

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

JOHN LEE WILLIAMS,
Appellant,
vs.
THE STATE OF NEVADA,
Respondent.

No. 90593-COA

FILED

MAR 09 2026

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK

ORDER OF AFFIRMANCE

John Lee Williams appeals from a district court order revoking probation and second amended judgment of conviction. Eighth Judicial District Court, Clark County; Eric Johnson, Judge.

Williams argues the district court erred in revoking his good time credits earned while on probation. In particular, Williams contends the revocation of credits was tantamount to the extension of probation and, thus, he was entitled to be present when the district court revoked his credits. He further contends that, by revoking his credits in his absence, the district court denied him the opportunity to contest the revocation.

Generally, a probationer is entitled to 10 days' credit toward the period of their probation for each month they are current on their supervision fees and restitution payments and for each month they serve and are actively involved in employment or enrolled in a program approved by the Division of Parole and Probation (Division). NRS 176A.500(6). However, a district court may forfeit all or part of such credits "after proof of the violation and notice to the probationer." NRS 176A.635(1)-(2).

As an initial matter, we reject Williams' contention that the district court extended the period of probation by revoking his credits. The

district court revoked Williams' credits in its March 27, 2025, minute order. In doing so, the district court did not alter or extend Williams' probationary term, which remained an indeterminate period not to exceed two years. *Cf.* NRS 176A.500(1) (permitting a district court to extend a probationary term so long as the period of probation, and any extensions thereof, do not exceed certain limits).

Nonetheless, even assuming the district court erred in revoking Williams' credits, we conclude any such error was harmless.¹ *See United States v. Havier*, 155 F.3d 1090, 1092 (9th Cir. 1998) ("A due process violation at a revocation proceeding is subject to harmless error analysis."). The district court subsequently held a probation revocation hearing, during which Williams stipulated to the alleged violations of probation. As a result, the district court revoked Williams' probation and imposed a modified prison sentence. Because probationary credits only apply to reduce the period of probation, *see* NRS 176A.500(6), and because the district court revoked Williams' probation in its entirety, the revocation of credits had no effect on the duration of time Williams had to serve under the imposed prison sentence. And Williams does not contend the district court erred in

¹We reject Williams' claim that the erroneous revocation of his probationary good time credits constitutes "structural error." The Nevada and United States Supreme Courts have recognized that "structural errors arise only in a very limited class of cases," *Cortinas v. State*, 124 Nev. 1013, 1024 & n.41, 195 P.3d 315, 322-23 & n.41 (2008) (internal quotation marks omitted); *Washington v. Recuenco*, 548 U.S. 212, 218 (2006), and Williams cites no authority to support the proposition that a due process violation in probation revocation proceedings falls within this limited class of cases, *see Washington*, 548 U.S. at 218 (recognizing that "most constitutional errors can be harmless" (quotation marks omitted)).

revoking his probation. Therefore, we conclude Williams is not entitled to relief on this claim.

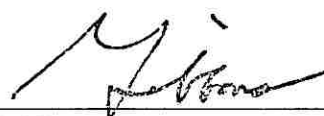
Williams also argues the district court violated the separation of powers doctrine by ordering or directing the Division to withdraw its dishonorable discharge recommendation and to file a probation violation report. Williams did not object on this ground below, and he does not argue plain error on appeal. *See Martinorellan v. State*, 131 Nev. 43, 48, 343 P.3d 590, 593 (2015) (stating “all unpreserved errors are to be reviewed for plain error without regard as to whether they are of constitutional dimension”). Specifically, he does not argue that the alleged error is “clear under current law from a casual inspection of the record.” *Jeremias v. State*, 134 Nev. 46, 50, 412 P.3d 43, 48 (2018). We thus conclude Williams has forfeited this claim, and we decline to review it on appeal. *See Miller v. State*, 121 Nev. 92, 99, 110 P.3d 53, 58 (2005) (stating it is the appellant’s burden to demonstrate plain error); *see also State v. Eighth Jud. Dist. Ct. (Doane)*, 138 Nev. 896, 900, 521 P.3d 1215, 1221 (2022) (recognizing the Nevada appellate courts “follow the principle of party presentation” and thus “rely on the parties to frame the issues for decisions and assign to courts the role of neutral arbiter of matters the parties present” (quoting *Greenlaw v. United States*, 554 U.S. 237, 243 (2008))); *Senjab v. Alhulaibi*, 137 Nev. 632, 633-34, 497 P.3d 618, 619 (2021) (“We will not supply an argument on a party’s behalf but review only the issues the parties present.”).

In light of the foregoing,² we

²To the extent Williams contends the Division lacked authority to file a probation violation report or the district court lacked jurisdiction to revoke his credits because his probationary period had expired, Williams did not allege when his probationary period began or expired or how many credits

ORDER the order for revocation of probation and second amended judgment of conviction AFFIRMED.


_____, C.J.
Bulla


_____, J.
Gibbons


_____, J.
Westbrook

cc: Hon. Eric Johnson, District Judge
Legal Resource Group
Attorney General/Carson City
Clark County District Attorney
Eighth District Court Clerk

he had earned while on probation, nor did he provide any relevant authority regarding a district court's continuing jurisdiction in probation revocation proceedings. Therefore, Williams fails to cogently argue this claim, and we decline to consider it. *See Maresca v. State*, 103 Nev. 669, 673, 748 P.2d 3, 6 (1987) (explaining this court need not consider issues unaccompanied by cogent argument and relevant authority).