



## STATE OF NEVADA

### BEFORE THE NEVADA COMMISSION ON ETHICS

In re **Cathy Tull**, Chief Marketing Officer,  
Las Vegas Convention and Visitors  
Authority, State of Nevada,

Ethics Complaint  
Case No. 19-018C

Subject. /

### REVIEW PANEL DETERMINATION AND REFERRAL ORDER NRS 281A.725; NAC 281A.440

The Nevada Commission on Ethics ("Commission") initiated this Ethics Complaint No. 19-018C ("Complaint"), regarding the alleged conduct of Cathy Tull ("Tull"), the Chief Marketing Officer of the Las Vegas Convention and Visitors Authority ("LVCVA"), in violation of the Ethics in Government Law set forth in NRS Chapter 281A ("Ethics Law"). The Complaint alleges that Tull accepted various improper gifts and used her official position and/or governmental time and resources to acquire airline gift cards owned by the LVCVA to pay for personal travel. The Commission issued its *Order Initiating an Ethics Complaint, Accepting Jurisdiction and Directing an Investigation* on March 20, 2019, instructing the Executive Director to conduct an investigation regarding alleged violations of NRS 281A.400(1), (2), (7) and (9).

Tull is a public employee as defined in NRS 281A.150. The Commission has jurisdiction over this matter pursuant to NRS 281A.280 because the allegations contained in the Complaint relate to Tull's conduct as a public employee and have associated implications under the Ethics Law.

On June 10, 2019, a Review Panel ("Panel") consisting of Commissioners Barbara Gruenewald, Esq. (Presiding Officer), Philip K. O'Neill<sup>1</sup> and Kim Wallin, CPA, reviewed the following: 1) Ethics Complaint No. 19-018C; 2) Order Initiating Complaint, Accepting Jurisdiction and Directing an Investigation; 3) Subject's Response to the Complaint; 4) Investigator's Report; and 5) Executive Director's Recommendation to the Review Panel.<sup>2</sup>

Under NAC 281A.430, the Panel unanimously finds and concludes that the facts establish credible evidence to support a determination that just and sufficient cause exists for the Commission to render an opinion in the matter regarding the allegations pertaining to NRS 281A.400(1), (2), (7) and (9) related to Tull's use of airline gift cards owned by the LVCVA or purchased with LVCVA funds for personal travel.

<sup>1</sup> In consultation with Commission Counsel, Commissioner O'Neill disclosed that he is a director on the Carson Tahoe Health Systems Board ("Board") whose legal counsel, Mike Pavlakis, Esq., of Allison Mackenzie, is also the legal counsel of the Subject, Cathy Tull, in this matter. Since legal matters of the Board are unrelated to the issues associated with this Ethics Complaint, the independence of judgment of a reasonable person in Commissioner O'Neill's situation would not be materially affected by the disclosed relationship to require abstention pursuant to NRS 281A.420.

<sup>2</sup> All materials provided to the Panel, except the Ethics Complaint, represent portions of the investigatory file and remain confidential pursuant to NRS 281A.725.

IT IS HEREBY ORDERED:

The Review Panel refers Ethics Complaint No. 19-018C to the Commission to render an opinion regarding the alleged violations of NRS 281A.400(1), (2), (7) and (9).

Dated this 10th day of June, 2019.

NEVADA COMMISSION ON ETHICS

By: /s/ Barbara Gruenewald  
Barbara Gruenewald, Esq.  
Commissioner/  
Presiding Officer

By: /s/ Philip K. O'Neill  
Philip K. O'Neill  
Commissioner

By: /s/ Kim Wallin  
Kim Wallin, CPA  
Commissioner

**CERTIFICATE OF MAILING**

I certify that I am an employee of the Nevada Commission on Ethics and that on this day in Carson City, Nevada, I transmitted a true and correct copy of the **PANEL DETERMINATION AND REFERRAL ORDER** regarding Ethics Complaint No. 19-018C via U.S. Certified Mail and electronic mail addressed as follows:

Cathy Tull  
c/o Mike Pavlakis  
Allison MacKenzie  
P.O. Box 646  
Carson City, NV 89702

Certified Mail No.: 9171 9690 0935 0037 6380 13

Email: [mpavlakis@allisonmackenzie.com](mailto:mpavlakis@allisonmackenzie.com)

Dated: 6/10/19

  
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Employee, Nevada Commission on Ethics