

NCOE
Legislative
Committee Agenda
Item 3
10/15/25



**MINUTES
of the meeting of the
LEGISLATIVE COMMITTEE OF THE
NEVADA COMMISSION ON ETHICS**

The Commission on Ethics held a public meeting on
Wednesday, August 20, 2025, at 11:00 a.m.
at the following location:

**State Bar of Nevada
9456 Double R Boulevard, Suite B
Reno, NV 89521**

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

1. Call to Order and Roll Call.

Kim Wallin, CPA, CMA, CFM, appeared in person in Reno and called the meeting to order at 11:00 a.m. Commissioners John Miller and Terry Reynolds also appeared in person. Present for Commission staff in Reno were Executive Director Ross E. Armstrong, Esq., Commission Counsel Elizabeth J. Bassett, Esq., Investigator Erron Terry, and Executive Assistant Elvira Saldaña.

2. Public Comment.

There was no public comment.

3. Election of Committee Chair and Vice Chair.

Commissioner Wallin asked Commissioners if there were any nominations for Committee Chair and Vice Chair.

Commissioner Reynolds stated he was happy to serve as Vice Chair.

Commissioner Miller made a motion to nominate Commissioner Wallin to be Chair and Commissioner Reynolds to be Vice Chair. Commissioner Reynolds seconded the motion. The Motion was put to a vote and carried as follows:

Commissioner Wallin: Aye.

Commissioner Miller: Aye.

Commissioner Reynolds: Aye.

4. Review of the Strategic Plan and its alignment with the Commission's legislative requests.

Executive Director Armstrong stated the four areas of focus for the Strategic Plan are outreach and education, maintaining the public's trust, sufficient staffing to deliver the mission of the Commission, and technology and service improvements. As there is consideration to legislative changes, the two that relate are outreach and education and maintaining the public's trust. There is not much in statute about outreach and education. The committee may consider it. Executive Director Armstrong welcomed any questions or thoughts.

Chair Wallin asked Commissioners if there were any questions.

Commissioner Reynolds congratulated Executive Director on the educational efforts. Commissioner Reynolds raised concerns about how the Commission can continue the outreach and education efforts, questioning whether there is going to be sufficient time and funding to provide training and conduct the level of outreach required.

Executive Director Armstrong stated training can be provided either live or on Nevada Ethics Online. Currently, there is an agreement with Clark County in which Clark County has a policy where they require a certain level of staff to take ethics training. They have content on their learning management system from Nevada Ethics Online. The county delivers the Commission's content on their platform and provides data every quarter. The Commission has the capacity to expand on that type of model.

Commissioner Reynolds stated the International City/County Management Association (ICMA) has a strong ethics program. They would be a good resource.

Executive Director Armstrong stated in the last legislative session there was only one bill regarding ethics education. The bill set forth training requirements for the onboarding of members of the Board of Regents.

Chair Wallin recommended providing training for individuals in higher-level positions, like the approach taken by Clark County.

Commissioner Miller asked if there is a charter statement for the committee.

Executive Director Armstrong stated he would need to look at the language when it was discussed. Executive Director Armstrong suggested Chair Wallin calling agenda items 4, 5, and 6 together. If the Commission would like to submit a bill draft request (BDR) to the Governor's Office for consideration, the language and concept must be completed by next March-April. A committee was not established in the last interim and the Commission elected to not put forth any proposals. During the prior legislative session, the committee submitted language to the Commission for approval for the Executive Director to submit to the Governor for their review. Executive Director Armstrong informed the committee that there are legislation options listed in the

proposed workplan. The committee is established to explore options for changes to the statutes that they may propose during the next legislative session.

Commissioner Reynolds commented that taking a bill to the legislature is comprehensive.

5. Presentation on Legislative History.

Executive Director stated included with the meeting material is a PowerPoint presentation which provides a legislative history. Executive Director Armstrong provided an overview of the ethics related bills and the progression of the bills during the 2021 and 2023 Legislative Sessions.

Chair Wallin commented the last time a bill passed was in 2017. When the committee was formed in 2021, the committee discussed what was important.

Commissioner Reynolds recommended keeping it narrow and not incorporating too much.

Executive Director Armstrong commented that any attempt the Commission makes in Ethics Law, the Commission can anticipate that the Legislature will amend it. There may be an opportunity for the Legislative Operations and Elections Interim Committee to propose their own legislative solution, and the Commission have a bill focused on their items. A lot of the things the Commission tried to do procedurally through the bill in 2021 and 2023, the Commission has done a good job of addressing in the last adoption of procedural regulations. Some of the timeframe issues have been addressed through the regulations.

Chair Wallin recommended removing previously requested items and focusing on initiatives that improve public trust, consistency, educational outreach, along with efforts that could help make the Commission's operations more efficient.

6. Discussion and identification of stakeholders.

Chair Wallin asked Commissioners who the stakeholders are.

Executive Director Armstrong stated the National Association of Counties (NACo), League of Cities, and the Legislative Operations and Elections Interim Committee.

Commissioner Reynolds commented that a lot of Senior Legislators will no longer be there and therefore will change the landscape of the Legislature. The committee may consider reviewing it, as it may have an impact.

Executive Director Armstrong stated BDR concepts are due to the Governor's Office by March.

Chair Wallin stated the general public gets integrated into instilling the trust in government they have, and it leads to trust that the Commission does something.

Executive Director Armstrong stated at the next committee meeting, Commission Counsel Bassett will present on court rulings, arguments received from Counsel, and public inquiries. Executive Director Armstrong stated there was a bill to create a Public Records Ombudsman that didn't pass; however, a task force was established to explore it. Executive Director Armstrong will stay informed about the task force as they meet and begin their work.

Chair Wallin stated for today's meeting, the committee should consider what they want going forward. In addition to common items and previous bills for the September meeting, Chair Wallin asked if the number of states that require ethics training can be provided.

Commissioner Reynolds stated he could check with ICMA to see what trends they are seeing and their recommendations.

Commissioner Miller will continue to review what he thinks makes sense for the committee to move forward.

7. Consideration and approval of the Committee Workplan.

Executive Director Armstrong stated for the September meeting there would be presentations. At the November Commission meeting, the committee will update the Commission and present some initial ideas to receive feedback from the members. The committee members will select target areas at the November committee meeting. Executive Director Armstrong and Commission Counsel will create a draft between November and December and provide the committee with some potential language. In February, the committee will need to have a full report to the Commission for their approval for submission to the Governor's Office.

Commissioner Reynolds made a motion to approve the committee workplan as submitted and revised. Commissioner Miller seconded the motion. The Motion was put to a vote and carried as follows:

Commissioner Wallin: Aye.

Commissioner Miller: Aye.

Commissioner Reynolds: Aye.

8. Commissioner Comments on matters including, without limitation, identification of future agenda items, upcoming meeting dates and meeting procedures.

Executive Director Armstrong requested consensus regarding the next meeting date. The next committee meeting will take place September 22, 2025 at 10:00 a.m.

9. Public Comment.

There was no public comment.

10. Adjournment.

Commissioner Reynolds made a motion to adjourn the public meeting. Commissioner Miller seconded the motion. The Motion was put to a vote and carried unanimously.

The meeting adjourned at 11:42 a.m.

Minutes prepared by:

/s/ Elvira Saldaña

Elvira Saldaña
Executive Assistant

/s/ Ross Armstrong

Ross Armstrong, Esq.
Executive Director

Minutes approved October 15, 2025

Kim Wallin, CPA, CMA, CFM
Chair

Terry Reynolds
Vice Chair

NCOE
Legislative
Committee Agenda
Item 5
10/15/25



Report on Arguments, Court Rulings and Inquiries

October 2025

Arguments

- Confidentiality Issues
- Gift Exception for Ceremonial/Educational Attendance at Events
- Definition of Nominal Gifts
- Definition of Willful Violation
- Disclosure – needed if everyone knows already?
- Substantial and Continuing Business Relationship with Law Firm

Court Rulings

- *Rodriguez v. NCOE*, Second Judicial District Court, Case No. CV23-01054 (appearance of impropriety)
- *Comm'n on Ethics v. Hardy*, 125 Nev. 285 (2009) (bounds of authority over Legislators)

Inquiries

- Bad Behavior/Bias in Public Capacity
- Unwarranted Harm to Benefit Significant Personal or Pecuniary Interest
- Allowable Investigation During Jurisdiction Determination
- Expanded Confidentiality Protection for Requesters
- Required Ethics Training- Specifically Elected Officials
- Use of Public Office to Benefit Political Party or Personal Interest

NCOE
Legislative
Committee Agenda
Item 6
10/15/25



Legislative Committee Workplan

August 2025 – **Completed 8/2025**

- Initial meeting
- Review legislative history & strategic plan
- Identification of stakeholders
- Approval of workplan

September 2025 – **Meeting rescheduled to October 15 due to statewide cyberattack**

- Committee meeting
- Legal presentation by Commission Counsel on arguments, court rulings, etc.
- Presentation on trends across the country re: Ethics Law
- Presentations as requested by committee

November 2025

- Committee update to full Commission
- Committee meeting
- Presentations as requested by committee
- Select target areas and strategies

December 2025

- Committee meeting
- Review of potential language

February 2026

- Committee vote on final language

March 2025

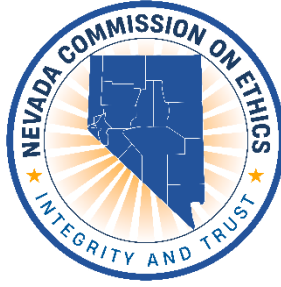
- Committee presentation to full Commission for vote

April/May

- Governor office review of proposed BDRs

Potential Pathways for Legislation

- 1) No Bill Draft Request proposal
- 2) Bill Draft Request
 - a. Fix one important thing
 - b. Fix multiple things in one topic
 - c. Procedure only
 - d. Substance only
 - e. Omnibus package that changes a variety to topics

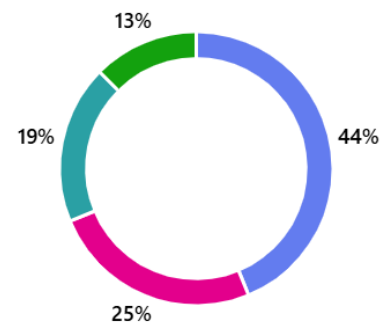


Brief Stakeholder Survey Results

October 2025
16 Responses

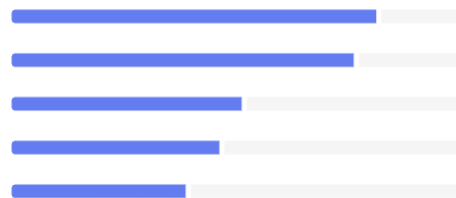
Responders

Local Government	7
State Executive Branch	4
State Boards and Commissions	3
Legislature	0
Non-government stakeholder	2



Rank Priorities for Change

- 1 Improper Benefits - gifts, use of equipment/property, use of information, etc
- 2 Disclosure and Abstention - transparency of conflicts of interests
- 3 Cooling Off - post-public service employment
- 4 Commission Advisory Procedures
- 5 Commission Complaint Procedures



Concerning Conduct Not Covered by the Ethics Law

- Breach of fiduciary duty to the office
- Misuse of public funds
- Gain to political party
- Using the office to harm others or the agency itself for personal or political purposes
- Nepotism in hiring
- Legislative ethics
- Judicial ethics

Consider for Additions

- Lobbyists
- More bragging of the Commission's good work
- Mandated training for public officials / government attorneys
- Creation of an "Ethics public defender"
- Clear guidelines on gifts – limit on value for 400(1) and 420(1) and (3) purposes

Consider for Potential Removal

- Non-profit board service (either put it expressly in commitment in a private capacity statute or stop considering it a commitment in a private capacity)
- Restriction on Petitions of Judicial Review of Advisory Opinions
- Remove use of prior letters of instruction/caution from consideration of current ethics complaints