

1 court record.” SRCR 3(4). “The . . . privacy . . . interests that outweigh the public interest
2 in open court records include findings that” : “[t]he sealing or redaction includes medical,
3 mental health, or tax records”; “[t]he redaction includes only restricted personal
4 information contained in the court record” ; “[t]he sealing or redaction is justified by
5 another compelling circumstance.” SRCR 3(4)(d), (f) and (h).

6 Once a motion to seal or redact is pending, “the information to be sealed or redacted
7 remains confidential for reasonable period of time until the court rules on the motion.”
8 SRCR 3(2).

9 Prior to the Formal Hearing in this matter, the Hearing Chair admitted the above-
10 listed exhibits as evidence, based on the parties’ stipulation thereto. Also prior to the
11 Formal Hearing, the parties submitted a Stipulation of Fact which included two tables
12 evidencing client funds that Respondent misappropriated. The Stipulation of Facts
13 rendered the above-listed exhibits as secondary to showing Respondent’s misappropriation
14 and violation of RPC 1.15 (Safekeeping Property).

15 The record on appeal for this matter was submitted to this Court on August 6, 2021
16 and officially file-stamped on August 9, 2021. The undersigned counsel for Respondent
17 and the State Bar, hereby respectfully requests that the following voluminous and sensitive
18 financial records which contain personal identifying information be sealed for
19 confidentiality purposes: SBN Exhibit 14, 15, 16, and 17.

The parties' request to seal the above exhibits is necessary to protect the compelling privacy interests in bank account and financial information which outweigh the public's access to these records. The referenced bank accounts continue to be used by Respondent and publication of the records would unnecessarily expose Respondent and his clients to the risk that the information would be used for fraudulent purposes. Further, Exhibits 18-20 are summary documents that contain the substantive information from the bank records, which supports the Panel's recommendation to this Court. The presence of these summary exhibits ensures that the public has access to any relevant information without undue exposure to Respondent and his clients.

Therefore, the undersigned Counsel for the State Bar of Nevada, and Counsel for Petitioner by virtue of their respective signatures below, hereby stipulate and agree to the immediate sealing of the exhibits listed above. .

DATED this 12th day of August 2021.

/s/ Emily Strand

PITARO & FUMO, CHTD.
THOMAS F. PITARO, ESQ.
Nevada Bar No. 1332
EMILY K. STRAND, ESQ.
Nevada Bar No. 15339
Attorneys for Respondent

STIPULATION TO SEAL RECORDS

THE UNDERSIGNED COUNSEL, for the respective parties, do hereby stipulate and agree that the following Exhibits in this case be immediately sealed: SBN Exhibit 14, 15, 16 and 17.

DATED this 12th day of August 2021.

/s/ Emily Strand

PITARO & FUMO, CHTD.
THOMAS F. PITARO, ESQ.
Nevada Bar No. 1332
EMILY K. STRAND, ESQ.
Nevada Bar No. 15339
601 Las Vegas Blvd.
Las Vegas, Nevada 89101
(702) 474-7554

Attorneys for Respondent

DATED this 12th day of August 2021.

STATE BAR OF NEVADA

Kait Flocchini

R. KAIT FLOCCHINI, ASST. BAR COUNSEL
Nevada Bar No. 9861
3100 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89102
(702) 382-2200

Attorney for State Bar of Nevada

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STATE BAR OF NEVADA
R. KAIT FLOCCHINI, ASST. BAR COUNSEL
3100 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89102

An employee of the Law Office of
PITARO & FUMO, CHTD.