada. If Public Employee is not permitted to seek employment with a Nevada firm (Potential Employer), Public Employee will be placed in a position to seek employment in other states.
15. Public Employee acknowledges the mandatory provisions of NRS 281A.410(1)(b) and will comply with the statutory requirements imposing a one-year restriction from providing counseling or representative services to any person (including a future employer-Potential Employer) on any issue that was under consideration by the Public Agency during Public Employee's public service.

IV. STATEMENT AND DISCUSSION OF RELEVANT STATUTES AND ISSUES

A. OVERVIEW OF ISSUES

The Ethics Law promotes public integrity through the appropriate separation of public duties and private interests by Nevada's public officers and employees. In furtherance of this mission, the Ethics Law, in two distinct statutes, imposes a one-year "cooling-off" requirement to prevent current and former public officers and employees from using any proprietary or regulatory information, access or relationships belonging to the public to create competitive disadvantages or other misuse of government information or resources in the private sector regulated by the governmental entity. See NRS 281A.550 and NRS 281A.410(1)(b).

If NRS 281A.550(5) is applicable, the Commission then considers whether it will grant relief from the strict application of the one-year “cooling-off” period pursuant to NRS 281A.550(6). The Commission confirms that Public Employee is subject to the requirements of NRS 281A.410(1)(b), which establish a one-year prohibition against representing or counseling a private entity on any matters that were under consideration by Public Agency during Public Employee’s tenure. In addition, the Commission provides education and directs compliance with the provisions of NRS 281A.400 that could apply to Public Employee’s circumstances.

B. RELEVANT STATUTES

1. Duty to Avoid Conflicts of Interest

NRS 281A.020(1) provides:

1. It is hereby declared to be the public policy of this State that:
 - (a) A public office is a public trust and shall be held for the sole benefit of the people.
 - (b) A public officer or employee must commit himself or herself to avoid conflicts between the private interests of the public officer or employee and those of the general public whom the public officer or employee serves.

2. Improper Use of Public Position

NRS 281A.400(1), (2), (3), (5) and (10) provide:

1. A public officer or employee shall not seek or accept any gift, service, favor, employment, engagement, emolument or economic opportunity, for the public officer or employee or any person to whom the public officer or employee has a commitment in a private capacity, which would tend improperly to influence a reasonable person in the public officer’s or employee’s position to depart from the faithful and impartial discharge of the public officer’s or employee’s public duties.

2. A public officer or employee shall not use the public officer’s or employee’s position in government to secure or grant unwarranted privileges, preferences, exemptions or advantages for the public officer or employee, any business entity in which the public officer or employee has a significant pecuniary interest or any person to whom the public officer or employee has a commitment in a private capacity. As used in this subsection, “unwarranted” means without justification or adequate reason.

3. A public officer or employee shall not participate as an agent of government in the negotiation or execution of a contract between the government and the public officer or employee, any business entity in which the public officer or employee has a significant pecuniary interest or any person to whom the public officer or employee has a commitment in a private capacity.

-5. If a public officer or employee acquires, through the public officer’s or employee’s public duties or relationships, any information which by law or practice is not at the time available to people generally, the public officer or employee shall not use the information to further a significant pecuniary

interest of the public officer or employee or any other person or business entity.

10. A public officer or employee shall not seek other employment or contracts for the public officer or employee or any person to whom the public officer or employee has a commitment in a private capacity through the use of the public officer's or employee's official position.

3. "Cooling-Off" – Accepting Employment

NRS 281A.550(5) provides:

5. Except as otherwise provided in subsection 6, a former public officer or employee of the State or a political subdivision, except a clerical employee, shall not solicit or accept employment from a person to whom a contract for supplies, materials, equipment or services was awarded by the State or political subdivision, as applicable, for 1 year after the termination of the officer's or employee's service or period of employment, if:

- (a) The amount of the contract exceeded \$25,000;
- (b) The contract was awarded within the 12-month period immediately preceding the termination of the officer's or employee's service or period of employment; and
- (c) The position held by the former public officer or employee at the time the contract was awarded allowed the former public officer or employee to affect or influence the awarding of the contract.

4. Relief from Strict Application of "Cooling-off" Requirements

NRS 281A.550(6), (7), (8) and (9) provide:

6. A current or former public officer or employee may file a request for an advisory opinion pursuant to NRS 281A.675 concerning the application of the relevant facts in that person's case to the provisions of subsection 3 or 5, as applicable, and determine whether relief from the strict application of those provisions is proper. If the Commission determines that relief from the strict application of the provisions of subsection 3 or 5, **as applicable**, is not contrary to:

- (a) The best interests of the public;
 - (b) The continued ethical integrity of the State Government or political subdivision, as applicable; and
 - (c) The provisions of this chapter,
- ↳ it may issue an advisory opinion to that effect and grant such relief. {

7. For the purposes of subsection 6, the request for an advisory opinion, the advisory opinion and all meetings, hearings and proceedings of the Commission in such a matter are governed by the provisions of NRS 281A.670 to 281A.690, inclusive.

8. The advisory opinion does not relieve the current or former public officer or employee from the strict application of any provision of NRS 281A.410.

9. For the purposes of this section:

- (a) A former member of the Public Utilities Commission of Nevada, the Nevada Gaming Control Board or the Nevada Gaming Commission; or
- (b) Any other former public officer or employee governed by this section,

↳ is employed by or is soliciting or accepting employment from a business, industry or other person described in this section if any oral or written agreement is sought, negotiated or exists during the restricted period pursuant to which the personal services of the public officer or employee are provided or will be provided to the business, industry or other person, even if such an agreement does not or will not become effective until after the restricted period.

5. “Cooling-Off” – Representing or Counseling

NRS 281A.410(1)(b) provides, in relevant part:

In addition to the requirements of the code of ethical standards and the provisions of this chapter:

1. If a public officer or employee serves in a state agency of the Executive Department or an agency of any county, city or other political subdivision, the public officer or employee:

(a) Shall not accept compensation from any private person to represent or counsel the private person on any issue pending before the agency in which that public officer or employee serves, if the agency makes decisions; and

(b) If the public officer or employee leaves the service of the agency, shall not, for 1 year after leaving the service of the agency, represent or counsel for compensation a private person upon any issue which was under consideration by the agency during the public officer’s or employee’s service. As used in this paragraph, “issue” includes a case, proceeding, application, contract or determination, but does not include the proposal or consideration of legislative measures or administrative regulations.

V. DECISION

A. NRS 281A.550(5) APPLIES TO RESTRICT PRIVATE EMPLOYMENT

NRS 281A.550(5) prohibits seeking or accepting employment with a private entity that contracts with the State or a political subdivision if the contract amount exceeds \$25,000, the contract was awarded within the 12 months immediately preceding the termination of public service, and the position held by the public officer or employee at the time the of the contract award allowed the public officer or employee to affect or influence the award of the contract.

Public Employee confirmed that Potential Employer was awarded a contract within the preceding 12 months, which contract amount exceeds \$25,000. Public Employee submits that the limited participation on the review committee selecting the contract for award should not be enough to trigger the application of NRS 281A.550(5), given the fair and unbiased process established by Public Agency for consultant selection.

Based upon a review of the record, the Commission determines that Public Employee’s role in the selection process for award of the contract to Potential Employer is not insignificant. Public Employee holds an upper-management position with supervisory authority over staff who participate in the contract selection and project management. Therefore, the public position held by Public Employee would have allowed Public Employee to affect or influence the awarding of the Potential Employer contracts for purposes of NRS 281A.550(5). This determination is consistent with statutory

requirements and the Commission's opinion precedent, in which the Commission has determined that the public officer or public employee need only be part of the process rather than the final decision maker for applicability of NRS 281A.550. See *In re Public Employee*, Comm'n Op. No. 17-28A (2018) (public employee not required to be final decision maker or hold a position directly responsible for making recommendations because public duties performed even under supervision may be sufficient for application of the restrictions set forth in NRS 281A.550).

Although the Commission determines NRS 281A.550(5) applies, it is appropriate to consider Public Employee's limited role in the contract selection process and Public Employee's other circumstances in granting relief under NRS 281A.550(6). Therefore, the Commission focuses the remaining portion of this decision on the following: (1) whether Public Employee should be granted relief from the "cooling-off" prohibition under NRS 281A.550(6); (2) explanation of the mandatory provisions of NRS 281A.410(1)(b); and (3) implications under NRS 281A.400 when a public employee seeks private employment and instruction to avoid any appearance of impropriety or violation of the Ethics Law.

B. NRS 281A.550(6) – RELIEF FROM STRICT APPLICATION OF NRS 281A.550(5)

Public Employee requests that the Ethics Commission grant relief from the strict application of the one-year "cooling-off" provisions given Public Employee circumstances. Historically, when the Commission has granted relief, the review has included and been subject to heightened scrutiny or sensitivity to ensure the Legislature's prohibition is maintained and relief is provided in unique and qualifying circumstances that protect the public trust. To grant relief from "cooling-off" under NRS 281A.550(6), the Commission must affirmatively find that the circumstances are not contrary to:

- (a) The best interests of the public;
- (b) The continued ethical integrity of the State Government or political subdivision, as applicable; and
- (c) The provisions of the Ethics Law.

"The intent of the exemption statute is to facilitate beneficial moves from the public to private sectors so long as the moves do not endanger either the public or private sectors and so long as there is nothing otherwise unethical in the way that the employment relationship occurred." See *In re Public Officer*, Comm'n Op. No. 11-96A (2012); *In re Public Employee*, Comm'n Op. No. 13-29A (2013).

Notably, NRS 281A.550(6) does not include a specific exception permitting employment by virtue of a promise not to work on Nevada-specific matters when hired by a contract vendor or the regulated industry. That exception, if it had been enacted by the Legislature, would by its very nature swallow the "cooling-off" provisions. However, future anticipated duties for the regulated industry or contract vendor (including abstaining on Nevada matters for the one-year period) are properly considered in granting relief, but are not controlling.

The Commission reviews the full circumstances on a case-by-case basis to determine whether or not it will render the required findings set forth in NRS 281A.550(6) to grant relief from the strict application of the "cooling-off" prohibition. See *In re Public Officer*, Comm'n Op. No. 15-74A (2016). Prior to discussing whether relief is appropriate, the Commission first assesses whether Public Employee solicited, accepted or otherwise

acquired employment in the regulated industry or from a contract vendor pursuant to NRS 281A.550(9).

1. **NRS 281A.550(9) – Statutory Requirements Pertaining to Seeking or Accepting Employment**

In 2017, the Legislature amended NRS 281A.550 to clarify restricted conduct associated with soliciting or accepting private employment from a contract vendor or the regulated industry. NRS 281A.550(9) establishes that a public officer/employee “is employed by or is soliciting or accepting employment from a business, industry or other person described in [NRS 281A.550] if any oral or written agreement is sought, negotiated or exists during the restricted period pursuant to which the personal services of the public officer or employee are provided or will be provided to the business, industry or other person, even if such agreement does not or will not become effective until after the restricted period.” The Legislature’s amendment verifies that public officers/employees may not solicit, accept or otherwise acquire employment in the regulated industry or from a contract vendor prior to obtaining relief from the strict application of NRS 281A.550. To do otherwise is at one’s peril

Admirably Public Employee has not sought or applied for a position with Potential Employer. Previously, each time any consultant approached Public Employee with an employment opportunity including Potential Employer, Public Employee declined to consider the employment. Public Employee recognizes and has complied with the requirements of NRS 281A.550(5) and NRS 281A.410(1)(b). Therefore, the Commission determines that Public Employee’s conduct does not implicate the definition of soliciting or accepting employment as set forth in NRS 281A.550(9), which conduct is prohibited by NRS 281A.550.

2. **NRS 281A.550(6) – Relief is Granted under the Circumstances**

Among the potential impropriety of certain employment relationships involving contract vendors is the appearance that a public officer or employee who is instrumental in influencing contracts for the public agency in a competitive business environment will be unduly influenced to benefit a vendor based upon promises of future employment with that vendor. Public Employee presents several reasons why relief should be granted, all of which were considered by the Commission even if the reasons are not specifically referenced in this Abstract Opinion. Based upon Public Employee’s circumstances, the Commission is convinced that Public Employee has complied with the Ethics Law and did not use a public position, relationships or information to compromise the public trust by seeking a private position with Potential Employer. See *In re Theobald*, Comm’n Op. No. 13-44A (2013).

The checks and balances established by Public Agency in its selection process for professional contracts and Public Employee’s limited role in the selection process were considered by the Commission. Other more noteworthy reasons include the fact that Public Employee’s circumstances do not implicate a revolving-door scenario; there is a shortage of professionals in Public Employee’s profession in Nevada; Public Employee’s professional license was obtained prior to public service; and Public Employee has extensive private-sector experience in the profession. Public Employee’s continued work in the profession in Nevada will provide continued benefits to Nevadans. In circumstances where the public employee’s services will continue to benefit Nevada or its local governments, “it is in the best interests of the State to retain talented professionals in Nevada’s workforce where the loss of professionals to other jurisdictions is prevalent.” *In re Public Employee*, Comm’n Op. No. 18-29A (2018), p. 8, citing *In re Public Employee*,

Comm'n Op. No. 15-35A (2016) at 9. Further, the integrity of the Public Agency will be preserved by isolating the conflict associated with Potential Employer if Public Employee abides by the pledge to exclude and refrain from providing any services of any nature on projects for Public Agency for a period of one-year after leaving public service and full compliance with NRS 281A.410(1)(b). This pledge is a material factor in the Commission's grant of relief.

Therefore, after review of the record and consideration of applicable law, the Commission determines that it is appropriate to grant relief from the strict application of NRS 281A.550(5) under NRS 281A.550(6) to permit Public Employee to seek private employment with Potential Employer.

C. NRS 281A.410(1)(b) - LIMITATIONS

The provisions of NRS 281A.410(1)(b) are mandatory. Accordingly, Public Employee is advised that under NRS 281A.410(1)(b), Public Employee may not, for the one-year period following separation from public service, represent or counsel any private person (including any employer or other business entities) on any issue that was under consideration by the Public Agency during Public Employee's tenure. In *In re Sweeney*, Comm'n Op. No. 15-70C (2016), the Commission found a violation even where the former employee did not realize her counseling or representation of a private person (her private employer) was restricted by NRS 281A.410(1)(b). These provisions apply even when the provisions of NRS 281A.550 do not and are not subject to relief. Accordingly, former public officers/employees must be vigilant to recognize applicable situations and comply with the statutory restrictions.

D. USE OF GOVERNMENT POSITION – APPLICABILITY OF NRS 281A.400 (1), (2), (3), (5) AND (10)

Lastly, the Commission takes this opportunity to educate Public Employee regarding several sections of NRS 281A.400 applicable to seeking private employment while serving the public. The sections that could apply are:

1. NRS 281A.400(1) - seeking or accepting engagement or, economic opportunity, influencing public duties;
2. NRS 281A.400(2) - using public position to secure unwarranted privilege/advantage;
3. NRS 281A.400(3) - participating as an agent of government in the negotiation or execution of a contract between the government and the public officer or employee, any business entity in which the public officer or employee has a significant pecuniary interest or any person to whom the public officer or employee has a commitment in a private capacity;
4. NRS 281A.400(5) - using information obtained through public duties or relationships to further a significant pecuniary interest; and
5. NRS 281A.400(10) - seeking employment/contracts through use of public position.

Central to each of these provisions is the improper use of a public position to acquire a private or personal gain. The statutory provisions are analyzed based upon the facts presented and are not subject to relief or waiver by the Commission. So, care must

be taken by public officers/employees to comply with these provisions and maintain the integrity of public service by avoiding actual conflicts or even an appearance of impropriety by properly separating private interests from public duties. NRS 281A.020.

Public Employee is a public employee who must commit to avoid conflicts between private interests and those of the general public served. Public Employee has a personal interest in seeking future gainful employment within the private sector. In furtherance thereof, Public Employee has a duty to avoid actual and perceived conflicts of interest and may not use a position in government to secure or grant unwarranted privileges, preferences, exemptions or advantages for Public Employee or for any person to whom the law establishes a commitment in a private capacity. NRS 281A.020, NRS 281A.065 and NRS 281A.400(1) and (2).

If Public Employee needs specific guidance in application of these provisions to a given set of circumstances, Public Employee is encouraged to seek a legal opinion from the official legal counsel for Public Agency pursuant to NRS 281A.790(5), which could provide a “safe harbor” from a willful violation of the Ethics Law. The safe harbor protection applies when a public officer/employee relies in good faith upon the advice of the legal counsel retained by the public body, if such advice was provided prior to the act or omission and is based upon a reasonable legal determination that is not contrary to the provisions of the Ethics Law, as interpreted by the Commission. In addition, the advisory opinion process of the Commission is available to provide guidance to public officers/employees on application of the Ethics Laws to a given set of circumstances.

VI. CONCLUSIONS OF LAW

1. Public Employee is a public employee as defined by NRS 281A.150.
2. Pursuant to NRS 281A.680(1), the Commission has jurisdiction to render an advisory opinion in this matter and such opinion may include educational guidance from the Commission to Public Employee pursuant to NRS 281A.665.
3. Given the public position held and associated duties, Public Employee is subject to the “cooling-off” provisions of the Ethics Law and its restrictions prohibiting, for a one-year period, certain employment and paid counseling and representation services pursuant to NRS 281A.550(5) and NRS 281A.410(1)(b).
4. Under the circumstances as presented, Public Employee’s prospective employment with Potential Employer is within the scope of the prohibitions delineated in NRS 281A.550(5) because Potential Employer has a current contract exceeding \$25,000 that was awarded during the past 12-month period and the public position held by Public Employee had the ability to influence the award of the contract.
5. Relief from the strict application of NRS 281A.550(5) is granted pursuant to NRS 281A.550(6) because there is no evidence suggesting that Public Employee used a public position, relationships or information to compromise the public trust to seek a private position and the anticipated future work for Potential Employer is not contrary to the best interests of the public, ethical integrity of the Public Agency, or the Ethics Law, as more particularly set forth in this opinion.
6. Pursuant to NRS 281A.410(1)(b), Public Employee may not represent or counsel a private person or entity, including Potential Employer, for at least one year after the termination of public service on any issues that were under consideration by the Public Agency during Public Employee’s tenure.

7. On matters implicating Public Employee's potential employment with Potential Employer, Public Employee is advised to fully comply with NRS 281A.400.

Any Finding of Fact hereafter construed to constitute a Conclusion of Law, or any Conclusion of Law construed to constitute a Finding of Fact, is hereby adopted and incorporated as such to the same extent as if originally so designated.

Dated this 11th day of December, 2019.

NEVADA COMMISSION ON ETHICS

By: /s/ Cheryl A. Lau
Cheryl A. Lau, Esq.
Chair

By: /s/ Teresa Lowry
Teresa Lowry, Esq.
Commissioner

By: /s/ Keith A. Weaver
Keith A. Weaver, Esq.
Vice-Chair

By: /s/ Philip K. O'Neill
Philip K. O'Neill
Commissioner

By: /s/ Brian Duffrin
Brian Duffrin
Commissioner

By: /s/ Kim Wallin
Kim Wallin
Commissioner

By: /s/ Barbara Gruenewald
Barbara Gruenewald, Esq.
Commissioner

By: Abstained
Amanda Yen, Esq.
Commissioner