

4. Attach two copies of all documents or items you believe provide credible evidence to support your allegations. NRS 281A.440.2(b)(1) requires you to submit all related evidence to support your allegations. NAC 281A.435.3 defines credible evidence as a minimal level of any reliable and competent form of proof provided by witnesses, records, documents, exhibits, minutes, agendas, videotapes, photographs, concrete objects, or other similar items that would reasonably support the allegations made within the complaint. Credible evidence does not include a newspaper article or other media report if the article or report is offered by itself.

State the total number of additional pages attached (including evidence) 7.

REQUESTOR'S INFORMATION:

| | |
|---|--|
| NAME: <u>Nevada Republican Party</u> | E-MAIL: <u>info@nevadarepub.org</u> |
| ADDRESS: <u>6655 Sathy Tenaya Way #120</u> | |
| CITY, STATE, ZIP: <u>Las Vegas, NV 89113</u> | |
| TELEPHONE: <u>(702) 250-9182</u> | CELL PHONE: <u>(775) 267-3784</u> |

By my signature below, I do affirm that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief and I am willing to provide sworn testimony if necessary regarding these allegations.

Sherry Dilley _____ April 16, 2010
 Signature Date
 Print Name: SHERY (SHARONANNE) DILLEY

Please return an original signed form, two copies of the form, and three copies of the supporting documents and evidence to:

Executive Director
 Nevada Commission on Ethics
 3476 Executive Pointe Way, Suite 10
 Carson City, Nevada 89706

Ethics complaints submitted by facsimile will not be considered as properly filed with the Commission.
NAC 281A.255.3

APR 16 2010

COMMISSION
ON ETHICS**Summary of Complaint Against State Treasurer Kate Marshall**

When filing necessary paperwork for candidacy with the Secretary of State, State Treasurer Kate Marshall provided the phone number for her public office as the contact number for her political campaign.

To support these claims, the Nevada Republican Party has provided screenshots of the Secretary of State's website (Exhibit A), where Ms. Marshall is listed as a candidate for State Treasurer, along with her contact phone number. The Nevada Republican Party has also provided official communications from the State Treasurer's office (Exhibit B) to illustrate that the State Treasurer's office phone number and the campaign contact phone number provided by Marshall are, in fact, the same number.

We also have documentation of phone calls made to the Treasurer's office (Exhibit C) for the purpose of campaign related questions, and the subsequent conversations, which included State Treasurer employees providing campaign and reelection information to callers.

Furthermore, The Nevada Republican Party will be providing, once our formal Public Records Request has been fulfilled by the Secretary of State's office, copies of the original documents filed by Marshall in which she submits, with her signature, the State Treasurer's office phone number as a campaign contact number (Exhibit D).

It is the contention of the Nevada Republican Party that by providing her public office phone number to the Secretary of State as a campaign contact, as well as conducting campaign-related business from the State Treasurer's office, Ms. Marshall has violated Nevada Revised Statute 281A.520 which states:

“Public officer or employee prohibited from requesting or otherwise causing governmental entity to incur expense or make expenditure to support or oppose ballot question or candidate in certain circumstances.”

The Nevada Republican Party also contends Ms. Marshall's actions are in violation of Nevada Revised Statute 281A.400(2) and (7) which state, respectively:

“A public officer or employee shall not use the public officer's or employee's position in government to secure or grant unwarranted privileges, preferences, exemptions or advantages for the public officer or employee, any business entity in which the public officer or employee has a significant pecuniary interest, or any person to whom the public officer or employee has a commitment in a private capacity to the interests of that person.”

“...A public officer or employee shall not use governmental time, property, equipment or other facility to benefit the public officer's or employee's personal or financial interest.”

The Nevada Republican Party requests that the Ethics Commission consider these claims and the evidence presented, and further investigate the violations committed by Ms. Marshall.

A

Nevada Secretary of State : 2010 Filed Candidates

http://nvsos.gov/index.aspx?page=337

SECRETARY OF STATE

| CANDIDATE'S NAME | ADDRESS & PHONE | PARTY | DATE FILED | DATE WITHDRAWN: |
|--|---|----------------------|------------|-----------------|
|  Rob Lauer | 2654 W. Horizon Ridge BS-266 Henderson, NV 89139 (702) 539-8000 | Republican | 03/03/2010 | |
|  Ross Miller | 570 Alydar Ct. Reno, NV 89521 (775) 684-5709 | Democrat | 03/01/2010 | |
|  John Wagner | 780 Norfolk Dr. Carson City, NV 89703 (775) 883-2752 | Independent American | 03/10/2010 | |

STATE TREASURER

| CANDIDATE'S NAME | ADDRESS & PHONE | PARTY | DATE FILED | DATE WITHDRAWN: |
|--|--|----------------------|------------|-----------------|
|  Mike Hawkins | 186 Ryndon #12 Elko, NV 89801 (775) 397-6860 | Independent American | 03/10/2010 | |
|  Kate Marshall | 570 Marsh Ave. Reno, NV 89509 (775) 684-7109 | Democrat | 03/01/2010 | |
|  Steven E. Martin | 7700 W. Wigwam Ave. Las Vegas, NV 89113 (702) 617-9954 | Republican | 03/03/2010 | |

Kate Marshall
State Treasurer



Cecilia G. Colling
Chief of Staff

Mark Winebarger
Chief Deputy Treasurer

STATE OF NEVADA
OFFICE OF THE STATE TREASURER

September 17, 2009

RE: Unclaimed Property Money Transferred to General Fund

Dear Member of the Legislature:

I am pleased to report that as the state continues to face ongoing budget problems associated with lower-than-expected revenues, the State Treasurer's Office, Unclaimed Property Division, recently transferred \$50,092,049 to the state General Fund, an increase of almost \$12 million more than projected as part of the April 2009 Economic Forum presentation. This 23% increase includes the \$7.6 million that would normally have been transferred from the Unclaimed Property Division to the Gov. Guinn Millennium Scholarship Fund, leaving an additional \$4.3 million in new money that will be available to the state to assist in filling present financial holes.

In addition, my office returned more than \$25 million in unclaimed property to its rightful owners this past fiscal year, while in Fiscal Year 2008, the Unclaimed Property Division returned slightly under \$25 million. By comparison, \$7.2 million was returned in Fiscal Year 2006. Thus, over the last two fiscal years, we have been able to triple our return to owners. For a better understanding of how these returns directly affect your constituents, I have included in this correspondence a report outlining claims paid by senatorial and assembly districts in 2009 alone. Please note the amount is an approximation, as districts obviously overlap.

I want you to know that I appreciate your working closely with my office during the 2009 Legislative Session in our efforts to keep the laws governing unclaimed property in fact, to the benefits of our shared constituents and the state. The funds transferred from the Unclaimed Property Division to the General Fund each year play an important role in helping you to establish and/or maintain vital programs offered by the state. Your understanding of the significant financial contribution this transfer has for the people of this state, who rely on critical programs in part financed by these funds, is appreciated.

CARSON CITY OFFICE
State Treasurer
101 N. Carson Street, Suite 4
Carson City, Nevada 89701-4786
(775) 684-5600 Telephone
(775) 684-5623 Fax

STATE TREASURER PROGRAMS
Governor Guinn Millennium Scholarship Program
Nevada Prepaid Tuition Program
Unclaimed Property
Upromise College Fund 529 Plan

LAS VEGAS OFFICE
555 E. Washington Avenue, Suite 4600
Las Vegas, Nevada 89101-1074
(702) 486-2025 Telephone
(702) 486-3246 Fax

Website: <http://NevadaTreasurer.gov> E-mail: StateTreasurer@NevadaTreasurer.gov

On another note, an additional \$40,570 was transferred to the Nevada Educational Trust Fund from the proceeds of unclaimed property, as required by NRS 120A.610(7):

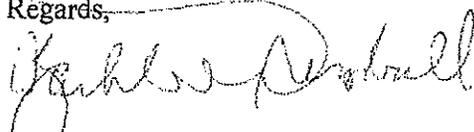
All proceeds received by the Administrator from abandoned gift certificates must be accounted for separately in the Abandoned Property Trust Account in the State General Fund. At the end of each fiscal year, before any other money in the Abandoned Property Trust Account is transferred pursuant to NRS 120A.620, the balance in the account created pursuant to this subsection, less any costs, service charges or claims chargeable to the account, must be transferred to the Educational Trust Fund which is hereby created in the State Treasury. The money in the Educational Trust Fund may be expended only as authorized by the Legislature for educational purposes.

This is the first year such a transfer has been completed, following the statutory dormancy period for collection of such gifts cards expiring in the fourth quarter of 2008. We expect the funds transferred to grow by an estimated 10% next fiscal year, as more cards expire.

Should you have any questions regarding the two transfers of funds from the Unclaimed Property Division to the state General Fund and the Educational Trust Fund, please feel free to call me or my senior Deputy Treasurer, Steve George, at (775) 684-7109, or contact me directly via email at katemarshall@nevadatreasurer.gov.

Again, thank you for your assistance in maintaining this important program for the citizens of Nevada.

Regards,



Kate Marshall
State Treasurer



Veterans In Politics International Incorporated

POST OFFICE BOX 28211

LAS VEGAS, NEVADA 89126 U.S.A.

STEVE SANSON, USMC - PRESIDENT/DIRECTOR
RICHARD HARRIS, USMC - TREASURER

JOHNNY SPICER, USN RET. - SECRETARY
GEORGE CHEHADE - MINISTER

April 14, 2010

To whom it may concern;

On April 7th, 2010 I was making my calls to the candidates that have not confirmed that they will be at our Endorsement Event for April 17th.

I have contacted candidates that have filed for candidacy with the Nevada Secretary of State Elections website. I used the information that was listed as a campaign contact number for each candidacy.

I contacted Secretary of State Ross Miller the contacted number that was listed as his campaign information is (775) 684-5709 I spoke with the Secretary of State Office Assistant (Sally) and I was given another number to reach his campaign headquarters (702) 492-4952.

I contacted Treasurer Kate Marshall the contact number that was listed as her campaign information is (775) 684-7109 I left a message on the official Treasures voice mail and received a call back from her Assistant to contact her campaign manager Gary Gray. I also indicated that the number to the Treasures Office should not have been listed as a campaign number with the Secretary of State Elections Department and I was told by her Assistant that it was not a big deal.

During my contact with these candidates I went on State Controllers Kim Wallin RE-Election campaign website and she had the Veterans In Politics organization listed as a Supporter. I could not understand where this information came from. We have not endorsed this seat and the interview process for this seat is on April 17th. In addition to this during the last election cycle we endorsed her opponent Steve Martin. Mr. Martin has the plaque and the photos to prove this. We even took the liberty of endorsing Mr. Martin in Carson City in 2006. There is only one Veterans In Politics so we don't understand why State Controller Wallin would list our organization as a supporter. I have personally contacted Controller Wallin and left a message on her voice mail April 7th and she has recently removed our organization as a supporter.

Respectfully Submitted By;

Steve Sanson
President of Veteran In Politics International
702 283 8088

Witness List

Cory Adair

6655 South Tenaya Way

Las Vegas, NV 89113

Jacob Hafter

8101 Moonstone Circle

Las Vegas, NV 89128

(702) 405-6700

Steve Sanson

P.O. Box

Las Vegas, NV 89126

(702)283-8088

Steve Martin

7700 W. Wigwam Ave

Las Vegas, NV 89113

(702) 617-9954

Rob Lauer

2654 W. Horizon Ridge St. B5-266

Henderson, NV 891052

①

**State of Nevada Declaration of Candidacy of
Kate Marshall**

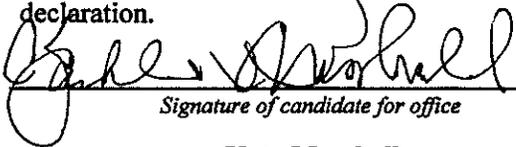
**For the Office of
State Treasurer**

Major Political Party - Partisan Office

Secretary of State Ross Miller

STATE OF NEVADA
COUNTY OF CARSON

For the purpose of having my name placed on the official ballot as a candidate for the Democrat
Party nomination for the office of State Treasurer, I, the undersigned
Kate Marshall, do swear or affirm under penalty of perjury that I actually, as opposed to
constructively, reside at 578 Marsh Ave, in the City or Town of
Reno, County of Washoe, State of Nevada; that my actual, as opposed to constructive,
residence in the state, district, county, township or other area prescribed by law to which the office pertains
began on a date at least 30 days immediately preceding the date of the close of filing of declarations of
candidacy for this office, in addition to any other requirements required by law; that my telephone number is
(775) 684.7109 and the address at which I receive mail, if different than my residence, is
Same; that I am registered as a member of the
Democrat Party; that I am a qualified elector pursuant to Section 1 of Article 2 of the
Constitution of the State of Nevada; that if I have ever been convicted of treason or a felony, my civil rights
have been restored by a court of competent jurisdiction; that I have not, in violation of the provisions of NRS293.176,
changed the designation of my political party or political party affiliation on an official application to
register to vote in any state since December 30th before the closing filing day for this election; that I generally
believe in and intend to support the concepts found in the principles and policies of that political party in the
coming election; that if nominated as a candidate of the Democrat Party at the ensuing
election, I will accept that nomination and not withdraw; that I will not knowingly violate any election law or
any law defining and prohibiting corrupt and fraudulent practices in campaigns and elections in this state; that I
will qualify for the office if elected thereto, including, but not limited to, complying with any limitation
prescribed by the Constitution and laws of this State concerning the number of years or terms for which a person
may hold the office; and that I understand my name will appear on all ballots as designated in this
declaration.



Signature of candidate for office

Kate Marshall

Designation of name to appear on ballot

Kate Marshall

Designation of name to appear on certificate of election

katemarshall@charter.net

E-mail address (optional)

Subscribed and sworn or affirmed to before me this 1st
day of the month of March of the year 2010

Kate Marshall

Name of Candidate



Notary Public or other person authorized to administer an oath

Code of Fair Campaign Practices

There are basic principles of decency, honesty and fair play which every candidate for public office in the State of Nevada has a moral obligation to observe and uphold, in order that, after vigorously contested but fairly conducted campaigns, the voters may exercise their constitutional right to vote for the candidate of their choice and that the will of the people may be fully and clearly expressed on the issues.

THEREFORE:

1. I will conduct my campaign openly and publicly and limit attacks against my opponent to legitimate challenges to his voting record or qualifications for office.

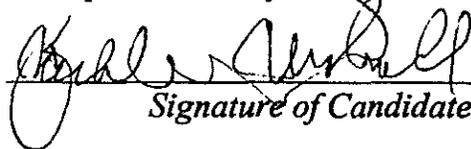
2. I will not use character defamation or other false attacks on a candidate's personal or family life.

3. I will not use campaign material which misrepresents, distorts or otherwise falsifies the facts, nor will I use malicious or unfounded accusations which are intended to create or exploit doubts, without justification, about the personal integrity of my opposition.

4. I will not condone any dishonest or unethical practice which undermines the American system of free elections or impedes or prevents the full and free expression of the will of the voters.

I, the undersigned, as a candidate for election to public office in the State of Nevada, hereby voluntarily pledge myself to conduct my campaign in accordance with the principles and practices set forth in this code.

1 March 2010
Date


Signature of Candidate

NOTE: Subscription to this code is voluntary. A candidate who subscribes to this code and submits this form to the appropriate filing officer may indicate on his or her campaign materials that he or she subscribes to this code.

Handwritten mark

ROSS MILLER
Secretary of State

STATE OF NEVADA

SCOTT W. ANDERSON
*Deputy Secretary
for Commercial Recordings*

NICOLE J. LAMBOLEY
Chief Deputy Secretary of State



MATTHEW M. GRIFFIN
Deputy Secretary for Elections

ROBERT WALSH
*Deputy Secretary for
Southern Nevada*

OFFICE OF THE
SECRETARY OF STATE

KATE THOMAS
*Deputy Secretary
for Operations*

CANDIDATE MEDIA SHEET

Voluntary Information Sheet

This sheet will be distributed to all media outlets. Because it is a public record and part of your Candidate Filing Packet, it would also be available to the public, on request. Before signing, please be sure all the information you have provided is correct and that you have not included any contact information you do not wish to be provided to members of the media.

NAME: KATE MARSHALL

OFFICE FILING FOR: STATE TREASURER

PARTY AFFILIATION: DEMOCRAT

Campaign Headquarters Address and Phone Number:

702.388.7788

Home Address and Phone Number:

FAX Number: ()
E-Mail Address: KATEMARSHALL@CHARTER.NET
Website Address: MARSHALLFORNEVADA.COM

I have reviewed the above information and agree to allow the Nevada Secretary of State's office to disseminate this Candidate Media Sheet to members of the media.

Kate Marshall
Signature of Candidate

1 March 2010
Date

NEVADA STATE CAPITOL
101 N. Carson Street, SUITE 3
Carson City, Nevada 89701-4786
Telephone: (775) 684-5708
Fax: (775) 684-5725

COMMERCIAL RECORDINGS
MEYER'S ANNEX OFFICE
202 N. Carson Street
Carson City, Nevada 89701-4201
Telephone: (775) 684-1708
Fax: (775) 684-5725

LAS VEGAS OFFICE
555 E. Washington Avenue
Las Vegas, Nevada 89101-1090
SECURITIES: SUITE 5200
Telephone: (702) 486-2440
Fax: (702) 486-2452
CORPORATIONS: SUITE 4000

SECURITIES SATELLITE OFFICE
1755 E. Plumb Lane, SUITE 231
Reno, Nevada 89502-3691
Telephone: (775) 688-1855
Fax: (775) 688-1858

8

2010
CANDIDATE FILING
PARTISAN OFFICE

Full name of candidate:

Kate Marshall

Office filing for: STATE TREASURER

District: _____

Political affiliation: DEMOCRAT

Address where candidate resides:

570 MARSH AVE RENO NV 89509

Mailing Address (if different): _____

E-mail address: Kate.marshall@charter.net

County of residence: WASHOE

Telephone number: 775.684.7109

Name to appear on ballot: KATE MARSHALL

Name to appear on certificate of election: KATE MARSHALL

CHECKLIST FOR OFFICE USE ONLY ---

- Declaration of Candidacy
- Collect filing fee and give receipt
- Code of fair campaign practices
- C & E
- IRS Filing Requirement
- Statement of Financial Disclosure
- Legislator** – Residency Requirement
- Let Bob know candidate is here
- Copy valid driver's license or ID issued by a governmental agency
- Copy utility bill, bank statement, paycheck (with residential address) if above ID does not contain residential address

FILING

| | |
|---|-------|
| State Senator or Assemblyman | \$100 |
| Governor | \$300 |
| Any state office, other than Governor or justice of the Supreme Court | \$200 |
| Any district office other than district judge | \$ 30 |
| Constable or other town or township office | \$ 30 |

Filing Officer's Initials _____

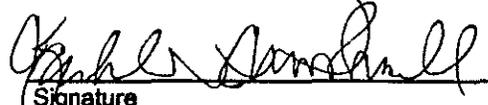
D

**ROSS MILLER
SECRETARY OF STATE
State of Nevada
2010
CAMPAIGN CONTRIBUTIONS AND EXPENSES REPORT**

**Candidate
Acknowledgement**

I, KATE MARSHALL, hereby acknowledge receipt of the required forms and filing date schedule for the reporting of contributions and expenses pursuant to the Nevada Campaign Practices Act. I understand that:

- > I must file the prescribed reports by:
Report No. 1 – June 1, 2010
Report No. 2 – October 26, 2010
Report No. 3 – January 15, 2011
- > A violation of the reporting of contributions and expenses is subject to a civil penalty of up to \$5,000 for each violation and payment of court costs and attorney's fees;
- > I must file the required Contributions & Expenses Reports even though:
 - (1) I withdraw my candidacy;
 - (2) I have no opposition;
 - (3) I lose the primary;
 - (4) My name does not appear on either the primary or general election ballot;
 - (5) I am elected to office;
 - (6) I do not file a declaration of candidacy, but am a candidate as defined in NRS 294A.005 because I have received campaign contributions in excess of \$100; or
 - (7) I do not receive contributions and/or expend any funds (less the filing fee).
- > I UNDERSTAND THAT A MONETARY CIVIL PENALTY MAY BE ASSESSED TO ME FOR FAILURE TO TIMELY FILE THESE REPORTS. (NRS 294A.420)
- > I UNDERSTAND THAT EACH REPORT MUST BE SIGNED UNDER PENALTY OF PERJURY. (NRS 294A.120, 294A.200)


Signature

Received and Filed:
This 1st day of March, 2010

Filing Officer

FILING OFFICER: This form is to be signed, returned and a copy is to be given to the candidate.

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