

STATE OF NEVADA COMMISSION ON ETHICS http://ethics.nv.gov

MINUTES of the meeting of the NEVADA COMMISSION ON ETHICS

The Commission on Ethics held a public meeting on Wednesday, August 23, 2023, at 10:00 a.m. at the following location:

State Bar of Nevada 9456 Double R Boulevard, Suite B Reno, NV 89521

Zoom Meeting Information

https://us06web.zoom.us/j/89529255935?pwd=RkkzT1FFSHdFMkR3Q1dTd1Nad0Nwdz09 Zoom Meeting Telephone Number: 720-707-2699 Meeting ID: 895 2925 5935 Passcode: 823902

These minutes constitute a summary of the above proceedings of the Nevada Commission on Ethics. A recording of the meeting is available for public inspection at the Commission's office and on the <u>Commission's YouTube channel</u>. Transcripts of Items 4 and 5 are available for public inspection at the Commission's office.

1. Call to Order and Roll Call.

Chair Kim Wallin, CPA, CMA, CFM appeared in-person at the State Bar of Nevada office in Reno and called the meeting to order at 10:00 a.m. Vice-Chair Thoran Towler, Esq. also appeared in-person. Commissioners Brian Duffrin, Barbara Gruenewald, Esq., and Teresa Lowry, Esq. also appeared in-person. Commissioners Stan R. Olsen and Amanda Yen, Esq. appeared via Zoom videoconference. Commissioner John T. Moran III, Esq. was absent. Present for Commission staff in Reno were Executive Director Ross E. Armstrong, Esq., Associate Counsel Elizabeth J. Bassett, Esq., Investigator Erron Terry, Senior Legal Researcher Wendy Pfaff, and Executive Assistant Kari Pedroza. Deputy Attorney General Laena St-Jules, Esq. and Conflict Counsel Wayne Klomp, Esq. also appeared in person in Reno.

2. Public Comment.

There was no public comment.

3. Approval of Minutes of the July 25, 2023, Commission Meeting.

Chair Wallin stated that all Commissioners were present for the July Commission Meeting, except for Commissioner Duffrin who was excused and therefore precluded from participating in this item.

Vice-Chair Towler moved to approve the July 25, 2023, Commission Meeting Minutes as presented. Commissioner Lowry seconded the motion. The Motion was put to a vote and carried as follows:

Aye.
Aye.
Abstain.
Aye.
Aye.
Aye.
Aye.

 Discussion and approval of a Written Opinion concerning Consolidated Ethics Complaint Case Nos. 21-062C & 21-082C regarding Joseph Lombardo, Sheriff of Clark County, State of Nevada.

Chair Wallin introduced the item and confirmed that the Review Panel in this matter consisted of Commissioners Duffrin and Gruenwald and those members would be precluded from participating in this item pursuant to NRS 281A.220(4).

Chair Wallin asked if any Commissioners needed to make a disclosure on this item. Commissioner Olsen disclosed that he is a former coworker of former Sheriff Lombardo, having worked at the Las Vegas Metropolitan Police Department during the same time period, specifying that although he was aware of who Mr. Lombardo was, Commissioner Olsen never worked with Mr. Lombardo. Commissioner Olsen stated he retired from Metro in 2007 and would categorize the current relationship as former co-workers and professional acquaintances. Commissioner Olsen further disclosed that Governor Lombardo appointed him as a Commissioner to the Nevada Commission on Ethics with a term starting on July 1, 2023. He stated that his appointment was made pursuant to statute and in the ordinary course. Commissioner Olsen shared that he registered as a lobbyist during the 2023 Legislative Session of the Nevada Legislature and since its conclusion he has not communicated directly with a State Legislator or member of a local Legislative body on anyone's behalf and does not plan to do so in the future. Commissioner Olsen stated that under NRS 281A.065, his relationship with Governor Lombardo is not one within the definition of commitment in a private capacity or in the interest of another person and consequently does not require disclosure or abstention under the Ethics Law pursuant to NRS 281A.420. He added that nothing in Judicial Cannon 2.11, the Code of Judicial Conduct, required disclosure or abstention pursuant to the manner of his appointment. Commissioner Olsen shared his belief that he would be fair and impartial in considering the matter and have no actual or perceived bias. He added that neither having been a former coworker of Governor Lombardo nor his appointment to the Commission on Ethics by Governor Lombardo would materially affect his independence of judgment or that of a reasonable person in his situation. Commissioner Olsen stated that he would be participating in and voting on the matter.

Chair Wallin stated for the record that proper notice had been provided and waivers were received regarding this item. She reiterated that Commissioners Duffrin and Gruenewald served as Review Panel members and would be precluded from participating on this Item. Chair Wallin outlined that all other Commissioners may participate and vote on this matter.

Commissioner Yen clarified that the Commission was considering the redlined version of the Order provided prior to the meeting by Conflict Counsel Klomp and Conflict Counsel Klomp provided an affirmative response. Counsel for both parties noted that they had not received the redline changes to the order prior to the meeting. Commissioner Yen read into the record the proposed redlined changes to the Order. Commissioner Yen made a motion to approve the draft Opinion and direct Conflict Counsel Wayne Klomp, Esq. to finalize the legal form of the Opinion in conjunction with the Commission Chair and any matters relating thereto. Vice-Chair Towler seconded the motion. The Motion was put to a vote and carried as follows:

Chair Wallin:	Aye.
Vice-Chair Towler:	Aye.
Commissioner Duffrin:	Abstain pursuant to NRS 281A.220
Commissioner Gruenewald:	Abstain pursuant to NRS 281A.220
Commissioner Lowry:	Aye.
Commissioner Olsen:	Nay.
Commissioner Yen:	Aye.

5. <u>Discussion and determination on Motion for Reconsideration of Opinion in Case No. 22-051C regarding Joseph Rodriguez, Trustee, Washoe County School District; Lieutenant, State Fire Marshall, State of Nevada.</u>

Chair Wallin introduced the item and noted that Commissioner Duffrin would be acting as presiding officer for this matter.

Commissioner Duffrin asked if any Commissioners needed to make a disclosure on this item. Commissioner Yen disclosed and abstained from participating in this matter because the Subject is a client of McDonald Carano, the firm Commissioner Yen is a partner with, and to which she has both a pecuniary interest in her employment and a private commitment to the firm, as her employer, and its clients under NRS 281A.065(4) and NRS 281A.065(5). The independent judgment of a reasonable person in Commissioner Yen's situation could be materially affected in voting upon matters related to this case.

Commissioner Duffrin stated for the record that proper notice had been provided and waivers were received regarding this item. He confirmed that Chair Wallin and Vice-Chair Towler served on the Review Panel in this matter and pursuant to NRS 281A.220(4) they would be precluded from participating in this item. Commissioner Duffrin reiterated that Commissioner Yen disclosed and abstained and noted that all other Commissioners may participate and vote on the matter.

Commissioner Duffrin acknowledged that both parties in the matter agreed to forgo oral argument presentations on Mr. Rodriguez's Motion for Reconsideration and therefore, the Commission would make its determination based on the parties' submitted papers. He further acknowledged that Mr. Rodriguez's supplement to his request for reconsideration included a citation to the Commission's recent oral decision in Consolidated Case Nos. 21-062C and 21-082C (Lombardo) wherein the Commission dismissed allegations pertaining to violations of NRS 281.400(2).

Commissioner Lowry stated that the only item included in the subject's motion for reconsideration she felt had merit would be the matter of consistency in Commission determinations between this case and the subsequent Lombardo matter relative to the violations of NRS 281.400(2). She acknowledged her previous affirmative vote to include NRS 281A.400(2) in this matter and shared her belief that this statutory violation also applied to the Lombardo cases, however, she ultimately did not vote to include the NRS 281.400(2) violation in the subsequent Lombardo matter. She stated she could understand the concern with consistency presented in Mr. Rodriguez's supplemental request. Commission's decisions by

the courts, clarification and direction would be provided to the Commission on NRS 281.400(2). Commissioner Lowry proposed a motion to conclude the matter.

Commissioner Gruenewald echoed Commissioner Lowry's comments and expressed her intention to provide a second on the proposed motion.

Commissioner Duffrin provided that when the Commission previously considered this case, the Lombardo matter was outstanding and had not yet been heard by the Commission. He stated that consistency is always his goal as a Commissioner. Commissioner Duffrin clarified that the matter had previously been concluded with 4 willful violations and provided that if there were 4 willful violations imposed, there would be further ramifications which was not his intention. Commissioner Duffrin stated he was comfortable with the motion as proposed by Commissioner Lowry.

Commissioner Lowry made a motion that Ethics Complaint Case No. 22-051C (Rodriguez) conclude with 2 willful violations of NRS 281.400(7), dismissal of NRS 281.400(2) violations and the same civil penalty previously imposed of \$1,000, \$500 per violation. She further directed counsel for the Commission to prepare a reconsidered final written Opinion consistent with the requirements of NRS 287A.765, NAC 281A.407(3) and NRS 233B.125. Commissioner Gruenewald seconded the motion. The Motion was put to a vote and carried as follows:

Chair Wallin:	Abstain pursuant to NRS 281A.220.
Vice-Chair Towler	Abstain pursuant to NRS 281A.220.
Commissioner Duffrin:	Aye.
Commissioner Gruenewald:	Aye.
Commissioner Lowry:	Aye.
Commissioner Olsen:	Aye.
Commissioner Yen:	Abstain pursuant to NRS 281A.420.

6. <u>Discussion and determination on a Proposed Stipulated Deferral Agreement concerning</u> <u>Ethics Complaint Case No. 23-005C regarding Larry Grant, Member, Mineral County</u> <u>Board of Commissioners, State of Nevada.</u>

Chair Wallin introduced the item and asked if any Commissioners needed to make a disclosure on this item. Commissioner Gruenewald disclosed pursuant to NAC 281A.195(1) that she participated in a settlement conference and discussed the matter currently pending before the Commission together with all parties and with the parties separately. Chair Wallin stated pursuant to NAC 281A.195(2), when a Commissioner discloses an ex parte communication, the Commission may require the member to abstain from participating with the Commission in any hearing or determination to be made by the Commission concerning the matter that was the subject of the ex parte communication and noted that Commissioner Gruenewald was a member of the Review Panel for the matter and is already precluded from acting on the Item. Chair Wallin further noted that Vice-Chair Towler also served as a member of the Review Panel and would be precluded from participating in this item pursuant to NRS 281A.220(4).

Chair Wallin asked the parties in the Complaint to identify themselves for the record. Associate Counsel Elizabeth J. Bassett, Esq. appeared on behalf of Executive Director Armstrong before the Commission in-person and Larry Grant appeared via videoconference.

Associate Counsel Bassett provided an overview of Ethics Complaint Case No. 23-005C (Grant) and the Proposed Stipulated Deferral Agreement. The Proposed Stipulated Deferral shall be in effect for a two-year period from the date of the approval by the Commission, during which time Mr. Grant must comply in all material respects with the Ethics Law set forth in NRS 281A. Mr. Grant agrees to complete Ethics Training within sixty (60) days of the

execution of the Stipulated Deferral. Associate Counsel Bassett thanked Mr. Grant for his cooperation and expressed her gratitude to Commissioner Gruenewald and Deputy Attorney General St-Jules for their assistance with the settlement conference.

Mr. Grant clarified for the record that the matter had nothing to do with his current position as County Commissioner and thanked everyone involved for their help in resolving the matter.

Chair Wallin thanked Mr. Grant for his cooperation.

Commissioner Duffrin thanked Commissioner Gruenewald for her assistance in facilitating the settlement conference. Commissioner Duffrin also thanked Mr. Grant for his participation and cooperation in the resolution.

Commissioner Duffrin made a motion to accept the terms of the Stipulated Deferral Agreement and proposed confidential letter of caution as presented by the parties in Ethics Complaint Case No. 23-005C (Grant) and direct counsel for the Commission to finalize the documents in appropriate form. Commissioner Duffrin further moved that the Chair is the delegated authority to approve and direct finalization of the dismissal of the complaint in this case if the Executive Director confirms to the Chair that Mr. Grant has complied with the terms and conditions of the Stipulated Deferral Agreement. Chair Lowry seconded the motion. The Motion was put to a vote and carried as follows:

Chair Wallin:	Aye.
Vice-Chair Towler	Abstain pursuant to NRS 281A.220.
Commissioner Duffrin:	Aye
Commissioner Gruenewald:	Abstain pursuant to NRS 281A.220.
Commissioner Lowry:	Aye.
Commissioner Olsen:	Aye.
Commissioner Yen:	Aye.

 Discussion and determination on a Proposed Stipulated Deferral Agreement concerning Ethics Complaint Case No. 23-054C regarding Raymond Tulloch, Trustee, Incline Village General Improvement District, State of Nevada.

Chair Wallin introduced the item and stated for the record that proper notice was provided, and waivers were received regarding this item. Chair Wallin noted that Mr. Tulloch waived the requirement for review of this matter by a Review Panel and all Commissioners can participate in this item unless they have reason to disclose and abstain. Chair Wallin asked if any of her fellow Commissioners needed to make a disclosure for this case. Commissioner Yen disclosed for the record that she is a partner with the law firm of McDonald Carano, and some members of her firm are involved in some capacity with the Incline Village General Improvement District (IVGID) project. Pursuant to NRS 281A.065(4) and (5), she has a commitment in a private capacity to the interest of her firm and IVGID. Therefore, to avoid any appearance of impropriety and comply with the Ethics Law and Judicial Canons applicable to the Commission, Commissioner Yen disclosed this conflict and abstained from participation in this matter.

Chair Wallin asked the parties in the Complaint to identify themselves for the record. Associate Counsel Elizabeth J. Bassett, Esq. appeared on behalf of Executive Director Armstrong before the Commission in this matter and Katherine Parks, Esq. appeared via videoconference on behalf of Raymond Tulloch, who was not in attendance but was provided proper notice of the Agenda Item and understood that the Commission would proceed in his absence.

Associate Counsel Bassett provided an overview of Ethics Complaint Case No. 23-054C (Tulloch) and the Proposed Stipulated Deferral. The Proposed Stipulated Deferral shall be in

effect for a two-year period from the date of the approval by the Commission, during which time Mr. Tulloch must comply in all material respects with the Ethics Law set forth in NRS 281A. Mr. Tulloch agrees to complete Ethics Training within sixty (60) days of the execution of the Stipulated Deferral. The Commission admonishes Mr. Tulloch pursuant to NRS 281A.785(1)(b) and cautions him to ensure he properly discloses his private interests when performing his public duties as Trustee for IVGID. Associate Counsel Bassett thanked Mr. Tulloch and his attorney Counsel Parks for their cooperation with the investigation and resolution of the matter.

Katherine Parks, Esq. stated that as usual the Associate Counsel and Executive Director showed their professionalism throughout the resolution of the matter, and it was appreciated.

Commissioner Lowry asked the reason for the statement of relevant facts in the agreement not making reference to abstention and Associate Counsel answered her question.

Chair Wallin thanked Counsel Parks and her client for their cooperation and participation.

Commissioner Lowry made a motion to accept the terms of the Stipulated Deferral as presented by the parties in Case No. 23-054C (Tulloch) and direct counsel for the Commission to finalize the agreement in appropriate form. Commissioner Lowry further moved that the Chair is the delegated authority to approve and direct finalization of the dismissal of the complaint in this case if the Executive Director confirms to the Chair that Mr. Tulloch has complied with the terms and conditions of the Stipulated Deferral Agreement. Commissioner Gruenewald seconded the motion. The Motion was put to a vote and carried as follows:

Chair Wallin:	Aye.
Vice-Chair Towler:	Aye.
Commissioner Duffrin:	Aye.
Commissioner Gruenewald:	Aye.
Commissioner Lowry:	Aye.
Commissioner Olsen:	Aye.
Commissioner Yen:	Abstain pursuant to NRS 281A.420.

8. <u>Discussion and determination on a Proposed Stipulated Deferral Agreement concerning</u> <u>Ethics Complaint Case No. 23-057C regarding Eric Blondheim, Undersheriff, Pershing</u> <u>County, State of Nevada.</u>

Chair Wallin introduced the item and stated for the record that proper notice was provided, and waivers were received regarding this item. Chair Wallin further noted that Vice-Chair Towler and Commissioners Gruenewald and Lowry served as members of the Review Panel and would be precluded from participating in this item pursuant to NRS 281A.220(4).

Chair Wallin asked the parties in the Complaint to identify themselves for the record. Associate Counsel Elizabeth J. Bassett, Esq. appeared on behalf of Executive Director Armstrong before the Commission in this matter and Eric Blondheim appeared via teleconference.

Associate Counsel Bassett provided an overview of Ethics Complaint Case No. 23-057C (Blondheim) and the Proposed Stipulated Deferral Agreement. The Proposed Stipulated Deferral shall be in effect for a two-year period from the date of the approval by the Commission, during which time Mr. Blondheim must comply in all material respects with the Ethics Law set forth in NRS 281A. Mr. Blondheim agrees to complete Ethics Training within sixty (60) days of the execution of the Stipulated Deferral. The Commission admonishes Mr. Blondheim pursuant to NRS 281A.785(1)(b) and cautions him to ensure he properly separate

government expenses and campaign support as Undersheriff for Pershing County Sheriff's Office. Associate Counsel Bassett thanked Mr. Blondheim for his cooperation with the investigation and resolution of the matter.

Chair Wallin asked Mr. Blondheim if he had any comments. Mr. Blondheim stated his appreciation for everyone involved in resolving the matter and noted his objection to a reference to his supervisor Sheriff Allen at the end of the Stipulated Deferral Agreement.

Commissioner Yen asked why this matter was resolved with a Stipulated Deferral Agreement and not a Stipulated Agreement and Executive Director Armstrong provided clarification on the different factors and considerations involved in the resolution. Chair Wallin and Commissioner Yen asked further clarifying questions and Executive Director Armstrong provided responses to their questions.

Commissioners Duffrin and Olsen asked clarifying questions of Mr. Blondheim and Mr. Blondheim answered their questions.

Commissioner Yen made a motion to accept the terms of the Stipulated Deferral as presented by the parties in Case No. 23-057C (Blondheim) and direct counsel for the Commission to finalize the agreement in appropriate form. Commissioner Lowry further moved that the Chair is the delegated authority to approve and direct finalization of the dismissal of the complaint in this case if the Executive Director confirms to the Chair that Mr. Blondheim has complied with the terms and conditions of the Stipulated Deferral Agreement. Commissioner Duffrin seconded the motion. The Motion was put to a vote and carried as follows:

Chair Wallin:	Aye.
Vice-Chair Towler:	Abstain pursuant to NRS 281A.220.
Commissioner Duffrin:	Aye.
Commissioner Gruenewald:	Abstain pursuant to NRS 281A.220.
Commissioner Lowry:	Abstain pursuant to NRS 281A.220.
Commissioner Olsen:	Aye.
Commissioner Yen:	Aye.

Chair Wallin thanked Undersheriff Blondheim for his cooperation.

Due to other meeting obligations, Commissioner Yen excused herself from the remainder of the Commission meeting at this time.

9. <u>Consideration and approval of the Fiscal Year 2023 Annual Report presented by the Executive Director pursuant to NAC 281A.180(2).</u>

Chair Wallin introduced the Agenda Item and asked Executive Director Armstrong for his presentation.

Executive Director Armstrong presented an overview of the changes to the Fiscal Year 2023 Annual Report and referenced the draft provided in the meeting materials. He requested feedback from the Commission regarding the proposed Commission Goals for Fiscal Year 2024 and welcomed any additional feedback. Executive Director Armstrong thanked Chair Wallin for bringing to his attention a date issue with the graph on page 25 and informed the Commission that he would update that graph prior to finalizing and publishing the annual report.

Commissioner Duffrin recommended that staff review the language for the Commission's proposed bill revisions and come up with a new game plan for future Legislative updates. He acknowledged that the status of the Commission's previous bill was not based on anything the staff or the Commission did and suggested that the Legislative Subcommittee consider a strategic

plan for Legislative action in the future. Commissioner Duffrin shared his opinion that the proposed FY24 Goals are great goals.

Commissioner Gruenewald stated that she was very impressed with the Annual Report and commended Commission staff on the graphs and overall presentation of the report data.

Commissioner Lowry echoed Commissioner Gruenewald's commendations and agreed the Annual report was very well done. She asked clarifying questions pertaining to the Commission's forthcoming Public Information Officer position, which Executive Director Armstrong answered.

Chair Wallin suggested that Outreach and Education for non-public entities be prioritized upon the addition of the Public Information Officer and that the Legislative Subcommittee focus on outreach to the Legislature this year in preparation of the next Legislative session. She asked that priority be placed on reviewing the Commission's NACs during the interim. Chair Wallin commented that she loves the Annual Report and appreciates its readability and ease.

Commissioner Duffrin asked whether the agency performance measures were in line with the proposed Goals and Executive Director Armstrong responded that he would double-check. Executive Director Armstrong outlined the performance measure revision process and Chair Wallin requested that Outreach be a focus of the agency's performance measures.

Commissioner Olsen stated he had read many annual reports and the proposed FY23 Annual Report presented by the Executive Director was an easy read. He asked for clarification on the data reflected in the Outreach and Education graphs included in the report and Executive Director Armstrong provided that information.

Commissioner Gruenewald made a motion to approve the Fiscal Year 2023 Annual Report as presented. Vice-Chair Towler seconded the motion. The motion was put to a vote and carried unanimously.

- 10. <u>Report by Executive Director on agency status and operations, and possible direction</u> thereon. Items to be discussed include, without limitation:
 - a. Education and Outreach
 - b. Budget Update
 - c. Staffing & Recruitment
 - d. Upcoming Meetings

Chair Wallin introduced the Item and asked Executive Director Armstrong for his presentation.

<u>a.</u> <u>Education and Outreach:</u> Executive Director Armstrong referenced the written report included in the meeting materials. He outlined the Education and Outreach priority tasks as continuing to test and adjust the Online Learning Management System and expand users to test the system. Executive Director Armstrong summarized the upcoming training presentations scheduled for the Fall.

b. Budget Update: Executive Director Armstrong informed the Commission that the FY23 Budget closing was being finalized. He outlined the FY24 Budget priorities including the Outreach and Education Specialist, computer equipment replacement and emphasized that FY24 was a base budget year.

c. <u>Staffing & Recruitment:</u> Executive Director Armstrong shared that staff was finalizing the Education and Outreach Specialist job posting and anticipated the position would be filled by mid-October. He reported that the Commission was now fully staffed with the appointment of Brandi Jensen to the Commission Counsel position.

<u>d.</u> <u>Upcoming Meetings:</u> Executive Director Armstrong outlined dates and locations for the upcoming Commission meetings in October and November.

Commissioner Duffrin moved to accept the Executive Director's agency status report as presented. Commissioner Gruenewald seconded the motion. The motion was put to a vote and carried unanimously.

11. <u>Appointment of members to the Personnel Subcommittee of the Nevada Commission on</u> <u>Ethics.</u>

Chair Wallin introduced the item and stated that the Personnel Subcommittee would be tasked with updating the Work Performance Standards for the Executive Director and Commission Counsel.

Commissioners discussed which members would be the best fit for the Subcommittee.

Chair Wallin made a motion that the Personnel Subcommittee consist of Chair Wallin, Vice-Chair Towler, and Commissioner Duffrin. Commissioner Gruenewald seconded the motion. The Motion was put to a vote and carried unanimously.

12. <u>Commissioner Comments on matters including, without limitation, identification of future</u> agenda items, upcoming meeting dates and meeting procedures. No action will be taken under this agenda item.

Commissioner Duffrin welcomed Commissioner Olsen to the Commission and thanked Deputy Attorney General St-Jules for her assistance and hard work during the Commission Counsel position vacancy.

Commissioner Lowry thanked Conflict Counsel Klomp and Deputy Attorney General St-Jules for their exemplary work for the Commission. She requested that the Commission Counsel research Commission precedent and provide an exhaustive case brief to the Commission for guidance on cases. Executive Director Armstrong suggested that project could be set as a priority for the Commission Counsel during the Personnel Subcommittee meeting.

Commission Gruenewald shared her appreciation for Deputy Attorney General St-Jules' communication skills and hard work on behalf of the Commission.

Deputy Attorney General St-Jules thanked the Commissioners for their cooperation and assistance.

Chair Wallin expressed her gratitude towards Conflict Counsel Klomp and Deputy Attorney General St-Jules for their assistance during the transition.

13. Public Comment.

There was no public comment.

14. Adjournment.

Vice-Chair Towler made a motion to adjourn the public meeting. Commissioner Lowry seconded the motion. The Motion was put to a vote and carried unanimously.

The meeting was adjourned at 11:41 a.m.

Minutes prepared by:

Minutes approved October 18, 2023:

/s/ Kari Pedroza Kari Pedroza

Executive Assistant

/s/ Ross Armstrong

Ross Armstrong, Esq. Executive Director

/s/ Kim Wallin

Kim Wallin, CPA, CMA, CFM Chair

/s/ Thoran Towler

Thoran Towler, Esq. Vice-Chair