



STATE OF NEVADA  
**COMMISSION ON ETHICS**

**BEFORE THE NEVADA COMMISSION ON ETHICS**

**IN THE MATTER OF THE REQUEST FOR OPINION  
CONCERNING THE CONDUCT OF**

**GEORGE KEELE**

Commissioner, Nevada Commission on Ethics

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**STIPULATION**

**Opinion No. 07-36C**

**STIPULATED AGREEMENT**

1. **PURPOSE:** The purpose of this Stipulated Agreement is to resolve Request for Opinion No. 07-36C (req. for opinion) concerning George Keele (“Keele”) and render an opinion as stipulated in lieu of holding a hearing.
2. **JURISDICTION:** At all material times, Keele was an appointed member of the Nevada Commission on Ethics, and is a public officer subject to the jurisdiction of the Commission pursuant to NRS 281.4365.
3. **STIPULATED FACTS:**
  - a. On August 31, 2007, a request for opinion was filed with the Commission by Keele alleging Keele submitted four late disclosures required by NRS 281.491(3).
  - b. In his August 31, 2007, request for opinion, Keele alleges that during the January 24, 2007, meeting of the Nevada Commission on Ethics, commissioners discussed the term “Executive Branch.” Later, they discussed having the Commission sponsor a legislative amendment to NRS 281.491, and Keele’s attention was drawn to the term

“Executive Branch” in subsection 3 thereof. Keele states that, as he read that subsection, it dawned on him for the first time that he has a duty to file disclosures. Promptly thereafter, Keele prepared the required disclosures.

- c. Keele waives an investigation by the executive director and the convening of a panel under NRS 281.511(3).
- d. Keele had an obligation to familiarize himself with chapter 281 of NRS, and at or around the time he was notified of his appointment to the Commission on Ethics, he read the entire chapter. However, he did not at that time recognize that a small portion of his professional activities fell within the requirements of NRS 281.491(3).
- e. As soon as Keele recognized his duty to file disclosures, he submitted them to the Commission.
- f. Keele waives notice of the allegations made against him and an opportunity to file a written response; and he is fully advised as to the allegations asserted against him in the request for opinion.
- g. Because the request for opinion is initiated by Keele against himself, Keele waives his right to file written responses to his allegations against himself.
- h. Keele stipulates that just and sufficient cause exists for the Commission to conduct a hearing on Keele’s August 31, 2007, request for opinion; nevertheless, the parties agree to enter into this Stipulated Agreement in lieu of proceeding to a full hearing.
- i. Having retained legal counsel in this matter, Keele is fully aware of his right to a hearing before the Commission on the allegations against him and of any and all rights he may be accorded pursuant to the Ethics in Government Law, the regulations of the Commission (NAC Chapter 281), the Nevada Administrative Procedures Act (NRS 233B), and the laws of the State of Nevada, and he freely and voluntarily

waives these rights, except as they apply to the rights and responsibilities of the parties under this Stipulated Agreement.

4. RELEVANT STATUTES AND OPINIONS: The following provisions of NRS are relevant to the allegations which give rise to this Stipulated Agreement:

**NRS 281.491(3) provides:**

3. Not later than January 10 of each year, any Legislator or other public officer who has, within the preceding year, represented or counseled a private person for compensation before a state agency of the Executive Branch shall disclose for each such representation or counseling during the previous calendar year:

- (a) The name of the client;
- (b) The nature of the representation; and
- (c) The name of the state agency.

The disclosure must be made in writing and filed with the Commission, on a form prescribed by the Commission. The Commission shall retain a disclosure filed pursuant to this subsection for 6 years after the date on which the disclosure was filed.

5. TERMS: George Keele and the Commission agree as follows:
- a. Keele committed four violations of NRS 281.491(3); but no willful violations.
  - b. Once Keele realized his duty to disclose he promptly did so.
  - c. Keele is advised to implement procedures and practices to insure timely filing of disclosures in the future. Any future violation by Keele of NRS 281.491(3) may be found willful.
  - d. Keele waives his right to any judicial review of this matter as provided in NRS 233B.130 or any other provision of Nevada state law.
  - e. This Stipulated Agreement applies only to the specific facts, circumstances and law related to the request for opinion filed by Keele against himself. Any facts and circumstances that differ from those contained in this Stipulated Agreement may create an entirely different resolution of this matter.

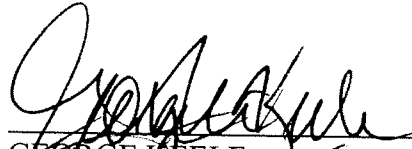
6. CONTINGENCY:

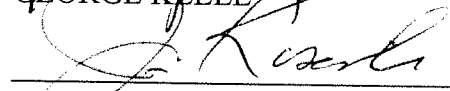
- a. This Stipulated Agreement, entered into pursuant to NAC 281.109(1), is subject to final approval by the Commission in an open public meeting. Once approved, this Stipulated Agreement shall be adopted as the Opinion of the Commission. This Stipulated Agreement will be the final disposition of this matter and shall be binding upon all parties.
- b. Should this Stipulated Agreement not be approved by the Commission, this matter will proceed to a full hearing before the Commission and this Stipulated Agreement shall be of no force or effect, nor will it be admissible, in part or whole, in such hearing.

7. ACCEPTANCE: We, the undersigned parties, have read this Stipulated Agreement, understand each and every provision therein, and agree to be bound thereby.

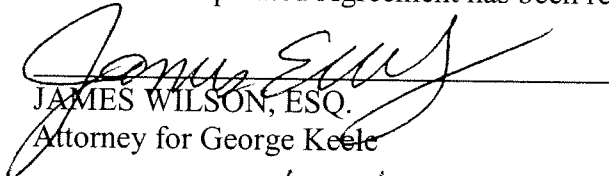
DATED this 12<sup>th</sup> day of Sept., 2007.

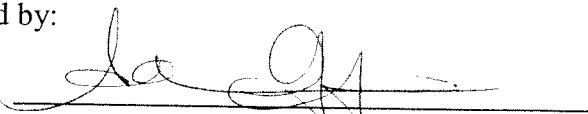
DATED this 12<sup>th</sup> day of Sept., 2007.

  
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GEORGE KEELE

  
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JIM KOSINSKI, CHAIRMAN  
Nevada Commission on Ethics

The above Stipulated Agreement has been reviewed by:

  
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JAMES WILSON, ESQ.  
Attorney for George Keele

  
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ADRIANA G. FRALICK, ESQ.  
Commission Counsel

DATED: 9/12/07

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