Bar Counsel Report

In Re: BRADLEY J. BELLISARIO
Bar No.: 13452
Case No.: 84144
Filed: 04/07/2022

ORDER OF DISBARMENT

This is an automatic review of a Southern Nevada Disciplinary Board hearing panel's recommendation that attorney Bradley J. Bellisario be disbarred based on violations of RPC 1.15 (safekeeping property), RPC 1.3 (diligence), RPC 1.4 (communication), RPC 1.5 (fees), RPC 1.8 (conflicts of interest: current clients: specific rules), RPC 8.1 (Bar admission and disciplinary matters), and RPC 8.4 (misconduct). Because no briefs have been filed, this matter stands submitted for decision based on the record. SCR 105(3)(b).

The State Bar has the burden of showing by clear and convincing evidence that Bellisario committed the violations charged. *See In re Discipline of Drakulich*, 111 Nev. 1556, 1566, 908 P.2d 709, 715 (1995). Here, however, the facts and charges alleged in the complaint are deemed admitted because Bellisario failed to answer the complaint and a default was entered.[1] The record therefore establishes that Bellisario violated the above-referenced rules by misappropriating and/or comingling approximately $260,000 of client funds, failing to pay liens on behalf of clients or communicate with them about their cases, obtaining a propriety interest other than a contingency fee in certain clients' personal injury cases, and failing to respond to the State Bar's inquiries.

Turning to the appropriate discipline, we review the hearing panel's recommendation de novo. SCR 105(3)(b). Although we "must … exercise independent judgment," the panel recommendation is persuasive. *In re Discipline of Schaefer*, 117 Nev. 496, 515, 25 P.3d 191, 204 (2001). In determining the appropriate discipline, we weigh four factors: "the duty violated, the lawyer's mental state, the potential or actual injury caused by the lawyer's misconduct, and the existence of aggravating or mitigating factors." *In re Discipline of Lerner*, 124 Nev. 1232, 1246, 197 P.3d 1067, 1077 (2008).

Bellisario intentionally and/or knowingly violated duties owed to his clients (safekeeping property, conflicts of interest, fees, communication, and diligence) and the profession (failing to respond to lawful requests for information by a disciplinary authority). Bellisario's clients suffered actual injuries as they did not receive their funds. And Bellisario's failure to cooperate in the disciplinary investigation harmed the integrity of the profession, which depends on a self-regulating disciplinary system. The baseline sanction for his misconduct, before considering aggravating or mitigating factors, is disbarment. *See* Standards for Imposing Lawyer Sanctions, *Compendium of Professional Responsibility Rules and Standards*, Standard 4.11 (Am. Bar Ass'n 2017) ("Disbarment is generally appropriate when a lawyer knowingly converts client property and causes injury or potential injury to a client."). The record supports the panel's findings of no mitigating circumstances and three aggravating circumstances (dishonest or selfish motive, multiple offenses, and vulnerability of victim). Having considered the four factors, we agree with the panel that disbarment is appropriate.

Accordingly, we disbar attorney Bradley J. Bellisario from the practice of law in Nevada. Such disbarment is irrevocable. SCR 102(1). Bellisario shall pay the costs of the disciplinary proceedings, including $3,000 under SCR 120, within 30 days of the date of this order. The State Bar shall comply with SCR 121.1.

It is so ORDERED.

In Re: MATTHEW W. BEASLEY
Bar No.: 9756
Case No.: 84445
Filed: 04/01/2022

ORDER GRANTING PETITION FOR TEMPORARY SUSPENSION AND RESTRICTING HANDLING OF CLIENT FUNDS

This is a petition by the State Bar for an order temporarily suspending attorney Matthew W. Beasley from the practice of law, pending the resolution of formal disciplinary proceedings against him. The petition and supporting documentation demonstrate that Beasley appears to have orchestrated and/or engaged in a Ponzi scheme to defraud investors of millions of dollars and that he used his trust account to facilitate the scheme. Further, when Federal Bureau of Investigation agents attempted to interview Beasley at his residence in its related investigation, Beasley brandished a gun for which he was arrested and charged with assaulting federal officers. Moreover, a United States Magistrate denied Beasley's release from custody pending the preliminary hearing, citing concern for public safety and risk of nonappearance.

SCR 102(4)(b) provides, in pertinent part:

> On the petition of bar counsel, supported by an affidavit alleging facts personally known to the affiant, which shows that an attorney appears to be posing a substantial threat of serious harm to the public, the supreme court may order, with notice as the court may prescribe, the attorney's immediate temporary suspension or may impose other conditions upon the attorney's practice.

In addition, SCR 102(4)(c) provides that we may place restrictions on an attorney's handling of funds.

We conclude that the documentation before us demonstrates that Beasley poses a substantial threat of serious harm to the public to warrant his immediate temporary suspension from the practice of law. SCR 102(4)(b). We further conclude that Beasley's handling of funds entrusted to him by clients and third parties should be restricted.

Accordingly, attorney Matthew W. Beasley is temporarily suspended from the practice of law, pending the resolution of formal disciplinary proceedings against him.[2] Immediately upon service of this order, Beasley is precluded from accepting new cases and from continuing to represent existing clients. SCR 102(4)(d) (providing that an attorney is not precluded from continuing to represent existing clients for the first 15 days after service of the temporary suspension order "unless the court orders otherwise"). In addition, pursuant to SCR 102(4)(b) and (c), we impose the following conditions on Beasley's handling of client funds:

1. All proceeds from Beasley's practice of law and all fees and other funds received from or on behalf of his clients or third-party investors shall, from the date of service of this order, be deposited into a trust account from which no withdrawals may be made by Beasley except upon written approval of bar counsel.
2. Beasley is prohibited from withdrawing any funds from any and all accounts in any way relating to his law practice, including but not limited to his general and trust accounts, except upon written approval of bar counsel.

The State Bar shall immediately serve Beasley with a copy of this order. Such service may be accomplished by personal service, certified mail, delivery to a person of suitable age at Beasley's place of employment or residence, or by publication. When served on either Beasley or a depository in which he maintains an account, this order shall constitute an injunction against withdrawal of the proceeds except in accordance with the terms of this order. See SCR 102(4)(c). Beasley shall comply with the provisions of SCR 115. If Beasley fails to comply with SCR 115, then bar counsel may proceed under SCR 118. The State Bar shall comply with SCR 121.1.[3]

It is so ORDERED.

In Re: HERA ARMENIAN
Bar No.: 12322
Case No.: 84198
Filed: 03/18/2022

ORDER APPROVING CONDITIONAL GUILTY PLEA AGREEMENT

This is an automatic review of a Southern Nevada Disciplinary Board hearing panel's recommendation that this court approve, pursuant to SCR 113, a conditional guilty plea agreement in exchange for a stated form of discipline for attorney Hera Armenian. Under the agreement, Armenian admitted to violating RPC 1.15 (safekeeping property) and RPC 8.1 (Bar and disciplinary matters). She agreed to a one-year suspension stayed during a one-year probationary period with conditions.

Armenian has admitted to the facts and violations as part of her guilty plea agreement. The record therefore establishes that she violated the above-cited rules by misappropriating and comingling funds in her client trust account, by not keeping complete records of the funds in her trust account, and by not fully responding to the State Bar's investigation regarding the funds.

The issue for this court is whether the agreed-upon discipline sufficiently protects the public, the courts, and the legal profession. *See State Bar of Nev. v. Claiborne*, 104 Nev. 115, 213, 756 P.2d 464, 527-28 (1988) (explaining the purpose of attorney discipline). In determining the appropriate discipline, we weigh four factors: "the duty violated, the lawyer's mental state, the potential or actual injury caused by the lawyer's misconduct, and the existence of aggravating or mitigating factors." *In re Discipline of Lerner*, 124 Nev. 1232, 1246, 197 P.3d 1067, 1077 (2008).

Armenian admitted that she knowingly violated duties owed to clients, the public, and the profession. Two clients suffered potential injury if Armenian could not repay the amounts misappropriated. Further, her actions caused harm to the State Bar and to the legal profession. The baseline sanction for such misconduct, before considering aggravating or mitigating circumstances, is suspension. *Standards for Imposing Lawyer Sanctions, Compendium of Professional Responsibility Rules and Standards,* Standard 4.12 (Am. Bar Ass'n 2018) (providing that suspension is appropriate "when a lawyer knows or should know that [s]he is dealing improperly with client property and causes injury or potential injury to a client"), Standard 7 .2 (providing that suspension is appropriate "when a lawyer knowingly engages in conduct that is a violation of a duty owed as a professional and causes injury or potential injury to a client, the public, or the legal system"). The record supports the panel's findings of one aggravating circumstance (multiple offenses) and two mitigating circumstances (absence of a prior disciplinary record and inexperience in the practice of law).[4] Considering all four factors, we conclude that the agreed-upon discipline is appropriate.

Accordingly, we hereby suspend Hera Armenian for one year, stayed during a one-year probationary period subject to the following conditions: Armenian provides quarterly reports to the State Bar regarding the status of her cases and trust accounting (including account journals, client ledgers, supporting records, and monthly reconciliations of the supporting records with the bank's records), she not practice as a solo attorney during the probationary period, she completes

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six hours of continuing legal education on accounting for client property, and she submit to a binding fee arbitration or make restitution regarding $5,000 of the misappropriated funds. Armenian shall also pay the costs of the disciplinary proceedings, including $2,500 under SCR 120, within 30 days from the date of this order, if she has not done so already. The State Bar shall comply with SCR 121.1

It is so ORDERED.[5]

In Re: JOSEPH B. IARUSSI
Bar No.: 9284
Case No.: 84116
Filed: 04/07/2022

ORDER OF REINSTATEMENT

This is an automatic review of a Southern Nevada Disciplinary Board hearing panel's recommendation to reinstate suspended attorney Joseph B. Iarussi with certain conditions. As no briefs have been filed, this matter stands submitted for decision. SCR 116(2).

This court suspended Iarussi from the practice of law for one year for violating RPC 1.4 (communication), RPC 1.15 (safekeeping property), and RPC 8.4(b) (misconduct: committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness). *In re Discipline of Iarussi*, Nos. 79030, 81338, 2020 WL 6275387 (Nev. Oct. 23, 2020) (Order Denying Petition for Temporary Suspension and Approving Conditional Guilty Plea Agreement). Iarussi petitioned for reinstatement and, following a hearing, the hearing panel unanimously recommended that he be reinstated to the practice of law with certain conditions.

Based on our de novo review, we agree with the panel's conclusion that Iarussi has satisfied his burden in seeking reinstatement by clear and convincing evidence. See SCR 116(2) (providing that an attorney seeking reinstatement must demonstrate compliance with certain criteria "by clear and convincing evidence"); *Application of Wright,* 75 Nev. 111, 112-13, 335 P.2d 609, 610 (1959) (reviewing a petition for reinstatement de novo). We therefore approve the panel's recommendation that Iarussi be reinstated to the practice of law. We also approve the conditions of reinstatement recommended by the panel, as set forth below:

1. Iarussi shall be placed on probation for one year from the date of this order;
2. During his probationary period, Iarussi shall be required to submit to drug and/or alcohol testing within twenty-four (24) hours of a request to do so by the Office of Bar Counsel; and
3. Iarussi shall pay the costs of the reinstatement proceeding, including $2,500 under SCR 120, within 90 days of the date of this order, if he has not done so already.

With these conditions, we hereby reinstate Joseph B. Iarussi to the practice of law in Nevada effective on the date of this order. See SCR 116(5) (allowing for conditions on reinstatement).

It is so ORDERED.

In Re: THOMAS C. MICHAELIDES
Bar No.: 5425
Case No.: 83876
Filed: 02/18/2022

ORDER OF SUSPENSION

This is an automatic review of a Southern Nevada Disciplinary Board hearing panel's recommendation that attorney Thomas C. Michaelides be suspended from the practice of law for 24 months, stayed, with an actual suspension of 6 months followed by an 18-month probationary period based on violations of RPC 3.3(a)(1) (candor towards the tribunal), RPC 3.4(b) (fairness to opposing party and counsel), RPC 4.1(a) (truthfulness in statements to others), RPC 4.2 (communications with persons represented by counsel), RPC 5.3(b) (responsibilities regarding nonlawyer assistants), and RPC 8.4(a), (c) (misconduct). Because no briefs have been filed, this matter stands submitted for decision based on the record. SCR 105(3)(b).

The State Bar has the burden of showing by clear and convincing evidence that Michaelides committed the violations charged. *In re Discipline of Drakulich*, 111 Nev. 1556, 1566, 908 P.2d 709, 715 (1995). We defer to the panel's factual findings that Michaelides violated the abovereferenced rules as those findings are supported by substantial evidence and are not clearly erroneous. SCR 105(3)(b); *In re Discipline of Colin*, 135 Nev. 325, 330, 448 P.3d 556, 560 (2019). In particular, the record shows that one of Michaelides' non-attorney employees sent a falsified default judgment order directly to a represented opposing party, as well as to another party, in an attempt to coerce the removal of a negative internet review about Michaelides. The record further shows that Michaelides had the opportunity to explain the situation to the district court but failed to do so. This evidence supports the complaint's allegations concerning Michaelides' professional misconduct. SCR 105(2).

Turning to the appropriate discipline, we review the hearing panel's recommendation de novo. SCR 105(3)(b). Although we "must … exercise independent judgment," the panel's recommendation is persuasive. *In re Discipline of Schaefer*, 117 Nev. 496, 515, 25 P.3d 191, 204 (2001). In determining the appropriate discipline, we weigh four factors: "the duty violated, the lawyer's mental state, the potential or actual injury caused by the lawyer's misconduct, and the existence

of aggravating or mitigating factors." *In re Discipline of Lerner*, 124 Nev. 1232, 1246, 197 P.3d 1067, 1077 (2008).

Here, Michaelides violated duties owed to the legal system (candor to the tribunal, fairness to opposing party and counsel, truthfulness in statements to others, communications with represented persons, and misconduct) and duties owed as a professional (responsibilities regarding nonlawyer assistants). His mental state was intentional or knowing as to the candor to the tribunal and responsibilities regarding nonlawyer assistant violations, and negligent as to the remaining violations. And while Michaelides ultimately stipulated to set aside the falsified default judgment order, the opposing party was injured as he incurred attorney fees to challenge that order. Creating a falsified judgment also caused actual injury to the legal profession and system.

The baseline sanction for Michaelides' misconduct, before considering aggravating and mitigating circumstances, is suspension. See *Standards for Imposing Lawyer Sanctions, Compendium of Professional Responsibility Rules and Standards*, Standard 6.12 (Am. Bar Ass'n 2018) (providing that suspension is appropriate when "a lawyer knows that false … documents are being submitted to the court or that material information is improperly being withheld, and takes no remedial action, and causes injury or potential injury to a party to the legal proceeding, or causes an adverse or potentially adverse effect on the legal proceeding"), Standard 6.32 (providing that suspension is generally appropriate "when a lawyer engages in communication with an individual in the legal system when the lawyer knows that such communication is improper, and causes injury or potential injury to a party or causes interference or potential interference with the outcome of the legal proceeding"), Standard 7.2 (providing that suspension is appropriate "when a lawyer knowingly engages in conduct that is a violation of a duty owed as a professional and causes injury or potential injury to a client, the public, or the legal system"). The record supports five aggravating circumstances (prior disciplinary offenses, dishonest or selfish motive, pattern of misconduct, multiple offenses, and substantial experience in the practice of law) and one mitigating circumstance ("a certain amount of remorse") found by the panel.[6] Considering all the factors, we agree that the panel's proposed discipline is appropriate to serve the purpose of attorney discipline. *See State Bar of Nev. v. Claiborne,* 104 Nev. 115, 213, 756 P.2d 464, 527-28 (1988) (observing Nev. v. Claiborne, the purpose of attorney discipline is to protect the public, the courts, and the legal profession, not to punish the attorney).

Accordingly, we hereby suspend attorney Thomas C. Michaelides from the practice of law for 24 months from the date of this order. After a 6-month actual suspension, the remainder of the suspension is stayed, subject to an 18-month probationary term. As conditions on his probation, Michaelides shall (1) obtain a legal practice mentor approved by the State Bar and provide quarterly reports to the State Bar and (2) engage in no professional misconduct following the date of this order that results in a screening panel recommending that new disciplinary charges be filed against Michaelides. Additionally, Michaelides shall pay the actual costs of the disciplinary proceedings as provided in the State Bar's memorandum of costs, including $2,500 under SCR 120(3), within 30 days from the date of this order if he has not already done so. The parties shall comply with SCR 115 and SCR 121.1.

It is so ORDERED.[7]

In Re: CALVIN X. DUNLAP
Bar No.: 2111
Case No.: OBC21-0072
Filed: 02/15/2022

PUBLIC REPRIMAND

To Calvin X. Dunlap:

Background

On April 18, 2019, you were issued a Letter of Reprimand for violating RPC 1.15 (Safekeeping Property) because you left funds in the Client Trust Account after being earned and there were multiple withdrawals for which you were unable to fully account for source of the fee being earned.

The Letter of Reprimand stated

> Your co-mingling of your funds with clients' funds exposes your clients' funds to the risk of attachment by your own creditors and the potential that you will overdraw from the account. Your inability to promptly account for the funds withdrawn from the IOLTA Trust Account also exposes the potential that you will overdraw from the account.

The Letter of Reprimand identified that the misconduct warranted a suspension, pursuant to application of Standard 4.12 of the ABA Standards for Imposing Lawyer Sanctions, but that your 50 years of practicing law without receiving discipline and a lack of actual injury to any clients warranted a substantial deviation down to imposition of the lowest form of discipline.

Facts of This Matter

On or about January 11, 2021, First Independent Bank/Torrey Pines Bank notified the State Bar of an overdraft in your Client Trust Account. On January 8, 2021, a check for $1,000 was presented for payment from Respondent's Client Trust Account but the balance of the account was only $100. The $1,000 check was made out to you, not a client and the bank honored the

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check despite the insufficient funds. You corrected the deficit on February 23, 2021, when you deposited $935, which included reimbursing the $35 overdraft fee charged on January 8, 2021.

In response to the State Bar's demand, you provided (i) six months of statements for your Client Trust Account, (ii) six months of statements for your operating account, (iii) a current print out of the Client Trust Account general ledger, (iv) relevant settlement disbursement sheets, and (v) copies of checks issued from the Client Trust Account.

The bank records show the following:

a. On October 5, 2020, you transferred $8,310.66 into your operating account. This sum was comprised of $7,151.55 in fees and costs for one client, $664.61 in fees and costs for a second client. But you could not identify a purpose for withdrawing the remaining $494.60.
b. On January 11, and 12, 2021, you deposited $243,227.31 in settlement funds for a third client, M.D.
c. On January 19, 2021, you disbursed $16,168.35 to yourself as reimbursement for multiple loans you provided to M.D. while you were representing her.

The $7,151.55 in the first client's fees and costs was consistent with the May 13, 2019 distribution sheet in that matter. The $664.61 in the second client's fees and costs was based on an October 10, 2019, check received in that matter.

Violations of the Rules of Professional Conduct

Pursuant to RPC 1.8(e) (Conflict of Interest: Current Clients: Specific Rules), you had a duty to refrain from providing a client with financial assistance during the pendency of her litigation. You knowingly[8] violated RPC 1.8(e) by loaning your client money while representing her and repaying the loan from her settlement proceeds. This rule violation had the potential to injure your client and did injure the integrity of the profession.

Pursuant to RPC 1.15 (Safekeeping Property), you had a duty to safekeep your clients' funds, properly record funds to be distributed, and timely distribute those funds. You negligently violated RPC 1.15 when you failed to adequately maintain records of funds in your Client Trust Account which resulted in you being unable account for the source of $494.60 of funds distributed to yourself. You also failed to promptly distribute funds to yourself from the Client Trust Account. This rule violation had the potential to injure a client and did injure the integrity of the profession.

Application of the ABA Standards for Imposing Lawyer Sanctions

Pursuant to Standard 4.32 of the ABA Standards for Imposing Lawyer Sanctions, the appropriate baseline sanction for your violation of RPC 1.8(e) is suspension. Moreover, Standard 8.2 provides that suspension is the appropriate baseline sanction for your violation of RPC 1.15.

However, consideration of the mitigating factors of (i) your absence of a dishonest or selfish motive (SCR 102.5(2)(b)) and (ii) your cooperative attitude toward the discipline proceeding (SCR 102.5(2)(e)) warrants a downward deviation from the baseline sanction to imposition of a Public Reprimand.

PUBLIC REPRIMAND

In light of the foregoing, you violated Rule of Professional Conduct ("RPC") 1.8(e) (Conflict of Interest: Current Clients: Specific Rules), and RPC 1.15 (Safekeeping Property) and are hereby PUBLICLY REPRIMANDED and required to pay $1,500 plus the hard costs of the days of the filing of the Order in the matter.

ENDNOTES:

1. The complaint and notice of intent to take a default were served on Bellisario through regular and certified mail to his SCR 79 address and emailed to his SCR 79 email address. The notice of intent to take a default was also sent to an alternate physical and an alternate email address. The scheduling order was sent to all of the foregoing addresses. Bellisario responded to a notice from the State Bar that his 2021 license renewal was overdue, but not to the disciplinary complaint against him.
2. Beasley may file a petition asking this court to dissolve or amend the order of temporary suspension as provided in SCR 102(4)(e).
3. As provided in SCR 121(5), this matter is now public. This is our final disposition of this matter. Any further proceedings shall be docketed as a new matter.
4. Armenian's limited testimony at the hearing does not support the panel's finding of remorse as a mitigating circumstance. *See In re Discipline of Colin*, 135 Nev. 325, 330, 448 P.3d 556, 560 (2019) (recognizing that this court does not defer to factual findings that are not supported by substantial evidence).
5. The Honorable Mark Gibbons, Senior Justice, participated in the decision of this matter under a general order of assignment.
6. The panel also found, in mitigation, that Michaelides was subject to other sanctions and penalties, referring to the approximately $51,000 of attorney fees awarded to the opposing party in the falsified judgment case. We do not consider this as a mitigating circumstance, however, as the district court awarded the attorney fees because Michaelides' claims were meritless under Nevada's anti-SLAPP statutes rather than because of the conduct we address in this disciplinary action.
7. The Honorable Mark Gibbons, Senior Justice, participated in the decision of this matter under a general order of assignment.
8. The ABA Standards for Imposing Lawyer Sanctions define the mental state of "knowledge" as "the conscious awareness of the nature or attendant circumstances of the conduct but without the conscious objective or purpose to accomplish a particular result" which is less culpable than an "intentional" mental state.

TIP FROM THE BAR COUNSEL

SCOTUS Case Could Upend Gun Laws ... or Not

Editor's Note: At the time of this writing, *New York State Rifle & Pistol Association v. Bruen* was pending before the current term of the U.S. Supreme Court with a decision likely this summer.

Debates in Nevada regarding firearms and the laws surrounding them have cooled off recently, especially since our state legislature won't reconvene until next year.

In past years, issues regarding carrying concealed weapons and background checks for gun purchases dominated firearms-related conversation in this state.

But although no hot-button gun issues are pending in Nevada, potential changes in firearms law elsewhere could impact gun laws here.

The U.S. Supreme Court is considering a challenge to "may issue" criteria for issuing concealed weapons permits. Its decision could be narrowly focused and affect relatively few states, or a broad ruling could shake up gun laws nationwide.

Most states – including Nevada – use a "shall issue" approach to issuing concealed carry weapon (CCW) permits. These states must issue permits if the applicant meets certain requirements and passes a background check. State officials have no discretion to deny the application.

In "may issue" states, public officials have discretion to deny a CCW application even if all other requirements have been met. California and New York are "may issue" states.

The case pending in the U.S. Supreme Court, *New York State Rifle & Pistol Association vs. Bruen,* deals with a challenge to New York's ability to deny CCW permits if applicants cannot show "proper cause" to justify their need to carry a weapon. The court heard oral arguments in 2021, and a decision is expected sometime this year.

The court, of course, could deny the appeal and leave the gun laws of New York untouched and, by extension, the rest of the country.

It also could issue a narrowly focused ruling regarding the requirement to show proper cause in New York and other "may issue" states. The result might only tweak New York's rules and leave other gun issues for another day.

If the court removes the discretion element when considering CCW applications, the decision might potentially flip "may issue" states to the "shall issue" category.

But a broader ruling could extend gun rights granted in *District of Columbia vs. Heller,* a 2008 case that allowed firearms to kept in the home. The *Heller* case stuck down a handgun ban in Washington, D.C., and the district's requirement that rifles and shotguns be kept unloaded.

In the pending case, the Supreme Court could declare that the Second Amendment gives law-abiding persons the right to carry firearms in public. The practical application of such a ruling, of course, is unknown, but it could change gun laws nationwide.

Whatever the ruling in *New York State Rifle & Pistol Association vs. Bruen*, Nevada would likely not greatly be affected since this already is a "shall issue" state, and the case's primary focus is on "may issue" protocols. However, even a relatively narrow decision could have a large impact on California, our huge neighbor to the west and a "may issue" state.