



**MINUTES
of the meeting of the
NEVADA COMMISSION ON ETHICS**

The Commission on Ethics held a public meeting on
Wednesday, October 16, 2024, at 10:00 a.m.
at the following location:

**State Bar of Nevada
3100 West Charleston Boulevard, Boardroom
Las Vegas, NV 89102**

These minutes constitute a summary of the above proceedings of the Nevada Commission on Ethics. A recording of the meeting is available for public inspection at the Commission's office and on the [Commission's YouTube channel](#).

1. Call to Order and Roll Call.

Chair Scott Scherer, Esq. appeared in person in Las Vegas and called the meeting to order at 10:00 a.m. Vice Chair Kim Wallin, CPA, CMA, CFM, Commissioners Teresa Lowry, Esq., Stan Olsen and Amanda Yen, Esq. also appeared in person at the State Bar in Las Vegas. Commissioners John T. Moran III, Esq., and Terry J. Reynolds appeared via videoconference. Commissioner Michael E. Langton, Esq. was excused. Commission staff present in person were Executive Director Ross E. Armstrong, Esq., Commission Counsel Elizabeth J. Bassett, Esq., Senior Legal Researcher Curtis Hazlett and Executive Assistant Kari Pedroza. Investigator Erron Terry and Outreach and Education Officer Sam Harvey were excused.

2. Public Comment.

Written Public Comment (Attachment A) was provided prior to the meeting by Jeff Church regarding general public comment and public comment, Agenda Item 7.

Jeff Church attended via Zoom videoconference and provided verbal public comment under this item pertaining to Agenda Item 7.

3. Approval of Minutes of the August 21, 2024, Commission Meeting.

Chair Scherer stated all Commissioners were present for the August 21, 2024, Commission Meeting and could participate in this item.

Vice Chair Wallin requested Commissioner Reynolds attendance be corrected to reflect in-person participation, not in-person and via videoconference.

Commissioner Olsen moved to approve the August 21, 2024, Commission Meeting Minutes corrected as discussed. Commissioner Yen seconded the motion. The Motion was put to a vote and carried unanimously.

4. Discussion and possible action to approve a Proposed Stipulation concerning Ethics Complaint No. 24-005C regarding Donald Otto, Trustee, Palomino Valley General Improvement District, Washoe County, State of Nevada.

Chair Scherer introduced the item, acknowledged pursuant to NRS 281A.220(4) he served on the review panel for this matter and was precluded from participating in the proceedings. He turned the item over to Vice Chair Wallin to act as presiding officer.

Vice Chair Wallin stated for the record Chair Scherer and Commissioners Moran and Olsen served as members of the Review Panel and were precluded from participating in this item pursuant to NRS 281A.220(4). She added that proper notice had been provided and waivers were received regarding this item.

Commissioner Yen made a disclosure in Ethics Complaint Case No. 24-005C. She is a partner with McDonald Carano and Washoe County is a client of the firm, therefore pursuant to NRS 281A.065(4) and (5) she has a commitment in a private capacity to her law firm and the client based on the law firm's continuing business relationship with that client. Consequently, the independence of judgment of a reasonable person in Commissioner Yen's situation could be materially affected in voting upon matters related to this case. To avoid conflicts of interest and any appearance of impropriety including complying with the Ethics Law and Judicial Cannons applicable to the Commission, Commissioner Yen disclosed the relationship and abstained from participating in the matter.

Vice Chair Wallin asked the parties in the Complaint to introduce themselves for the record. Appearing on his own behalf was Executive Director Armstrong. Rebecca Bruch, Esq. with Lemons, Grundy & Eisenberg appeared via Zoom videoconference on behalf of her client, Mr. Otto.

Executive Director Armstrong presented an overview of the Proposed Stipulation to resolve Ethics Complaint Case No. 24-005C regarding Mr. Otto. The terms of the Proposed Stipulation were that Mr. Otto agreed to stipulate to one non-willful violation of NRS 281A.400(2), the alleged violations of NRS 281A.400(7) and NRS 281A.420(1) and (3) are dismissed, Mr. Otto will pay a civil penalty of \$1,000 pursuant to NRS 281A.793 and if Mr. Otto returns to public employment within 1 year of the execution of the agreement he will be required to complete Ethics training within 60 days of the start of his employment. In addition, a confidential letter of caution will be issued to Mr. Otto regarding disclosure and abstention requirements. Executive Director Armstrong outlined the following mitigating factors: Mr. Otto had no prior history before the Commission, he responded promptly and cooperated fully in the investigation process and the work he coordinated also helped those within his improvement district.

Rebecca Bruch, Esq. thanked Executive Director Armstrong and Commission Counsel Bassett for their professionalism, cooperation and flexibility in resolving the case. She added that this was her client's first foray before the Commission, and she appreciated that Executive Director Armstrong and Commission Counsel Bassett both assisted with the expeditious resolution.

Commissioner Lowry made a motion to accept the terms of the Stipulation as presented by the parties to resolve Ethics Complaint Case No. 24-005C (Otto) and direct Commission Counsel to finalize the agreement in appropriate legal form and any matters relating thereto. Commissioner Reynolds seconded the motion. The Motion was put to a vote and carried as follows:

Chair Scherer:	Abstain pursuant to NRS 281A.220(4).
Vice Chair Wallin:	Aye.
Commissioner Lowry:	Aye.
Commissioner Moran:	Abstain pursuant to NRS 281A.220(4).
Commissioner Olsen:	Abstain pursuant to NRS 281A.220(4).
Commissioner Reynolds:	Aye.

Commissioner Yen:

Abstain pursuant to NRS 281A.420(3).

Vice Chair Wallin thanked Ms. Bruch for her comments and work with Commission staff in the resolution of this matter.

5. Discussion and possible action to approve a Proposed Stipulated Deferral concerning Ethics Complaint No. 24-027C regarding Kelvin Watson, Executive Director, Las Vegas-Clark County Library District, State of Nevada.

Chair Scherer introduced the item and stated for the record Commissioners Langton, Reynolds and Yen served as members of the Review Panel and were precluded from participating in this item pursuant to NRS 281A.220(4).

Chair Scherer asked the parties in the Complaint to introduce themselves for the record. Scott M. Abbott, Esq. with Kamer Zucker Abbott appeared via Zoom videoconference on behalf of his client, Mr. Watson. Executive Director Armstrong appeared on his own behalf.

Executive Director Armstrong presented an overview of the Ethics Complaint Case No. 24-027C and the Proposed Stipulated Deferral Agreement to resolve the matter. The terms of the Proposed Stipulation were that during the 1 year deferral period, Mr. Watson agreed to continue to comply with the provisions of the Ethics Law without being the subject of another ethics complaint for which a Review Panel determines there is just and sufficient cause for the Commission to render an opinion, Mr. Watson agreed to arrange and implement ethics training provided and/or approved by the Executive Director for all Las Vegas-Clark County Library District staff, including himself, within 90 days of the Commission's approval of the Proposed Stipulation, and lastly Mr. Watson agreed to work with the Las Vegas-Clark County Library District's legal counsel and Board of Trustees to revise the District's internal policy on conflicts of interest and gifts with final copies of the District-approved policy submitted to the Executive Director for the compliance file.

Scott M. Abbott, Esq. expressed his appreciation for the hard work and assistance of Executive Director Armstrong, Commission Counsel Bassett and Commissioner Yen as the presiding officer of the settlement conference.

Commissioner Lowry addressed government employees and those who fall under the Ethics Law in the State of Nevada and stated you have the opportunity in our State to be offered tickets to a multitude of sporting venues and events, don't do it. She recognized the probability that organizations have policies and procedures which prohibit the acceptance of such gifts. Commissioner Lowry noted this case is considered an outlier in terms of the resolution because the individual relied on advice of counsel, incorrect advice, but the Ethics Law provides mitigators to those who reasonably seek guidance from counsel and the safe harbor implications applied to the matter. She emphatically cautioned public officials and public employees against taking tickets or accepting gifts to various sporting events.

Chair Scherer acknowledged that Executive Director Armstrong pointed out one mitigating factor in this case being that Mr. Watson relied on the advice of counsel and noted another mitigating factor is that the Las Vegas-Clark County Library District doesn't regulate the National Football League, the program benefits the Las Vegas-Clark County Library District and its activities. He agreed with Commissioner Lowry that this resolution is unique and without the safe harbor and the lack of regulatory authority the resolution would be much different.

Vice Chair Wallin made a motion to accept the terms of the Stipulation as presented by the parties to resolve Ethics Complaint Case No. 24-027C (Watson) and direct Commission Counsel to finalize the agreement in legal form and any matters relating thereto. Commissioner Olsen seconded the motion. The Motion was put to a vote and carried as follows:

Chair Scherer:

Aye.

Vice Chair Wallin:

Aye.

Commissioner Lowry:	Aye.
Commissioner Moran:	Aye.
Commissioner Olsen:	Aye.
Commissioner Reynolds:	Abstain pursuant to NRS 281A.220(4).
Commissioner Yen:	Abstain pursuant to NRS 281A.220(4).

6. Consideration and review of the final draft Fiscal Year 2024 Annual Report presented by the Executive Director pursuant to NAC 281A.180(2), and possible direction thereon.

Chair Scherer introduced the item and asked Executive Director Armstrong for his presentation.

Executive Director Armstrong referenced the draft provided in the meeting materials for the Commission's final review and approval. He confirmed receipt of additional typographical adjustments to the report from Chair Scherer via email and Chair Scherer went through each change for his fellow Commissioners.

Vice Chair Wallin shared that she really likes the annual report, the format of it and that it is very informative. She said well done to Commission staff. Commissioner Lowry echoed her comments.

Commissioner Yen made a motion to approve the Fiscal Year 2024 Annual Report as presented and amended and direct the Executive Director to publish the report after final formatting and data verification performed by staff. Commissioner Reynolds seconded the motion. The motion was put to a vote and carried unanimously.

7. Discussion and possible action to direct Commission Counsel to take legal steps necessary to defend the Commission and Commissioners in *Rodriguez v. NCOE*, Second Judicial District Court Case No. CV24-02169.

Chair Scherer introduced the item and asked if any Commissioners needed to make a disclosure.

Commissioner Yen made a disclosure that she is a partner with McDonald Carano and Mr. Rodriguez is a client of the firm, therefore pursuant to NRS 281A.065(4) and (5) she has a commitment in a private capacity to her law firm and the client based on the law firm's continuing business relationship with that client. Consequently the independence of judgment of a reasonable person in Commissioner Yen's situation could be materially affected in voting upon matters related to this case. To avoid conflicts of interest and any appearance of impropriety including complying with the Ethics Law and Judicial Cannons applicable to the Commission, Commissioner Yen disclosed the relationship and abstained from participating in the matter.

Commission Counsel Bassett outlined the purpose for the Item.

Vice Chair Wallin made a motion to grant Commission Counsel the authority to defend the Commission, Commissioners and Executive Director in the case filed in the Second Judicial District Court *Rodriguez v. NCOE*, Case No. CV24-02169 including filing any appropriate motions and Commission Counsel shall bring back case dispositive decisions such as dismissals or stipulated settlement agreements before the full Commission. Vice Chair Wallin further moved to delegate authority to the Chair and Vice Chair to consult with Commission Counsel regarding any legal issues or decisions pursuant to NRS 241.357 and NAC 281A.055 but for agreements to dismiss or settlement. Commissioner Lowry seconded the motion. The Motion was put to a vote and carried and carried as follows:

Chair Scherer:	Aye.
Vice Chair Wallin:	Aye.
Commissioner Lowry:	Aye.

Commissioner Moran:	Aye.
Commissioner Olsen:	Aye.
Commissioner Reynolds:	Aye.
Commissioner Yen:	Abstain pursuant to NRS 281A.420(3).

8. Report by Executive Director on agency status and operations, and possible direction thereon. Items to be discussed include, without limitation:
- a. Strategic Plan Implementation Update
 - b. Budget Update
 - c. Upcoming Meetings

Chair Scherer introduced the item and asked Executive Director Armstrong for his presentation.

Executive Director Armstrong provided an agency operations update including the approval of the amendment to the Commission's regulations, increase of submitted complaint cases in August and September, and continued vacancy in the Associate Counsel position. He thanked Investigator Terry for stepping in to assist with initial casework drafting.

a. Strategic Plan Implementation Update: Executive Director Armstrong informed the Commission that since the approval at the August meeting, the Strategic Plan had been published and promoted and staff are working on an implementation plan. This update will be given at each meeting.

b. Budget Update: Executive Director Armstrong provided an update on the agency's budget noting a time extension for federal grant funding, a handful of stale claims due to timely processing issues and reported that the Commission's upcoming biennial budget build had been submitted to the Governor's Finance Office.

c. Upcoming Meetings: Executive Director Armstrong informed the Commission that the next meeting is scheduled to be held November 16 in Reno. He stated that the Commission will consider the 2025 meeting dates at the November meeting.

Commissioner Olsen asked a clarifying question about the amended regulation changes and Executive Director Armstrong provided the clarification.

At Vice Chair Wallin's request Executive Director Armstrong noted the three enhancements submitted with the agency's budget request.

9. Report on Outreach and Education Presentation, and possible direction thereon.

Chair Scherer opened the item and asked Executive Director Armstrong to provide the Outreach and Education presentation in Outreach and Education Officer Harvey's absence.

Executive Director Armstrong referenced the written report included with meeting materials, outlined the recent education and outreach efforts and noted upcoming events at which OEO Harvey will be tabling and presenting. He shared feedback received when he, Commission Counsel Bassett and OEO Harvey recently attended the Civil Government Attorney's conference, specifically the topic of gifts. Executive Director Armstrong noted the Commission's continued growth in social media followers, additional feedback method in training presentations and recently published newsletter distributed through electronic mail. He provided details pertaining to public records requests received by the Commission over the fiscal year.

Commissioner Olsen noted he really likes the ease of use by including the QR Code on education and outreach materials.

Commissioner Lowry asked who received the Ethics Newsletter and Executive Director stated that he would ask OEO Harvey for the specific recipients and provide that information.

Vice Chair Wallin suggested the next newsletter include information on the gifts topic and Executive Director Armstrong and the Commissioners discussed this idea.

Chair Scherer clarified that the reference in the Outreach and Education written report to Nevada Gaming Compliance Board should be the Nevada Gaming Control Board. Executive Director Armstrong agreed that was a typographical error.

10. Commissioner Comments.

Vice Chair Wallin wished everyone a Happy Global Ethics Day.

Chair Scherer thanked Commission staff for their hard work in preparation for Commission meetings.

11. Public Comment.

Jordan Zito attended via Zoom videoconference and provided verbal public comment under this item regarding issues with the Nevada Commission on Judicial Discipline, judges and justices. Chair Scherer explained that the Commission does not have jurisdiction over judicial branch and provided that the Nevada Ethics Law gives the Commission jurisdiction over the executive branch and limited jurisdiction over the legislative branch. Jordan Zito thanked the Commission for its time and the opportunity to make public comment.

12. Adjournment.

Vice Chair Wallin made a motion to adjourn the public meeting. Commissioner Olsen seconded the motion. The Motion was put to a vote and carried unanimously.

The meeting was adjourned at 10:57 a.m.

Minutes prepared by:

/s/ Kari Pedroza

Kari Pedroza
Executive Assistant

/s/ Ross Armstrong

Ross Armstrong, Esq.
Executive Director

Minutes approved November 13, 2024:

/s/ Scott Scherer

Scott Scherer, Esq.
Chair

/s/ Kim Wallin

Kim Wallin, CPA, CMA, CFM
Vice Chair

Attachment A

Public Comment Received

From: [WatchDogJeff](#)
To: [Ross Armstrong](#); [Nevada Commission on Ethics](#)
Subject: Public Comment for NCOE Meeting See Attached For the Record
Date: Tuesday, October 15, 2024 1:55:52 PM
Attachments: [NCOE Oct General Public Comment.docx](#)
[NCOE Oct PC Agenda Item 7 Rodriguez.docx](#)

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

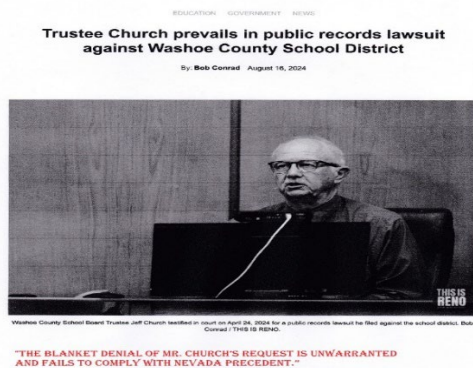
Please see attached for NCOE Board Meeting Public Comment

Jeff Church
[WatchDogJeff.com](#)

*Views are mine and do not reflect the opinions of any government agency.

I'll endear myself to the Nevada Commission on Ethics (NCOE) as I express my disdain for the organization.

First: Letter of Caution: I was out of town but recently received a Letter of Caution from NCOE regarding my defense and disclaimer of March 12, 2024. I decline to accept that. How do I go about appealing that? To date, I had no notice of any hearing nor appeal process. BTW: Do I get the same free lawyer that Trustee Joe Rodriguez has? Should not WCSD indemnify me and protect me from willful malicious politically motivated attacks as I act in performance of my duty, i.e. to view public document applications for committees. Please Note ruling of Judge Drakulich in said matter. I will not go into detail here but wish to dispute alleged factual details of the matter.



<https://thisisreno.com/2024/08/trustee-church-prevails-in-public-records-lawsuit-against-washoe-county-school-district/>

Next, the NCOE role:

NCOE see its role as: *"to enhance the people's faith in integrity and impartiality of public officers and employees, adequate guidelines are required to show the appropriate separation between the roles of persons who are both public servants and private citizens."*

Does NCOE or anyone truly believe that this is the case? Does anyone have faith in the Ethics Commission? What is the annual cost NCOE for money in, manure out? Imagine the useful purposes that could be served in NCOE was eliminated. And would anything change? No.

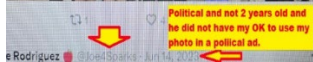
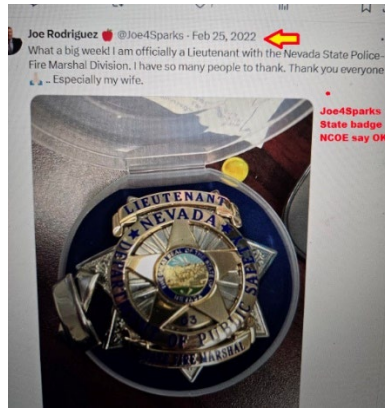
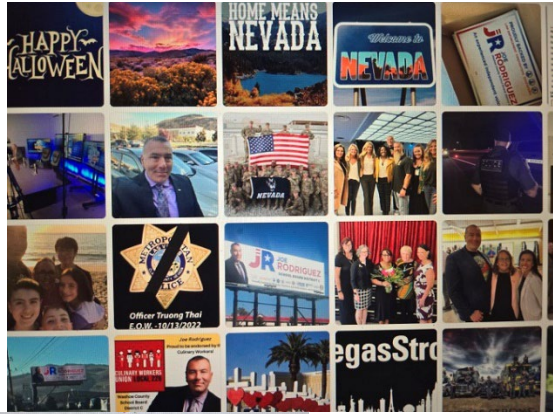
I have many ideas such as having the Guinn Institute or students at UNLV (Boyd or ?) study how each state does it and suggest streamlined and cheaper methods as well as enhancing NCOE ability to enforce its sanctions. Has NCOE ever forced people to pay their fines. Can we create a simple appeal decision along the lines of small claims court and a judge? How about a simple initial process as in the military UCMJ "Captain's Mast"?

One of the most ridiculous decisions from NCOE is that in two identical situations a violation only occurs if the agency has a policy against the conduct. WCSD trustees routinely use staff and interior, off limits, school photos in campaigns and NCOE says

it's OK because there is no WCSD policy against it. (BTW there is such a policy and NCOE was informed and ignored that, AR 4530).



WCSD Trustee Joe Rodriguez: (*WCSD=Washoe County School District) On or about I submitted a lengthy detailed complaint of concerns over Rodriguez' campaign CURRENT social media sites with various photos including him (with Trustee mayberry) both in uniform. Also included various accoutrements of office all of which seem to not meet Judge Sigurdson decision limitations as these are not photos of him in the performance of his duties. The response a terse email that you do not look into issues over two years old. These were not.



The "Driver License Rule": The State of Nevada appears to clearly follow the Driver License Rule in complaints. First look at the driver's license of the complaint and accused and only then decide if they'll be dealt with fairly or not. NCOE actions seem to adhere to the Driver License Rule.

Also why would NCOE have a member of the lawfirm, McDonald Carano on their staff? That's any easy way to eliminate one member.

Very sincerely,

Jeffrey Church
WatchdogJeff.com
775 544 7366
Renotaxrevolt@sbcglobal.net

To: NCOE, Public Comment, October 16, 2024, Agenda Item 7:

Item 7: Discussion and possible action to direct Commission Counsel to take legal steps necessary to defend the Commission and Commissioners in Rodriguez v. NCOE, Second Judicial District Court Case No. CV24-02169.

Moving on regarding Washoe County School District (WCSD) Trustee Rodriguez, now a candidate for Sparks City Council. Can anyone explain why he is exempt from filing a Secretary of State Legal Defense Fund form or otherwise disclosing in his C&E Reports? Can anyone explain why he can accept over \$5,000 or \$10,000 in pro bono legal work without any disclosure at all?

<https://www.nvsos.gov/SOSCandidateServices/AnonymousAccess/CEFDSearchUU/CandidateDetails.aspx?o=3CkpgKFqKXvuR5bJhfTg4g%253d%253d>

It appears that Rodriguez has not even filed his latest C&E Report due October 15, 2024.

NRS 294A.160 Permitted and prohibited use and disposition of contributions: Notwithstanding the provisions of NRS 294A.286, a candidate or public officer may use contributions to pay for any legal expenses that the candidate or public officer incurs in relation to a campaign or serving in public office without establishing a legal defense fund. Any such candidate or public officer shall report any expenditure of contributions to pay for legal expenses in the same manner and at the same time as the report filed pursuant to NRS 294A.120 or 294A.200. A candidate or public officer shall not use contributions to satisfy a civil or criminal penalty imposed by law.

What is an in-kind contribution?

A: The value of goods or services provided in kind for which money would have otherwise been paid (NRS 294A.007). For example, a person donates billboard space to a candidate free of charge. This would be an in-kind contribution, the value of which would be what it would normally cost to rent the billboard space.

In-Kind Contributions: • In-kind contributions are the value of services provided in kind for which money would have otherwise been paid. N.R.S. § 294A.007. Within 30 days of providing any in-kind goods or services, a donor must provide the recipient a signed statement setting forth the actual cost of the goods and services provided, or their fair market value. N.A.C. § 294A.043.

From Texas: TEXAS ETHICS COMMISSION ETHICS ADVISORY OPINION NO. 580 held that “In conclusion, a legal action that depends on a person’s status as a candidate is connected with a campaign, and pro bono legal services provided to a candidate in connection with such litigation constitute contributions for purposes of the Texas Election Code. Tex. Elec. Code § 251.001(3). Consequently, such pro bono legal services may not be provided to a candidate by a corporation. Id. at § 253.094.” Likewise in their Opinion #533 they held, “Free legal services provided by an attorney to a judge to defend a lawsuit arising from the judge’s activities as a candidate are a campaign contribution subject to the restrictions under title 15 of the Election Code and section 36.08 of the Penal Code.”

Might anyone just ask- maybe he’ll decline- but ask him and counsel who is paying for his legal fees?

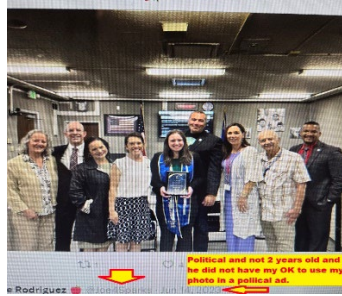
Might anyone ask if his attorney or his lawfirm is representing the WCSD where he is a Trustee on various matter and if he disclosed or recused himself on voting on matters that may involve McDonald Carano. For example it appears that Mr. Hosmer of

McDonald Carano is and has been involved in two Writ actions by Trustee Church and that on or about March 12, Rodriguez voted to fund opposition to those writs and has participated in subsequent meetings on those matters including offers of settlement that were declined? Does not the public record reflect that McDonald Carano has received and continues to receive thousands of dollars in fees from WCSD while Rodriguez was a Trustee?

So let's summarize all that; does McDonald Carano provide ongoing legal services to WCSD where Rodriguez is a trustee and yet he receives thousands of dollars in free pro-bono, gifted, undisclosed legal services from the firm and same attorney possibly in excess of \$10,000- and no one cares?

MCDONALD CARANO WILSON LLP + GENERAL COUNSEL 9/15/2023 \$31,344.45/
MCDONALD CARANO WILSON LLP + GENERAL COUNSEL 7/22/2022 \$68,850.94/
MCDONALD CARANO WILSON LLP + GENERAL COUNSEL 7/8/2021 \$15,502.00/
MCDONALD CARANO WILSON LLP + GENERAL COUNSEL 10/16/2020 \$16,275

FISCAL YEAR 2023-2024 WCSD Legal Expenditures/General Council									
Vendor Name	Purchase Order #	Date	Amount	VS.	Check Written	Check Range	#	Amount	
Alexander, et al					07/27/23		1	6,400.00	
Sub Total:								6,400.00	
Carano Law	130578	06/27/23	50,000.00		07/26/23-08/15/24		2	10,000.00	
Sub Total:			50,000.00					10,000.00	
Carano Law								17.50	
Sub Total:								17.50	
Elle Investigations Inc					10/27/23-03/22/24		9	22,227.83	
Sub Total:								22,227.83	
Elle Investigations Inc					09/11/23-07/15/24		7	28,819.08	
Sub Total:								28,819.08	
Elle Investigations Inc	130537	06/20/23	35,000.00		09/15/23-04/05/24		6	10,000.00	
Sub Total:			35,000.00					10,000.00	
Elle Investigations Inc	131910	10/10/23	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	130544	03/16/23	36,000.00						
Sub Total:			36,000.00						
Elle Investigations Inc					12/22/23-03/22/24			31,344.45	
Sub Total:								31,344.45	
Elle Investigations Inc	131484	10/10/23	2,000.00					2,000.00	
Sub Total:			2,000.00					2,000.00	
Elle Investigations Inc					10/14/23			3,879.50	
Sub Total:								3,879.50	
Elle Investigations Inc	131503	11/30/23	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	130538	06/20/23	50,000.00		07/19/23-03/28/24		12	73,481.00	
Sub Total:			50,000.00					73,481.00	
Elle Investigations Inc	130573	06/20/23	50,000.00		09/19/23-05/15/24		14	203,490.38	
Sub Total:			50,000.00					203,490.38	
Elle Investigations Inc	131565	08/24/23	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	131567	08/24/23	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	131900	10/10/23	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	134214	03/09/24	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	132891	03/09/24	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	130707	03/13/24	50,000.00						
Sub Total:			50,000.00						
Elle Investigations Inc	132768	08/16/23	25,420.00						
Sub Total:			25,420.00						
Elle Investigations Inc	130683	03/13/23	35,000.00						
Sub Total:			35,000.00						
Elle Investigations Inc	130539	06/20/23	50,000.00		07/21/23-03/22/24			9,391.40	
Sub Total:			50,000.00					9,391.40	
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Sub Total:			10,000.00						
Elle Investigations Inc	130910	07/17/23	10,000.00						
Sub Total:			10,000.00						
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Elle Investigations Inc	130910	07/17/23	10,000.00						
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Elle Investigations Inc	130910	07/17/23							



Further having been so noticed on the ethical issues (regardless of wordsmithing NRS 281A, NRS 294 or others), the esteemed lawyers at NCOE are now aware of this obvious issue, conflict and concerns regarding the legal representation of Trustee Rodriguez by Mr. Hosmer and McDonald Carano.

Sincerely,

Jeffrey Church
WatchdogJeff.com
775 544 7366
Renotaxrevolt@sbcglobal.net