



## STATE OF NEVADA

### BEFORE THE NEVADA COMMISSION ON ETHICS

In re **Caroline Sexton**,  
Chief Marketing Officer,  
Division of Tourism,  
State of Nevada,

Ethics Complaint  
Case No. 25-059C

Subject. /

#### REVIEW PANEL DETERMINATION

NRS 281A.730; NAC 281A.440

On May 27, 2025, the Nevada Commission on Ethics ("Commission") received the above-entitled Ethics Complaint ("Complaint") against Caroline Sexton ("Subject") and instructed the Executive Director to investigate alleged violations of NRS 281A.400(1), and (2) and NRS 281A.420(1). During the investigation, Sexton was provided notice of additional facts and issues related to NRS 281A.400(3) and (10).

During all material times, Subject was 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 Subject's conduct as a public employee and associated implications under the Ethics Law.

On September 3, 2025, a Review Panel consisting of Chair Scherer (Presiding Officer), Commissioner Langton and Commissioner Miller considered the following: (1) Ethics Complaint; (2) Order on Jurisdiction and Investigation; (3) Subject's Response; and (4) Executive Director's Recommendation to the Review Panel with Summary of Investigatory Findings and Relevant Evidentiary Exhibits.<sup>1</sup>

The Review Panel unanimously finds and concludes the facts and evidence establish credible evidence that the Subject failed to comply with the requirements of NRS 281A.400(1), (2) and (10) and that just and sufficient cause exists to refer this matter to the Commission for further proceedings on those alleged violations. The Review Panel further finds and concludes that the facts do not 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 alleged violations of NRS 281A.400(3) and NRS 281A.420(1). Those alleged violations are therefore dismissed.

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<sup>1</sup> All materials provided to the Review Panel, except the Ethics Complaint and the Order on Jurisdiction and Investigation, represent portions of the investigatory file and remain confidential pursuant to NRS 281A.755.

Therefore, this Complaint is referred to the Commission for adjudicatory proceedings and a determination regarding Subject's alleged violations of NRS 281A.400(1), (2) and (10).

Dated this 3rd day of September, 2025

NEVADA COMMISSION ON ETHICS

By: /s/ Scott Scherer  
Scott Scherer, Esq.  
Chair

By: /s/ Michael Langton  
Michael Langton, Esq.  
Commissioner

By: /s/ John Miller  
John Miller  
Commissioner