

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) _____.

REQUESTOR'S INFORMATION:

NAME: DENNIS JOHNSON	E-MAIL: inquiriesforme@gbis.com
ADDRESS: 2489 ROCKBRIDGE Dr	
CITY, STATE, ZIP: CARSON CITY NV 89706	
TELEPHONE: 775-841-3825	CELL PHONE: 775-233-8256

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.



Signature _____
 Print Name: DENNIS JOHNSON

_____ OCT 22, 2010
 Date

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
 704 W. Nye Lane, Suite 204
 Carson City, Nevada 89703

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

2. Conduct Violating the Provisions of NRS 281A

Steven Horsford has served in the Nevada State Senate since November 2004, serving during three regular sessions and numerous special sessions. Senator Horsford has served as Majority Floor Leader since 2009. Since 2009 he has also served as co-chair of the Senate Committee on Finance and as a member of the Senate Committees on Government Affairs and Health and Education.

On or about April 12, 2010, Senator Horsford formed Victory 2010 PAC. See Attachment A – Committee for Political Action Registration Form filed with the Secretary of State. Horsford serves as president of the PAC, and his co-conspirators in this questionable endeavor include vice president and Senator Mike Schneider, treasurer Michael Kern and, in an unnamed capacity, State Senator Valerie Wiener.

The PAC's start up funding was provided largely by a \$10,000 contribution made on May 27, 2010 from a Washington, D.C.-based union, the American Federation of State, County and Municipal Employees (AFSCME). The AFSCME web site bills itself as the largest public employee and health care worker union in the nation (see <http://afscme.org>). The PAC also received a \$100 donation from Friends for Steven Horsford on May 6, 2010. See Attachment B – Victory 2010 PAC Contribution and Expenditure Report filed June 1, 2010 with the Secretary of State's office by Senator Horsford.

One could comment about the appearance of impropriety of a PAC formed with union dollars to sway voters toward Democrat candidates being formed by the Democrat State Senate Majority Leader and other State Senators, but it is best to move forward to actual illegal conduct versus an appearance of impropriety.

On or about June or July, 2010, Senator Horsford sent an undated letter to an unknown number of "supporters" on letterhead titled "Victory Leaders." The first sentence of the letter references "the primary elections in Nevada this past month," hence setting forth an approximate timeframe of the mail date of the letter. The bottom of each page of the two page letter indicates it was "Paid for by *Victory 2010 PAC*" and was "Printed in House." The official address of Victory 2010 PAC is identical to that of Senator Horsford's "district office." See Attachment C for the two page letter from Victory Leaders with attachment on "Fact Sheet and Benefits" for membership.

The letter solicited for financial commitments of sponsorship for Victory 2010. According to the letter sent and signed by Senator Horsford, monetary donations to Victory 2010 would be rewarded by various benefits to the donor through "sponsorship levels." Depending on the level of sponsorship a donor could receive benefits including but not limited to: a private dinner with the Senate Majority Leader and Chairs of all the standing committees, a private dinner with the Senate Majority Leader and a Chair of a standing committee of their choice, a private reception with the Senate Majority Leader and Nevada Senate Democrats or a luncheon with the Senate Majority Leader. In short, Senator Horsford was attempting to sell access to the highest-ranking members of the

Nevada State Senate. This pay-to-play ultimatum flies in the face of the spirit and intent of the Nevada Ethics in Government Law.

After the letter became public through the news media, Senator Horsford apparently had a change of heart. On August 19, 2010 the Las Vegas Review Journal published an article announcing that Senator Horsford was “rescinding his letter soliciting contributions in exchange for access” and that “The program in question has been discontinued.” At least one Democrat Senator, John Lee of North Las Vegas, commented to the newspaper that Horsford did not speak to him prior to sending the letter. See Attachment D.

The newspaper also cites Senator Bill Raggio, R-Reno, as saying that lobbyists have told him that Democrats are intimidating them into not giving donations to Republicans or their issues will not be heard in the 2011 session of the Nevada Legislature. If true, this conduct is outrageous and tantamount to an abuse of power.

Further, the Elections Deputy for Democrat Secretary of State Ross Miller (Matt Griffin) was quoted by the newspaper as saying “There is nothing in the letter that violates the law. The primary concern of people was it was so overtly ‘pay to play.’” Overt indeed. One has to wonder how Secretary of State Miller and his deputy will respond to this complaint if it is filed under state elections law, since they appear to have already passed judgment on the legitimacy and legality of this heinous attempt to twist lobbyists’ arms and unduly influence the outcome of an election by selling access to the 2011 session of the Nevada Legislature under the threat of not hearing legislative proposals vital to lobbyists’ clients and industries.

The group Citizen Outreach sent a letter to Horsford on August 29, 2010 asking certain specific questions, including:

1. Have all the dinner club memberships to Victory 2010 PAC been returned to all of the donors, or will you only be returning memberships at the donors’ request?
2. If you only intend to return dinner club memberships at the donor’s request, are you worried that those who choose not to make such a request are choosing not to do so only because they fear legislative retribution from you, your office and your colleagues in the 2011 Legislature.
3. Even though it may not be “legally” required, will you be publicly disclosing the names of individuals, businesses, unions and/or other special interests who joined your dinner club – along with the amount they contributed? If not, why not?
4. Under the circumstances, wouldn’t you agree that it would be inappropriate for those who joined your dinner club – some surely under perceived duress – to “voluntarily” give alternative donations to you or any other PACs you’re affiliated with for the duration of this current election cycle? If not, why not?

It is not known whether Senator Horsford responded to these questions, but they would be excellent questions to ask him.

Despite the fact that Senator Horsford “rescinded” the letter and may or may not have returned “membership” contributions, his actions still constitute a violation of state ethics laws by virtue of the fact that he solicited and accepted contributions under the program.

By implying that in order to have legislation considered by Senate Democrats individuals needed to contribute money to Victory 2010 PAC, Senator Horsford is in direct violation of NRS 281A.400 (1), NRS 281A.400 (2) and NRS 281A.400 (4).

Senator Horsford attempted to sell access to high ranking public officials in the State of Nevada. This is a clear violation of NRS 281A.400 (1) as the gifts, emoluments and economic opportunities solicited by Senator Horsford were clearly designed as quid pro quo in exchange for access to legislators and undoubtedly resulted in his departure from “...the faithful and impartial discharge...” of his public duties.

Senator Horsford used his position as Senate Majority Leader to secure unwarranted privileges, preferences and advantages for himself, his business entity--Victory 2010 PAC and other fellow Senate Democrats and to grant unwarranted privileges, preferences and advantages to lobbyists and others to whom the letter was sent in a direct violation of NRS 281A.400 (2).

Donations to Victory 2010 PAC are an augmentation or “other compensation” from a private source for the performance of a public officer’s duties, e.g. to allow free exchange of ideas and encourage full public participation in the legislative process. Senator Horsford accepted these augmentations and other compensations when he accepted contributions to Victory 2010 PAC on behalf of himself and other Senate Democrats and in exchange promised as a public officer to provide certain access to himself and other public officers which violates NRS 281A.400 (4).

Senator Horsford’s actions in this instance violate several sections of the Nevada ethics law. He attempted to sell access to high ranking political officials, thereby creating a situation where those with money have more access and therefore more influence over the legislative process. This action is unbecoming of a state Senator whose job is to serve as an elected representative of the public, and more specifically as an elected representative of the members of his Senate district. Although Senator Horsford rescinded the letter and discontinued the program in question, he nevertheless violated state ethics laws by his deliberate, intentional and willful conduct in soliciting and accepting contributions through the letter and, likely, other activities he conducted on behalf of Victory 2010 PAC before his egregious conduct became a matter of public record.

The deadline for the second reporting period for Victory 2010 PAC is October 26, 2010, which fortunately for Horsford and the Senate Democrats is just days before the general election. It remains to be seen whether Horsford will appropriately and legally report all contributions to, and potentially refunds from, Victory 2010 PAC. Unfortunately for voters, there will be little time to respond to this information in the short time between the filing date and the election date.

3. Additional Witnesses:

Senator Mike Schneider, Victory 2010 PAC officer

Senator Valerie Weiner, Victory 2010 PAC officer

Michael Kearm, Victory 2010 PAC officer

Julie Mogensen, Resident Agent for Victory 2010 PAC and district office manager for Senator Steven Horsford

John Does 1 to 200 or more, recipients of Victory Leaders letter

ATTACHMENT A

KRut
04/14/10

Office of the
Secretary of State
Ross Miller
Ross Miller
Elections Division

STATE OF NEVADA
COMMITTEE FOR POLITICAL ACTION (PAC)
Registration Form



Secretary of State Ross Miller

KRut
Victory2010

COMMITTEE FOR POLITICAL ACTION: (check one)

New Registration

Amended Registration (if amended, list reason)

Change Resident Agent

Change of Address

Change in Officers

Other: _____

NAME OF COMMITTEE: Victory 2010

Mailing Address: 3450 W Cheyenne Ave Ste. 100

North Las Vegas NV 89032

City

State

Zip

Telephone

PURPOSE: (Briefly state the purpose for which the Political Action Committee was organized.)

To support 2010 democratic candidates

RESIDENT AGENT: (Pursuant to NRS 294A.240, each Committee for Political Action must appoint and keep in this state a resident agent who must be a natural person who resides in the State of Nevada.)

Name of Resident Agent: Julie Mogensen

Mailing Address: 10258 Garden State Dr

Las Vegas NV 89135 (702) 985-7535

City

State

Zip

Telephone

ACCEPTANCE OF APPOINTMENT BY RESIDENT AGENT

I, Julie Mogensen, hereby accept appointment as Resident Agent for the above named Committee for Political Action.

Julie Mogensen
Signature of Resident Agent

4/12/10

Date

OFFICERS: (Please list the name, title, address and telephone number of each officer.)

NAME: Steven Horsford ADDRESS: 3450 W. Cheyenne Ave. Ste. 100
 TITLE: President N. Las Vegas NV 89032 (702) 985-7535
City State Zip Telephone

NAME: Michael Schneider ADDRESS: 6381 Sandpiper Way
 TITLE: Vice President Las Vegas NV 89103 (702) 876-5121
City State Zip Telephone

NAME: Valerie Wiener ADDRESS: 3540 W Sahara #352
 TITLE: _____ Las Vegas NV 89102 (702) 871-6536
City State Zip Telephone

NAME: Michael Kern ADDRESS: 6100 Elton Ave Ste 1000
 TITLE: Treasurer Las Vegas NV 89107 (702) 384-1120
City State Zip Telephone

AFFILIATIONS

If the Committee for Political Action is affiliated with any other organizations, list the name, address and telephone number of each organization. (Please attach additional pages if necessary)

<u>Name of Organization</u>	<u>Address & Telephone No.</u>			
Organization	City	State	Zip	Telephone
Organization	City	State	Zip	Telephone
Organization	City	State	Zip	Telephone

Submitted By

X Steven Horsford
Signature of representative of group

4/12/10
Date

(702) 985-7535
Telephone



Send completed form to:
SECRETARY OF STATE ROSS MILLER
ELECTIONS DIVISION
101 NORTH CARSON STREET, STE. 3
CARSON CITY, NEVADA 89701-4768
PHONE: (775) 684-5705 FAX: (775) 684-5718

Reset Form

ATTACHMENT B

CAMPAIGN CONTRIBUTIONS AND EXPENSES REPORT

State of Nevada

Victory 2010 PAC
 Name (print) 3450 W. Cheyenne Ave. Ste. 100 Office (if applicable) (702) 985-7535 District (if applicable)
 Mailing Address (include city and zip code) North Las Vegas NV 89032 Telephone No.

E-Mail Address
 Select Appropriate Box(es) CANDIDATE PAC POL.PRTY IND EXP NONPROFIT CORP 24432
 LEGAL DEFENSE FUND AMENDED LOCAL BAG

- Annual Filing - Due January 15, 2010
Period: January 1, 2009 - December 31, 2009
- Report #1 - Due June 1, 2010*
Period: Jan. 1, 2010 - May 27, 2010
- Report #2 Due - October 26, 2010*
Period: May 28, 2010 - Oct. 21, 2010
- Report #3 Due - January 15, 2011**
Period: Oct. 22, 2010 - Dec. 31, 2010
- Annual Filing - Due January 15, 2011
Period: January 1, 2010 - December 31, 2010

LAS VEGAS, NV
2010 JUN -1 PM 12:5

FOR OFFICE USE ONLY

2010 JUN -1 PM 12:5
 (Handwritten initials)

* These Reports are filed by incumbents/candidates in the 2010 election cycle
 ** Third Report suffices for 2011 Annual Filing if candidate also filed Report Nos. 1 and 2

CONTRIBUTIONS SUMMARY

	This Period	Cumulative From Beginning of Report Period #1 Through End of This Reporting Period
1. Total Monetary Contributions Received in Excess of \$100 (See page 1 of instruction sheet)	10,100	10,100
2. Total Monetary Contributions in the form of loans guaranteed by a third party. (See page 2 of instruction sheet)	0	0
3. Total Monetary Contributions in the form of loans that were forgiven (See page 2 of instruction sheet)	0	0

	This Period	Cumulative From Beginning of Report Period #1 Through End of This Reporting Period
4. Total Amount of Monetary Contributions Received (Add Lines 1 through 3) (See page 2 of instruction sheet)	10,100	10,100
5. Total Amount of Written Commitments for Contributions (When commitment is funded, report as contribution (monetary or in kind)) (See page 2 of instruction sheet)	0	0
6. Total Value of In Kind Contributions Received in Excess of \$100 (See page 2 of instruction sheet)	0	0

EXPENSES SUMMARY

7. Total Monetary Expenses Paid in Excess of \$100 (See page 2 of instruction sheet)	0	0
8. Total Value of In Kind Expenses in Excess of \$100 (See page 3 of instruction sheet)	0	0

AFFIRMATION

I Declare Under Penalty of Perjury That the Foregoing is True and Correct.

Steve Horvath 6/1/10
 Signature Date

ATTACHMENT C



Dear [REDACTED].

First, let me say thank you! Because of your support, we won the primary elections in Nevada this past month. Of our endorsed candidates, 100% won their primaries and in one targeted district, Senate District 9, the incumbent Republican who has served in the Legislature since 1995 was defeated - providing a direct path to victory for the Senate Democrats come November.

I wanted to personally brief you on the results of the primary and what they mean for the November elections.

Victories and Opportunities:

- In Senate District 5, Clark County, State Senate Leader Joyce Woodhouse will take on newcomer Michael Roberson to be re-elected to a second term.
- In Senate District 8, Clark County, Tammy Peterson, our endorsed candidate, won her primary with resounding 62% of the vote. Peterson, a lifelong Nevadan and local attorney, will challenge two-term incumbent Republican Barbara Cegavske in the General Election.
- In Senate District 12, Clark County, Aaron Ford, a local attorney and former educator, now knows his republican challenger, seven-term legislator Joe Hardy.
- In Senate District 2, Washoe County, Allison Edwards, the Senate Democrats' choice, won her primary with nearly 60% of the vote and will go on to challenge Don Gustavson, an extreme conservative and five-term incumbent Assemblyman.
- And in what turned out to be the upset of the primary election cycle in the State Senate, two-term incumbent Republican Dennis Nolan lost in Senate District 9, Clark County. This game-changer provides a direct path for Benny Yerushalmi, a lifelong Nevadan and small business owner, to increase the majority in the State Senate come November.

What's Next:

The Nevada Senate Democrats worked diligently to recruit the best and the brightest to run for the Nevada legislature this election cycle. Now that the races are determined and the bench is full, the Nevada Senate Democrats are poised to grow our majority. First, there is no doubt that the Senate

Paid for by *Victory 2010 PAC* | EIN# 27-2374839

Printed In House



Democrats will return with the Majority come 2011. Aside from Senate District 5, the Nevada Senate Democrats have four additional seats in play this election cycle – all of which are safe Democratic Districts with extraordinary Democratic Advantages and no viable Republican challengers. In fact, we already know that Senate District 2, Clark County, will stay blue, as candidate Moises Denis is not only running an aggressive campaign, but also has no challenger in his race.

In this election cycle, the stakes have never been higher. Reapportionment, the budget and major policy issues affecting the working families and small businesses of Nevada are too important to be held hostage by the Republicans who will now be controlled by an even more conservative membership moving forward. Growing the majority and obtaining at least fourteen votes will be critical in ensuring that we are able to put Nevada back on the path to prosperity.

With your help, the State Senate will be led by Senators with the courage and competence to move Nevada forward is what Nevada desperately needs right now.

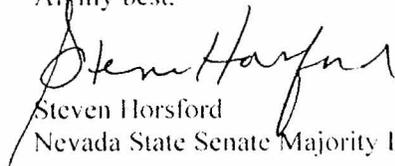
That's why I am asking for your continued support of our efforts. You have been there for us before and I need you to be there again. I am asking for you to join our new Victory 2010 Leadership Program and to make a financial commitment to join with us, as our partner, in moving Nevada forward. We can't do it alone. We need your support. Please decide today to help us grow the majority in the Nevada State Senate. Sponsorship levels for Victory 2010 are included with this letter.

Whatever level you decide to join, know that you are part of making Nevada stronger by electing and re-electing a new generation of leaders who are committed to tackling the tough challenges facing our state. These leaders have the competence to lead and the courage to do what's right.

I'm asking for your continued support because, like you, I'm concerned about the future of Nevada. Working together, we can build a better Nevada. One that diversifies our economy strategically, invests in a quality education, and allows us to responsibly grow again.

Please join Victory 2010 today. With your continued financial support, the Nevada State Senate will be on the road to growing our majority and moving Nevada forward again.

All my best,


Steven Horsford
Nevada State Senate Majority Leader

Paid for by *Victory 2010 PAC* | EIN# 27-2374839

Printed In House

Fact Sheet and Benefits

"To shape the future of Nevada by providing the Nevada Senate Democrats the capability to compete and succeed in every election."



Victory Leaders Membership

- Victory Leadership Circle: \$25,000 Contribution
- Chairman's Leadership Circle: \$10,000 Contribution
- Caucus Leadership Circle: \$5,000 Contribution
- Friends of Nevada Senate Democrats: \$1,000 Contribution

Benefits

- **Victory Leadership Circle**
Organizations or individuals that contribute \$25,000 or more will receive a private dinner with the Senate Majority Leader and Chairs of all the standing committees. The dinner will permit up to 10 invited guests to accompany the Victory Leadership Circle Member.
- **Chairman's Leadership Circle**
Organizations or individuals that contribute between \$10,000 - \$25,000 will receive a private dinner with the Senate Majority Leader and a Chair of a standing committee of their choice. The dinner permits up to 7 invited guests to accompany the Chairman's Leaders Member.
- **Caucus Leadership Circle**
Organizations or individuals that contribute between \$5,000 - \$10,000 will be entitled to a private reception with the Senate Majority Leader and Nevada Senate Democrats.
- **Friends of Nevada Senate Democrats**
Organizations or individuals that contribute between \$1,000 - \$5,000 will be entitled to a luncheon with the Senate Majority Leader.

Paid for by Victory 2010 PAC.
Make Contributions Payable to: Victory 2010 PAC • EIN# 27-2374839
3450 W. Cheyenne Ave., Ste. 100 • North Las Vegas, Nevada 89032 • (702) 307-9001
Not authorized by any candidate or candidate's committee.

ATTACHMENT D

Aug. 19, 2010
Copyright © Las Vegas Review-Journal

Horsford rescinds letter soliciting contributions in exchange for access

Fundraising solicitation called sale of political access

By ED VOGEL
LAS VEGAS REVIEW-JOURNAL CAPITAL BUREAU

CARSON CITY -- State Senate Majority Leader Steven Horsford, criticized for promising access to himself and committee chairpersons for a price, has withdrawn the offer.

Horsford on Wednesday rescinded a letter he sent in July to prospective campaign donors that guaranteed them dinners and receptions with him and key Senate Democrats if they donated money to his political action committee.

For a person or organization donating more than \$25,000, the letter promised a private dinner with the Las Vegas Democrat and the chairpersons of all Senate committees.

For \$10,000 to \$25,000, the donor would get a dinner with Horsford and any chairperson selected.

Lesser contributions would get only a luncheon or a reception with Horsford or a chairperson.

"If our fundraising letter has been misconstrued, we deeply apologize," Horsford said in a statement.

"The program in question has been discontinued. We believe that honesty and transparency is critical for Nevadans and their government. It has never been our intention to cross any boundaries. We are fighting to put Nevadans back to work, so that our state can prosper once again."

The solicitation letter did not violate any campaign or election laws, according to the secretary of state's office. Horsford's mistake was that he made such a direct offer in selling access, according to sources close to the Legislature.

"There is nothing in the letter that violates the law," Deputy Secretary of State Matt Griffin said. "The primary concern of people was it was so overtly 'pay to play.'"

State laws do not prohibit politicians from offering access if people contribute money, according to Griffin.

In fact, that is exactly what happens in all levels of politics, sources said, including presidential campaigns.

People who contribute money get right through when they call a politician. They can get their

picture taken with the president or be invited to a dinner.

Horsford is not up for re-election until 2012, but he is trying to increase his party's membership in the Senate to a veto-proof, two-thirds majority so the Democrats can control the Legislature. The state is expected to face a budget shortfall of as much as \$3 billion in 2011, and Horsford has said additional tax revenue will be needed to balance the budget.

The Democrats have a 12-9 majority now and need to pick up two seats to secure a veto-proof advantage.

Sen. John Lee, D-North Las Vegas, said he knew nothing about Horsford's letter, although he chairs the Senate Government Affairs Committee, and the majority leader committed Lee and other chairs to dinners.

"I never talked to him about this," Lee said. "I am accessible to everyone. If you have an issue I am interested in, I will talk to you."

Sen. Mike Schneider of Las Vegas, who chairs the Transportation and Infrastructure Committee, did not return a phone call seeking comment.

The solicitation effort was dropped after Senate Minority Leader Bill Raggio, R-Reno, and other Republican leaders questioned the pay-for-play tone of the letter.

"It was heavy-handed and left the impression he was selling access," Raggio said Wednesday.

"If you paid, you got a dinner; if you didn't pay, you didn't get any consideration. Pay less and you still get a dinner with a chairman. The more you give, the more your matters will be considered," he said.

Raggio said he has been told by lobbyists that Democrats are intimidating them into not giving donations to some Republicans or their issues won't be heard in 2011.

He insisted he never has promised anyone something for a donation and might even take a position against them if they thought they could secure a favorable vote for money.

Ray Bacon, a lobbyist for the Nevada Manufacturers Association, said Horsford's letter was "too blatant."

"He made a definitive connection between money and access," said Bacon, who did not receive the letter. "In 20 years of lobbying, I have never seen anything so blatant. You never are told, 'Give me money, and you get access.' Usually you give to the party caucuses and take your chances (that legislators will talk with you)."

But in past legislative sessions, key lobbyists such as Harvey Whittemore and the late Jim Joyce held considerable clout over legislators, in part because of their ability to secure donations and the power of their clients. Both represented the gaming industry and many other businesses.

In some sessions, lobbyists such as Whittemore would walk into offices of legislative leaders while others might have to wait hours to speak for a few minutes, if they could get an appointment.

Contact Capital Bureau Chief Ed Vogel at evogel@reviewjournal.com or 775-687-3901.

Find this article at:

<http://www.lvrj.com/news/horsford-rescinds-letter-soliciting-contributions-in-exchange-for-access-101041964.html>

Check the box to include the list of links referenced in the article.

Copyright © Las Vegas Review-Journal, 1997 - 2008

Go Green! Subscribe to the electronic Edition at www.reviewjournal.com/ee/

OTHER

C

CITIZEN OUTREACH

Putting the Public Back in Public Policy

767 Benedict Drive
Las Vegas, NV 89110
(702) 942-3291 * www.citizenoutreach.com

August 29, 2010

Hon. Steven Horsford
Nevada Senate Majority Leader
3450 W. Cheyenne Ave., Ste. 100
North Las Vegas, NV 89032

VIA FAX

Dear Sen. Horsford,

We're still hoping you'll accept our August 18 request for a "Dutch treat" dinner with you and the Democrat Party chairmen of the Nevada State Senate to discuss issues critical to our state's future with ten of our conservative friends and colleagues; however, we suspect your lack of response to date indicates a rejection of our outreach effort.

If you change your mind, the offer stands.

That said, on August 21 you issued a letter to donors to your Victory 2010 PAC who were offered dinner access to you and your Democrat colleagues in exchange for various levels of financial support, informing them that you had "made the decision to discontinue the Victory 2010 program."

In addition, you also wrote that you would be returning donations to join your "Victory Leaders Membership" dinner club; however, there have been conflicting media reports indicating that perhaps you would be returning contributions if, and only if, a donor requested such a refund.

Then on August 25, Las Vegas Sun columnist Jon Ralston reported that you told him you had returned \$70,000 worth of dinner club memberships.

All of which raises several questions we hope you will address forthrightly, publicly and in a timely fashion.

- 1.) Have all the dinner club memberships to Victory 2010 PAC been returned to all of the donors, or will you only be returning memberships at a donors' request?
- 2.) If you only intend to return dinner club memberships at a donor's request, are you worried that those who choose not to make such a request are choosing not to do so only because they fear legislative retribution from you, your office and your colleagues in the 2011 Legislature.
- 3.) Even though it may not be "legally" required, will you be publicly disclosing the names of individuals, businesses, unions and/or other special interests who joined your dinner club - along with the amounts they contributed? If not, why not?

Page 1 of 2

4.) Under the circumstances, wouldn't you agree that it would be inappropriate for those who joined your dinner club - some surely under perceived duress - to "voluntarily" give alternative donations to you or to any other PACs you're affiliated with for the duration of this current election cycle? If not, why not?

Of course, we all know Jon Ralston is a closet Republican whose opinions are shaped and directed by Fox News and Karl Rove; however, it's hard to dispute his statement that your dinner club solicitation was "one of the more spectacularly dumb ideas in recent memory, as if (you) wanted to put a 'For Sale' sign on (your) door while renting out (your) committee chairmen."

But we also agree with what you wrote in announcing your decision to discontinue the Victory 2010 PAC; that "honesty and transparency is critical for Nevadans and their government." As such we encourage you to:

- (a) Fully disclose the names of everyone who contributed to become a member of the Victory Leaders Membership dinner club, as well as the amounts they contributed,
- (b) Refund everyone's donation to the Victory Leaders Membership dinner club whether they ask for their money back or not, and
- (c) Decline to accept any additional donations from Victory 2010 donors for the duration of this campaign cycle.

By being open and honest with the citizens of Nevada, we hope you'll be able to put the distraction of this "spectacularly dumb idea" behind you and we can all move on to critical issues of concern to our state.

Speaking of which, in a further effort to be honest and transparent with the citizens of Nevada, would you also please (a) detail for us exactly who you plan to raise taxes on, and by how much, to reach your proposed \$1.5 billion in "revenue enhancements," as well as (b) exactly where in the general fund budget you intend to cut to reach your proposed \$1.5 billion in spending reductions?

Respectfully yours,



Chuck Muth
President
Citizen Outreach



Assemblyman Ed Goedhart
Assembly District 36
Chairman, Tax Pledge Caucus

P.S. In visiting your website this morning, we noticed that your "In the Press" page advises visitors that "There are no items to display." As this controversy surrounding your dinner club has been widely covered by the media, you might want to have your webmaster update your site to include those stories and columns. We would be happy to provide several links for your consideration.

Just trying to be helpful in a bipartisan way.

Las Vegas Sun

Horsford's fall and his detractors' gall

By **Jon Ralston** (contact)

Wednesday, Aug. 25, 2010 | 2 a.m.

I have been ruminating on what the proper reaction is to Steven Horsford's "Money for Something and Your Access Ain't Free" fundraising pitch. Or what the proper reaction to the reaction might be.

Bemusement? Disgust? Sadness?

I have felt all of the above in the week since the state Senate majority leader solicited up to \$25,000 from prospective donors (also known as lobbyists or special interests) to become part of "Victory Leaders Membership" circles. The offer, now withdrawn, has to be one of the more spectacularly dumb ideas in recent memory, as if Horsford wanted to put a "For Sale" sign on his door while renting out his committee chairmen (apparently unaware their services, such as they are, were being offered).

What Horsford did was crass, heavy-handed and arrogant. But it takes a spectacular naiveté or a willful ignorance — and there is much more of the latter than the former in much of the reaction — not to realize this is just par for a course where membership is reserved only for a closed circle and where the entry fee for influence is often too rich for almost anyone without a Las Vegas Boulevard South address.

"My wording was too blunt," Horsford told me in a brief interview Tuesday. Indeed, that is the salient point here: That Horsford foolishly put in stark language what has been going on in Carson City — and most state capitals and Washington, D.C., for decades. It's a familiar perversion of Patrick Henry: "Give me money or I'll give you legislative death."

Horsford wouldn't tell me who suggested the idea — "It doesn't really matter" — but this sounds like some genius from Washington who remembers schemes such as Senate Finance Chairman Lloyd Bentsen's breakfast club (where lobbyists paid for the privilege) coming up with this brainstorm.

It is, however, hard to take seriously all of the Louis Renaults running around, trying to keep a straight face, especially the Republicans who are just shocked, shocked Horsford would attempt such a thing.

I smiled when I read of state Senate Minority Leader Bill Raggio tut-tutting about Horsford's solicitation, suggesting his counterpart had been intimidating lobbyists not to contribute to Republicans during the campaign season. This is laugh-out-loud funny, folks.

Raggio is the anti-Horsford, but not in the way he implied. When he was majority leader, Raggio was anything but blunt. A master of finesse, he knew how to inspire fear with a carefully chosen word or two, or perhaps by using someone else to send a message.

Don't misunderstand: I don't suggest Raggio ever did anything unethical. But when a consummate insider, a man who served on gaming and managed care boards while being the most powerful legislator in the state for decades, expresses disdain for Horsford's blunt instrument, I figured he must be muttering, "That young man needs to learn a little subtlety."

Even better, state GOP Chairman Mark Amodei's sense of outrage was comically outrageous. "We never operated that way when we were in the majority," Amodei told the Las Vegas Review-Journal. "Probably no laws were broken, but it sends a bad sign about the whole process. You need to raise money, but you don't do that."

This from the man who, while a state senator, auditioned for a job as the mining association's top lobbyist and formed a political action committee with business interests he regulated. A sense of irony is always helpful, Mr. Chairman.

The point here goes beyond the incestuous nature of Nevada politics being a bipartisan abomination. Carson City is the locus, a den of iniquity where thoughtful policy and public-interest legislation often are entombed over wine at Adele's or in the majority leader or speaker's office, no matter what party is in control.

Favors large and small are exchanged daily during the session in a brothel that Raggio would have burned down in his days as a crusading district attorney and that one his old nemesis, Joe Conforte, would have been ashamed to oversee. Yes, some do have hearts of gold, some even try to make an honest living. But almost all realize after a session or two that unless they sell a piece of themselves, unless they lie down with the likes of those they can barely tolerate, there's no coming back.

So spare me the wails over Horsford's solicitation. It was immature and tone-deaf, an expensive (he says he's returned \$70,000) lesson for a promising young politician who now has to try to scrub away the tarnish.

But in Carson City, a place where outrage goes to die, Steven Horsford is simply guilty of poor execution in a game that has been played since before Bill Raggio was born.

© **Las Vegas Sun, 2010, All Rights Reserved. Job openings. Published since 1950. Contact us to report news, errors or for advertising opportunities.**