

1 BEFORE THE STATE BOARD OF EDUCATION

2
3 JHONE EBERT, SUPERINTENDENT OF)
PUBLIC INSTRUCTION, DEPARTMENT)
4 OF EDUCATION, STATE OF NEVADA,)

CASE NO. 2024-05

5 Petitioner,)

6 v.)

7 ALIJAI FAISON,)

8 Respondent.)
9

10 **DECLARATION OF ANGIE CASTELLANOS**

11 I, ANGIE CASTELLANOS, declare that the following is true.

12 1. I am over the age of twenty-one (21) and competent to testify to the facts in
13 this Declaration.

14 2. I am employed by the State of Nevada, Department of Education as an
15 Administrative Assistant III, and I am assigned as the assistant to the State Board of
16 Education. I have been employed by the Department of Education since October, 2023.

17 3. Attached hereto are true and correct copies of the following Board of
18 Education documents as kept in the normal course of business: the Petition and
19 Recommendation for Revocation of License and Notice of Right to Hearing (“Petition and
20 Notice”), submitted as Exhibit “1A”; the certified mail receipt for service of the Petition
21 and Notice, submitted as Exhibit “1B”; the Notice of Intent to Consider Character,
22 Misconduct, Competence or Health of a Person (“Open Meeting Law Notice”), submitted
23 as Exhibit “1C”; and the certified mail receipt for service of the Open Meeting Law Notice,
24 submitted as Exhibit “1D”.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed on this 12 day of March, 2024.

27 *Angie Castellanos*
28 _____
ANGIE CASTELLANOS
Declarant

EXHIBIT LIST

Exhibit No.	Title	Pages
1A	Petition and Notice	21
1B	Certified Mail Receipt for service of the Petition and Notice	2
1C	Open Meeting Law Notice	2
1D	Certified Mail Receipt for service of the Open Meeting Law Notice	2

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EXHIBIT “1A”

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EXHIBIT “1A”

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BEFORE THE STATE BOARD OF EDUCATION

JHONE EBERT, SUPERINTENDENT OF)
PUBLIC INSTRUCTION, DEPARTMENT)
OF EDUCATION, STATE OF NEVADA,)

CASE NO. 2024-05

Petitioner,

v.

ALIJAI FAISON,

Respondent.

**PETITION AND RECOMMENDATION FOR REVOCATION OF LICENSE AND
NOTICE OF RIGHT TO HEARING**

Jhone Ebert, Superintendent of Public Instruction, Department of Education, State of Nevada ("Petitioner"), hereby petitions the State Board of Education for the revocation of the teacher license held by ALIJAI FAISON ("Respondent"), issued by the Nevada Department of Education. This Petition and Recommendation for Revocation of License and Notice of Right to Hearing ("Petition and Recommendation") is supported by NRS 391.320, NRS 391.330, and the following allegations:

I. Jurisdiction

Respondent was, at the relevant times mentioned in this Petition and Recommendation, the holder of License No. 95591 issued by the Superintendent of Public Instruction, Department of Education, State of Nevada, pursuant to the provisions of Chapter 391 of the Nevada Revised Statutes (the "License"). Such License is as follows: Substitute license for PK-12. The License expired on August 27, 2015. (A true and correct copy of the License is attached as Exhibit A).

Petitioner hereby files this Petition and Recommendation in her official capacity as Superintendent of Public Instruction, Department of Education, State of Nevada. See NRS 391.322. The State Board of Education may revoke or suspend Respondent's license,

1 if recommended by the Superintendent of Public Instruction or the Board of Trustees of a
2 School District, after notice and opportunity for hearing, based upon the NRS 391.330
3 grounds for suspension and revocation. See also NRS 391.320; NRS 391.322; NRS
4 391.330.

5 **II. Factual Allegations**

6 According to the Second Amended Information filed in the Eighth Judicial Court of
7 the State of Nevada, in and for Clark County, (a true and correct copy of which is
8 attached as Exhibit B) on or about August 6, 2019, Respondent did commit the crime of
9 Conspiracy to Commit Battery (Gross Misdemeanor – NRS 200.481, 199.480 – NOC
10 50243). This crime was committed by Respondent as he did willfully and unlawfully
11 conspire with an unknown individual to commit a battery and the Respondent and/or
12 conspirator(s) did willfully and unlawfully use force or violence upon another person by
13 shooting in the area of Everett Ramos.

14 On or about October 17, 2023, Respondent entered into a Guilty Plea Agreement (a
15 true and correct copy of which is attached as Exhibit C) pleading guilty to the crime of
16 Conspiracy to Commit Battery (Gross Misdemeanor – NRS 200.481, 199.480 – NOC
17 50243).

18 On or about December 5, 2023, the Eighth Judicial Court of the State of Nevada, in
19 and for Clark County, adjudged Respondent guilty of Conspiracy to Commit Battery
20 (Gross Misdemeanor – NRS 200.481, 199.480 – NOC 50243). (A true and correct copy of
21 the Judgment of Conviction is attached hereto as Exhibit D).

22 According to the Judgment of Conviction, the Court sentenced Respondent to credit
23 for time served and ordered Respondent to pay restitution in the amount of \$51,640.95 to
24 Everett Ramos.
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1 **III. Legal Allegations**

2 NRS391.330(1), states as follows in pertinent part:

3 (a) Unprofessional conduct.

4 . . .

5 (c) Evident unfitness for service.

6
7 By committing the acts that constituted the crime of Conspiracy to Commit Battery
8 (Gross Misdemeanor – NRS 200.481, 199.480 – NOC 50243) and being convicted of said
9 offense, Respondent has subjected Respondent’s license to revocation or suspension by
10 violation of the following:

11 (a) NRS 391.330(l)(a) Unprofessional conduct; and

12 (c) NRS 391.330(l)(c) evident unfitness for service.

13 **IV. Notice of Right to Hearing**

14 Respondent is hereby given notice of the recommendation by the Superintendent of
15 Public Instruction for the revocation of Respondent’s license. The protocol and procedure
16 for the suspension or revocation of a license are set forth in NRS 391.320 to 391.361,
17 inclusive. Respondent has the right to a hearing on this Petition and Recommendation
18 before a hearing officer, who will be selected pursuant to NRS 391.322, to answer the
19 allegations of the Petition and Recommendation and to present evidence and argument on
20 all issues involved, either personally or through an attorney.

21 If Respondent desires a hearing before a hearing officer, Respondent must file a
22 written request within **fifteen (15) days** from the receipt of this Petition and
23 Recommendation as provided in NRS 391.322. Respondent's request should be addressed
24 to the Superintendent of Public Instruction, Nevada Department of Education, 700 East
25 5th Street, Carson City, Nevada, 89701-5096 or via email at marakawa@doe.nv.gov. If
26 Respondent requests a hearing, a hearing officer will be selected pursuant to NRS
27 391.322, and that hearing officer will notify Respondent, in writing, of the time and
28

1 location of the hearing not less than ten (10) days before the hearing. If Respondent
2 requests a hearing and a hearing officer is selected, the procedures for the suspension or
3 revocation of licenses found in NAC 391.500 to 391.555, inclusive, will be followed as
4 appropriate. Pursuant to NAC 391.507, "[n]ot later than ten (10) days after a hearing
5 officer is selected pursuant to NRS 391.322, the holder of the license shall submit to the
6 hearing officer an answer to the allegations set forth" in this Petition and
7 Recommendation. If no request for a hearing is filed within the time specified, the State
8 Board of Education may suspend or revoke Respondent's license or take no action on the
9 recommendation.

10 WHEREFORE, Petitioner prays that the State Board of Education issue its
11 decision to revoke Respondent's license.

12 DATED: February 6, 2024

13
14 AARON D. FORD
15 Attorney General

16
17 By: /s/ David M. Gardner
18 DAVID M. GARDNER
19 Senior Deputy Attorney General
20 555 E. Washington Ave., Suite 3900
21 Las Vegas, Nevada 89101
22 (702) 486-5714
23 Attorneys for the State of Nevada,
24 Department of Education
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EXHIBIT LIST

Exhibit No.	Title	Pages
A	Respondent's License	1
B	Second Amended Information	2
C	Guilty Plea Agreement	7
D	Judgment of Conviction	2

EXHIBIT "A"

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EXHIBIT "A"

Search Results

First Name: Last Name: \$550

Active

- Personal
- Financial
- Education
- Apprenticeship History
- License
- Compliance
- Notes
- Log
- Documents
- Programs
- RFI
- Professional Development
- Legacy Data
- Hold

Status : No Pending Transactions

Profile: IndividualLicense

License

No license or provision is eligible to extend.

Current License/Endorsement

Kind	Endorsement	Type	Grade	Original	Effective	Expires	Status	Pathway	Extended	Action
										Add License/Endorsement

License/Endorsement History/Pending

Kind	Endorsement	Type	Grade	Original	Effective	Expires	Status	Pathway	Extended	Action
Substitute	Substitute	Provisional	PK-12	08/27/2012	08/27/2012	08/27/2015	Invalid (Invalid)		No	+ FROZ

Provisions

Type	License	Description	Required Date	Removal Date	Additional Text	Extended	Action
		Fingerprint Clearance	08/27/2013	12/26/2012		No	Add License Provision

EXHIBIT "B"

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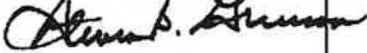
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EXHIBIT "B"



1 **AINF**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 CAROLINE C. MORALES
6 Chief Deputy District Attorney
7 Nevada Bar #0008854
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

CASE NO: C-21-356537-1

11 -vs-

DEPT NO: III

12 ALIJAI FAISON, aka,
13 Ali Jai Al-Zakar Faison, #1864674,
14 Defendant.

**SECOND A M E N D E D
I N F O R M A T I O N**

15 STATE OF NEVADA)
16 COUNTY OF CLARK) ss.

17 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State
18 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

19 That ALIJAI FAISON, aka, Ali Jai Al-Zakar Faison, the Defendant(s) above named,
20 having committed the crime of **CONSPIRACY TO COMMIT BATTERY (Gross**
21 **Misdemeanor - NRS 200.481, 199.480 - NOC 50243)** on or about the 6th day of August,
22 2019, within the County of Clark, State of Nevada, contrary to the form, force and effect of
23 statutes in such cases made and provided, and against the peace and dignity of the State of
24 Nevada, did willfully and unlawfully conspire with an unknown individual to commit a
25 battery, by the defendant(s) and/or the conspirator(s) did willfully and unlawfully use force

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or violence upon the person of another, to wit: EVERET RAMOS, by shooting in the area of
EVERET RAMOS.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY /s/ Caroline C. Morales
CAROLINE C. MORALES
Chief Deputy District Attorney
Nevada Bar #0008854



19FN2247X/jm/mlb/L5
NLVPD EV#1916064

EXHIBIT “C”

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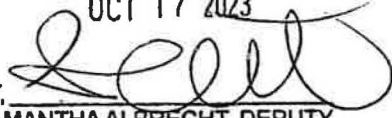
EXHIBIT “C”

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GPA
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
CAROLINE C. MORALES
Chief Deputy District Attorney
Nevada Bar #008854
200 Lewis Avenue
Las Vegas, NV 89155-2212
(702) 671-2500
Attorney for Plaintiff

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

OCT 17 2023

BY, 
SAMANTHA ALBRECHT, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA



THE STATE OF NEVADA,

Plaintiff,

-vs-

ALIJAI FAISON, aka,
Ali Jai Al-Zakar Faison, #1864674

Defendant.

CASE NO: C-21-356537-1
DEPT NO: III

GUILTY PLEA AGREEMENT

I hereby agree to plead guilty to: **CONSPIRACY TO COMMIT BATTERY (Gross Misdemeanor - NRS 200.481, 199.480 - NOC 50243)** as more fully alleged in the charging document attached hereto as Exhibit "1".

My decision to plead guilty is based upon the plea agreement in this case which is as follows:

The State will not oppose credit for time served. The Defendant agrees to pay restitution which will be determined at a later date to the named victim, Everet Ramos. If the Defendant successfully completes probation and receives an honorable discharge from probation, he may withdraw his guilty plea to the felony offense and plead guilty to Conspiracy to Commit Battery, a gross misdemeanor and receive credit for time served.

All remaining counts contained in the Criminal Complaint which were bound over to District Court shall be dismissed when Defendant is adjudged guilty and sentenced.

I agree to the forfeiture of any and all weapons or any interest in any weapons seized

1 and/or impounded in connection with the instant case and/or any other case negotiated in
2 whole or in part in conjunction with this plea agreement.

3 I understand and agree that, if I fail to interview with the Department of Parole and
4 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,
5 by affidavit review, confirms probable cause against me for new criminal charges including
6 reckless driving or DUI, but excluding minor traffic violations, the State will have the
7 unqualified right to argue for any legal sentence and term of confinement allowable for the
8 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have
9 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without
10 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite
11 twenty-five (25) year term with the possibility of parole after ten (10) years.

12 Otherwise I am entitled to receive the benefits of these negotiations as stated in this
13 plea agreement.

14 CONSEQUENCES OF THE PLEA

15 I understand that by pleading guilty I admit the facts which support all the elements of
16 the offense(s) to which I now plead as set forth in Exhibit "1".

17 I understand that as a consequence of my plea of guilty I may be imprisoned in the
18 Clark County Detention Center for a period of not more than three hundred sixty-four (364)
19 days and that I may be fined up to \$2,000.00. I understand that the law requires me to pay an
20 Administrative Assessment Fee.

21 I understand that, if appropriate, I will be ordered to make restitution to the victim of
22 the offense(s) to which I am pleading guilty and to the victim of any related offense which is
23 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to
24 reimburse the State of Nevada for any expenses related to my extradition, if any.

25 I understand that I am eligible for probation for the offense to which I am pleading
26 guilty. I understand that, except as otherwise provided by statute, the question of whether I
27 receive probation is in the discretion of the sentencing judge.

28 I understand that I must submit to blood and/or saliva tests under the Direction of the

1 Division of Parole and Probation to determine genetic markers and/or secretor status.

2 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,
3 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or
4 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation
5 and may receive a higher sentencing range.

6 I understand that if more than one sentence of imprisonment is imposed and I am
7 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order
8 the sentences served concurrently or consecutively.

9 I understand that information regarding charges not filed, dismissed charges, or charges
10 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

11 I have not been promised or guaranteed any particular sentence by anyone. I know that
12 my sentence is to be determined by the Court within the limits prescribed by statute.

13 I understand that if my attorney or the State of Nevada or both recommend any specific
14 punishment to the Court, the Court is not obligated to accept the recommendation.

15 I understand that if the offense(s) to which I am pleading guilty was committed while I
16 was incarcerated on another charge or while I was on probation or parole that I am not eligible
17 for credit for time served toward the instant offense(s).

18 I understand that if I am not a United States citizen, any criminal conviction will likely
19 result in serious negative immigration consequences including but not limited to:

- 20 1. The removal from the United States through deportation;
- 21 2. An inability to reenter the United States;
- 22 3. The inability to gain United States citizenship or legal residency;
- 23 4. An inability to renew and/or retain any legal residency status; and/or
- 24 5. An indeterminate term of confinement, with the United States Federal
25 Government based on my conviction and immigration status.

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1 Regardless of what I have been told by any attorney, no one can promise me that this
2 conviction will not result in negative immigration consequences and/or impact my ability to
3 become a United States citizen and/or a legal resident.

4 I understand that the Division of Parole and Probation will prepare a report for the
5 sentencing judge prior to sentencing. This report will include matters relevant to the issue of
6 sentencing, including my criminal history. This report may contain hearsay information
7 regarding my background and criminal history. My attorney and I will each have the
8 opportunity to comment on the information contained in the report at the time of sentencing.
9 Unless the District Attorney has specifically agreed otherwise, the District Attorney may also
10 comment on this report.

11 WAIVER OF RIGHTS

12 By entering my plea of guilty, I understand that I am waiving and forever giving up the
13 following rights and privileges:

- 14 1. The constitutional privilege against self-incrimination, including the right
15 to refuse to testify at trial, in which event the prosecution would not be
 allowed to comment to the jury about my refusal to testify.
- 16 2. The constitutional right to a speedy and public trial by an impartial jury,
17 free of excessive pretrial publicity prejudicial to the defense, at which
18 trial I would be entitled to the assistance of an attorney, either appointed
 or retained. At trial the State would bear the burden of proving beyond
 a reasonable doubt each element of the offense(s) charged.
- 19 3. The constitutional right to confront and cross-examine any witnesses who
20 would testify against me.
- 21 4. The constitutional right to subpoena witnesses to testify on my behalf.
- 22 5. The constitutional right to testify in my own defense.
- 23 6. The right to appeal the conviction with the assistance of an attorney,
24 either appointed or retained, unless specifically reserved in writing and
25 agreed upon as provided in NRS 174.035(3). I understand this means I
26 am unconditionally waiving my right to a direct appeal of this conviction,
27 including any challenge based upon reasonable constitutional,
28 jurisdictional or other grounds that challenge the legality of the
 proceedings as stated in NRS 177.015(4). However, I remain free to
 challenge my conviction through other post-conviction remedies
 including a habeas corpus petition pursuant to NRS Chapter 34.

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1 VOLUNTARINESS OF PLEA

2 I have discussed the elements of all of the original charge(s) against me with my
3 attorney and I understand the nature of the charge(s) against me.

4 I understand that the State would have to prove each element of the charge(s) against
5 me at trial.

6 I have discussed with my attorney any possible defenses, defense strategies and
7 circumstances which might be in my favor.

8 All of the foregoing elements, consequences, rights, and waiver of rights have been
9 thoroughly explained to me by my attorney.


10 I believe that pleading guilty and accepting this plea bargain is in my best interest, and
11 that a trial would be contrary to my best interest.

12 I am signing this agreement voluntarily, after consultation with my attorney, and I am
13 not acting under duress or coercion or by virtue of any promises of leniency, except for those
14 set forth in this agreement.


15 I am not now under the influence of any intoxicating liquor, a controlled substance or
16 other drug which would in any manner impair my ability to comprehend or understand this
17 agreement or the proceedings surrounding my entry of this plea.

18 My attorney has answered all my questions regarding this guilty plea agreement and its
19 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

20 DATED this 17 day of October, 2023.

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22 
23 _____
24 ALIJAI FAISON, aka,
25 Ali Jai Al-Zakar Faison
26 Defendant

24 AGREED TO BY:

25  10051 for
26 _____
27 CAROLINE C. MORALES
28 Chief/Deputy District Attorney
Nevada Bar #008854

1 CERTIFICATE OF COUNSEL:

2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court
3 hereby certify that:

- 4 1. I have fully explained to the Defendant the allegations contained in the
5 charge(s) to which guilty pleas are being entered.
- 6 2. I have advised the Defendant of the penalties for each charge and the restitution
7 that the Defendant may be ordered to pay.
- 8 3. I have inquired of Defendant facts concerning Defendant's immigration status
9 and explained to Defendant that if Defendant is not a United States citizen any
10 criminal conviction will most likely result in serious negative immigration
11 consequences including but not limited to:
- 12 a. The removal from the United States through deportation;
 - 13 b. An inability to reenter the United States;
 - 14 c. The inability to gain United States citizenship or legal residency;
 - 15 d. An inability to renew and/or retain any legal residency status; and/or
 - 16 e. An indeterminate term of confinement, by with United States Federal
17 Government based on the conviction and immigration status.

18 Moreover, I have explained that regardless of what Defendant may have been
19 told by any attorney, no one can promise Defendant that this conviction will not
20 result in negative immigration consequences and/or impact Defendant's ability
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of guilty offered by the Defendant pursuant to this agreement are
23 consistent with the facts known to me and are made with my advice to the
24 Defendant.
- 25 5. To the best of my knowledge and belief, the Defendant:
- 26 a. Is competent and understands the charges and the consequences of
27 pleading guilty as provided in this agreement,
 - 28 b. Executed this agreement and will enter all guilty pleas pursuant hereto
voluntarily, and
 - c. Was not under the influence of intoxicating liquor, a controlled
substance or other drug at the time I consulted with the Defendant as
certified in paragraphs 1 and 2 above.

Dated: This 17 day of October, 2023.

AMANDA PELLIZZARI, ESQ.

jm/mlb/L5



EXHIBIT “D”

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DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,

-vs-

ALIJAI FAISON,
#1864674

Defendant.

CASE NO: C-21-356537-1

DEPT NO: III

**JUDGMENT OF CONVICTION
(PLEA OF GUILTY)**

The defendant previously appeared before the Court with counsel and entered a plea of guilty to the crime(s) of CONSPIRACY TO COMMIT BATTERY (Gross Misdemeanor), in violation of NRS 200.481, 199.480; thereafter, on the 17th day of October, 2023, the defendant was present in court for sentencing with counsel, Amanda Pellizzari, and good cause appearing,

THE DEFENDANT WAS HEREBY ADJUDGED guilty of said offense(s) and, in addition to the \$25.00 Administrative Assessment fee and \$3.00 DNA Collection fee, Defendant SENTENCED to CREDIT FOR TIME SERVED; trial VACATED. Court to retain jurisdiction as to the restitution and FURTHER ORDERED, status check SET. Court advised Defendant's presence was waived for the status check or he could appear by Bluejeans. BOND, if any, EXONERATED.

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THEREAFTER, and on the 16th day of November, 2023, the defendant's counsel Amanda Pellizzari appeared, COURT ORDERED, RESTITUTION in the amount of \$51,640.95 to be paid to Everett Ramos.

Dated this 5th day of December, 2023

Carli Kierny

D73 B24 479F 6948
Carli Kierny
District Court Judge

Thomas A. Higgins

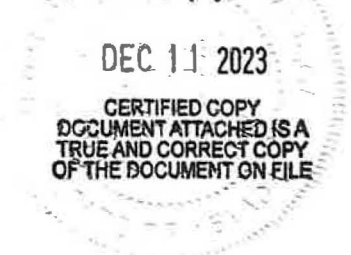


EXHIBIT “1B”

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EXHIBIT “1B”

Tracking Number:

[Remove X](#)

7021095000028787691

[Copy](#)

[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

Latest Update

Your item was picked up at a postal facility at 10:03 am on February 13, 2024 in LAS VEGAS, NV 89128.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Individual Picked Up at Postal Facility

LAS VEGAS, NV 89128

February 13, 2024, 10:03 am

Notice Left (No Authorized Recipient Available)

LAS VEGAS, NV 89128

February 8, 2024, 3:22 pm

Departed USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

February 7, 2024, 8:38 am

Arrived at USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

February 6, 2024, 10:42 pm

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Product Information



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Need More Help?

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FAQs

EXHIBIT “1C”

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EXHIBIT “1C”

**NOTICE OF INTENT TO CONSIDER CHARACTER, MISCONDUCT,
COMPETENCE OR HEALTH OF A PERSON. NRS 241.033**

STATE BOARD OF EDUCATION

700 E. Fifth Street
Carson City, NV 89701
Phone: (775) 687-9115

March 1, 2024

Via Certified Mail
7020 2450 0001 1950 7382

Alijai Faison
1504 Couples Street
Las Vegas, NV 89128

**Re: Notice of meeting of the State Board of Education to consider
your character, alleged misconduct, competence, or health.**

Dear Mr. Faison:

In connection with your teacher license, a Petition and Recommendation for Revocation of License and Notice of Right to Hearing (“Petition and Notice”) was filed with the State Board of Education (“Board”) and mailed to you via certified mail. The Petition and Notice informed you of your right to request a hearing before a hearing officer by filing a written request within fifteen days from receipt of the Petition and Notice. Enclosed for your convenience is a copy of the Petition and Notice.

As you have failed to request such a hearing, the Board will be requested to move forward with revocation of your license and may consider your character, alleged misconduct, competence, or health at its meeting on **March 27, 2024**. **The meeting will begin at 2:00 p.m. at 700 E. Fifth Street in Carson City, Nevada and 2080 E. Flamingo Rd, Suite 210, Las Vegas, Nevada.** The meeting is a public meeting, and you and/or your legal counsel are welcome to attend at either location. The Board may go into closed session or remain in an open meeting to consider the following general topics: your teacher license; the Petition and Notice; the Judgment of Conviction; and matters properly related thereto. You are welcome to attend the closed session and/or open meeting, have an attorney or other representative of your choosing present during the closed session and/or open meeting and present written evidence, provide testimony, and present witnesses relating to your character, alleged misconduct, professional competence, or physical or mental health.

Alijai Faison
March 1, 2024
Page 2

If the Board determines it necessary, after considering your character, alleged misconduct, professional competence, or physical or mental health, whether in a closed meeting or open meeting, it may also take administrative action against you at this meeting, which could include suspending or revoking your teacher license. This informational statement is in lieu of any notice that may be required pursuant to NRS 241.034.

This notice is provided to you under NRS 241.033 and NRS 241.034.

Sincerely,

/s/ Angie Castellanos
Angie Castellanos
Board Secretary

EXHIBIT “1D”

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EXHIBIT “1D”

Tracking Number:

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[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

Latest Update

Your item was delivered to the front desk, reception area, or mail room at 3:02 pm on March 4, 2024 in LAS VEGAS, NV 89101.

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USPS Tracking Plus®

Delivered

Delivered, Front Desk/Reception/Mail Room

LAS VEGAS, NV 89101

March 4, 2024, 3:02 pm

In Transit to Next Facility

March 2, 2024

Arrived at USPS Regional Facility

LAS VEGAS NV DISTRIBUTION CENTER

March 1, 2024, 11:21 pm

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Text & Email Updates



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Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

1 BEFORE THE STATE BOARD OF EDUCATION

2
3 JHONE EBERT, SUPERINTENDENT OF)
4 PUBLIC INSTRUCTION, DEPARTMENT)
OF EDUCATION, STATE OF NEVADA,)

CASE NO. 2024-05

5 Petitioner,)

6 v.)

7 ALIJAI FAISON,)

8 Respondent.)

9
10 **DECLARATION OF MICHAEL ARAKAWA**

11 I, MICHAEL ARAKAWA, declare that the following is true.

12 1. I am over the age of twenty-one (21) and competent to testify to the facts in this
13 Declaration.

14 2. I am employed by the State of Nevada, Department of Education, as a Chief
15 Compliance Investigator. I have been employed by the Department of Education since
16 July, 2014.

17 3. Attached hereto as Exhibit "2A" is a true and correct copy of Respondent's
18 License.

19 4. Attached hereto as Exhibit "2B" is a true and correct copy of the Second
20 Amended Information.

21 5. Attached hereto as Exhibit "2C" is a true and correct copy of the Guilty
22 Plea Agreement.

23 6. Attached hereto as Exhibit "2D" is a true and correct copy of the Judgment of
24 Conviction.

25 7. These documents are kept by the Department of Education in the normal course
26 of business.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 12 day of March, 2024.



MICHAEL ARAKAWA
Declarant

EXHIBIT LIST

Exhibit No.	Title	Pages
2A	Respondent's License	1
2B	Second Amended Information	2
2C	Guilty Plea Agreement	7
2D	Judgment of Conviction	2

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EXHIBIT “2A”

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EXHIBIT “2A”

Last Name	First Name	Certificate#
Faison	All Jai	95591

- Personal
- Financial
- Education
- Application History
- License
- Compliance
- Notes
- Log
- Documents
- Programs
- NEPF
- Professional Development
- Legacy Data
- Hold

Status : No Pending Transactions 👤 +

Profile: IndividualInfo_license

License

No license or provision is eligible to extend 👁 ✉

Current License/Endorsement

Add LicenseKind/Endorsement

Kind	Endorsement	Type	Grade	Original	Effective	Expires	Status	Pathway	Extended	Action
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License/Endorsement History/Pending

Kind	Endorsement	Type	Grade	Original	Effective	Expires	Status	Pathway	Extended	Action
Substitute	Substitute	Provisional	PK-12	08/27/2012	08/27/2012	08/27/2015	Invalid (Invalid)		No	+ Prov ✎ 🗑

Provisions

Add License Provision

Type	Endorsement	Description	Required Date	Removal Date	Additional Text	Extended	Action
License		Fingerprint Clearance	08/27/2013	12/28/2012		No	✎ 🗑

EXHIBIT “2B”

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EXHIBIT “2B”



1 **AINF**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 CAROLINE C. MORALES
6 Chief Deputy District Attorney
7 Nevada Bar #0008854
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10 Plaintiff,

CASE NO: C-21-356537-1

11 -vs-

DEPT NO: III

12 ALIJAI FAISON, aka,
13 Ali Jai Al-Zakar Faison, #1864674,
14 Defendant.

**SECOND AMENDED
INFORMATION**

15 STATE OF NEVADA }
16 COUNTY OF CLARK } ss.

17 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State
18 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

19 That ALIJAI FAISON, aka, Ali Jai Al-Zakar Faison, the Defendant(s) above named,
20 having committed the crime of **CONSPIRACY TO COMMIT BATTERY (Gross**
21 **Misdemeanor - NRS 200.481, 199.480 - NOC 50243)** on or about the 6th day of August,
22 2019, within the County of Clark, State of Nevada, contrary to the form, force and effect of
23 statutes in such cases made and provided, and against the peace and dignity of the State of
24 Nevada, did willfully and unlawfully conspire with an unknown individual to commit a
25 battery, by the defendant(s) and/or the conspirator(s) did willfully and unlawfully use force

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or violence upon the person of another, to wit: EVERET RAMOS, by shooting in the area of
EVERET RAMOS.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY /s/ Caroline C. Morales
CAROLINE C. MORALES
Chief Deputy District Attorney
Nevada Bar #0008854



19FN2247X/jm/mlb/L5
NLVPD EV#1916064

EXHIBIT “2C”

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EXHIBIT “2C”

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

OCT 17 2023

BY, 
SAMANTHA ALBRECHT, DEPUTY

1 **GPA**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 CAROLINE C. MORALES
6 Chief Deputy District Attorney
7 Nevada Bar #008854
8 200 Lewis Avenue
9 Las Vegas, NV 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

C-21-356537-1
GPA
Guilty Plea Agreement
5061469



9 THE STATE OF NEVADA,
10
11 Plaintiff,

11 -vs-

CASE NO: C-21-356537-1

12 ALIJAI FAISON, aka,
13 Ali Jai Al-Zakar Faison, #1864674

DEPT NO: III

14 Defendant.

15 GUILTY PLEA AGREEMENT

16 I hereby agree to plead guilty to: **CONSPIRACY TO COMMIT BATTERY (Gross**
17 **Misdemeanor - NRS 200.481, 199.480 - NOC 50243)** as more fully alleged in the charging
18 document attached hereto as Exhibit "1".

19 My decision to plead guilty is based upon the plea agreement in this case which is as
20 follows:

21 The State will not oppose credit for time served. The Defendant agrees to pay
22 restitution which will be determined at a later date to the named victim, Everet Ramos. If the
23 Defendant successfully completes probation and receives an honorable discharge from
24 probation, he may withdraw his guilty plea to the felony offense and plead guilty to Conspiracy
25 to Commit Battery, a gross misdemeanor and receive credit for time served.

26 All remaining counts contained in the Criminal Complaint which were bound over to
27 District Court shall be dismissed when Defendant is adjudged guilty and sentenced.

28 I agree to the forfeiture of any and all weapons or any interest in any weapons seized

1 and/or impounded in connection with the instant case and/or any other case negotiated in
2 whole or in part in conjunction with this plea agreement.

3 I understand and agree that, if I fail to interview with the Department of Parole and
4 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,
5 by affidavit review, confirms probable cause against me for new criminal charges including
6 reckless driving or DUI, but excluding minor traffic violations, the State will have the
7 unqualified right to argue for any legal sentence and term of confinement allowable for the
8 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have
9 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without
10 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite
11 twenty-five (25) year term with the possibility of parole after ten (10) years.

12 Otherwise I am entitled to receive the benefits of these negotiations as stated in this
13 plea agreement.

14 CONSEQUENCES OF THE PLEA

15 I understand that by pleading guilty I admit the facts which support all the elements of
16 the offense(s) to which I now plead as set forth in Exhibit "1".

17 I understand that as a consequence of my plea of guilty I may be imprisoned in the
18 Clark County Detention Center for a period of not more than three hundred sixty-four (364)
19 days and that I may be fined up to \$2,000.00. I understand that the law requires me to pay an
20 Administrative Assessment Fee.

21 I understand that, if appropriate, I will be ordered to make restitution to the victim of
22 the offense(s) to which I am pleading guilty and to the victim of any related offense which is
23 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to
24 reimburse the State of Nevada for any expenses related to my extradition, if any.

25 I understand that I am eligible for probation for the offense to which I am pleading
26 guilty. I understand that, except as otherwise provided by statute, the question of whether I
27 receive probation is in the discretion of the sentencing judge.

28 I understand that I must submit to blood and/or saliva tests under the Direction of the

1 Division of Parole and Probation to determine genetic markers and/or secretor status.

2 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,
3 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or
4 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation
5 and may receive a higher sentencing range.

6 I understand that if more than one sentence of imprisonment is imposed and I am
7 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order
8 the sentences served concurrently or consecutively.

9 I understand that information regarding charges not filed, dismissed charges, or charges
10 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

11 I have not been promised or guaranteed any particular sentence by anyone. I know that
12 my sentence is to be determined by the Court within the limits prescribed by statute.

13 I understand that if my attorney or the State of Nevada or both recommend any specific
14 punishment to the Court, the Court is not obligated to accept the recommendation.

15 I understand that if the offense(s) to which I am pleading guilty was committed while I
16 was incarcerated on another charge or while I was on probation or parole that I am not eligible
17 for credit for time served toward the instant offense(s).

18 I understand that if I am not a United States citizen, any criminal conviction will likely
19 result in serious negative immigration consequences including but not limited to:

- 20 1. The removal from the United States through deportation;
- 21 2. An inability to reenter the United States;
- 22 3. The inability to gain United States citizenship or legal residency;
- 23 4. An inability to renew and/or retain any legal residency status; and/or
- 24 5. An indeterminate term of confinement, with the United States Federal
Government based on my conviction and immigration status.

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1 VOLUNTARINESS OF PLEA

2 I have discussed the elements of all of the original charge(s) against me with my
3 attorney and I understand the nature of the charge(s) against me.

4 I understand that the State would have to prove each element of the charge(s) against
5 me at trial.

6 I have discussed with my attorney any possible defenses, defense strategies and
7 circumstances which might be in my favor.

8 All of the foregoing elements, consequences, rights, and waiver of rights have been
9 thoroughly explained to me by my attorney.


10 I believe that pleading guilty and accepting this plea bargain is in my best interest, and
11 that a trial would be contrary to my best interest.

12 I am signing this agreement voluntarily, after consultation with my attorney, and I am
13 not acting under duress or coercion or by virtue of any promises of leniency, except for those
14 set forth in this agreement.

15 I am not now under the influence of any intoxicating liquor, a controlled substance or
16 other drug which would in any manner impair my ability to comprehend or understand this
17 agreement or the proceedings surrounding my entry of this plea.

18 My attorney has answered all my questions regarding this guilty plea agreement and its
19 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

20 DATED this 17 day of October, 2023.

21
22 
23 _____
24 ALIJAI FAISON, aka,
25 Ali Jai Al-Zakar Faison
26 Defendant

24 AGREED TO BY:

25 
26 _____
27 CAROLINE C. MORALES
28 Chief/Deputy District Attorney
Nevada Bar #008854

1 CERTIFICATE OF COUNSEL:

2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court
3 hereby certify that:

- 4 1. I have fully explained to the Defendant the allegations contained in the
5 charge(s) to which guilty pleas are being entered.
6 2. I have advised the Defendant of the penalties for each charge and the restitution
7 that the Defendant may be ordered to pay.
8 3. I have inquired of Defendant facts concerning Defendant's immigration status
9 and explained to Defendant that if Defendant is not a United States citizen any
10 criminal conviction will most likely result in serious negative immigration
11 consequences including but not limited to:
12 a. The removal from the United States through deportation;
13 b. An inability to reenter the United States;
14 c. The inability to gain United States citizenship or legal residency;
15 d. An inability to renew and/or retain any legal residency status; and/or
16 e. An indeterminate term of confinement, by with United States Federal
17 Government based on the conviction and immigration status.

18 Moreover, I have explained that regardless of what Defendant may have been
19 told by any attorney, no one can promise Defendant that this conviction will not
20 result in negative immigration consequences and/or impact Defendant's ability
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of guilty offered by the Defendant pursuant to this agreement are
23 consistent with the facts known to me and are made with my advice to the
24 Defendant.
25 5. To the best of my knowledge and belief, the Defendant:
26 a. Is competent and understands the charges and the consequences of
27 pleading guilty as provided in this agreement,
28 b. Executed this agreement and will enter all guilty pleas pursuant hereto
voluntarily, and
c. Was not under the influence of intoxicating liquor, a controlled
substance or other drug at the time I consulted with the Defendant as
certified in paragraphs 1 and 2 above.

29 Dated: This 17 day of October, 2023.

30 AMANDA PELLIZZARI, ESQ.

31 jm/mlb/L5



EXHIBIT “2D”

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EXHIBIT “2D”

Amanda Pellizzari
CLERK OF THE COURT

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JOC

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

ALIJAI FAISON,
#1864674

Defendant.

CASE NO: C-21-356537-1

DEPT NO: III

JUDGMENT OF CONVICTION

(PLEA OF GUILTY)

The defendant previously appeared before the Court with counsel and entered a plea of guilty to the crime(s) of CONSPIRACY TO COMMIT BATTERY (Gross Misdemeanor), in violation of NRS 200.481, 199.480; thereafter, on the 17th day of October, 2023, the defendant was present in court for sentencing with counsel, Amanda Pellizzari, and good cause appearing,

THE DEFENDANT WAS HEREBY ADJUDGED guilty of said offense(s) and, in addition to the \$25.00 Administrative Assessment fee and \$3.00 DNA Collection fee, Defendant SENTENCED to CREDIT FOR TIME SERVED; trial VACATED. Court to retain jurisdiction as to the restitution and FURTHER ORDERED, status check SET. Court advised Defendant's presence was waived for the status check or he could appear by Bluejeans. BOND, if any, EXONERATED.

//

//

1 THEREAFTER, and on the 16th day of November, 2023, the defendant's counsel
2 Amanda Pellizzari appeared, COURT ORDERED, RESTITUTION in the amount of
3 \$51,640.95 to be paid to Everett Ramos.

4
5 Dated this 5th day of December, 2023

6 *Carli Kierny*
7 _____

8 D73 B24 479F 6948
9 Carli Kierny
10 District Court Judge

