



## STATE OF NEVADA

### BEFORE THE NEVADA COMMISSION ON ETHICS

In the Matter of the Third-Party Request  
for Opinion Concerning the Conduct of  
**Gerald Antinoro**, Sheriff, Storey  
County, State of Nevada,

Request for Opinion No. **16-54C**

\_\_\_\_\_  
Subject. /

### OPINION

#### I. INTRODUCTION AND PROCEDURAL HISTORY

Pursuant to NRS 281A.440(2)(b), a *Third-Party Request for Opinion* ("RFO") was filed with the Nevada Commission on Ethics ("Commission") on June 2, 2016, alleging that Gerald Antinoro, ("Antinoro"), Storey County Sheriff, violated various provisions of the Ethics in Government Law set forth in Chapter 281A of the Nevada Revised Statutes ("Ethics Law").

On or about June 17, 2016, the Commission served Antinoro via certified mail with a *Notice to Subject* advising him of the allegations set forth in the RFO implicating NRS 281A.400(2) (using public position to grant an unwarranted advantage to himself or others), NRS 281A.400(7) (improperly using government resources) and NRS 281A.520 (causing a government entity to incur an expense in support of a candidate).

On July 26, 2016, Antinoro, by and through his attorney, Katherine F. Parks, Esq., with Thorndal Armstrong Delk Balkenbush & Eisinger, provided a response to the allegations.

On August 2, 2016, the Commission served Antinoro with a *Notice of Additional Issues and Facts* via process server, which identified relevant issues and facts beyond those presented in the original RFO concerning Antinoro appearing in a video endorsement wearing his uniform. On August 16, 2016, Antinoro waived the statutory time limits for a hearing in this matter pursuant to NRS 281A.440(6) and submitted a response to the additional allegations on September 6, 2016.

On October 26, 2016, the Commission's Investigatory Panel issued its *Panel Determination* finding just and sufficient cause for the Commission to hold a hearing and render an opinion in this matter based on credible evidence that alleged Antinoro used official letterhead to make a private political endorsement in violation of NRS 281A.400(7).<sup>1</sup> However, under NAC 281A.435, the Panel concluded that the facts did not establish credible evidence to substantiate just and sufficient cause for the Commission

<sup>1</sup> Commissioners Groover and Gruenewald served on the Investigatory Panel and are precluded by NRS 281A.220(4) from participation in further matters after issuance of the Panel Determination. Accordingly, the necessary quorum to act upon this matter and the number of votes necessary is reduced as though these members were not members of the Commission under NAC 281A.200. All other Commissioners are eligible to participate in the consideration of this matter.

to consider the alleged violations of NRS 281A.400(2), NRS 281A.400(7) (regarding use of badge and uniform), and NRS 281A.520. Therefore, those allegations were dismissed.

On November 3, 2016, a *Notice of Hearing and Scheduling Order* was issued outlining a schedule for discovery and dispositive motions and setting the matter for hearing for February 15, 2017.

Parties filed *Stipulated Facts* on and subsequently agreed to continue the February hearing to a later date. A *First-Amended Notice of Hearing and Scheduling Order* was issued by the Commission on January 5, 2017 approving the continuance and setting the hearing for April 19, 2017, for consideration of any stipulated agreements or dispositive motions.

On March 1, 2017, the Executive Director filed a *Motion for Summary Judgment*. Antinoro filed an *Opposition to the Motion for Summary Judgment and a Cross-Motion for Summary Judgment* on March 15, 2017. The Executive Director filed a *Reply to the Opposition and an Opposition to the Cross-Motion for Summary Judgment* on March 21, 2017 followed by Antinoro's *Reply to the Opposition to the Cross-Motion for Summary Judgment* on March 27, 2017, collectively referred to as "Motions."

On April 19, 2017, the Commission considered oral argument, the Motions and record on file to issue its determination granting the Executive Director's Motion for Summary Judgment and denying Antinoro's Motion for Summary Judgment. The Commission ordered that the parties submit briefs on willfulness of the violation under the requirements of NRS 281A.475 and whether any penalties or fines should be imposed by the Commission pursuant to the provisions of NRS 281A.480. See *Order on Motions for Summary Judgment* dated May 3, 2017. Accordingly, a *Notice of Hearing and Scheduling Order Regarding Briefing* was issued on March 3, 2017, reflecting the stipulation of the parties to submit briefs and for the Commission to consider submitted briefs without oral argument.

On May 15, 2017, the Commission held a hearing to consider the briefs. At the conclusion of the May hearing and, after fully considering the record in accordance with the requirements of the law including, without limitation, the mitigating factors set forth in NRS 281A.475, the Commission deliberated and announced its decision on the record that, based upon a preponderance of evidence, Subject Antinoro engaged in one willful violation of NRS 281A.400(7). A penalty in the amount of \$1,000.00 was imposed on Antinoro. In addition, the Commission provided the Executive Director authority to coordinate a schedule for payment of the fine, which schedule must not exceed six (6) months. The Commission now renders this written opinion setting forth its formal findings of fact and conclusions of law in compliance with NRS 233B.125.

## **II. FINDINGS OF FACT**

The Commission granted summary judgment against Antinoro because there are no material issues of fact remaining in dispute and summary judgment was warranted as a matter of law. Antinoro's conduct is deemed to constitute one willful violation of NRS 281A.400(7), as more particularly set forth in this opinion, which determination of willfulness considered the mitigating factors set forth in NRS 281A.475, and resulted in a fine imposed in the amount of \$1,000. In rendering this opinion, the Commission determines the following facts to be established under the preponderance of evidence standard set forth in NRS 281A.480:

1. Antinoro is the elected Sheriff of Storey County, a public officer as defined in NRS 281A.160.
2. Storey County is a political subdivision as defined in NRS 281A.145.
3. The Storey County Sheriff's Office is a local agency as defined in NRS 281A.119.
4. During the relevant time period, Nevada State Assemblywoman Michelle Fiore ("Fiore") was a United States Congressional candidate for Nevada's Third Congressional District in Clark County.
5. On May 27, 2016, Fiore contacted Sheriff Antinoro by phone to request his endorsement of her candidacy for U.S. Congress.
6. Sheriff Antinoro prepared a three-paragraph statement endorsing Fiore's candidacy, dated May 27, 2016, on his personal computer at his home during his lunch hour.
7. The statement endorsing Fiore's candidacy was typed on the official Storey County Sheriff's Office letterhead and emailed to Fiore from Sheriff Antinoro's personal computer and email account.
8. The official letterhead of the Storey County Sheriff's Office utilized by Sheriff Antinoro included the header displaying the official logo and the footer containing address and contact information.
9. On May 27, 2016, Sheriff Antinoro's private endorsement, with the exception of the footer containing the address and contact information, appeared in a YouTube video that was tweeted on Fiore's Twitter account, @VoteFiore.
10. The YouTube video containing Sheriff Antinoro's private endorsement was also posted on Fiore's Facebook page on May 27, 2016.
11. Sheriff Antinoro did not produce the YouTube video or supply any of the other images used in the video. Fiore did not contact Sheriff Antinoro to inform him about the endorsement video.
12. Fiore was defeated in her campaign for U.S. Congress in the primary election held on June 15, 2016.
13. Policy Number 213 of the Storey County Administrative Policies and Procedures ("Storey County Policies") addresses political activity by employees:

213: Political Activity

Employees are expressly forbidden to use any employer resources, including but not limited to: interoffice mail, email, telephone, fax machines, the Internet, or copy machines to engage in any political activity outside the approved scope of the employees' official duties.

....

Employees who are seeking, or who have been elected or appointed to public office, shall not conduct any business related to these activities while on duty. This includes all the items listed in the previous section, (i.e., political activity).

14. The Storey County Policies contain the following definition of “employee:”

**Employee:** A person employed in a budgeted position on a full- or part-time basis. For purposes of those section of these policies covering discipline, layoff, and dispute resolution, the term employee excludes elected officials, department heads and casual workers.

15. The Storey County Sheriff’s Office has a policy regarding Employee Speech, Expression and Social Networking that addresses endorsements:

1060.4.1 UNAUTHORIZED ENDORSEMENTS, ADVERTISEMENTS, AND ACTIVITIES

While employees are not restricted from engaging in the following activities as private citizens or as authorized members of a recognized bargaining unit or deputy associations, employees may not represent the Storey County Sheriff’s Office or identify themselves in any way that could be reasonably perceived as representing the Storey County Sheriff’s Office in order to do any of the following, unless specifically authorized by the Sheriff:

(a) Endorse, support, oppose or contradict any political campaign or initiative.

...

Additionally, when it can reasonably be construed that an employee, acting in his/her individual capacity or through an outside group or organization (e.g., bargaining group), is affiliated with this office, the employee shall give a specific disclaiming statement that any such speech or expression is not representative of the Storey County Sheriff’s Office.

16. Antinoro issued a private message endorsing a political candidate by use of the official letterhead of the Storey County Sheriff’s Office.

17. The official letterhead of the Storey County Sheriff’s Office is government property.

18. Antinoro’s conduct in using the official letterhead of the Storey County Sheriff’s Office as the mechanism to provide a private political endorsement did not comply with the policies established by Storey County or the Storey County Sheriff’s Office.

19. The endorsement provided to Fiore did not contain a disclaiming statement that the endorsement was not representative of the Storey County Sheriff’s Office.

20. Antinoro has a significant personal interest in endorsing a political candidate, which private interest is of such importance as to be protected as free speech by the *First Amendment of the U.S. Constitution*.

21. The record did not demonstrate that Antinoro’s conduct constituted a permitted limited use of governmental property for a personal benefit as permitted by NRS 281A.400(7)(a).

22. Antinoro’s conduct violated NRS 281A.400(7), which prohibits the use of government property to benefit a significant personal interest of the public officer or employee.

### **III. STATEMENT OF THE ISSUE AND RELEVANT STATUTES**

#### **A. ISSUE**

The issue is whether Antinoro's conduct in utilizing government property to benefit a significant personal interest constitutes a willful violation of NRS 281A.400(7). The Nevada Legislature has expressly declared that public office is a public trust to be held for the sole benefit of the people. The Ethics Law governs the conduct of public officers and employees and requires that public officers and employees must avoid conflicts between their private interests and those of the general public they serve. See NRS 281A.020(1).

#### **B. RELEVANT STATUTES**

##### **1. Duty to Avoid Conflicts - 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 Government Resources and Property - NRS 281A.400(7) provides:**

Except for State Legislators who are subject to the restrictions set forth in subsection 8, a public officer or employee shall not use governmental time, property, equipment or other facility to benefit a significant personal or pecuniary interest of the public officer or employee. This subsection does not prohibit:

- (a) A limited use of governmental property, equipment or other facility for personal purposes if:
  - (1) The public officer or employee who is responsible for and has authority to authorize the use of such property, equipment or other facility has established a policy allowing the use or the use is necessary as a result of emergency circumstances;
  - (2) The use does not interfere with the performance of the public officer's or employee's public duties;
  - (3) The cost or value related to the use is nominal; and
  - (4) The use does not create the appearance of impropriety;
- (b) The use of mailing lists, computer data or other information lawfully obtained from a governmental agency which is available to members of the general public for nongovernmental purposes; or
- (c) The use of telephones or other means of communication if there is not a special charge for that use.

.....If a governmental agency incurs a cost as a result of a use that is authorized pursuant to this subsection or would ordinarily charge a member of the general public for the use, the public officer or employee shall promptly reimburse the cost or pay the charge to the governmental agency.

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**3. Standards for Determining Willful Violation – NRS 281A.475 provides:**

1. In determining whether a violation of this chapter is a willful violation and, if so, the amount of any civil penalty to be imposed on a public officer or employee or former public officer or employee pursuant to NRS 281A.480, the Commission shall consider [:], without limitation:

(a) The seriousness of the violation, including, without limitation, the nature, circumstances, extent and gravity of the violation;

(b) The number and history of previous warnings issued to or violations of the provisions of this chapter by the public officer or employee;

(c) The cost to the Commission to conduct the investigation and any hearing relating to the violation;

(d) Any mitigating factors, including, without limitation, any self-reporting, prompt correction of the violation, any attempts to rectify the violation before any complaint is filed and any cooperation by the public officer or employee in resolving the complaint;

(e) Any restitution or reimbursement paid to parties affected by the violation;

(f) The extent of any financial gain resulting from the violation; and

(g) Any other matter justice may require.

2. The factors set forth in this section are not exclusive or exhaustive, and the Commission may consider other factors in the disposition of the matter if they bear a reasonable relationship to the Commission's determination of the severity of the violation.

3. In applying the factors set forth in this section, the Commission shall treat comparable situations in a comparable manner and shall ensure that the disposition of the matter bears a reasonable relationship to the severity of the violation.

**4. Definitions applicable to Willfulness Determination:**

**NRS 281A.105 “Intentionally” defined:**

“Intentionally” means voluntarily or deliberately, rather than accidentally or inadvertently. The term does not require proof of bad faith, ill will, evil intent or malice.

**NRS 281A.115 “Knowingly” defined:**

“Knowingly” imports a knowledge that the facts exist which constitute the act or omission, and does not require knowledge of the prohibition against the act or omission. Knowledge of any particular fact may be inferred from the knowledge of such other facts as should put an ordinarily prudent person upon inquiry.

**NRS 281A.170 “Willful” defined:**

“Willful violation” means a violation where the public officer or employee:

1. Acted intentionally and knowingly; or
2. Was in a situation where this chapter imposed a duty to act and the public officer or employee intentionally and knowingly failed to act in the manner required by this chapter,

↳ unless the Commission determines, after applying the factors set forth in NRS 281A.475, that the public officer's or employee's act or failure to act has not resulted in a sanctionable violation of this chapter.

**5. Civil Penalties for Willful Violations – NRS 281A.480 provides in pertinent part:**

1. In addition to any other penalties provided by law and in accordance with the provisions of NRS 281A.475, the Commission may impose on a public officer or employee or former public officer or employee civil penalties:

- (a) Not to exceed \$5,000 for a first willful violation of this chapter;
- (b) Not to exceed \$10,000 for a separate act or event that constitutes a second willful violation of this chapter; and
- (c) Not to exceed \$25,000 for a separate act or event that constitutes a third willful violation of this chapter.

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9. A finding by the Commission that a public officer or employee has violated any provision of this chapter must be supported by a preponderance of the evidence unless a greater burden is otherwise prescribed by law.

**IV. DECISION**

**A. WILLFUL VIOLATION OF NRS 281A.400(7) - IMPROPER USE OF GOVERNMENT RESOURCES AND PROPERTY**

The Ethics Law is designed to preserve the public trust and ensure that public officers and employees maintain proper separation between their public duties and private interests. See NRS 281A.020. The Ethics Law contains a strict prohibition against a public officer or employee from using government time, property, equipment or other facility to benefit a significant personal or pecuniary interest of the public officer or employee. NRS 281A.400(7). Pursuant to NRS 281A.400(7)(a), a governmental agency may establish by policy a limited use exception to the strict prohibition, allowing the use or the use is necessary as a result of emergency circumstances provided that such use does not interfere with the performance of public duties, the cost or value is nominal and the use does not create an appearance of impropriety.

The official letterhead of a government constitutes government property. See *In re Hammargren*, Comm'n Op. No. 95-35C (1996); *In re Hettrick*, Comm'n Op. No. 01-10A (2001); and *In re Tiffany*, Comm'n Op. No. 05-21C (2007). The use of official letterhead demonstrates a wielding or exertion of the official authority of public office. It also creates the impression that the Sheriff's Office, as a law enforcement department, endorses the contents of the letter.<sup>2</sup> An endorsement on private letterhead does not carry the same weight as one issued on official letterhead. The message or speech is not regulated by the Ethics Law; however, the mechanism by which the message was delivered, or use of official letterhead, is the concern. Certainly, "all individuals enjoy a constitutional right to speak out on political concerns." *Hettrick at p. 2*. However, the Ethics Law prohibits the

<sup>2</sup> Storey County Sheriff Policy 1060.4.1 recognized the appearance of impropriety for its members when using public positions, property or resources to privately endorse any political campaign because such conduct is reasonably perceived as representing the Storey County Sheriff's Office. Consequently, the policy required that even private endorsements of political candidates required disclaimers.

use of governmental property, including its official letterhead, to benefit a significant personal interest, especially when such use creates an appearance of impropriety or the impression that the government sanctions the activity. *Id.*

Moreover, the right of a private citizen to endorse a candidate of his selection is of such significance as to be provided constitutional protection under the *First Amendment*. See *Buckley v. Valeo*, 424 U.S. 1, 14, 96 S.Ct. 612, 632 (1976). Consequently, the private endorsement of a candidate is a significant personal interest for purposes of application of the Ethics Law.

Prior to application of the mitigating factors set forth in NRS 281A.475, the Commission considered whether Antinoro's use of government property as the mechanism to provide a private political endorsement was intentional or knowingly. Pursuant to NRS 281A.170, a willful violation is premised upon conduct that was intentional and knowing, which terms are defined in NRS 281A.105 and NRS 281A.115. The legislative history enacting these provisions associated with the definition of a willful violation of NRS Chapter 281A requires the Commission to interpret the meanings of "intentional" and "knowing" consistent with Nevada case law. See Legislative Minutes of Assembly Committee on Elections, Procedures, Ethics and Constitutional Amendments, May 12, 2009, and Senate Committee on Judiciary, May 21, 2009, regarding Senate Bill 160 of the 75<sup>th</sup> Legislative Session of Nevada (2009).

For an act to be intentional, NRS 281A.105 requires that Antinoro acted "voluntarily and deliberately." See *In re Fine v. Nevada Commission on Judicial Discipline*, 116 Nev. 1001 (2000) ("the relevant inquiry regarding willful misconduct is an inquiry into the intentional nature of the actor's conduct."). Here, Antinoro purposefully utilized the official letterhead to provide a private endorsement. His conduct was not accidental or inadvertent. *Id.*<sup>3</sup>

The Ethics Law requires that Antinoro had knowledge of his actions. See NRS 281A.115 (definition of "knowingly"). It is properly noted that the provisions of NRS Chapter 281A do not require Antinoro to have actual knowledge that his conduct violated the Ethics Law but it does impose constructive knowledge on a public officer when other facts are present that should put an ordinarily prudent person upon inquiry. See *Garcia v. The Sixth Judicial District Court of Nevada*, 117 Nev. 697, 30 P.3d 1110 (2001) ("constructive knowledge fulfills a statutory requirement that an act be done 'knowingly.' State of mind need not be proved by positive or direct evidence but may be inferred from conduct and the facts and circumstances disclosed by the evidence."); and *State v. Rhodig*, 101 Nev. 608, 707 P.2d 549 (1985) ("... the law does not require knowledge that such an act or omission is unlawful.").

The record before the Commission established that Antinoro knew he was utilizing the official letterhead of the Storey County Sheriff as the mechanism to provide a private political endorsement. Further confirming the intentionality of the conduct is the parties' stipulation that Antinoro typed the endorsement "on the official Storey County Sheriff's office letterhead." See *Stipulated Facts*. Further, the use of official letterhead to endorse a political candidate was not permitted by established policy of the affected agencies, nor was it permitted under the limited use exception set forth in NRS 281A.400(7)(a) or other applicable law.<sup>4</sup>

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<sup>3</sup> The law does not require proof that the intentional behavior was engaged in bad faith or with malicious motive to be deemed willful. See *In re Matson*, Comm'n Op. No. 14-70C (2016).

<sup>4</sup> The Commission did not find the advisory letter issued by the Office of Special Counsel discussing the application of the Federal Hatch Act to a partisan sheriff, permitting the use of title and badge to endorse



## **B. NRS 281A.475 - MITIGATING FACTORS AND CIVIL PENALTY**

The Commission considered the mitigating factors set forth in NRS 281A.475 in conducting an analysis of willfulness and determination of the appropriateness of a civil penalty. Each factor may not necessarily be present or be provided equal weight. In synopsis, these factors are:

1. Seriousness of Violation
2. History of Warnings or Violations
3. Cost of Investigation and Hearings
4. Mitigating Factors (cooperation, self-reporting, correction of violation, etc.)
5. Restitution or Reimbursements paid to Affected Parties
6. Extent of Financial Gain
7. Other Matters as Justice Requires

In review of the mitigating factors contained in NRS 281A.475, the Commission reviewed the totality of the circumstances, which included taking into consideration Antinoro's cooperation in stipulating to a set of facts, the nature of the RFO did not require an expensive or lengthy investigation/hearing, there was no financial gain and the use of the official letterhead for a private endorsement was accomplished during a lunch hour on a personal computer.

The conduct at issue relates to utilizing government property to benefit a substantial personal interest. The seriousness of the violation is demonstrated by the intentional use of official government letterhead as the mechanism to provide a private political endorsement. Further confirming the gravity of the conduct is Antinoro's noncompliance with policies issued by the County and Sheriff's Office that expressly restricted use of public resources for political purposes including candidate endorsements.

Antinoro had not taken any steps to mitigate his conduct, such as reissuing the endorsement on private letterhead or requesting removal of the official letterhead from social media sites. Further, Antinoro had recently committed an ethics violation associated with the use of an official position in a political/election environment. See *in re Antinoro*, Comm'n Op. No. 14-59C. The totality of conduct is determined to be significant when measured against the public's trust and the public policy of the State of Nevada requiring public officers and employees to maintain a proper separation between the role of a public servant and a private citizen. NRS 281A.020(2).

Based on the foregoing, the Commission determines that Antinoro's conduct constituted a willful violation of NRS 281A.400(7) and imposes a civil penalty against Antinoro of \$1,000.

## **V. CONCLUSIONS OF LAW**

1. At all times relevant to this matter, Antinoro was a "public officer," as defined by NRS 281A.160 and 281A.180.
2. Pursuant to NRS 281A.440(1) and NRS 281A.460, the Commission has jurisdiction to render an opinion in this matter.

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political candidates, to be precedential or applicable to the circumstances presented. See *Order on Motions for Summary Judgment* issued May 3, 2017.

3. Antinoro, as a public officer, had a duty under the Ethics Law and its interpretive opinions to maintain proper separation between public duties and private interests. See NRS 281A.020.
4. Pursuant to NRS 281A.400(7), Antinoro, as a public officer, was prohibited from using government time, property, equipment or other facility to benefit a significant personal or pecuniary interest of the public officer or employee.
5. Summary Judgment was appropriately granted given the undisputed or uncontested facts of this matter, the applicable provisions of the Ethics Law, and the interpretive opinions of the Ethics Law.<sup>5</sup>
6. Pursuant to the provisions of the Ethics Law, Antinoro willfully violated NRS 281A.400(7) by using official letterhead (government property) as the mechanism to provide a private political endorsement.
7. In accordance with the authority of the Commission under NRS 281A.475 and NRS 281A.480, civil penalties are imposed and Antinoro must pay a civil penalty in the amount of \$1,000. Authorization is provided for the Executive Director and Subject Antinoro to enter into a payment schedule, with payment being completed within six (6) months after the date of this opinion.

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.<sup>6</sup>

The following Commissioners participated in this Opinion:

Dated this 8<sup>th</sup> day of June, 2017.

#### NEVADA COMMISSION ON ETHICS

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

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

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

By: /s/ Amanda Yen  
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Commissioner

By: /s/ Brian Duffrin  
Brian Duffrin  
Commissioner

By: /s/ Lynn Stewart  
Lynn Stewart  
Commissioner

<sup>5</sup> See *Order on Motions for Summary Judgment* issued on May 3, 2017.

<sup>6</sup> Findings of Fact and Conclusion of Law are set forth separately in this opinion as required by NRS 233B.125; however, they are deemed interchangeable for interpretive purposes. See *State, Dep't of Commerce v. Soeller*, 98 Nev. 579, 586, 656 P.2d 224, 228 (1982)(concluding that when "the conclusion itself gives notice of the facts on which the Commission relied ... we may imply the necessary factual findings, so long as the record provides substantial evidence to support the Commission's conclusion").

## CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada Commission on Ethics and that on this day in Carson City, Nevada, I transmitted a true and correct copy of the **OPINION** in Request for Opinion **No. 16-54C**, via U.S. Certified Mail and electronic mail, to the Parties and the Requester, as an interested person, as follows:

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DATED: June 8, 2017

  
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An employee, Nevada Commission on Ethics