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Attorneys for Defendant, Michele Fiore

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHELE FIORE,

Defendant.

CASE NO. 2:24-cr-00155-JAD-DJA

**MICHELE FIORE’S MOTION TO VACATE SENTENCING DATE DUE TO**  
**EXECUTIVE GRANT OF CLEMENCY**

Defendant, Michele Fiore, by and through her attorney, Paola M. Armeni, Esq., and Gia N. Marina, Esq. of the law firm of Clark Hill PLLC, moves this Court to Vacate the sentencing date currently set for May 14, 2025, at 1:30 p.m. due to the Executive Grant of Clemency signed on the 23<sup>rd</sup> of April 2025.

**MEMORANDUM OF POINTS AND AUTHORITIES**

The President of the United States pursuant to his powers under Article II, Section 2, Clause 1, of the United States Constitution, has the authority to “grant Reprieves and Pardons for Offences against the United States, except in Case of Impeachment.” This authority may be exercised at any time after an offenses’ commission, “either before legal proceedings are taken or during their pendency, or after conviction and judgment.”<sup>1</sup> “If granted before conviction it prevents any of the

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<sup>1</sup> *Ex parte Garland*, 71 U.S. 333, 334, 18 L. Ed. 366 (1866).

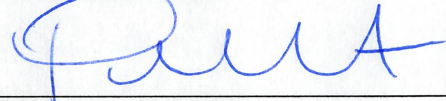
1 penalties and disabilities consequent upon conviction from attaching; if granted after conviction it  
2 removes the penalties and disabilities and restores him to all his civil rights.”<sup>2</sup>

3 On April 23, 2025, the President of the United States, Donald J. Trump exercised his  
4 authority and granted Ms. Fiore a **full and unconditional pardon** for those offenses set forth in  
5 this case. *See* Exhibit A – a true and accurate copy of the Executive Grant of Clemency.

6 For the foregoing reasons, the sentencing cannot go forward and as such should be vacated.

7 Dated this 24<sup>th</sup> day of April, 2025.

8 CLARK HILL PLLC

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10 PAOLA M. ARMENI  
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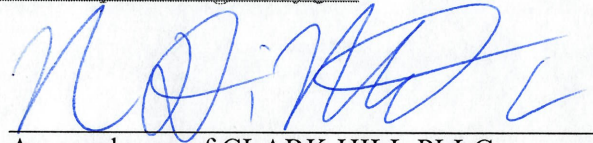
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27 <sup>2</sup>*Ex parte Garland*, 71 U.S. 333, 334, 18 L. Ed. 366 (1866).  
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**CERTIFICATE OF SERVICE**

The undersigned, an employee of Clark Hill PLLC, hereby certifies that on the 24th day of April, 2025, I served a copy of the **MICHELE FIORE'S MOTION TO VACATE SENTENCING DATE DUE TO THE EXECUTIVE GRANT OF CLEMENCY** via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

Alexander Byrne Gottfried [alexander.gottfried@usdoj.gov](mailto:alexander.gottfried@usdoj.gov)

Dahoud Askar [Dahoud.Askar@usdoj.gov](mailto:Dahoud.Askar@usdoj.gov), [heather.depremio2@usdoj.gov](mailto:heather.depremio2@usdoj.gov)



An employee of CLARK HILL PLLC

# EXHIBIT A

## Executive Grant of Clemency

# EXHIBIT A



# Executive Grant of Clemency

## Donald J. Trump

### *President of the United States of America*

TO ALL TO WHOM THESE PRESENTS SHALL COME, GREETING:

BE IT KNOWN, THAT THIS DAY, I, DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, PURSUANT TO MY POWERS UNDER ARTICLE II, SECTION 2, CLAUSE 1, OF THE CONSTITUTION, HAVE GRANTED UNTO THE INDIVIDUAL NAMED BELOW

A FULL AND UNCONDITIONAL PARDON

For those offenses against the United States individually enumerated and set before me for my consideration:

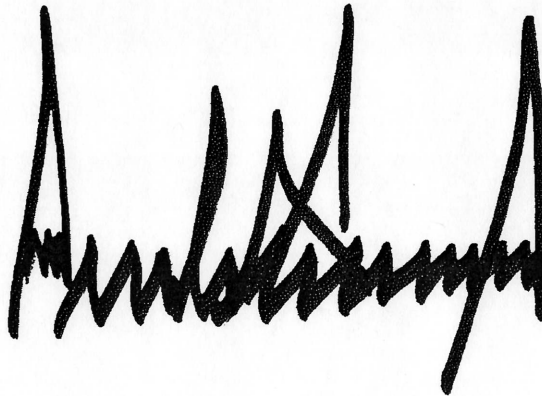
United States v. Fiore, 2:24-cr-155

MICHELE FIORE

I HEREBY DESIGNATE, direct, and empower the Attorney General, as my representative, to immediately sign the grant of clemency to the person named herein. The Attorney General shall declare that her action is the act of the President, being performed at my direction.

IN TESTIMONY WHEREOF, I have hereunto signed my name and  
caused the seal of the Department of Justice to be affixed.

*Done at the City of Washington in the  
District of Columbia this ~~23rd~~ day of  
April in the year of our Lord Two  
Thousand Twenty-five and of the  
Independence of the United States the  
Two Hundred and Forty-ninth.*

A handwritten signature in black ink, appearing to read "Donald Trump", with a large, stylized "D" and "T".

**DONALD J. TRUMP**  
**PRESIDENT**