

STATE OF NEVADA COMMISSION ON ETHICS http://ethics.nv.gov

MINUTES of the meeting of the NEVADA COMMISSION ON ETHICS

August 23, 2017

The Commission on Ethics held a public meeting on Wednesday, August 23, 2017, at 10:30 a.m. at the following locations:

Nevada Legislative Building Room 3137 401 S. Carson Street Carson City, NV 89701

and via video-conference to:

Grant Sawyer State Building Room 4412E 555 E. Washington Avenue Las Vegas, NV 89101

These minutes constitute a summary of the above proceedings of the Nevada Commission on Ethics. Verbatim transcripts are available for public inspection at the Commission's office located in Carson City.

1. Call to Order and Roll Call.

Chair Cheryl A. Lau, Esq. called the meeting to order in Carson City, Nevada at 10:30 a.m. Also present in Carson City were Commissioners Brian Duffrin, Barbara Gruenewald, Esq. and P.K. O'Neill. Present in Las Vegas, Nevada were Vice-Chair Keith A. Weaver, Esq. and Commissioners Amanda C. Yen, Esq. and Lynn Stewart. Present for Commission staff in Las Vegas was Executive Director M. Nevarez-Goodson, Esq. and in Carson City were Commission Counsel Tracy L. Chase, Esq., Associate Counsel Judy Prutzman, Esq. and Executive Assistant Valerie M. Carter, CPM.

2. Public Comment.

No public comment.

3. Approval of Minutes of the June 19, 2017 and July 25, 2017 Commission Meetings.

Executive Director Nevarez-Goodson proposed a modification to the draft Minutes of the Commission's June 19, 2017 Meeting related to the Executive Director's report regarding the Commission's budget for the current biennium. Specifically, the Executive Director requested that the Minutes accurately reflect that the Legislature approved certain salary enhancements for certain Commission staff positions, but the Legislature did not approve all title and salary adjustments as requested by the Commission in line with similar titles and salaries of the Judicial Discipline Commission staff. Specifically, the Legislature approved modified enhancements to the salaries of the Executive Director and Commission Counsel and approved the corrected title

of the Associate Counsel without the requested salary enhancement. The Legislature also corrected the salary for the Commission's Senior Legal Researcher to the same amount as the Commission's Executive Assistant and in line with other paralegals within the Unclassified Pay Bill. However, the Legislature did not approve the salary adjustments of the Executive Director, Commission Counsel, Associate Counsel or Senior Legal Researcher at the requested amounts. The Legislature also did not approve the requested title and salary change of the Commission's Executive Assistant to Management Analyst III or IV.

Commissioner Duffrin moved to approve the June 19, 2017 Minutes, as amended, and Commissioner Grunewald seconded the motion. The Motion was put to a vote and carried unanimously.

Commissioner Duffrin also moved to approve the July 25, 2017 Minutes and Commissioner Grunewald seconded the motion. The Motion was put to a vote and carried unanimously.

4. <u>Presentation and approval of FY17 Annual Report prepared by the Executive Director</u> <u>pursuant to NAC 281A.180 (2).</u>

Executive Director Yvonne Nevarez-Goodson, Esq. presented her draft of the Commission's Annual Report for Fiscal Year 17. (See Exhibit A) The Commission accepted the Annual Report to be finalized and published on the Commission's website.

5. <u>Report and recommendations by Executive Director on agency status and operations and possible direction thereon.</u>

Executive Director Nevarez-Goodson updated the Commission on various issues and staff projects during the beginning of the fiscal year and related to implementation of new procedures under Senate Bill 84 of the 2017 Legislative Session. Director Nevarez-Goodson acknowledged and thanked the Commission staff for its hard work after the legislative session to ensure the timeliness and quality of its cases and opinions, litigation portfolio, updates to its internal forms, notices and working documents and outreach/education efforts on behalf of the Commission.

Executive Director Nevarez-Goodson introduced and discussed the Commission's updated Public Records Policy and confirmed that it would be published on the Commission's website. (See Exhibit B).

The Director confirmed that the Commission continues to have a vacancy to be appointed by the Legislative Commission and she would follow-up with the Legislative Commission on this issue. Director Nevarez-Goodson also reminded the Commissioners to reserve the third Wednesday of each month for Commission meetings and she would inform the Commission of any cancellations.

Regarding the status of the Commission's cases, Director Nevarez-Goodson provided the Commission with a status log of pending matters to inform the Commissioners of how many cases, both complaint and advisory, were pending before the Commission and the procedural status of those cases. Director Nevarez-Goodson confirmed that staff was complying with all statutory deadlines and meeting current agency performance measures for issuance of opinions and other matters.

Executive Director Nevarez-Goodson informed the Commission of fiscal discrepancies discovered in closing its Fiscal Year 17 budget. The State Budget Office discovered that the local governments who contribute to the Commission's budget were credited back too much money from prior fiscal year reserve savings to create a shortfall in its closing budget. However, the State Budget Office and Legislative Counsel Bureau resolved the error and the Commission billed the local governments for the shortfall. The local governments paid the shortfall amounts and the budget was closed. The Commission appeared before the Board of Examiners to acquire

contingency funds for the shortfall; however, sufficient payments were made by the local governments such that the Commission ultimately did not need those funds.

As a final matter, the Executive Director reported on the extensive outreach anticipated for Eastern and Southern Nevada in September and October to perform numerous trainings for the local jurisdictions and various boards and agencies. She reminded the Commission of its goals to provide extensive outreach after each legislative session and anticipated several more requests for training in the coming months.

Commissioner O'Neill suggested a broader outreach and education program to the general public. Executive Director Nevarez-Goodson agreed to work with Commissioner O'Neill to develop new outreach opportunities.

6. <u>Election of Commission Chair and Vice Chair for Fiscal Year 2018, pursuant to NAC 281A.150.</u>

Commissioner Gruenewald moved for Chair Cheryl A. Lau to continue serving as the Commission Chair and Vice-Chair Weaver to continue serving as the Commission's Vice-Chair for the next fiscal year. Commissioner Stewart seconded the Motion. Commissioner Duffrin expressed his support of the nominations and gratitude of the leadership demonstrated by Chair Lau and Vice-Chair Weaver for the newly appointed commissioners. The Motion was put to a vote and carried unanimously.

7. <u>Commissioner Comments on matters including, without limitation, identification of future</u> agenda items, upcoming meeting dates and meeting procedures. No action will be taken under this agenda item.

Commissioner O'Neill questioned whether the Legislative Commission Meeting had any scheduled future meeting dates and the Executive Director confirmed that a meeting had not been scheduled. She stated that she would notify the Director of the Legislative Counsel Bureau to remind him of the vacancy on the Commission.

8. Open Session for Public Comment.

No public comment.

9. Adjournment.

Commissioner Duffrin moved to adjourn the meeting. Commissioner Gruenewald seconded the Motion. The Motion was put to a vote and carried unanimously, and the meeting was adjourned.

Minutes prepared by:

Minutes approved November 15, 2017:

<u>/s/ Yvonne M. Nevarez-Goodson</u> Yvonne M. Nevarez-Goodson, Esq. Executive Director <u>/s/ Cheryl A. Lau</u> Cheryl A. Lau, Esq. Chair

/s/ Keith A. Weaver_

Keith A. Weaver, Esq. Vice-Chair



Exhibit A



A public office is a public trust, to be held for the sole benefit of the people.

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ANNUAL REPORT TO THE COMMISSION ON ETHICS REGARDING FISCAL YEAR 2017

Pursuant to Nevada Administrative Code 281A.180(2), the Executive Director provides this Annual Report to the Commission on Ethics ("Commission") regarding the fiscal, legislative, regulatory and other business undertaken by and on behalf of the Commission in the past fiscal year and the goals for new fiscal year. This Report recognizes the Commission's activities and accomplishments between July 1, 2016 and June 30, 2017 (FY17) and its objectives for the coming year.

The information presented is based upon public records of the Commission. Additionally, the Commission maintains a public website at www.<u>ethics.nv.gov</u> at which the public may search the Commission's database of opinions, review minutes and agendas, instructions and forms for filing requests for the Commission's opinion and access other public information. The Commission also posts its agendas on the Nevada Public Notice statewide website at www.<u>notice.nv.gov</u>.

July 1, 2017

Commissioners:

Fiscal Year 2017 (FY17) marks a year of significant legal, technological and procedural advancements for the Commission and its staff. The Commission achieved its goals outlined for FY17 through its progressive legislative endeavors, technological advancements, litigation and overall case management. At the end of FY16, the Commission sought to achieve efficiency in resolving cases before the Commission to prevent a backlog of written opinions, refocus its efforts on outreach and education and modernize with new technologies to ensure secure communications with staff and open transparency with the public. The Commission launched its new Website, procured a contract to develop a customized case and document management system and online opinion database, transitioned to secured communications via State-issued email accounts, and increased its in-house technologies to include enhanced Internet. With the developments from the 2017 Legislative Session, the Commission is poised to develop new processes for investigating and adjudicating ethics complaints and carrying forward its updated technology into FY18.

In the midst of these in-house changes and expansive legislative and budgetary priorities, the Commission welcomed several new Commissioners prepared to offer fresh perspective and dialogue to the Commission's work and outreach. The Commission consists of Gubernatorial and Legislative appointees, which must include a certain number of licensed attorneys and former public officers or employees. In FY17, the Governor appointed Brian Duffrin, former Chief of the Administration Division of the Nevada Gaming Control Board, and P.K. O'Neill, former State Assemblyman and former Investigator with the Nevada Department of Public Safety. With their collective administrative and management experience as former public officers and employees, both Commissioners immediately offered dynamic and thoughtful insight and perspective to case resolution, complaint investigations, agency operations and legislative priorities.

In addition to the Governor's new appointees for FY17, the Legislative Commission appointed Amanda Yen, Esq., an attorney at McDonald, Carano & Wilson law firm and former State Assemblyman Lynn Stewart to join the Commission. Commissioner Yen initiated and rendered strong legal analysis and interpretation, creative problem-solving and practical insights during a year that included significant litigation and new Commission precedent, and Commissioner Stewart has offered invaluable legislative insights given the demands of the 2017 Legislative Session.

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Under the continued leadership and experience of Chair Cheryl Lau, Esq., Vice-Chair Keith Weaver, Esq. and Commissioner Barbara Gruenewald, Esq., the Commission decided multiple precedent-setting cases, confronted varied constitutional and legal challenges and streamlined and formalized various procedures to ensure more efficient meetings and case management. These Commissioners guided their newer colleagues through aggressive legislative proposals, both budgetary and substantive, and welcomed fresh perspective on new cases. Looking forward to FY18, the Commission anticipates its remaining vacancy will be filled by the Legislative Commission.

Under the continued direction, governance and partnership of Executive Director Yvonne M. Nevarez-Goodson, Esq. and Commission Counsel Tracy L. Chase, Esq., the Commission and its staff achieved great success in the 2017 Legislature and in various judicial forums, all while continuing to timely respond to advisory and complaint based requests for the Commission's opinion. Continuing to serve the Commission during the past fiscal year, and providing outstanding public service, were the Commission's Associate Counsel, Judy Prutzman, Esq., Executive Assistant, Valerie Carter, CPM, Senior Legal Researcher, Darci Hayden, PP, and Investigator, Anthony Freiberg.

The Commission should be further commended for maintaining a current case load, preventing a backlog and increasing its outreach and education, all while defending the Commission's legal interests on judicial review in various legal forums, including various district courts and the Nevada Supreme Court, and pursuing an expansive legislative agenda.

Upon reflection of the goals and achievements for FY17, I present this report highlighting our past accomplishments and promoting our future endeavors. As you review the information in this Annual Report, I trust you will be as confident as I am about the Commission's successes and direction for future reforms in the upcoming year. Thank you for the opportunity to serve the Commission, its staff and the public for these last 8 years. I am honored to continue serving in this prestigious role to implement the Commission's goals for the next fiscal year.

Sincerely,

Yvonne M. Nevarez-Goodson, Esq. Executive Director

I. About the Nevada Commission on Ethics

Nevada Commission on Ethics - Ethics in Government Law:

The Nevada Commission on Ethics is an independent public body appointed equally by the Governor and Legislative Commission to enforce and interpret the provisions of Nevada's Ethics in Government Law, NRS Chapter 281A ("Ethics Law"). The Ethics Law preserves the public's trust in government and ensures that public officers and employees avoid conflicts between their private interests and the interests of the public. The Ethics Law sets forth various standards of conduct to guide public officers and employees to avoid such conflicts and maintain integrity in public service.

The Commission's primary mission includes providing outreach and education to Nevada's public officers, employees and attorneys regarding conflicts of interest and the provisions of the Ethics Law. Encompassed in its educational efforts, the Commission provides advisory opinions to public officers and employees regarding their own circumstances ("First-Party Requests for Advisory Opinion") and investigates and opines regarding conduct of public officers and employees alleged to be in violation of the Ethics Law ("Third-Party Requests for Opinion" and/or "Ethics Complaints"), hereafter collectively referred to as "Requests for Opinion" or "RFOs".

Membership:

The Commission consists of 8 members, appointed equally by the Governor and the Nevada Legislative Commission. The Governor and Legislative Commission must each appoint at least two former public officers or employees and one attorney licensed in the State of Nevada, and no members may be actively involved in the work of any political activity or campaign or conduct lobbying activities for compensation on behalf of private parties. Not more than half of the total commissioners may be members of the same political party or residents of the same county in the State. The appointment criteria establishes independence and objectivity in addressing RFOs as applicable to all State and local government elected and appointed public officers and employees. During the majority of FY17, the Commission operated with only 7 members, including 4 new commissioners and one vacancy of the Legislative Commission.

Requests for Opinions:

The Commission holds the exclusive statutory authority to interpret and enforce the provisions of the Ethics Law and renders its opinion regarding the applicability of the Ethics Law to public officers and employees via First-Party Requests for Advisory Opinions and Third-Party Requests for Opinions (Complaints). The Commission's primary mission to provide outreach and education to public officers and employees is consistent with its responsiveness to requests for advisory opinions and efforts to prevent third-party complaints. The Commission staff is responsible for reviewing and preparing all requests for the Commission's opinion, including jurisdictional and other legal analysis and preparation and presentation of evidence for hearings.

First-Party Requests for Advisory Opinions:

Any public officer or employee may request a confidential advisory opinion from the Commission regarding the applicability of the Ethics Law to his/her own past, present or future circumstances. If the request relates to a conflict of interest between a public duty and private interest, the Commission will conduct a closed hearing and render a confidential opinion in the matter advising the public officer or employee whether he/she has a conflict of interest and whether or how the ethical standards of conduct apply to his/her circumstances. With the assistance of its staff, the Commission collects all relevant facts and circumstances related to the RFO, holds an evidentiary hearing in the matter and renders its oral opinion. The Commission later issues a formal written opinion in the matter. The Commission's advice is binding with respect to future conduct and any advice related to present or future conduct may be subject to judicial review for errors of law or abuses of discretion.

Third-Party Requests for Opinions (Complaints):

Any member of the public may file an ethics complaint or the Commission may initiate an ethics complaint against a public officer or employee alleging a violation of the Ethics Law. The Commission may investigate the allegations, conduct hearings and impose sanctions. If the Commission has jurisdiction regarding a complaint and it is properly filed with sufficient information to support the allegations, the Executive Director will investigate the matter and make a recommendation to a two-member investigatory

panel of the Commission regarding whether the evidence is sufficient to warrant a hearing and formal opinion in the matter. If the Panel determines that the matter supports just and sufficient cause for the Commission to render an opinion, the matter will proceed for formal hearing or informal disposition of the matter. Since 2013, all complaints that have been forwarded to the Commission from a Panel have been resolved through informal dispositions, including stipulated findings and agreements and dispositive legal motions.

II. Case Statistics

Requests for Opinion (RFOs) Received:

Fiscal Year/Dates	<u>Total 1st Party</u> <u>RFOs Rec'd</u>	<u>Total 3rd Party</u> <u>RFOs Rec'd</u>	REJECTED 3rd Pty	ACCEPTED 3rd Pty
FY17: 7/16 - 6/17	12	43	31	12

Third-Party RFOs which the NCOE accepted jurisdiction:

<u>Fiscal</u> <u>Year/Dates</u>	Investigated	<u>Panel</u> Dismissed	Panel Waived/ Forwarded to Commission for Hearing/Opinion	<u>3rd Pty to</u> Hearings/Opinion	<u>3rd Pty</u> Stips/Orders
FY17: 7/16 - 6/17	12 ¹	1	5	0	5

The Commission experienced a decrease in the number of Third-Party RFOs accepted/investigated during the last two fiscal years as compared to prior years. The Commission does not control the number of Third-Party RFOs that may be filed in any particular year. Most, if not all, Third-Party RFOs the Commission has considered since 2013 have resulted in stipulated resolutions. This denotes the nature of alleged violations of the Ethics Law and the role of the Executive Director and Associate Counsel, along with the Subjects' counsel, to resolve matters in a timely fashion and mitigate the strain on Commission resources. Given this trend, the Commission sought legislative approval during the 2017 Legislature to further streamline its investigatory and hearing processes and diversify the scope of sanctions for violations to include various corrective action, letters of caution or instruction and public admonitions, censures and reprimands. The Legislature approved these amendments and the new processes and discipline will be implemented in the next fiscal year.

Jurisdictional Reviews:

The regulations set forth in NAC Chapter 281A require the Executive Director and Commission Counsel to review each Third-Party Request for Opinion and make a determination whether the Commission has jurisdiction to investigate the matter. This decision is based upon confirmation that the Subject is a public officer or employee, the alleged conduct is within the scope of NRS 281A, and credible evidence has been

¹ 6 RFOs still pending outcome.

provided that supports the allegations. The Commission adopted procedural regulations authorizing appeals of staff jurisdictional determinations to the Commission wherein the Requester may seek review of the staff's denial of jurisdiction and the Subject may request the Commission's review of staff's determination to accept jurisdiction. The statistics below highlight the number of administrative jurisdictional reviews processed during FY17.

The 2017 Legislature approved various procedural amendments to the Ethics Law, including a requirement for the full Commission to determine jurisdiction in all matters before an investigation is conducted. Accordingly, the Commission will no longer accept jurisdictional appeals.

Jurisdictional Appeals Received:

<u>Fiscal</u> <u>Year</u> /Dates	<u>Total 3rd Party</u> <u>RFOs Rec'd</u>	<u>Total</u> Jurisdictional <u>Reviews</u>	<u>Jurisdictional</u> <u>Reviews by Subject</u> (Upheld/Overturned)	<u>Jurisdictional Reviews by</u> <u>Requester</u> (Upheld/Overturned)
FY17: 7/16-	43	3	<u>1 Total</u> (Upheld)	<u>2 Total</u> (2 upheld)
6/17			Jurisdiction Confirmed	Jurisdiction Denied

Sanctions Imposed:

In FY17, the Commission imposed \$5,500 in civil penalties for willful violations of the Ethics in Government Law. Pursuant to State law, the Commission collects and deposits all funds received from the imposition of sanctions into the State General Fund. Subjects who do not pay the civil sanction are reported to the State Controller for collection.

	Statute(s) violated	Civil Penalty
Public Officer or Employee		
Donna Lopez, Quality Control Officer, PEBP	NRS 281A.020 and NRS 281A.400(1)	\$1,000
Kimberlie Buffington, Former Lander County Planning Commissioner	NRS 281A.020 and NRS 281A.420(1)(3)	\$1,000
Gerald Antinoro, Sheriff, Storey County	NRS 281A.400(7)	\$1,000
Brad Bonkowski, Supervisor, Carson City Board of Supervisors	NRS 281A.420(1)(3)	\$2,500

Documents Filed:

Pursuant to NRS 281A.500, public officers filed 658 Acknowledgment of Ethical Standards forms with the Commission for calendar year 2016. Most public officers are statutorily required to file these forms at the beginning of a term of office, so the number of forms filed from year to year are not indicative of a rise or fall in overall compliance. The number of Acknowledgements generally increases following educational outreach by the Commission, as the awareness of this requirement is implemented throughout the State and local jurisdictions. In FY17, the Executive Director included direct correspondence to Nevada's state and local government clerks and agency managers to increase compliance.

NRS 281A.410 requires certain public officers to disclose their paid representation or counseling of private persons before a state agency of the Executive branch. The Commission received 11 disclosures of agency representation for 2016.

Starting in FY18, public officers will no longer be required to file the representation forms. The Legislature eliminated the requirement for these forms, instead requiring public disclosures of such representations if the public officer has a conflict of interest between a public duty and the nature of the representation.

III. Litigation & Appellate Review:

During FY17, the Commission defended several of its decisions that were the subject of petitions for judicial review and/or petitions for writs of mandamus.

RFOs 14-21C and 14-22C (Hansen and Wheeler)

Throughout FY17, the Commission awaited a decision from the Nevada Supreme Court in response to a motion to dismiss the Commission's appeal related to these matters that have been the subject of litigation during the last 3 fiscal years. As reported in prior Annual Reports, after the Commission's acceptance of jurisdiction of these matters, Subjects Hansen and Wheeler filed a joint Petition for Judicial Review and/or Petition and Application for Writ of Certiorari, Review or Prohibition entitled "Hansen and Wheeler v. Nevada Commission on Ethics" in the First Judicial District Court of the State of Nevada in and for Carson City, Case No. 150C000761B, challenging subject matter jurisdiction. The Subjects asserted protection from the Commission's jurisdiction based upon certain principles of legislative privilege and immunity. The Commission objected to these assertions on the basis that they were premature and the Commission must have an opportunity to investigate the facts and determine whether the alleged conduct constitutes legislative acts subject to the privileged immunity. The District Court granted the petition for judicial review in favor of the Subjects, holding that the Commission did not abuse its discretion or act unreasonably or arbitrarily, but the Commission nevertheless did not have jurisdiction to investigate the matters based on the application of a new law that was enacted by the Legislature during the 2015 Legislative Session. The Commission filed a Notice of Appeal of the District Court decision in the Nevada Supreme Court, Case No. 69100.

In response to the Commission's Notice of Appeal of the District Court decision, the Subjects filed complaints against the Commission in the First Judicial District Court alleging that the Commission violated various provisions of Nevada's Open Meeting Law, along with a related motion in the pending appeal before the Nevada Supreme Court. The complaints and motion challenge the Commission's process for appealing the decision and assert that the Commission did not provide appropriate notice to the Subjects that the Commission would evaluate their character or competence by appealing the District Court's decision on the petition for judicial review. The Commission opposed

all allegations and defended these claims before the First Judicial District Court of the State of Nevada in and for Carson City, Case Nos. 15OC002611B and 16OC000291B, and the Nevada Supreme Court Case No: 69100. The two open meeting law cases were consolidated and stayed pending resolution of the motion in the Nevada Supreme Court. On June 29, 2017, a 3-member panel of the Nevada Supreme Court granted the motion to dismiss the appeal. The Commission anticipates seeking Rehearing and/or Reconsideration of the Panel Opinion during the next fiscal year and defending the open meeting law claims.

RFO 16-33C (Sullivan)

The Commission accepted jurisdiction of this complaint which alleged that Sullivan misused her official position to secure unwarranted benefits for herself and failed to disclose a conflict of interest and abstain from participating in a land use project that affected her personal residence. The Executive Director investigated the matter and provided a report and recommendation to an Investigatory Panel of the Commission regarding just and sufficient cause for the Commission to render an opinion in the matter. The Panel issued a determination concluding that the investigation did not yield sufficient evidence to support a violation of the Ethics Law and dismissed the matter.

The Requester of the complaint filed a Petition for a Writ of Mandamus in the First Judicial District Court of the State of Nevada in and for Carson City, Case No. 16OC002811B, asserting that the Commission should overturn the Panel Determination and hold a hearing in the matter. The Commission defended the Petition asserting that the Requester was not a party to the proceedings and lacked standing to file the Petition. The Court agreed with the Commission that the Requester lacked standing and dismissed the case.

RFO 16-63N (Confidential Subject)

The Commission received this complaint which alleged that Confidential Subject misused an official position for private interests. The Commission concluded that the allegations did not assert conflicts of interest under the Ethics Law. The matter remains confidential because it was dismissed at the jurisdictional phase of proceedings, without a Panel proceeding which marks the point in time at which a complaint becomes public

under NRS 281A.440. The Requester of the complaint filed a Petition for a Writ of Mandamus in the First Judicial District Court of the State of Nevada in and for Carson City, Case No. 16OC002901B, asserting that the Commission should accept jurisdiction and conduct an investigation of the matter. The Commission defended the Petition asserting that the Requester was not a party to the proceedings and lacked standing to file the Petition. The Court agreed with the Commission that the Requester lacked standing and dismissed the case.

RFO 15-74A (Confidential Subject)

In response to this confidential request for an advisory opinion filed by Confidential Subject, the Commission issued an opinion regarding the application of the disclosure and abstention provisions of the Ethics Law to the Confidential Subject's private circumstances. Confidential Subject filed a Petition for Judicial Review in the Second Judicial District Court of the State of Nevada in and for Washoe County, Case No. CV16-02118, asserting that the Commission committed various errors of law, including various constitutional errors. The District Court upheld the Commission's determination regarding disclosure and concluded that the Commission's opinion did not violate any constitutional protections. However, the Court overturned the Commission's determination regarding abstention.

The Commission filed a Notice of Appeal with the Nevada Supreme Court asserting that the District Court committed error in its reversal of the Commission's abstention analysis. The Confidential Subject filed a cross-appeal asserting the Court committed error in its affirmance of the Commission's opinion related to disclosure and its dismissal of the constitutional claims. These matters have been filed under seal with the Nevada Supreme Court, Case No. 73105, to maintain the statutory confidentiality of the Confidential Subject and the Commission's opinion. The Commission will continue to defend its opinion and the petition in the next fiscal year.

RFO 16-54C (Antinoro)

The Commission issued a final opinion in this matter finding that Antinoro committed a willful violation of the Ethics Law by using government letterhead as a mechanism to endorse a political candidate and the Commission imposed a \$1,000

sanction. Sheriff Antinoro filed a Petition for Judicial Review of the Commission's decision in the First Judicial District Court in Carson City, asserting that the Commission committed legal error and that the statute is unconstitutional. The petition was filed at the end of the fiscal year and the Commission will defend its opinion and the judicial review in the next fiscal year.

IV. Legislative Matters

The Commission proposed and submitted a bill draft request to amend various provisions of the Nevada Ethics in Government Law set forth in NRS Chapter 281A to the 2017 Nevada Legislature. The Governor sponsored the proposal which was presented to the Legislature as Senate Bill 84. After various amendments, the Nevada Legislature enacted Senate Bill 84 during the 79th Legislative Session (2017). The majority of the amendatory provisions are effective on July 1, 2017 and will be implemented by the Commission in Fiscal Year 18.

The measure encompasses vast amendments to NRS Chapter 281A, including: 1) Reorganizing and restructuring various statutes and sections within NRS Chapter 281A; 2) Revising statutory terminology and procedures to clarify distinctions between advisory requests and complaints; 3) Clarifying the scope of the Commission's jurisdiction to include certain persons who contract with public agencies to fill positions that would ordinarily be held or filled by a public officer or employee under certain circumstances, and to exclude allegations solely related to employment-based discrimination and harassment claims; 4) Streamlining the Commission's jurisdictional, investigatory and case management processes of ethics complaints, including a new review panel and approval of deferral agreements; 5) Expanding the remedies available to review panels for terms and conditions of deferral agreements and to the Commission for findings of violations; 6) Adopting consistent criteria regarding conflicts of interest throughout the statutory standards of conduct; 7) Clarifying that the cooling-off provisions which prohibit former public officers or employees from seeking, negotiating or entering into employment in the private sector includes services contemplated or provided through oral or written agreements and that any relief from the application does not relieve the public officer or employee from the prohibitions against representing or counseling private persons on issues that were under consideration by the former public agency; and 8) Revising the filing and disclosure requirements for public officers.

Most notably, SB 84 contemplates a new structure by which third-party requests for opinion, now "ethics complaints", will be processed, investigated and considered by the Commission. Specifically, the Ethics Law will now require the full Commission to make jurisdictional determinations in all ethics complaints upon a review of sufficient

evidence to support the allegations. The Commission will have the authority to dismiss the complaint with or without a confidential letter of instruction or letter of caution, or direct the Executive Director to investigate the matter and make a recommendation to a Panel regarding whether there is credible evidence to support just and sufficient cause for the Commission to render an opinion in the matter. Upon direction from the Commission, the Executive Director will conduct an investigation.

Senate Bill 84 replaced the current 2-member investigatory panel with a 3-member review panel that will have final authority to dismiss the complaint with or without a letter of instruction or caution, forward the matter to the Commission for a final opinion or approve a deferral agreement between the subject of the complaint and the Executive Director. Senate Bill 84 further expands the remedies available to the Commission upon findings of violations to impose various forms of discipline and provide for certain administrative decisions and less formal resolutions of minor violations, including letters of instruction or caution, deferred discipline with education, corrective action, public apologies and public admonitions, censures and reprimands.

After the 2017 Legislative Session, Commission staff spent the final months of FY17 revising all of its forms, updating its website and drafting internal templates for the new procedures outlined in SB 84. As the new legislation becomes effective on July 1, 2017, the Commission will be prepared to implement the law related to its receipt of requests for advisory opinions, ethics complaints, and acknowledgement forms. The Commission will also be prepared to seamlessly issue jurisdictional orders, letters of caution or instruction, deferral agreements and revised forms of discipline via educational requirements and public admonitions, censures and reprimands.

V. Fiscal Matters

Commission Budget:

FY17 wrapped up the second year of the Commission's current biennial budget. Other than cost savings in travel and court reporting, the Commission expended its legislatively approved budget for the fiscal year. The Commission's legislatively approved budget for FY17 was \$827,146 including personnel (salaries/benefits), travel, operating expenses, court reporting, information technology equipment and services, and other State-related cost allocations and assessments. Other than personnel and operating costs, the Commission's outreach and education program and responding to requests for opinions establish the largest fiscal impacts on the Commission's budget.

Given the legislative priorities and demands of Commissioners and staff during FY17 and the demands on staff to respond to significant litigation, the Commission held fewer in-person meetings which resulted in cost savings to the Commission's travel and court reporting budget categories. These cost-savings provided sufficient budget authority for the Commission to retain the services of an independent contractor to develop an online customized document management system and on-line searchable opinion database. This customized system will be launched in FY18 and will be compatible with and accessible through the Commission's newly launched Website. All forms and documents may then be filed electronically with the Commission. Furthermore, public attorneys will have access to on-line searchable database of the Commission's published opinions which will allow the attorneys to search for opinions based on specific terms or other search criteria. This is particularly important given the safe harbor provisions of the Ethics Law which provide protection from a finding of a willful violation where the public officer or employee reasonably relies upon the advice of counsel and such advice is not contrary to the Commission's published opinions. This system was conceived in part with the anticipated legislation to streamline internal investigatory and case management processes.

The Commission's budget objectives in FY17 included direction to the Executive Director to continue seeking appropriate title changes and salary enhancements for certain staff positions within the agency to establish parity with similar positions in other State agencies, in particular, the Commission's counterpart in the Judicial Branch, the

Nevada Judicial Discipline Commission. The Nevada Legislature addressed many, but not all, of the Commission's requested enhancements. However, the Commission remains resolute in its quest to achieve total parity in title and salary for equivalent positions and may again seek additional enhancements in future biennia which are consistent with these agencies. The Legislature also adopted SCR 6, which required an Interim Salary Study of the Unclassified and Non-classified positions in State Government to achieve parity. The Commission expects to participate in this Interim Study as appropriate.

The Commission derives its funding based upon a proportionate split between the State General Fund and certain of Nevada's Local Governments (cities and counties). The portion attributable to the local governments is based on the respective populations of those cities and counties. Historically, in prior biennia, the number of requests for opinion the Commission received regarding public officers or public employees in the various jurisdictions formed the basis for each entity's proportional contribution. During the last three biennia, the State/Local split has ranged from its current split of 21 percent State and 79 percent Local Government, to 31 percent State and 69 percent Local Government.

During the 2017 Legislative Session, the Commission sought an amendment to its budget to stabilize the funding split between the State General Fund and Local Governments. The Commission believed a funding split based on the number of requests for opinion received did not accurately reflect the Commission's overall expenditures attributable to the State versus local governments. In addition to resolving Requests for Opinion, the Commission conducts significant outreach and training to State and local governments and responds to litigation from various jurisdictions.

Accordingly, the Commission reviewed objective labor data that showed a consistent average split of Nevada's public officers and employees employed by the State or local governments at approximately 28 percent State and 72 percent local governments. These numbers are similar to the proportionate split over the last three biennia which averaged approximately 30 percent State and 70 percent local governments. Consequently, the 2017 Legislature approved a methodology change whereby the State and Local Government split will be determined based on the number

of public officers and employees in Nevada between State and local governments as reported in the labor statistics. As these numbers remain relatively consistent, it is anticipated that the split will also remain consistent in future biennia. This new methodology accurately reflects the full scope of the Commission's work attributable between State and local governments.

VI. Outreach & Education Program

In FY17, the Commission continued its outreach and education program to Nevada's public officers and employees and public attorneys. This year, the Executive Director provided significant outreach to State legislators during the Legislative Session and the Commission's proposed amendments to the Ethics Law. Outreach has also included an emphasis on the Commission's anticipated new processes, revised forms and electronic submissions of documents. In addition to the traditional outreach through trainings, the Executive Director also targeted specific groups of public officers and employees based on specific concerns or cases addressed by the Commission in the preceding year. Specifically, the Executive Director initiated direct correspondence and informational letters to various groups, including, without limitation, correspondence and meetings with Nevada's state and local government clerks and managers regarding the required acknowledgment forms for elected and appointed public officers and brokers who simultaneously serve public office, and other newly established public agencies or agencies under public scrutiny.

Trainings Provided to:	Number of Ethics in Government Law Trainings Presented:	
State Government Entities	7	
Local Government Entities	12	
Other	2	
Total	21	

Ethics Trainings - FY17

In addition to the Commission's training program, the Commission began tracking its other outreach efforts via staff communications and correspondence with the public during FY 16. The Commission staff provides regular, often daily, feedback for the public, public officers and employees and attorneys regarding the applicability of NRS 281A and Commission's opinion precedent. The Commission commenced tracking these communications regarding inquiries that are unrelated to pending RFOs. In FY17, the Commission staff reported that it responded to approximately 490 calls and emails related to questions regarding the applicability of the Ethics in Government Law. This marks an increase of more than 100 calls or emails over last fiscal year. It is estimated that this number does not fully reflect all staff communications related to ethics questions, and the

Commission staff will continue to track this form of educational outreach in the next fiscal year.

VI. Closing Remarks

The Commission's focus on the 2017 Legislative Session marks a substantial achievement for the Commission during FY17 which will result in streamlining of the Commission's investigatory and case management processes. The emphasis on training and outreach during the past fiscal year and diversifying the format of such outreach has demonstrated success in educating public officers and employees to identify conflicts of interest and maintain proper separations of private conflicts from public duties under the Ethics in Government Law.

The current and anticipated document management system and technological upgrades are essential to promote and maintain timely and efficient processing of matters before the Commission. The launch of online forms and resources in FY18 will dramatically reduce internal staff processes and assist those served by the Commission by providing easier access to laws, regulations, opinions and forms.

The Commission will maintain its mission to advise public officers and employees regarding the applicability of the Ethics Law and confront conduct in violation of the Ethics Law to maintain the public trust associated with holding public office, which is held for the sole benefit of the people.

Commission and Commissioner Information

Nevada Commission on Ethics as of 06/30/17

Commissioners

*=Appointed by Governor

**=Appointed by Legislative Commission

Chair - Cheryl Lau, Esq. (R)* (07/01/16 - 06/30/20)

Vice Chair - Keith Weaver, Esq. (D)* (04/06/16 - 09/30/20)

Brian Duffrin (NP)* (10/01/16 - 10/31/19)

Philip "P.K." O'Neill (R)* (01/30/17 – 6/30/19)

Barbara Gruenewald, Esq. (D)** (11/01/15 - 10/31/19)

> Amanda Yen, Esq. (R)** (12/21/16 – 06/30/20)

> > Lynn Stewart (R)** (01/27/17 - 10/31/19)

> > > VACANT**

<u>Staff</u>

Yvonne M. Nevarez-Goodson, Esq. Executive Director Tracy L. Chase, Esq. Commission Counsel

Judy A. Prutzman, Esq. Associate Counsel

Darci L. Hayden, PP-SC Senior Legal Researcher Valerie M. Carter, CPM Executive Assistant Anthony L. Freiberg Investigator



Nevada Commission on Ethics

Nevada Commission on Ethics 704 W. Nye Lane, Suite 204 Carson City, NV 89703 Tel: 775-687-5469 Fax: 775-687-1279 www.ethics.nv.gov

Email: ncoe@ethics.nv.gov



Exhibit B



STATE OF NEVADA COMMISSION ON ETHICS 704 West Nye Lane, Suite 204 Carson City, Nevada 89703 (775) 687-5469 • Fax (775) 687-1279 http://ethics.nv.gov

NEVADA COMMISSION ON ETHICS PUBLIC RECORDS POLICY

A. Purpose

To provide members of the public with reasonable uniform procedures to access, inspect and copy public books and records of the Nevada Commission on Ethics ("Commission") as permitted by law in compliance with the Nevada Public Records Act set forth in NRS Chapter 239 and interpretive regulations located in NAC Chapter 239 (collectively referred to as the "Public Records Act").

B. Policy Statement

1. Access to Public Records. The Commission is committed to providing access to public records in accordance with the Public Records Act. In furtherance of the Public Records Act, the Ethics in Government Law set forth in NRS Chapter 281A and NAC Chapter 281A (collectively referred to as the "Ethics Law") contain statutory authority and interpretive regulations declaring specific proceedings and records of the Commission confidential. Any controlling law or governing amendments to the Public Records Act or the Ethics Law shall control and supersede any conflicting provisions of this policy. Additionally, the Commission adopts, as general guidelines for processing public records requests, the applicable

provisions of the Nevada Public Records Act: A Manual for State Agencies, latest edition, as duly issued and approved. The Manual is available at <u>nsla.nv.gov</u>.

2. Assistance and Compliance with Americans with Disabilities Act ("ADA"). In accordance with the ADA, reasonable accommodations are made available to the public for the inspection and copying of public records including providing the opportunity to request public records in an alternative format. The public should direct requests for reasonable accommodations to the Commission's designated Records Official.

NOTICE: For assistance with ADA compliance or any other questions, please contact the Commission during regular business hours on Monday through Thursday, from 7:00 a.m. to 5:30 p.m., excluding holidays and other official business closures.

3. Public Records located on Official Website. Copies of agendas, minutes, proposed regulations and final Commission Opinions constitute public records and will be provided to the public without charge. The Commission maintains an official website located at <u>www.ethics.nv.gov</u> where these and certain other public records may be obtained.

4. Confidential and Restricted Records. A number of proceedings and records of the Commission are declared to be confidential under Nevada law. In addition to records of the Commission designated as confidential pursuant to the Public Records Act and Ethics Law, the Commission acknowledges all other laws declaring the records of the Commission to be confidential or restricted, including interpretive regulations, cases, and other legal precedent. Each public records

Updated 8/16/17

request received by the Commission will be reviewed to determine whether the records requested are confidential or restricted.

C. Public Records Request Guidelines:

The following guidelines are provided to assist the public in completing a public records request:

1. Public Records Request Form. A Public Records Request form (Exhibit "A") is provided to facilitate a request for public records of the Commission. When completing the Public Records Request Form, it is important to be as specific as possible and provide concise and legible information. Details identifying the public records such as names, dates, and any other identifying information will assist with the processing of a request. Public Records Requests may be sought via the Commission's official website at www.ethics.nv.gov or sent to the attention of Yvonne M. Nevarez-Goodson, Esq., Executive Director, as the designated Records Official for the Commission:

E-Mail: ncoe@ethics.nv.gov

Mailing and Physical Address: State of Nevada Commission on Ethics 704 West Nye Lane, Suite 204 Carson City, NV 89703 Phone: (775) 687-5469 / Fax: (775) 687-1279

The Records Official is available to assist individuals with disabilities with a public records request including processing of public records in an alternative form.

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2. Processing of Public Records Request. Pursuant to NRS 239.0105, within five (5) business days after receiving a request for a public record, the Records Official will:

- Allow the requestor to inspect or copy the record; or
- Notify the requestor that the office does not possess the information and provide the name and address of the entity that does, if known; or
- Notify the requestor that the information will not be available within five (5) business days and provide a date and time after which the record will be available to inspect or copy; or
- Notify the requestor that the information is confidential and cite the statute or other legal authority to deny the request.

3. Fee Schedule for Public Records. Pursuant to NRS 239.052, a governmental entity may charge a fee for providing a copy of a public record. The Commission's Fee Schedule for Public Records is attached hereto as <u>Exhibit "B."</u> The Fee Schedule sets forth both Standard Fees and Extraordinary Use Fees. Standard Fees are charged separate from and in addition to any Extraordinary Use Fee.

Standard Fees represent the actual costs authorized pursuant to NRS 239.052, including costs for reproduction, copying, postage, and transcription fees allowed under NRS 239.053. Extraordinary Fees represent additional fees authorized pursuant to NRS 239.055 when the extraordinary use of personnel or technological resources is required to respond to a public records request.

The Commission will provide an estimate of Standard Fees and Extraordinary Fees ("Fee Estimate") for producing requested records to the Requestor, and will not produce the records until after the Requester remits a deposit in the amount of the Fee Estimate. If the actual fees are less than the Fee Estimate, the Commission will refund the difference to the Requestor. If the actual fees exceed the Fee Estimate, the Commission will send an invoice to the Requestor, and the Requester shall remit payment to the Commission within thirty (30) days.

D. Effective Date

This policy was adopted by a majority vote of the Commission on August 23, 2017, and continues in force until it is amended or revoked.

Dated: This 23rd day of August, 2017.

By: /s/ Cheryl A. Lau Cheryl A. Lau, Esq., Chair

By: /s/ Yvonne M. Nevarez-Goodson Yvonne M. Nevarez-Goodson, Esq. Executive Director

EXHIBIT A



State of Nevada Commission on Ethics Public Records Request

Email, Deliver, Mail or Fax to: 704 W. Nye Lane, Suite 204 Carson City, NV 89703 Tel. 775-687-5469, Fax: 775-687-1279 www.ethics.nv.gov || ncoe@ethics.nv.gov

Section A – Requester Information

Date of Request					
Requester Conta	Requester Contact Information				
Name:					
Organization:					
Address:					
City, State, Zip:					
Phone:					
E-mail:					

Section B – Record(s) Requested

Records Requested:
Check one: Electronic copies Paper Copies Inspection (in person)
Describe the record(s) you are requesting. Please be as specific as possible and include enough detail to assist the
Nevada Commission on Ethics staff in locating the records(s). Include relevant dates or date ranges. You may attach
additional pages, if necessary.

Section C – Receiving Records

<i>Please specify the preferred method of receiving the requested record(s):</i>					
E-mail or drop box	I will pick up	Please send USPS	Please FedEx		
(no charge)			Fed Ex billing number:		

Statement						
	By signing below, I certify that the information above is true and correct to the best of my knowledge. I understand					
1, 0	that copying and other associated fees may apply and that records will not be released until the estimated fee deposit is					
received.	eceived.					
Requester Signature	Requester Signature	Date				

Exhibit B – Fee Schedule



STATE OF NEVADA COMMISSION ON ETHICS 704 West Nye Lane, Suite 204 Carson City, Nevada 89703 (775) 687-5469 • Fax (775) 687-1279 http://ethics.nv.gov

PUBLIC RECORDS POLICY

FEE SCHEDULE

Pursuant to Nevada Revised Statutes Chapter 239 and the Nevada Commission on Ethics' ("Commission") Public Records Policy, the Commission's schedule of fees for copies of public records, where not otherwise set by state or federal law or regulation, is set forth below.

- Records available at No Charge: Agendas, minutes or proposed regulations are available electronically at no charge. Certain other records and data maintained by the Commission are available for viewing at no charge on the Commission's website, <u>www.ethics.nv.gov</u>.
- 2. Cost Estimates: The Commission will provide an estimate of actual costs of producing records to the requester and if the fee is estimated to exceed \$25, the records will not be produced until after payment is remitted. If the actual cost is less than the estimated cost, the Commission will refund the difference to the requester. If the actual cost exceeds the cost estimate, the Commission will issue an invoice and the requester shall remit payment within thirty (30) days.

3. Standard Fees:

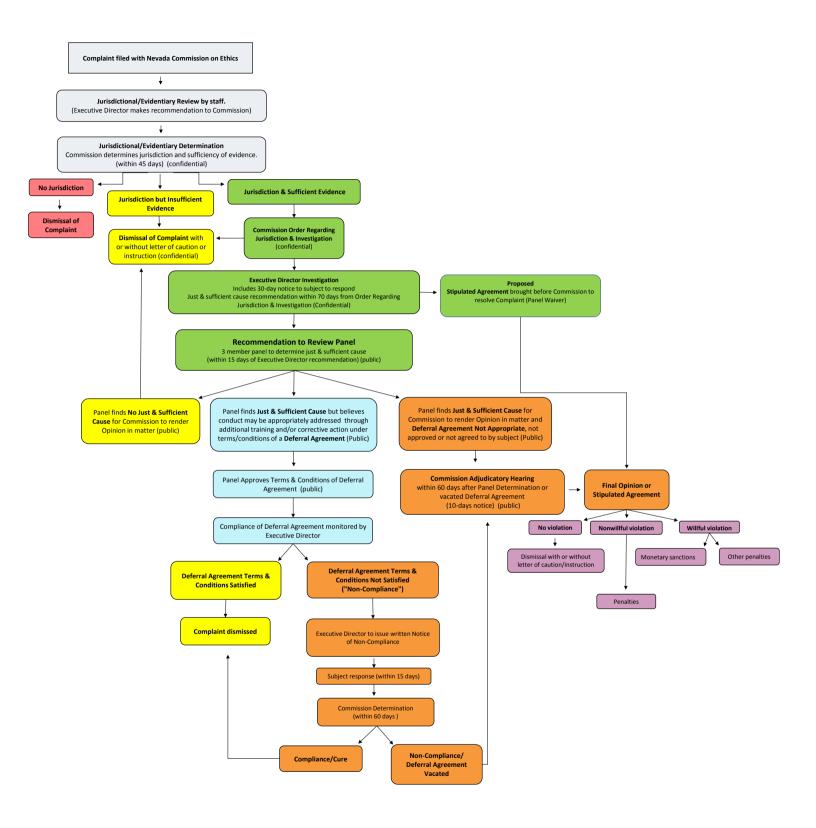
3.1. <u>Copying Fees</u> – The Commission will deliver electronic copies of records via email or other electronic means which have no associated cost to the Commission at no charge, unless the response requires an extraordinary use of personnel or resources. For printed copies, the Commission will provide the first fifty (50) pages at no charge if printable on standard or legal sized paper. After the first fifty (50) pages, the Commission will charge one cent (\$.01) per page for standard letter or legal sized paper. The Commission will charge five cents (\$.05) per page for copies of documents or photographs in color.

- 3.2. <u>Use of Outside Copying Service</u> The Commission will charge actual costs for any copies of records reproduced by a service vendor. The selected vendor will be a local bonded copying service vendor, which directly charges the requester for its services.
- 3.3. <u>Postage</u> The Commission will deliver responses to all public records requests via e-mail or U.S. Mail, unless otherwise requested and approved by the Commission for delivery via other methods. The Commission will charge the requester the actual costs for delivery by U.S. Mail or as otherwise requested and approved by the Commission.
- 3.4. <u>Transcripts</u> NRS 239.053 authorizes the Commission to charge an additional fee for reproduction of transcripts of its administrative proceedings. The Commission's transcription services are provided by Litigation Services (doing business as Sunshine Litigation), a duly authorized contracted vendor with the State of Nevada. Pursuant to the vendor contract, the Commission will refer requests for transcripts directly to the vendor. Rates are subject to change and the requester should confirm the current rate with the vendor. The 2017 quoted rates for Transcript fees from the vendor are:
 - OUTSIDE SALE COPIES: TWO DOLLARS (\$2.00) PER PAGE
- 3.5. <u>Other</u> Copies of records provided via other media including, without limitation, CDs, DVDs, flash (thumb) drives, audiotapes, microfilm, etc., not listed as having a specific fee herein shall be charged at the actual cost of the medium.
- 4. Extraordinary Use Fees: In addition to any other fee authorized herein, the Commission may charge an additional fee, not to exceed fifty cents (\$.50) per page, for extraordinary use of personnel and/or technological resources. See NRS 239.055. Without limitation, examples of public records requests that implicate an extraordinary use include: (1) requests for a voluminous or substantial number of records; (2) redacting confidential information that the requester is not entitled to receive which requires extensive copying; and (3) requests requiring computer programing skills in order to retrieve the requested public record. Extraordinary use fees will not include time spent for locating or retrieving public records or other fees which are precluded under the provisions of NRS Chapter 239.

- 4.1. <u>Personnel</u> Given the limited number of Commission staff, a request that is reasonably estimated to take more than sixty (60) minutes of staff time will be deemed extraordinary.
- 4.2. <u>Technology</u> Extraordinary use of technological resources refers to the use of information systems or information services acquired, developed, operated, maintained or otherwise used by the Commission. If services of the State or contract services are required to produce the requested records, such services are considered extraordinary use of technological resources, and the actual cost of such services will be utilized to determine the additional extraordinary use fee within the fifty cent (\$.50) per page statutory limitation.
- **5. Waiver**: Under NRS 239.052, the Commission may waive all or a portion of a charge or a fee for a public record for good cause shown.

Item 4

Nevada Commission on Ethics Complaint Process



State of Nevada Commission on Ethics FY18 Training Information

Date	Presenter	Entity:	Location:	Jurisdiction
7/26/17	YMNG	UNR IVLP Parliamentarian Delegation	Carson City	State
7/26/17	YMNG	TRMPA Truckee Meadows Regional Planning Agency	Sparks	Local
7/27/17	YMNG	UNR - Northern NV International Center - Burmese Delegation	Carson City	Other
8/1/17	YMNG	Clerk's Academy (UNR Extended Studies)	Reno	Local
8/16/17	JAP	UNR - Northern NV International Center - Jordan Delegation	Carson City	Other
9/13/17	YMNG	Clark County Training #1	Las Vegas	Local
9/13/17	YMNG	City of Las Vegas	Las Vegas	Local
9/14/17	YMNG	County Fiscal Officer's Presentation	Pahrump	Local
9/26/17	YMNG	NACO Conference	Winnemucca	Local
9/27/17	YMNG	City of Elko	Elko	Local
9/27/17	YMNG	City of West Wendover	West Wendover	Local
9/28/17	YMNG	City of Ely	Ely	Local
10/3/17	YMNG	DETR	Carson City	State
10/11/17	YMNG	Virgin Valley Water District/City of Mesquite	Mesquite	Local
10/12/17	YMNG	Clark County Dept. of Building & Fire Prevention	Las Vegas	Local
10/25/2017	YMNG	AG Boards & Commission Training	Carson City	State
11/1/17	YMNG	AG Boards & Commission Training	Las Vegas	State
11/8/17	YMNG	LVCVA Executive Staff	Las Vegas	Local
11/14/17	YMNG	LVCVA B.O.D I	Las Vegas	Local
(T) 11/17/17	YMNG	NV Association of School Boards	Carson Clty	State
12/12/17	YMNG	LVCVA B.O.D II	Las Vegas	Local
(T) 12/14/17	YMNG	Stadium Authority	Las Vegas	Local
1/9/18	YMNG	LVCVA B.O.D III	Las Vegas	Local
(T) 1/25/18	YMNG	PEBP Board	Carson City	State/Local
2/13/18	YMNG	LVCVA B.O.D IV	Las Vegas	Local