



STATE OF NEVADA

BEFORE THE NEVADA COMMISSION ON ETHICS

In re **James Gibson**,
Commissioner, Clark County,
State of Nevada,

Ethics Complaint
Case No. 24-085C

Subject. /

In re **Justin Jones**,
Commissioner, Clark County,
State of Nevada,

Ethics Complaint
Case No. 24-086C

Subject. /

In re **Ross Miller**,
Commissioner, Clark County,
State of Nevada,

Ethics Complaint
Case No. 24-087C

Subject. /

In re **William McCurdy II**,
Commissioner, Clark County,
State of Nevada,

Ethics Complaint
Case No. 24-088C

Subject. /

In re **Tick Segerblom**,
Commissioner, Clark County,
State of Nevada,

Ethics Complaint
Case No. 24-089C

Subject. /

STIPULATED AGREEMENT

1. **PURPOSE:** This Stipulated Agreement ("Agreement") resolves consolidated Ethics Complaints Case Nos. 24-085C, 24-086C, 24-087C, 24-088C, and 24-089C before the Nevada Commission on Ethics ("Commission") concerning Clark County Commissioners James Gibson ("Gibson"), Justin Jones ("Jones"), Ross Miller ("Miller"), William McCurdy II ("McCurdy"), and Tick Segerblom ("Segerblom"), (collectively "County Commissioners").

2. JURISDICTION: At all relevant times, County Commissioners served as Clark County Commissioners, and were public officers as defined in NRS 281A.160. The Ethics in Government Law (“Ethics Law”) set forth in NRS Chapter 281A gives the Commission jurisdiction over elected and appointed public officers and public employees whose conduct is alleged to have violated the provisions of NRS Chapter 281A. See NRS 281A.280. Accordingly, the Commission has jurisdiction over County Commissioners in this matter.

3. PROCEDURAL HISTORY:

a. One June 12, 2024, the Commission initiated Ethics Complaint No. 24-085C and directed the Executive Director to issue an *Order Initiating Company by Motion* regarding the alleged violations of NRS 281A.400(1) and (2) and NRS 281A.420(1) and (3) by County Commissioners and investigate their alleged violations of the Ethics Law.

b. On July 31, 2025, the Commission’s Review Panel (“Panel”) issued a Review Panel Determination and Referral Order finding just and sufficient cause for the Commission to hold a hearing and render an opinion in this matter regarding County Commissioners’ alleged violations of NRS 281A.420(1) and (3) but dismissing the alleged violations of NRS 281A.400(2). By a split 2-1 vote, the Review Panel also found just and sufficient cause to refer the alleged violations of NRS 281A.400(1) to the full Commission.

c. On August 25, 2025, the parties participated in a voluntary settlement conference with Commissioner Michael E. Langton, Esq. as the settlement Commissioner.

d. On August 26, 2025, the Chair consolidated the Complaints at the request of the parties pursuant to NAC 281A.260.

e. In lieu of an adjudicatory hearing before the Commission, County Commissioners and the Commission now enter into this Agreement.

4. STIPULATED FACTS:

a. County Commissioners each served on the Clark County Board of Commissioners (“Board”) at all material times. Respondent Gibson also served as Chair of the Las Vegas Convention Visitors Authority at all material times.

b. At its June 6, 2023 Meeting, the Board authorized staff to enter into negotiations for a private-public partnership between the County and LVGP.

c. At its October 17, 2023 Meeting, the Board approved an Advertising Agreement with LVGP.

d. On or about November 9, 2023, County Commissioners each received a letter from the Las Vegas Grand Prix (“LVGP”) gifting them tickets to attend the Las Vegas Grand Prix races with a purported face value of \$10,000 + 9% Live Entertainment Tax (“Grand Prix Pass”). Each Grand Prix Pass was good for all four days of the event. The Grand Prix Passes were non-transferable.

e. LVGP’s letter stated the purpose of the tickets was to “educate [County Commissioners] about the Grand Prix and how the Clark County Commission can work with LVGP with respect to future Grand Prix.”

f. Each Respondent attended at least one day of the event.

g. At its November 21, 2023 meeting, after the County Commissioners’ receipt of the Grand Prix Passes, and after the Grand Prix event took place, the Board ratified two agreements between LVGP and Clark County. The agreements required LVGP to reimburse Clark County for fire and safety measures during the event, which is historically typical of such large-scale events held in Clark County.

h. None of the County Commissioners who received and used the gifted tickets disclosed their receipt of the Grand Prix Passes or abstained during the November 21, 2023, Meeting. Each Respondent did, however, at one time or another, disclose the receipt of the Grand Prix Passes either on their required contribution and expenditure reports or their annual financial disclosure forms.¹

i. At its March 19, 2024 meeting, the Board received a debriefing from staff regarding the LVGP event. No County Commissioners disclosed the gifted Grand Prix Passes during the discussion.

j. At the Board’s May 21, 2024 Meeting, Respondent Gibson had an item placed on the agenda in order to direct staff on business licensing opportunities for LVGP. Gibson did not disclose his Grand Prix Pass prior to or during the direction to staff.

¹ The Commission notes that requirements for financial disclosures to the Secretary of State and disclosures under the Ethics Law are different legal requirements and the completion of one is insufficient to meet the requirements of the other.

5. **TERMS / CONCLUSIONS OF LAW:** Based on the foregoing, County Commissioners and the Commission agree as follows:

a. Each of the stipulated facts enumerated in Section 4 of this Agreement is agreed to by the parties.

b. Allegations that County Commissioners violated NRS 281A.400(1) and NRS 281A.420(3) are hereby dismissed by stipulation of the parties.

c. The LVGP pass provided to County Commissioners was a gift for purposes of the Ethics Law. See *In re McClinton*, Comm'n Op. No. 24-168C (2025) (tickets to view a sporting event are a gift).

d. NRS 281A.420(1) required County Commissioners to make disclosures sufficient to inform the public of the potential effect of the action upon the LVGP, the entity that provided the gift. County Commissioners were required to make the disclosures at the time each matter related to LVGP was considered.

e. The disclosure requirements of the Ethics Law are essential to achieving the Commission's purpose to enhance the people's faith in the integrity and impartiality of public officers as the requirements require the appropriate transparency so that the public may properly evaluate policy decisions of their elected officials.

f. County Commissioners' failure to disclose the acceptance of the Grand Prix Pass when considering County Commission agenda items that would impact LVGP constitutes a single course of conduct resulting in one violation of NRS 281A.420(1).

g. Based upon the consideration and application of the statutory mitigating criteria set forth in NRS 281A.775, the Commission concludes that County Commissioners' violation in this case should be deemed non-willful pursuant to NRS 281A.170 for the following reasons:

- 1) ***Seriousness of Violation:*** The Commission takes seriously when gifts are sought or accepted by public officers from organizations or individuals who are expressly or implicitly seeking government funding or action from the recipient of the gift. In this case, County Commissioners had legitimate government purposes, including ceremonial and educational goals, for attending the Grand Prix event in his public position.
- 2) ***Previous History:*** County Commissioners have not previously been the subject of any deferral agreement or violation of the Ethics Law.

- 3) ***Cost of Investigation and Proceedings***: County Commissioners were diligent in cooperating with and participating in the Commission's investigation and resolution of this matter. Because County Commissioners were willing to resolve these matters prior to an adjudicatory hearing, significant Commission resources were preserved.
- 4) ***Prompt correction of the violation or other mitigating factors***: There was no self-reporting, prompt correction, or request for an advisory opinion by County Commissioners. However, County Commissioners listed the Grand Prix Passes on either their financial disclosure statements or their contribution and expense reports filed with the Secretary of State. Additionally, County Commissioners are committed to advocating systemic changes as Clark County to increase the transparency and compliance surrounding the receipt and use of event gifts.
- 5) ***Restitution***: This is not a case where restitution is a factor.
- 6) ***Financial Gain***: County Commissioners did not receive any personal financial gain in this matter.

h. As part of this Agreement, County Commissioners agree that they will work with Clark County to establish an Ethics Officer for Clark County with the authority of an Assistant County Manager to oversee ethics education and compliance (this position can be assigned to an existing position).

i. County Commissioners further agree to work with Clark County to establish an event attendance policy that applies to County Commissioners and County leadership to set forth rules and regulations surrounding ceremonial event attendance, educational event attendance, and other event attendance that ensures attendance at these types of events is narrowly tailored to ceremony or education and provides suitable guidance in future such instances.

j. The Executive Director agrees to provide technical assistance, if requested, to Clark County in the development of an Ethics Officer and an event attendance policy.

k. The Commission admonishes County Commissioners subject to NRS 281A.785(1)(b) providing this written expression of disapproval of their conduct.

l. This Agreement is based on the specific facts, circumstances, and law now before the Commission. Facts or circumstances that differ from those present in this matter may create a different resolution.

m. This Agreement is not intended to be applicable to or create any admission of liability by County Commissioners for any other proceedings against or involving them, and such use is prohibited to the extent permitted by the jurisdiction of the Commission. If the Commission rejects this Agreement, none of the provisions herein shall be considered by the Commission or be admissible as evidence in a hearing in this matter.

6. WAIVER

a. The Parties knowingly and voluntarily waive any, and all rights they may be accorded in regard to this matter pursuant to NRS Chapter 281A, the regulations of the Commission (NAC Chapter 281A), the Nevada Administrative Procedures Act (NRS Chapter 233B), and any other applicable provisions of law.

b. County Commissioners knowingly and voluntarily waive their rights to any judicial review of this Agreement as provided in NRS Chapter 281A, NRS Chapter 233B, or any other applicable provisions of law.

7. ACCEPTANCE: We, the undersigned parties, have read this Agreement, understand each and every provision therein, and agree to be bound thereby once approved by the Commission. In addition, the parties orally agreed to be bound by the terms of this Agreement during the regular meeting of the Commission on September 3, 2025.²

DATED this 27th day of August, 2025.

/s/ James Gibson

James Gibson, Esq.

DATED this 27th day of August, 2025.

/s/ Justin Jones

Justin Jones, Esq.

DATED this 27th day of August, 2025.

/s/ Ross Miller

Ross Miller, Esq.

DATED this 27th day of August, 2025.

/s/ William McCurdy, II

William McCurdy II

DATED this 27th day of August, 2025.

/s/ Tick Segerblom

Tick Segerblom, Esq.

² Subject waived any right to receive written notice pursuant to NRS 241.033 of the time and place of the Commission's meeting to consider his character, alleged misconduct, professional competence, or physical or mental health.

FOR COUNTY COMMISSIONERS

DATED this 27th day of August, 2025.


Bradley Scott Schrager, Esq.
Bravo Schrager LLP

DATED this 27th day of August, 2025.


Ross E. Armstrong, Esq.
Executive Director
Nevada Commission on Ethics

Approved as to form by:

FOR NEVADA COMMISSION ON ETHICS

DATED this ____ day of ____, 2025.

Elizabeth J. Bassett, Esq.
Commission Counsel

The Stipulated Agreement is accepted by the Nevada Commission on Ethics:

DATED this ____ day of ____, 2025.

By: /s/
Kim Wallin, CPA, CMA, CFM
Vice Chair

By: /s/
Terry J. Reynolds
Commissioner

By: /s/
Teresa Lowry, Esq.
Commissioner

By: /s/
Brianna Smith, Esq.
Commissioner

By: /s/
John T. Moran, III, Esq.
Commissioner

FOR COUNTY COMMISSIONERS

DATED this _____ day of _____, 2025.

Bradley Scott Schrager, Esq.
Bravo Schrager LLP

DATED this _____ day of _____, 2025.

Ross E. Armstrong, Esq.
Executive Director
Nevada Commission on Ethics

Approved as to form by:

FOR NEVADA COMMISSION ON ETHICS

DATED this 23rd day of September, 2025.

/s/ Elizabeth J. Bassett
Elizabeth J. Bassett, Esq.
Commission Counsel

The Stipulated Agreement is accepted by the Nevada Commission on Ethics:

DATED this 23rd day of September, 2025.

By: /s/ Kim Wallin
Kim Wallin, CPA, CMA, CFM
Vice Chair

By: /s/ Terry J. Reynolds
Terry J. Reynolds
Commissioner

By: /s/ Teresa Lowry
Teresa Lowry, Esq.
Commissioner

By: Abstained³
Brianna Smith, Esq.
Commissioner

By: /s/ John T. Moran
John T. Moran, III, Esq.
Commissioner

³ Commissioner Smith abstained from participation and voting in this matter based on Code of Judicial Conduct, Canon 2.11. In her role on the Commission, Commissioner Smith serves in a quasi-judicial role. Code of Judicial Conduct, Canon 2.11 requires a judge or quasi-judicial officer to disqualify herself in any proceeding in which her impartiality might reasonably be questioned based on, but not limited to, various circumstances listed in Canon 2.11, including personal knowledge of or experience with the parties or the facts involved in the matter or association with a lawyer who participated substantially as a lawyer in the matter during such association. Having reviewed the circumstances listed in Canon 2.11, Commissioner Smith determined it was appropriate to abstain from this matter to avoid the appearance of bias or impropriety in the proceedings.