

**LAW OFFICE
GENTILE CRISTALLI
MILLER ARMENI SAVARESE**

**Attorneys at Law
410 South Rampart Boulevard, Suite 420
Las Vegas, NV 89145
Telephone: (702) 880-0000 · Facsimile: (702) 778-9709**

www.gcmaslaw.com

Dominic P. Gentile, Esq.
dgentile@gcmaslaw.com

July 11, 2018

Via Registered Mail:

Hon. Adam Laxalt
Nevada Attorney General &
Republican Party Candidate for Governor
3502 S. Virginia St., Suite A7,
Reno, NV 89502

Re: *Kathleen Vermillion*

Dear General Laxalt:

I write to you as counsel for Kathleen Vermillion concerning certain statements that you are making in your campaign for Governor about her daughter. I am fairly certain that you are aware of Kathleen and that she was once in a relationship with your Democratic opponent that ended more than six years ago. The statements that you are making about her daughter give rise to concerns as to the impact upon Kathleen's efforts to regain physical, mental and moral well-being that any public reference you or your campaign make to that former relationship might have, particularly with respect to her daughter. Thus, I write to you in her behalf.

You have been open and candid about your history of substance abuse and addiction and your thus far successful efforts at recovery. Therefore, you are aware of how easily a setback can occur and what a struggle it can be to stay sober. What you may not be aware of is that from 2010 to 2015 Kathleen was a poly-substance abuser and addict. Since that time, she has turned to a Higher Power and has now been sober for three years. Through difficult personal and spiritual effort, she has reached step Nine in her Twelve-Step program. I know that you realize what that means and are aware that to reach her goal she must make amends to those whom she has harmed by past wrongs performed while in the depths of her addiction. It is a long list of victims for which only she possesses the roster. For present purposes it is sufficient for her to acknowledge Steve Sisolak was prominent among them.

July 12, 2018
Page 2

Simply stated, any accusations that Kathleen made as to Commissioner Sisolak behaving inappropriately toward her daughter were untrue and begotten by the demonic impact that her addiction had upon her ability to perceive reality at that time. In her own words, excerpted from a narrative in my possession which she prepared in pursuit of fulfilling her Ninth step in an effort to make amends with both Steve Sisolak and her daughter: *“I was taking unimaginable amounts of prescription drugs and abusing alcohol- from the minute I woke up until the minute I went to bed- and had been for a long time...Now that I am sober, I realize how devastating and hurtful that accusation was.”*

Kathleen’s current admission of her untruthfulness with regard to those accusations back in late 2011 and early 2012 are corroborated by documents that I have obtained from both Robert Martin, her lawyer at that time, and Mark Fierro, a publicist who was hired to assist him. Messrs. Martin and Fierro confirm that Kathleen told them that she had text messages that would provide corroboration for her accusations but when they pressed her to produce them she admitted that the texts never existed.

When Kathleen retained me to counsel and represent her regarding this subject she did so hoping that Steve Sisolak’s gubernatorial opponents would not try to use her past accusations about him in their campaigns. She also hoped that they would show compassion for her daughter and not make her relive that event, particularly because it wasn’t true. At the time, Kathleen influenced, controlled and directed her daughter, and it has taken great effort on both of their parts to remediate their relationship.

I have explained to Kathleen that political campaigns being what they are, values such as compassion and decency toward third parties would not likely be ingredients in the decision-making process of a gubernatorial candidate, but that if anyone possessed those qualities it was you, given your own experience with addiction. I also advised her that by coming forward as to the falsity of the accusations she made, any use of them by you or on your behalf, without also simultaneously revealing their untruth, could be actionable by her if it caused severe emotional distress resulting in mental or physical damage to her, such as relapse into addiction. As you are probably aware, stress is the number one cause of addiction relapse. Although it seems rather impossible, should that not have as yet come to your attention you can become informed by a visit to such online sources as:

1. www.huffingtonpost.com/2013/03/11/stress-addiction-drug-relapse_n_2837819.html;
2. www.psychologytoday.com/blog/science-choice/201705/stress-and-addiction;
3. www.verywellmind.com/why-did-i-relapse-21900;
4. www.ncbi.nlm.nih.gov/pubmed/17915078; and

Gentile Cristalli
Miller Armeni Savarese

Attorneys at Law

July 12, 2018
Page 3

5. https://scholar.google.com/scholar?q=stress+and+addiction+relapse&hl=en&as_sdt=0&as_vis=1&oi=scholart&sa=X&ved=0ahUKEwj4udP-qdXZAhXox1QKHQAUDGwQgQMINTAA

It is Kathleen's hope that now that you know of the untruthfulness of the accusations she made about Steve Sisolak in the past - even going so far as to include her daughter in the fabricated events – coupled with your ability to relate to her fragility, you will not ignore either. She wishes you well in your campaign efforts but cannot abide by any harm that they may cause to her. If you have any questions regarding anything mentioned in this letter, please contact me. Please do not directly or indirectly attempt to contact Kathleen except through me.

Sincerely,
GENTILE CRISTALLI
MILLER ARMENI SAVARESE

DOMINIC P. GENTILE, ESQ.