

NCOE

Legislative Committee

Agenda Item 3

1/21/26



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

The Commission on Ethics held a public meeting on
Wednesday, November 12, 2025, at 9:00 a.m.
at the following location:

**State Bar of Nevada
9456 Double R Blvd., 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.

Chair Kim Wallin, CPA, CMA, CFM, appeared in person in Reno and called the meeting to order at 9:01 a.m. Vice Chair Terry Reynolds and Commissioner John Miller also appeared in person. Present for Commission staff in Reno were Executive Director Ross E. Armstrong, Esq., Commission Counsel Elizabeth J. Bassett, Esq., Senior Legal Researcher Caitlin Pagni, and Executive Assistant Elvira Saldaña. Outreach and Education Officer Sam Harvey appeared via Zoom video conference.

2. Public Comment.

There was no public comment.

3. Approval of Minutes of the October 15, 2025, Legislative Committee Meeting.

Chair Wallin noted Vice Chair Reynolds was not present at the October 15, 2025 committee meeting, therefore would not participate on the item. Chair Wallin asked if there were any additions or corrections.

There were no recommendations.

Commissioner Miller moved to approve the October 15, 2025, Legislative Committee Meeting Minutes. Chair Wallin seconded the motion. The motion was put to a vote and carried unanimously.

4. Review and discussion of materials provided by staff from other states, and potential approval of direction to staff for drafting priorities and legislative approach.

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

Executive Director Armstrong noted he provided a memo containing information from other states. He also provided an overview of topics requested by the committee at the October meeting, which included: abuse of power/unwarranted harm language, disclosure requirements, confidentiality statutes, previous attempt to define “appearance of impropriety,” and gifts. Also included in the memo is a link to a report on the strength of Ethics Commissions and considerations for each topic for the committee members to review.

Chair Wallin stated that following questions and comments from committee members, she would like to discuss and narrow it down to two items to address.

Commissioner Miller commented that Oregon’s approach to gifts seems to be logical and asked if gifts have been a major item consistently over the years.

Executive Director Armstrong responded that the most frequent question related to gifts the Commission receives through advisory opinions is regarding educational conferences. The Commission has encountered few instances involving gifts related to sports events.

Commission Counsel Bassett commented that sports tickets is a newer issue.

Executive Director Armstrong stated numerous questions relating to gifts are asked during training.

Commission Counsel Bassett stated gifts are a big topic.

Commissioner Miller stated that abuse of power is a great topic, however he is concerned if the Commission could handle the potential volume of complaints with the current structure.

Chair Wallin commented she does not know if they would see an increase in complaints.

Executive Director Armstrong stated numerous complaints have been received about bad government that are outside of the Commission’s scope. The Commission may see an increase in investigations.

Commissioner Miller referenced Georgia law, relating to complaints being made internally within a government agency.

Commissioner Reynolds commented that two items of importance are providing a framework for review on issues and a broader definition of gifts.

Executive Director Armstrong stated as the committee works on the definition of gifts, intent should be looked at.

Chair Wallin suggested considering a dollar limit on gifts.

Commissioner Reynolds stated ceremonial duties of elected officials needs to be better defined.

Chair Wallin asked Commissioner Miller if he agrees with including ceremonial duties.

Commissioner Miller stated he agreed.

Chair Wallin suggested meeting with the Secretary of State to address disclosure.

Executive Director Armstrong stated he is considering the development of a list of ethical standards and would begin working on it.

Commissioner Reynolds commented that it should be mandatory that every public officer be required to take ethics training within 6 months of their appointment.

Chair Wallin stated she agreed.

Outreach and Education Officer Harvey asked for clarification on the process when a proposed legislative change may have budgetary implications.

Executive Director Armstrong responded after the bill is drafted, state and local governments get the opportunity to provide input on how much it will cost to comply with the law.

Commissioner Reynolds stated that online training for regular employees would be good. Training for public officials should be more than online training and would have a fiscal impact which should be looked at.

Commissioner Miller inquired about the current duration to complete training and whether there are different levels of training available.

Outreach and Education Officer Harvey responded there is an ethics basics course which takes 1 ½ hours- 2 hours to complete. The training is for all public officers and employees. A candidates and campaigns resource training is also available; however, training tailored to specific roles or positions is currently not offered.

Executive Director Armstrong noted when training is conducted in person, staff recommends the duration to be 90 minutes to allow sufficient time for training and questions.

Chair Wallin recommended the mandatory training be online as more resources are gathered.

Executive Director Armstrong suggested starting with a statutory requirement for only public officers.

Chair Wallin referenced what was noted in the memo regarding acknowledgment forms and expressed concern about the inability to not being able to obtain a list of public officers from government agencies.

Executive Director Armstrong noted the Secretary of State's Office receives a list of individuals who are required to complete the financial disclosure statement. He suggested that a potential starting point would be to request the list from the Secretary of State's Office.

Commissioner Miller inquired about the definition of "public officer" and if the financial disclosure statement is only required to be reported when the individual makes over \$8,000.00.

Executive Director Armstrong responded by explaining the definition under Ethics Law which is slightly different.

Chair Wallin stated that the Secretary of State may be able to inform candidates of the additional requirements at the time they file to run for office.

Executive Director Armstrong stated that after the election, training will be conducted, which will include information on acknowledgments.

Commissioner Reynolds commented that establishing standards for disclosures and ethics training at the time of the initial appointment is the most effective approach.

Chair Wallin inquired if there has been thought on improving confidentiality for requesters that no longer work for the agency.

Executive Director Armstrong stated some language can be drafted. Fear of economic harm is a common concern.

Chair Wallin asked committee members for their thoughts.

Commissioner Reynolds agreed with economic harm.

Chair Wallin stated the committee will consider gifts, ceremonial duties, and mandatory training for public officers, and look into confidentiality.

Commissioner Reynolds asked for clarification on the bill draft request process once the Commission approves it.

Executive Director Armstrong responded by explaining the process.

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

There were no Commissioner comments.

6. Public Comment.

There was no public comment.

7. Adjournment.

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

The meeting adjourned at 9:54 a.m.

Minutes prepared by:

/s/ Elvira Saldaña

Elvira Saldaña
Executive Assistant

/s/ Ross Armstrong

Ross Armstrong, Esq.
Executive Director

Minutes approved January 21, 2026

Kim Wallin, CPA, CMA, CFM
Chair

Terry Reynolds
Vice Chair

NCOE

Legislative Committee

Agenda Item 4

1/21/26



Statutory Language Options

Mandatory Training

NRS 281A.500

3. Each public officer shall, on or before the 30th day following the date on which they take office, complete an ethics training course covering the requirements of NRS 281A.400 through NRS 281A.550 inclusive.

4. Each public officer shall acknowledge that the public officer:

(a) Has received, read and understands the statutory ethical standards;

(b) Has completed an ethics training course covering the requirements of NRS 281A.400 through NRS 281A.550 inclusive, and

(c) Has a responsibility to inform himself or herself of any amendments to the statutory ethical standards as soon as reasonably practicable after each session of the Legislature.

...

12. Willful refusal to complete ethics training or to execute and file the acknowledgment required by this section shall be deemed to be:

(a) A willful violation of this chapter for the purposes of NRS 281A.785 and 281A.790; and

(b) Nonfeasance in office for the purposes of NRS 283.440 and, if the public officer is removable from office pursuant to NRS 283.440, the Commission may file a complaint in the appropriate court for removal of the public officer pursuant to that section. This paragraph grants an exclusive right to the Commission, and no other person may file a complaint against the public officer pursuant to NRS 283.440 based on any violation of this section.

Unwarranted Harm

A public officer or employee shall not use the public officer's or employee's position or power in government to take any actions or compel a subordinate to take any actions that would cause unwarranted harm or damage to another person to benefit a significant personal or pecuniary interests of the public officer or employee or any person to whom the public officer or employee has a commitment in a private capacity. As used in this section "unwarranted" means without justification or adequate reason.

Appearance of Impropriety

"Appearance of Impropriety" means a reasonable person would find, based on the given set of facts and circumstances, that a public officer's or public employee's limited use of governmental property, equipment or other facility for personal purpose is inappropriate, disproportionate, excessive, or unreasonable under that given set of facts and circumstance.

Gifts

“Gift” means something of economic value given to a public employee, public officer, or someone to whom they have a commitment in a private capacity without valuable consideration of equivalent value, including the full or partial forgiveness of indebtedness, which is not extended to others who are not public employees, public officers, or someone to whom they have a commitment in a private capacity or for valuable consideration less than that required from others who are not public employees or officers.

NRS 281A.400(1) 1. A public officer or employee shall not seek or accept any gift, service, favor, employment, engagement, emolument or economic opportunity, for the public officer or employee or any person to whom the public officer or employee has a commitment in a private capacity, which would tend improperly to influence a reasonable person in the public officer’s or employee’s position to depart from the faithful and impartial discharge of the public officer’s or employee’s public duties.

(a) When determining if an event attendance gift under this section “would tend improperly to influence a reasonable person to depart from the faithful and impartial discharge of the public officer’s or employee’s public duties” the Commission shall consider:

- I. If the public officer’s or public employee’s attendance is clearly for ceremonial purpose;
- II. The extent to which the attendance offered to the public officer or employee is broadly available to the public and media in duration and scope;
- III. The event primarily provides educational information clearly related to the public officer’s or employee’s public duties;
- IV. The value of the gift;
- V. The ability of the public officer or employee to make official decisions regarding the individual or entity providing the gift.

Cooling Off – Strict One Year

NRS 281A.410 Limitations on representing or counseling private persons before public agencies; request for relief from strict application of certain provisions. In addition to the requirements of the code of ethical standards and the other provisions of this chapter:

1. Except as otherwise provided in NRS 678A.360, if a public officer or employee serves in a state agency of the Executive Department or an agency of any county, city or other political subdivision, the public officer or employee:

(a) Shall not accept compensation from any private person to represent or counsel the private person on any issue pending before the agency in which that public officer or employee serves, if the agency makes decisions; and

(b) If the public officer or employee leaves the service of the agency, shall not, for 1 year after leaving the service of the agency, represent or counsel for compensation a private person upon any issue ~~which was under consideration by~~ before the agency ~~during the public officer's or employee's service~~. As used in this paragraph, "issue" includes a case, proceeding, application, contract or determination, but does not include the proposal or consideration of legislative measures or administrative regulations.

Confidentiality Expansion

281A.750(2) Except as otherwise provided in subsection 3, if a person who files an ethics complaint asks that his or her identity as the requester be kept confidential, the Commission:

(a) Shall keep the identity of the requester confidential if he or she is a public officer or employee who works for the same public body, agency or employer as the public officer or employee who is the subject of the ethics complaint ~~or who worked at the same public body, agency or employer as the public officer or employee at the time of the alleged misconduct~~.

(b) May keep the identity of the requester confidential if he or she offers sufficient facts and circumstances showing a reasonable likelihood that disclosure of his or her identity will subject the requester or a member of his or her household to a bona fide threat of physical force or violence.

~~(c) May keep the identity of the requester confidential if he or she offers sufficient facts and circumstances showing a reasonable likelihood that disclosure of his or her identity would result in substantial economic harm to the requester or his or her household.~~