

COMMISSION ON JUDICIAL SELECTION APPLICATION

EIGHTH JUDICIAL DISTRICT  
DEPARTMENT Y

**By**

**(Nicholas Tyrone Petsas)**



Personal Information
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1.	Full Name	Nicholas Tyrone Petsas
2.	Have you ever used or been known by any other legal name (including a maiden name)? If so, state name and reason for the name change and years used.	N/A
3.	How long have you been a continuous resident of Nevada?	Since July 2013. Previously from 2001 – 2009.
4.	City and county of residence	Las Vegas, Clark County
5.	Age	41

Employment History
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6. Please start with your current employment or most recent employment, self-employment, and periods of unemployment for the last 20 years preceding the filing of this Application.

Current or Last Employer	Petsas Law Group, PLLC (self employed)
Phone	702-625-0869
Physical Address & Website	11700 W. Charleston Blvd. #170-749 Las Vegas, NV 89138 <a href="http://www.petsaslawgroup.com">www.petsaslawgroup.com</a>
Date(s) of Employment	April 2023 - current
Supervisor's Name and Title	Nicholas Petsas, Manager
Your Title	Manager
Describe Your Key Duties	Represent clients in family matters, primarily dependency. Run firm business, including licensing, budgeting, administrative work, etc.
Reason for Leaving	N/A

Previous Employer	Clark County School District
Phone	702-799-2273
Address & Website	5100 W. Sahara Ave. Las Vegas, NV 89146 <a href="http://www.ccsd.net">www.ccsd.net</a>
Date(s) of Employment	September 2022 – April 2023

Supervisor's Name and Title	Luke Puschnig, General Counsel
Your Title	Assistant General Counsel
Describe Your Key Duties	Prepare and conduct litigation and administrative law hearings as assigned by the General Counsel. Prepare pleadings, trial and appellate briefs; negotiation between parties; conduct trial; and all other court or hearing appearances in order to represent most effectively the interests of the Clark County School District. Prepare and render legal opinions concerning the District; provide other legal research services to the District. Provide any other legal assistance necessary.
Reason for Leaving	Started Petsas Law Group, PLLC

Previous Employer	Washoe County Public Defender
Phone	775-328-3464
Address & Website	350 S. Center St. #6 Reno, NV 89501 <a href="http://Washoecounty.gov/defender/">Washoecounty.gov/defender/</a>
Date(s) of Employment	July 2022 – September 2022
Supervisor's Name and Title	Elizabeth Lopez, Deputy Public Defender IV
Your Title	Deputy Public Defender III
Describe Your Key Duties	Represented indigent criminal defendants in Washoe County courts in all stages of proceedings.
Reason for Leaving	Decided to remain in Las Vegas

Previous Employer	Lee, Landrum & Ingle
Phone	702-880-9750
Address & Website	7575 Vegas Dr. #150 Las Vegas, NV 89128 <a href="http://www.lee-lawfirm.com">www.lee-lawfirm.com</a>
Date(s) of Employment	April 2022 – July 2022
Supervisor's Name and Title	David Lee Managing Partner
Your Title	Senior Associate
Describe Your Key Duties	Represent full civil caseload related to construction defect, premises liability, and other litigation.
Reason for Leaving	Accepted position with Washoe County Public Defender

Previous Employer	Legal Aid Center of Southern Nevada
Phone	702-386-1070
Physical Address & Website	725 E. Charleston Blvd. Las Vegas, NV 89104 <a href="http://www.lacsn.org">www.lacsn.org</a>
Date(s) of Employment	April 2018 – April 2022
Supervisor's Name and Title	Kimberly Abbott CAP Team Chief North/4&U
Your Title	CAP Attorney
Describe Your Key Duties	Direct representation of children in dependency matters in the Eighth Judicial District Court.
Reason for Leaving	Accepted position with Lee, Landrum & Ingle

Previous Employer	Giovaniello Law Group
Phone	702-784-7638
Physical Address & Website	3753 Howard Hughes Parkway, Suite 200-399 Las Vegas, NV 89169 <a href="http://www.giolawgroup.com">www.giolawgroup.com</a>
Date(s) of Employment	August 2017 – April 2018
Supervisor's Name and Title	Alexander Giovaniello Founding Partner
Your Title	Associate Attorney
Describe Your Key Duties	Handled full civil caseload in the areas of medical malpractice defense and collections. Was the sole employee of the Las Vegas branch of California-based civil litigation firm.
Reason for Leaving	Accepted position at Legal Aid Center of Southern Nevada

Previous Employer	Lee, Hernandez, Landrum & Garofalo
Phone	702-880-9750
Physical Address & Website	7575 Vegas Dr. #150 Las Vegas, NV 89128 <a href="http://www.lee-lawfirm.com">www.lee-lawfirm.com</a>
Date(s) of Employment	September 2016 – July 2017
Supervisor's Name and Title	David Lee Managing Partner
Your Title	Associate Attorney
Describe Your Key Duties	Represent full civil caseload related to construction defect, premises liability, and other litigation.

Reason for Leaving	Multiple major cases settled, not enough firm work.
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Previous Employer	Quest Academy Charter School
Phone	702-631-4751
Physical Address & Website	4025 N. Rancho Dr. Las Vegas, NV 89130 <a href="http://www.questlv.com">www.questlv.com</a>
Date(s) of Employment	January 2015 – August 2016
Supervisor's Name and Title	Stephanie Brown Assistant Principal
Your Title	Teacher; High School RTI Specialist
Describe Your Key Duties	Prepared and taught meaningful lessons structured according to standards-based curriculum. Developed and enacted a research-based Response to Intervention program at the high school campus.
Reason for Leaving	Accepted position at Lee, Hernandez, Landrum & Garofalo

Previous Employer	Clark County District Attorney – Criminal Division
Phone	702-671-2500
Physical Address & Website	200 Lewis Avenue Las Vegas, NV 89101 <a href="https://www.clarkcountynv.gov">https://www.clarkcountynv.gov</a>
Date(s) of Employment	August 2014 – January 2015
Supervisor's Name and Title	Shanon Clowers Chief Deputy District Attorney
Your Title	Deputy District Attorney
Describe Your Key Duties	Represented the State of Nevada in all aspects of criminal matters in Justice Court, including but not limited to initial arraignments, bail arguments, preliminary hearings, and misdemeanor trials.
Reason for Leaving	Offered position at Quest Charter School

Previous Employer	Odyssey Charter High School
Phone	702-257-0578
Physical Address & Website	2251 S. Jones Blvd. Las Vegas, NV 89146 <a href="http://www.odysseyk12.org">www.odysseyk12.org</a>
Date(s) of Employment	January 2014 – August 2014
Supervisor's Name and Title	Rob Carter Principal

Your Title	Teacher
Describe Your Key Duties	Supervised and assisted students with multiple subject areas in student-driven, independent learning environment. Taught multiple sections of a Nevada High School Math Proficiency Exam preparation class.
Reason for Leaving	Accepted position with Clark County District Attorney

Previous Employer	Quest Academy Charter School
Phone	702-631-4751
Physical Address & Website	4025 N. Rancho Dr. Las Vegas, NV 89130 <a href="http://www.questlv.com">www.questlv.com</a>
Date(s) of Employment	August 2013 – January 2014
Supervisor's Name and Title	Mahina Gago Assistant Principal
Your Title	Teacher
Describe Your Key Duties	Taught Algebra I and Geometry. Created and implemented meaningful lessons that aligned with Nevada Standards for Mathematics.
Reason for Leaving	Accepted position at Odyssey Charter School

Previous Employer	Law Offices of Kathryn Schlepphorst
Phone	408-993-1120
Physical Address & Website	82 North Second Street San Jose, CA 95113
Date(s) of Employment	December 2012 – July 2013
Supervisor's Name and Title	Kathryn Schlepphorst Managing Partner
Your Title	Associate Attorney
Describe Your Key Duties	Represented clients in Family, Civil, and Wellness Courts. Drafted motions, stipulations, declarations, and memoranda. Researched applicable statutes, case law, and administrative rules.
Reason for Leaving	Relocated to Las Vegas

Previous Employer	Odyssey Charter High School
Phone	702-257-0578
Physical Address & Website	2251 S. Jones Blvd. Las Vegas, NV 89146

Date(s) of Employment	August 2008 – July 2009
Supervisor's Name and Title	Tim Lorenz Principal
Your Title	Teacher
Describe Your Key Duties	Developed intuitive online lessons for high-risk students. Collaborated with other teachers to address and solve students' problems with proficiency exams.
Reason for Leaving	Enrolled in law school.

Previous Employer	Clark County School District
Phone	702-799-5000
Physical Address & Website	5100 W. Sahara Ave. Las Vegas, NV 89146 <a href="http://www.ccsd.net">www.ccsd.net</a>
Date(s) of Employment	August 2007 – August 2008
Supervisor's Name and Title	Lisa Rustand Principal
Your Title	Teacher
Describe Your Key Duties	Taught 7 <sup>th</sup> and 8 <sup>th</sup> grade mathematics classes. Coordinated a highly successful after school "Math Club" for all students to receive tutoring.
Reason for Leaving	Accepted position at Odyssey Charter High School

### Educational Background

7. List names and addresses of high schools, colleges and graduate schools (other than law school) attended; dates of attendance; certificates or degrees awarded; reason for leaving.

St. Helena High School  
1401 Grayson Ave  
St. Helena, CA 94574  
Attended 1997 – 2001  
Graduated with HS Diploma

University of Nevada Las Vegas  
4505 S. Maryland Pkwy  
Las Vegas, NV 89154  
Attended 2001 – 2002; 2004 – 2007  
Graduated with B.S. in Elementary Education

Western Governors University  
6795 S. Edmund Street, 3<sup>rd</sup> Floor  
Las Vegas, NV 89118  
Attended 2015 – 2018  
Graduated with M.S. in Educational Leadership

8. Describe significant high school and college activities including extracurricular activities, positions of leadership, special projects that contributed to the learning experience.

I was a member of the track team in High School. Also, I received a scholarship for multiple summer programs through a group called Summer Search for high achieving, high risk youth. Through that program, I was able to attend a summer program in Greece after my sophomore year, and attended a summer college program at Syracuse University after my junior year.

9. List names and addresses of law schools attended; degree and date awarded; your rank in your graduating class; if more than one law school attended, explain reason for change.

Willamette University College of Law  
245 Winter St. SE  
Salem, OR 97301  
Attended 2009 – 2012  
Graduated with Doctorate of Jurisprudence

10. Indicate whether you were employed during law school, whether the employment was full-time or part-time, the nature of your employment, the name(s) of your employer(s), and dates of employment.

I was not employed during law school, being a student was my full time job!

11. Describe significant law school activities including offices held, other leadership positions, clinics participated in, and extracurricular activities.

I was a member of summary service Willamette Law Online, Oregon Court of Appeals, 2010-2012.

I participated in multiple Trial Advocacy, Mock Trial, and Moot Court competitions:

1. First Year Appellate Competition in Spring 2010, where my teammate and I won the competition, and I placed 2<sup>nd</sup> overall.
2. Donald H. Turner Criminal Trial Competition – Fall 2011 and 2012. This was an open criminal trial competition. I participated as a witness for a finalist team in 2011 and was an attorney participant in 2012.
3. I participated in the Intensive Trial Practice Competition in Summer 2011, which was the culminating activity for a course taught by multiple distinguished attorneys and the Hon. William Bauer of the 7<sup>th</sup> Circuit Court of Appeals. My team obtained a favorable verdict.

4. Finally, I participated in the American Association for Justice (“AAJ”) Trial Competition in Spring 2013, which was a civil trial competition only open to Moot Court board members.

Law Practice
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12. State the year you were admitted to the Nevada Bar.

2013

13. Name states (other than Nevada) where you are or were admitted to practice law and your year of admission.

California, 2012

14. Have you ever been suspended, disbarred, or voluntarily resigned from the practice of law in Nevada or any other state? If so, describe the circumstance, dates, and locations.

No

15. Estimate what percentage of your work over the last five years has involved litigation matters, distinguishing between trial and appellate courts. For judges, answer questions 15-19 for the five years directly preceding your appointment or election to the bench.

Legal Discipline	Percentage of Practice
Domestic/family	
Juvenile matters	80%
Trial court civil	12%
Appellate civil	1%
Trial court criminal	7%
Appellate criminal	
Administrative litigation	
Other: Please describe	

16. In the past five years, what percentage of your litigation matters involved cases set for jury trials vs. non-jury trials?

~85% non-jury trials; ~15% jury trials

17. Give the approximate number of jury cases tried to a conclusion during the past five years with you as lead counsel. Give the approximate number of non-jury cases tried to a decision in the same period.

No jury cases tried to conclusion. Numerous non-jury cases tried to decision in dependency matters – more than I can reasonably count.

18. List courts and counties in any state where you have practiced in the past five years.

Clark County – Las Vegas Justice Court; District Court Family; District Court Civil  
City of Las Vegas Municipal Court; City of Henderson Municipal Court

19. List by case name and date the five cases of most significance to you (not including cases pending in which you have been involved), complete the following tables:

Case 1
Case name and date: Beckett v. Beckett, 2012
Court and presiding judge and all counsel: Superior Court of California, County of Santa Clara – Family Law Division; Judge Bondonno; Petitioner’s Counsel: Kathryn Schlepffhorst, Respondent was Pro Per.
Importance of the case to you and the case’s impact on you: This was one of the first cases I worked on as a licensed attorney. I worked in a small family law firm where I was one of three attorneys in the building. The firm had represented Ms. Beckett for a significant time prior to my arrival. Ms. Beckett’s case had involved contentious litigation regarding division of assets, custody of the couple’s two young children, and domestic violence by Mr. Beckett against Ms. Beckett. Despite the years of representation and the six-figures in fees billed to Ms. Beckett’s file, she had a payment arrangement where she paid what she could afford and Kathy continued to represent her.  As a recent law school graduate, this matter helped open my eyes to the reality of family law practice. First, when it comes to the end of relationships, marriage, and custody of children, people rarely act rationally. Additionally, I learned the value of representing clients would not otherwise be able to afford quality legal representation. Without the experienced, zealous counsel of Ms. Schlepffhorst, Ms. Beckett would have not been able to afford to defend herself from the barrage of legal attacks, violated orders, and other wrongdoings of her abusive ex-husband. This experience helped drive me towards more service-oriented positions in law.
Your role in the case: I was a new associate tasked with continuing to represent Ms. Beckett in the ongoing, harassing litigation continually being brought by Mr. Beckett. I worked closely with my supervisor to provide quality legal representation to our client.

Case 2
Case name and date: Snipes v. Greif, 2017
Court and presiding judge and all counsel: EJDC Dept XIII; Judge Denton; Plaintiff’s counsel Kristine Brewer of Jimmerson Law Firm; Defendant’s counsel Nick Petsas of Lee Law Firm.

Importance of the case to you and the case's impact on you: This was one of the first civil litigation matters that I was tasked with working directly with the client on the matter. This case helped teach me about client control, managing client expectations, and how to develop rapport with clients. Mr. Greif had been previously represented by the managing partner of the firm in an unrelated civil suit where he had prevailed in a long, drawn out civil jury trial. Thus, when Mr. Greif retained the firm for this matter, he had aspirations of achieving victory in a similar manner. However, that was not to be the case here, as it was a very different matter with completely unrelated facts and law.

This case also helped me learn to utilize and adapt my teaching experience to explain complex legal procedures in a way that a layperson, albeit a very smart and educated one, could understand, having obtained only an informal legal education through participation in a civil jury trial. Mr. Greif appreciated our conversations and would share that he felt like he could be the lawyer on his case after a few of them!

Your role in the case: My role was twofold – prepare pleadings and strategize, and field all questions and calls from the client. Mr. Greif required regular contact, even when nothing had occurred in the case. He and I developed a great rapport whereby we would discuss his case regularly.

### Case 3

Case name and date: Total Credit Recovery v. Crosby, 2017

Court and presiding judge and all counsel: EJDC Dept XVI; Judge Williams; Plaintiff's counsel Mark Bourassa; Defendant's counsel Nick Petsas of Lee Law Firm.

Importance of the case to you and the case's impact on you: This was a pro bono matter I was able to take on with the blessing of the managing partner. Our client had a credit card debt that had been reduced to judgment years earlier and he had been fighting to avoid having his bank account garnished.

In this matter, I was able to piece together an argument that a Consent Order issued by the Federal Consumer Finance Protection Bureau against Chase Bank precluded Plaintiff from continuing efforts to collect from Defendant. The argument hinged on language in the Consent Order related to Plaintiff's purchase of the debt from Chase Bank.

At the hearing on Defendant's Motion to Vacate Judgment, Judge Williams took under advisement Defendant's argument that the Consent Order applied to Plaintiff as an assignee of the debt originally from Chase Bank.

Ultimately, the motion was unsuccessful, but it helped me to understand that there can often be connections in the facts and law that may lead to an unexpected result. I appreciated that Judge Williams not only read the motion and argument, but asked pointed questions at the hearing to better ensure he understood Defendant's argument. He also gave Plaintiff the

opportunity to respond in kind. I appreciated that the Court ensured that both sides were heard and their arguments were respected.

Your role in the case: I was the primary counsel tasked with figuring out a way to assist Defendant in arguing for relief from an old creditor judgment he could not afford to pay.

#### Case 4

Case name and date: Dependency Case re: Minors D.E. and M.E., 2020

Court and presiding judge and all counsel: District Court Family Division – Dept Y, Hearing Master Rincon-White and Judge Charter; Counsel for mother Audrey Beeson, Esq., counsel for father Courtney Ketter, Esq., counsel for the State of Nevada Candice Saip, Esq. and Payal Patel, Esq., counsel for the children Nicholas Petsas.

Importance of the case to you and the case’s impact on you: This was a heartbreaking case whereby one of the children was subjected to horrific physical abuse, while there was no evidence of abuse toward the younger child. Throughout the life of the case, which lasted for years, I would regularly visit both children and determine their position with regards to their permanency. Although the child who was subject to the abuse did not want to have contact with one of his parents, he still remained hopeful to possibly reunify with one or both of them in the future. The younger child was with a foster family who was open to eventually adopting her, but as much as she loved her foster mother, she still wished to be reunified with her parents.

This matter required me to regularly staff and review my clients’ representations for possible conflicts of interest between the siblings. I felt so badly for what had happened to these two young children, but had to represent to the court and counsel that they still wished to reunify, despite the extreme abuse one had suffered. This case required me to ensure I separated my personal feelings with my professional duties to my clients and make arguments in court regarding their desires but not necessarily what was in their best interests. CAP attorneys appointed in dependency matters practice direct representation of children, which may lead to making arguments that do not make sense to an adult looking at the facts. In fact, in this case, I felt as though counsel was not pleased with some of my clients’ arguments that were entertained by the court, but at the end of the day I was required to adhere to my duty to my clients, which I did.

Your role in the case: I was the CAP attorney representing the children.

#### Case 5

Case name and date: Dependency Case re: Minor K.C., 2022

Court and presiding judge and all counsel: Eighth Judicial District Court Family Division Dept D; Judge Teuton; Counsel for mother Nicholas Petsas, Esq., counsel for father Jennifer

McDonald, Esq., counsel for the child Pro Bono CAP Volunteer Richard Foster, Esq., Guardian ad Litem for mother Denise Gallagher, Esq.

Importance of the case to you and the case's impact on you: This dependency matter involved a mother and father who both suffered from cognitive delays, while the mother additionally had severe mental health concerns that had not been treated nor addressed. Throughout the case, the Clark County Family Services caseworker did his best to provide the parents to referrals to services, even going so far as to draft a simplified case plan for the parents' attorneys to review with them and ensure they understood.

Despite the best efforts available to counsel, CCFS, and the parents, the mother continued to refuse to acknowledge any mental health concerns and would refuse any medication or treatment to address the same. Eventually, the matter was set for a Termination of Parental Rights Trial (the mother refused to accept or acknowledge the circumstances, nor would she accept any terms of an Open Adoption Agreement). At the trial, I did my best to ensure that my client received her due process. This included putting her on the stand to testify, which she indicated she wished to do. Keep in mind that during *every* previous hearing on this matter, mother would become agitated to the point of having to be escorted out of the courtroom and sometimes the courthouse as well.

This matter pushed my trial advocacy skills to the brink. While my client was on the stand, I was able to elicit the specific testimony my client wished to put on the record and that the Court needed to make whatever findings were necessary for a sound decision. During my client's testimony, she began to get agitated and escalated. However, with the Court's permission, I was able to approach her at the witness stand, maintain a calm voice, and bring her back down. In the end, she felt that she was able to say everything she wanted to say and remained calm throughout the remainder of the trial.

This was such a sad case, there was ultimately little that could be done to reunify this mother with her child in a safe manner. However, with the assistance of court staff and counsel, I was able to ensure my client still had the opportunity to participate in the proceedings in a meaningful manner.

Your role in the case: Appointed mother's attorney

20. Do you now serve, or have you previously served as a mediator, an arbitrator, a part-time or full-time judicial officer, or a quasi-judicial officer? To the extent possible, explain each experience.

No

21. Describe any pro bono or public interest work as an attorney.

I have assisted low income clients on a pro bono or sliding scale in cases involving family, contract, and criminal matters.

22. List all bar associations and professional societies of which you are or have been a member. Give titles and dates of offices held. List chairs or committees in such groups you believe to be of significance. Exclude information regarding your political affiliation.

State Bar of Nevada, Member  
State Bar of California, Member (inactive)

23. List all courses, seminars, or institutes you have attended relating to continuing legal education during the past five years. Are you in compliance with the continuing legal education requirements applicable to you as a lawyer or judge?

I am currently in compliance with CLE requirements for 2024.

List of all CLE over the past five years:

1. Working with Child Clients: Interviewing and Counseling
2. Dependency Bench Bar: Paternity Cases
3. Preparation & Examination of Witnesses in Contested Dependency Hearings
4. PLI's California MCLE Marathon 2020
5. 53<sup>rd</sup> Annual Immigration and Naturalization Institute
6. Solo Practice Boot Camp
7. Advocating for Preverbal & Nonverbal Children in Abuse/Neglect Proceedings
8. Supplemental CLE: Psychotropic Medications: The Law & the Science
9. Promoting Permanency in a Way That Values Child Well-Being
10. Child Welfare: Mental Health 101
11. Ethics: Questions Arising from Working with Parents, Placements, and Children
12. Court Ordered Education Decision Makers, Individualized Education Plans...
13. 24<sup>th</sup> Annual Children's Law Institute
14. 33<sup>rd</sup> Annual Elder Law Institute
15. Imposter Syndrome in the Legal Community Fear of Failure and Perfect
16. Cannabis: Business Fundamentals 2021
17. Divorce
18. KZA Webinar: Managing Leave of Absence Challenges
19. Creating Cohesion and Happiness in a High-Stress Profession
20. Civil Trial Guide 2023
21. Biased? Me? How Biology & Psychology Affect Our Opinions and Actions
22. Social Awareness: Best Practices for Ethically Using Social Media in Your Law Practice
23. Labor and Employment Legislative Update
24. Creative LLC v. Elenis: What's Next?
25. Implicit Bias
26. Socially Responsible: How to Ethically Use Social Media in Your Practice
27. Scary Good Tips for Identifying Potential Legal Malpractice Exposure
28. Using Nevada Legal Services to help indigent clients
29. Contemporary Intersections of Race and the Criminal Justice System
30. Checking Out: Ethical Considerations for Stepping Away From Your Practice

31. Storytelling for Lawyers
32. Where the Rubber Meets the Road: Ethics, Attorney Strategy, and Client Centered Representation
33. The Ins and Outs of Labor/Employment Administrative Agencies
34. Imposter Syndrome
35. Behind the Scenes at the Nevada Supreme Court
36. Balancing the Scale: Healthy Screen Habits and Mindfulness for Lawyers
37. A Healthy Law Practice: Personal and Professional Wellness

24. Do you have Professional Liability Insurance or do you work for a governmental agency?

I have Professional Liability Insurance.

### Business & Occupational Experience

25. Have you ever been engaged in any occupation, business, or profession other than a judicial officer or the practice of law? If yes, please list, including the dates of your involvement with the occupation, business, or profession.

Yes, I was a teacher from 2007-2009, and again in 2013.

26. Do you currently serve or have you in the past served as a manager, officer, or director of any business enterprise, including a law practice? If so, please provide details as to:
- a. the nature of the business
  - b. the nature of your duties
  - c. the extent of your involvement in the administration or management of the business
  - d. the terms of your service
  - e. the percentage of your ownership

I am currently the manager of Petsas Law Group, PLLC

- a. Law Practice.
- b. Represent clients in various matters, primarily Dependency matters. Ensure all needs of the business are met.
- c. I am the sole manager and administrator.
- d. I have run the business since April 2023.
- e. 100% ownership.

27. List experience as an executor, trustee, or in any other fiduciary capacity. Give name, address, position title, nature of your duties, terms of service and, if any, the percentage of your ownership.

N/A

Civic Professional & Community Involvement
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28. Have you ever held an elective or appointive public office in this or any other state?

No

29. Have you been a candidate for such an office?

No

If so, give details, including the offices involved, whether initially appointed or elected, and the length of service. Exclude political affiliation.

N/A

30. State significant activities in which you have taken part, giving dates and offices or leadership positions.

I was a board member and then the board President of Discovery Charter School in Las Vegas. Member from 2019 – 2021; President 2021 – 2022.

31. Describe any courses taught at law schools or continuing education programs. Describe any lectures delivered at bar association conferences.

I taught the Introduction CLE for Pro Bono CAP Attorneys multiple times. I also co-created and presented the CLE entitled: So Your Client is Turning 18...What Now?

32. List educational, military service, service to your country, charitable, fraternal and church activities you deem significant. Indicate leadership positions.

N/A

33. List honors, prizes, awards, or other forms of recognition.

N/A

34. Have you at any time in the last 12 months belonged to, or do you currently belong to, any club or organization that in practice or policy restricts (or restricted during the time of your membership) its membership on the basis of race, religion, creed, national origin or sex? If so, detail the name and nature of the club(s) or organization(s), relevant policies and practices, and whether you intend to continue as a member if you are selected for this vacancy.

No

35. List books, articles, speeches and public statements published, or examples of opinions rendered, with citations and dates.

N/A

36. During the past ten years, have you been registered to vote?

Yes

Have you voted in the general elections held in those years?

Yes

37. List avocational interests and hobbies.

Spending time with my children and spouse, attending Golden Knights games, going to shows at the Smith Center, exercising, reading, listening to podcasts.

Conduct
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38. Have you read the Nevada Code of Judicial Conduct and are you able to comply if appointed?

Yes

39. Have you ever been convicted of or formally found to be in violation of federal, state or local law, ordinance or regulation? Provide details of circumstances, charges, and dispositions.

No

40. Have you ever been sanctioned, disciplined, reprimanded, found to have breached an ethics rule or to have acted unprofessionally by any judicial or bar association discipline commission, other professional organization or administrative body or military tribunal? If yes, explain. If the disciplinary action is confidential, please respond to the corresponding question in the confidential section.

No

41. Have you ever been dropped, suspended, disqualified, expelled, dismissed from, or placed on probation at any college, university, professional school or law school for any reason including scholastic, criminal, or moral? If yes, explain.

No

42. Have you ever been refused admission to or been released from any of the armed services for reasons other than honorable discharge? If yes, explain.

No

43. Has a lien ever been asserted against you or any property of yours that was not discharged within 30 days? If yes, explain.

No

44. Has any Bankruptcy Court in a case where you are or were the debtor, entered an order providing a creditor automatic relief from the bankruptcy stay (providing in rem relief) in any present or future bankruptcy case, related to property in which you have an interest?

No

45. Are you aware of anything that may require you to recuse or disqualify yourself from hearing a case if you are appointed to serve as a member of the judiciary? If so, please describe the circumstances where you may be required to recuse or disqualify yourself.

No.

Other

46. If you have previously submitted a questionnaire or Application to this or any other judicial nominating commission, please provide the name of the commission, the approximate date(s) of submission, and the result.

N/A.

47. In no more than three pages (double spaced) attached to this Application, provide a statement describing what you believe sets you apart from your peers, and explains what education, experience, personality or character traits you possess, or have acquired, that you feel qualify you as a supreme court justice. In so doing, address appellate, civil (including family law matters), and criminal processes (including criminal sentencing).

See attached.

48. Detail any further information relative to your judicial candidacy that you desire to call to the attention of the members of the Commission on Judicial Selection.

I believe everything is covered in my application materials.

49. Attach a sample of no more than ten pages of your original writing in the form of a decision, "points and authorities," or appellate brief generated within the past five years, which

demonstrates your ability to write in a logical, cohesive, concise, organized, and persuasive fashion.

See attached.

## **Statement of Qualifications for District Court Judge**

What sets me apart from my peers is the breadth and depth of my professional and personal experiences, including my background as both an educator and an attorney. My decade of legal practice spans multiple areas of law, including civil litigation, criminal defense, prosecution, governmental representation, and advocacy for children, providing me with a comprehensive and balanced perspective on the legal system.

Prior to my legal career, I worked as a teacher, where I developed skills that continue to serve me in the courtroom and would be invaluable as a District Court Judge. Teaching students of all ages required me to break down complex concepts, present them in a clear and accessible way, and foster an environment of respect and understanding for people from diverse backgrounds. These abilities would be instrumental in managing a courtroom, particularly when working with self-represented litigants, ensuring they feel heard and understand the proceedings without compromising the impartiality of the court.

Throughout my career, I have prided myself on being ethical and transparent in my communications and decision-making. Whether guiding clients through complex legal issues or collaborating with colleagues, I have consistently demonstrated integrity, fairness, and honesty. These principles are at the core of my professional identity and would guide me in ensuring the judiciary remains a trusted institution.

With regards to my academic background, I graduated from Willamette University College of Law, Cum Laude, receiving multiple honors for my achievements. I am admitted to practice in both California and Nevada, bringing a broad understanding of legal principles across jurisdictions to my work.

Professionally, I have represented a wide variety of clients, from private individuals to large governmental agencies. As Assistant General Counsel for the Clark County School District, I navigated complex legal issues, including personal injury cases, public records law, employment law, and compliance with court orders and arbitration decisions. These responsibilities demanded not only a command of the law but also strong problem-solving, collaboration, and communication skills.

Currently, I manage my own law practice and currently serve over 140 clients. This role requires exceptional organizational skills, the ability to prioritize competing responsibilities, and a focus on delivering high-quality representation. I balance collaboration and problem-solving with assertive litigation when necessary.

What further distinguishes me is my ability to connect with people from all walks of life. Whether through teaching, my legal practice, or courtroom advocacy, I have developed a talent for simplifying complex legal concepts and communicating them in a way that resonates with diverse audiences. This ensures that clients, litigants, and stakeholders feel understood and respected, which is essential for fostering trust in the judicial system.

In addition to my professional skills, my temperament is well-suited to the bench. I am calm under pressure, composed in the face of conflict, and committed to creating a courtroom environment that is fair, respectful, and efficient. My extensive courtroom experience has prepared me to handle the demands of managing a busy hearing calendar and conducting evidentiary hearings with diligence and impartiality.

If given the honor of serving as a District Court Judge, I will draw upon my experience as an educator, attorney, and advocate, as well as my dedication to ethics and transparency, to make

sound legal decisions, adhere to all applicable laws and regulations, and uphold the integrity of the judicial system.

Thank you for the opportunity to serve,

Nicholas T. Petsas

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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 TAMMY WOLFE,

11 Plaintiff,

12 v.

13 CLARK COUNTY SCHOOL DISTRICT; and  
14 DOES Individuals I through X; *inclusive*,

15 Defendants.  
16

Case No: 2:22-cv-01709-JAD-BNW

**DEFENDANT’S MOTION TO DISMISS**

17 Defendant Clark County School District (“Defendant”), by and through its counsel of  
18 record, hereby files the following Motion to Dismiss pursuant to Federal Rule of Civil Procedure  
19 12(b)(6). Defendant moves to dismiss both of Plaintiff Tammy Wolfe’s (“Plaintiff”) causes of  
20 action for being barred as a matter of law and/or insufficiently pled. This Motion is made and  
21 supported by the attached Memorandum of Points and Authorities, all pleadings on file with the  
22 Court in this matter, and any oral argument the Court permits.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 This lawsuit involves allegations of retaliation under the ADA and Rehabilitation Act by a  
4 former teacher employed with the Clark County School District (“CCSD”). Specifically, Plaintiff  
5 alleges two causes of action: (1) Retaliation in Violation of the Americans with Disabilities Act of  
6 1990 (“ADA”), and (2) Retaliation in Violation of Section 504 of the Rehabilitation Act of 1973  
7 (“Section 504”).

8 Defendant moves to dismiss Plaintiff’s claims on the grounds that Plaintiff has failed to  
9 state a plausible prima facie case of retaliation under either cause of action. As this Honorable  
10 Court will see, although Plaintiff seems to have engaged in a protected activity, the alleged  
11 adverse employment actions upon which Plaintiff’s claims hinge do not exist in the way they are  
12 framed in her complaint. Complaint at ¶¶35, 38, 41, 49, and 58. In fact, Plaintiff was not subject  
13 to *any* adverse employment action at all.

14 Plaintiff alleges that she was “reprimanded” by administration on October 15, 2021 due to  
15 emailing CCSD regional staff regarding her concerns about how several special education  
16 students were not being adequately served, and again in March 2022 for reasons not specified by  
17 Plaintiff. *Id.* at ¶¶35 and 38. This is an artful attempt by Plaintiff to allege a plausible cause of  
18 action, when in reality one does not exist. Plaintiff’s “reprimands” consisted of her being  
19 instructed on the proper procedure by which to communicate her concerns.

20 Plaintiff makes additional ambiguous allegations that are completely devoid of facts or  
21 documentation to support them, such as “persistent harassment... in the performance of her job,”  
22 and “unwarranted criticisms of her job performance.” *Id.* at ¶41. Plaintiff’s allegations are  
23 ambiguous and lack the specificity required to meet the pleading standard required to survive a  
24 12(b)(6) challenge.

25 Additionally, Plaintiff has failed to demonstrate any type of causal connection between  
26 engaging in protected activity and the alleged adverse employment actions. Plaintiff alleges that  
27 she was subject to her “reprimands” in October 2021 and March 2022, yet continued to work in  
28 her position through the conclusion of the 2021-2022 academic year, and did not file her EEOC

1 complaint until approximately June 24, 2022, approximately eight months after the initial  
2 “reprimand” meeting to which Plaintiff refers in her complaint. *Id.* at ¶¶41-42. Accordingly,  
3 Plaintiff’s claims must be dismissed.

## 4 **II. RELEVANT BACKGROUND**

5 Plaintiff was employed as a Special Education Teacher at CCSD and assigned to Duane  
6 D. Keller Middle School (“Keller”) during the 2020-2021 and 2021-2022 school years, after  
7 which she voluntarily resigned<sup>1</sup>. *Id.* at ¶41. In October 2021, Plaintiff wrote an email (“October  
8 email”) to two CCSD regional staff members requesting clarification on special education  
9 eligibility for several students on her caseload whom Plaintiff believed were not being adequately  
10 served. *Id.* at ¶33.

11 Plaintiff’s October email prompted a staffing that occurred on or about October 15, 2021  
12 with Keller Assistant Principal Rachelle Duggins-Tetlow, who informed Plaintiff that she should  
13 be communicating with Mrs. Duggins-Tetlow or Keller’s Special Education Instructional  
14 Facilitator (“SEIF”) Mr. Tawresey regarding any concerns or questions pertaining to IEPs,  
15 placements, or eligibility of students at Keller. Plaintiff was informed that Keller’s administration  
16 would then be responsible for communicating directly with SSD coordinators and district-level  
17 employees. *Id.* at ¶34

18 Plaintiff alleges that the October 15, 2021 meeting was a reprimand, despite the nature of  
19 the meeting being to remind Plaintiff that she should be discussing issues regarding her students  
20 with Keller staff, specifically Mrs. Duggins-Tetlow or Mr. Tawresey. *Id.* at ¶35. It should be  
21 noted that Plaintiff does not allege that any material change in Plaintiff’s duties or responsibilities  
22 occurred on or after the October 15, 2021 meeting. *See Id., generally.*

23 Further, Plaintiff alleges that she was referred to CCSD regional staff on February 25,  
24 2022, due to concerns regarding Plaintiff’s classroom management, yet provides no additional  
25 information. *Id.* at ¶37. Plaintiff alleges an additional “reprimand” that occurred in March 2022,  
26 where she states that Plaintiff met with CCSD regional personnel, Keller administrators, and Mr.

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28 <sup>1</sup> Plaintiff states in her complaint that she resigned on May 18, 2022, at the conclusion of the 2021-2022 academic year. However, the 2021-2022 CCSD academic year did not conclude until May 25, 2022.

1 Tawresey, yet provides no additional information or documentation regarding this allegation. *Id*  
2 at ¶38.

3 Plaintiff filed a charge with the EEOC on or about June 24, 2022. *Id* at ¶42. The EEOC  
4 issued a Determination and Notice of Rights letter on July 12, 2022. *Id* at ¶43. This lawsuit  
5 followed approximately ninety days later.

### 6 **III. LEGAL STANDARD**

#### 7 **A. Federal Rule of Civil Procedure 12(b)(6)**

8 Federal Rule of Civil Procedure 8(a)(1)(2) provides that a complaint must set out “a short  
9 plain statement of the claim showing that the pleader is entitled to relief ...” Where a complaint  
10 falls short of this standard, a court may dismiss the deficient claims for failing to provide a basis  
11 for the possibility of granting relief. Fed. R. Civ. P. 12(b)(6).

12 Although the party opposing a Rule 12(b)(6) motion to dismiss is given the benefit of the  
13 doubt by accepting their factual allegations as true, the “[f]actual allegations must be enough to  
14 raise a right to relief above the speculative level.” Alleged facts must do more than “merely  
15 create[] a suspicion [of] a legally cognizable right of action.” *Bell Atlantic v. Twombly*, 550 U.S.  
16 544, 555 (2007) (citations omitted). As the Court in *Twombly* found, “a plaintiff’s obligation to  
17 provide the ‘grounds’ of his ‘entitle[ment] to relief’ requires more than labels and conclusions”  
18 rather, a plaintiff must allege actual facts to “nudge” the claims “across the line from conceivable  
19 to plausible” in order to survive a motion to dismiss. *Id.* at 555 (quoting *Papasan v. Allain*, 478  
20 U.S. 265, 286 (1986)). Where a complaint does not satisfy this standard, a court should dismiss  
21 the deficient claims. *Id.* at 555.

22 The context-specific line separating the plausible from the merely conceivable is not  
23 always a clear one. The reviewing court is to “draw on its judicial experience and common sense”  
24 in making the determination of what satisfies a plausible claim. *Ashcroft v. Iqbal*, 556 U.S. 662,  
25 678 (2009). In *Iqbal*, the Supreme Court provided a framework within which the reviewing court  
26 could exercise its experience and common sense. *Id.* In a two-step process, the court should first  
27 determine which averments merely state a legal conclusion and which are factual assertions. *Id.*  
28 Second, the court should consider whether the factual allegations present a plausible entitlement

1 to relief. *Id.* That is, does the remaining factual content of the claim, if true, allow the court to  
2 draw a reasonable inference that the defendant is liable for the alleged misconduct? *Id.* at 1949-  
3 50. In sum, a claim should be dismissed “where the well-pleaded facts do not permit the court to  
4 infer more than the mere possibility of misconduct...” and the pleader has not shown they are  
5 entitled to relief. *Id.* (internal quotations and citations omitted).

#### 6 **IV. LEGAL ARGUMENT**

7 Plaintiff’s Complaint alleges Retaliation in Violation of the Americans with Disabilities  
8 Act and Retaliation in Violation of Section 504 of the Rehabilitation Act. Neither of Plaintiff’s  
9 claims are able to pass Rule 12(b)(6) muster. Accordingly, Defendant moves to dismiss Plaintiff’s  
10 claims in their entirety.

#### 11 **Plaintiff’s Retaliation Claims Should Be Dismissed For Failure to State a Prima** 12 **Facie Case Under both the ADA and Section 504**

13 Plaintiff alleges that CCSD retaliated against her in violation of the ADA and Section 504.  
14 To state a prima facie claim for retaliation under the ADA, Plaintiff must establish that: (1) she  
15 engaged in protected activity under the ADA; (2) an adverse employment action was taken  
16 against her, and (3) a causal connection exists between these two events. *Pardi v. Kaiser Found.*  
17 *Hosp.*, 389 F.3d 840, 849 (9<sup>th</sup> Cir. 2004); *Hashimoto v. Dalton*, 118 F.3d. 671, 675 n.1 (9<sup>th</sup> Cir.  
18 1997).

19 The legal elements and production of proof for a retaliation claim under the Rehabilitation  
20 Act are the same as that used under the ADA. *Brooks v. Capistrano Unified School Dist.* 1  
21 F.Supp.3d 1029, 1035 (C.D. Cal. 2014). Thus, the shortcomings of both of Plaintiff’s causes of  
22 action will be analyzed simultaneously.

#### 23 **A. Protected Activity**

24 Plaintiff contends that she was engaged in protected activity under both the ADA and  
25 Section 504. Under both legal frameworks, in order for a special education teacher to be engaged  
26 in a protected activity on behalf of her students, she must do more than merely assist them; she  
27 must advocate on behalf of those students or protest discrimination perpetrated on them by others.  
28 *See Id* at 1036. Under Section 504, Plaintiff, as a teacher of students with disabilities, has

1 standing to being a claim. The Ninth Circuit has recognized that teachers who allege retaliation  
2 for advocacy on behalf of students with disabilities have standing to bring claims under Section  
3 504. *Barker v. Riverside Cty. Office of Educ.*, 584 F.3d 821, 826.

4 Here, Plaintiff contends that she was advocating on behalf of students in the emails she  
5 sent to CCSD regional staff. For the purposes of the instant motion these facts are assumed to be  
6 true. As such, Plaintiff meets the element of engaging in protected activity.

7 **B. Adverse Employment Action**

8 Plaintiff alleges adverse employment actions “including, but not limited to, receiving  
9 reprimands in October 2021, and March 2022, for her complaints to CCSD regional personnel  
10 regarding IEP documentation and receiving unfounded complaints and scrutiny from CCSD  
11 administrators regarding her classroom management” after voicing her concerns regarding some  
12 Keller students’ IEPs. Complaint at ¶49 and 58. Plaintiff also alleges she was referred to CCSD  
13 regional staff on February 25, 2022 due to concerns Keller officials had with her classroom  
14 management. *Id* at ¶37.

15 Only in Plaintiff’s allegation regarding the October 2021 instructional meeting does she  
16 allege with any specificity a potential adverse employment action. Plaintiff’s other allegations,  
17 including the March 2022 meeting and the February 25 referral, lack the specificity required to  
18 form a plausible claim under the *Iqbal* and *Twombly* standard.

19 An adverse employment action is any action reasonably likely to deter employees from  
20 engaging in protected activity. *Pardi* 389 F.3d at 850. Adverse employment actions in the school  
21 setting are often situations where plaintiffs have their position terminated, contracts not renewed,  
22 or otherwise have the terms of employment materially changed. *See McManus*, 21 WL 3355269,  
23 at \*7 (D. Alaska August 2, 2021) (Court found that elimination of one plaintiff’s position and  
24 neither of the two plaintiffs teaching contracts being renewed constituted adverse employment  
25 actions.).

26 Here, Plaintiff has not alleged she was terminated, nor that was she displaced from her  
27 position. In fact, Plaintiff has not alleged that she CCSD found she had committed any  
28

1 misconduct, nor that she was subject to disciplinary action other than labeling meetings with  
2 Keller administration “reprimands.”

3 The sole incident Plaintiff provides more than general allegations is the October 2021  
4 meeting where Plaintiff alleges she was “reprimanded” by Mrs. Duggins-Tetlow on October 15,  
5 2021 during a meeting called to ensure that Plaintiff was aware of the proper procedure for  
6 communicating about the eligibility of students, placements, or IEPs at the school site level. As  
7 the Court can see, this meeting was called to ensure that Plaintiff was expressing her concerns  
8 through the appropriate channels and to personnel who would be able to properly address those  
9 concerns. At no time does Plaintiff state in her complaint that she was subject to disciplinary  
10 action, nor did CCSD ever make a determination of misconduct.

11 Plaintiff's allegation regarding meeting with Keller administrators, CCSD regional  
12 personnel, and Mr. Tawresey in March 2022 provides no evidence other than general allegations  
13 of “receiving unfounded complaints and scrutiny from CCSD administrators regarding her  
14 classroom management after making said complaints.” Complaint at ¶¶38, 49, and 58. If Plaintiff  
15 was receiving increased scrutiny and complaints from her administration regarding her classroom  
16 management, those concerns would have likely been documented on Plaintiff's annual teacher  
17 evaluations. Yet Plaintiff has made no mention of any negative reviews or evaluations; she does  
18 not provide any documentation with her general allegations. *See* Complaint, generally.

19 Plaintiff is attempting to artfully pick and choose what information to utilize in her  
20 Complaint in order to meet the plausibility standard articulated in *Twombly*. In reality, Plaintiff  
21 did not suffer any adverse employment action, and no reasonable employee in Plaintiff's  
22 circumstances would have viewed Defendant's actions as reasonably likely to deter her from  
23 engaging in the protected activity of advocating for her special needs students. As there was no  
24 adverse employment action, Plaintiff's causes of action must be dismissed for failure to state a  
25 claim under Rule 12(b)(6).

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1           **C.       Causal Connection**

2           Under both analyses, the causal link analysis has consistently been interpreted by the  
3 Ninth Circuit to require a “but-for” standard of causation. *McManus*, 21 WL 3355269, at \*6-7  
4 (citing *T.B. ex rel. Brenneise v. San Diego Unified Sch. Dist.*, 806 F.3d 451, 472-73 (9<sup>th</sup> Cir.  
5 2015); *Brooks*, 1 F.Supp.3d at 1037. Retaliation claims require proof that the adverse employment  
6 action would not have occurred in the absence of the protected activity. *Id.* The plaintiff must  
7 show that retaliation for the protected conduct was the only reason for the employer’s adverse  
8 action. *Kilroy* 2016 WL 5662042 at \*7 (C.D. Cal. August 18, 2016).

9           Here, Plaintiff’s administrators clearly had no issue with the activity in which Plaintiff  
10 engaged, as evidenced by Plaintiff’s allegation that Mrs. Duggins-Tetlow directed Plaintiff to  
11 communicate her concerns directly to Keller administration and/or Mr. Tawresey. Complaint at  
12 ¶35. In other words, the subject matter of Plaintiff’s October email was not the reason for the  
13 October 15, 2021 meeting that Plaintiff categorizes as a “reprimand,” it was to whom she  
14 communicated in that email. Mrs. Duggins-Tetlow was ensuring that Plaintiff understood that she  
15 was to communicate her concerns about her students to specific people at Keller’s school site.  
16 The October 15, 2021 meeting was not a reprimand, and Plaintiff alleges very little to substantiate  
17 her claim that it was.

18           Plaintiff posits that the only reason she was redirected by Keller’s administration was due  
19 to her concerns regarding her students, but the fact of the matter is that Plaintiff was required to  
20 follow her school site and CCSD protocol, regardless of whether Plaintiff was aware of the steps  
21 that entailed. It follows that even if the Court takes Plaintiff’s allegations that she was being  
22 “reprimanded” as true, the but-for cause of Defendant’s conduct was not Plaintiff’s protected  
23 activity in advocating for her special education students, but to whom she addressed her concerns.

24           There is also an issue regarding the timing between when Plaintiff alleges she suffered  
25 adverse employment actions and when she availed herself of any potential avenues to address her  
26 allegations. Here, the only adverse employment action that Plaintiff both alleges and supports  
27 with any specificity is the October 15, 2021 meeting. Complaint at ¶35. Plaintiff continued to  
28 work for the remainder of the 2021-2022 school year, submitting her resignation on May 18,



1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 21st day of November, 2022, the foregoing  
3 **DEFENDANT’S MOTION TO DISMISS** was served by e-service through the Nevada United  
4 States District Court CM/ECF System upon:

5 Jason J. Bach, Esq.  
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11 /s/ Susan Gerace  
12 AN EMPLOYEE OF THE OFFICE OF THE  
13 GENERAL COUNSEL-CCSD  
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