



**STATE OF NEVADA
BEFORE THE NEVADA COMMISSION ON ETHICS**

In re **Tracy Larkin Thomason**, Director,
Nevada Department of Transportation,
State of Nevada,

Ethics Complaint
Case No. 25-038C
Confidential

Subject. /

REVIEW PANEL DETERMINATION
NRS 281A.730; NAC 281A.440

On April 15, 2025, the Nevada Commission on Ethics ("Commission") received the above-referenced Ethics Complaint ("Complaint") from a member of the public ("Requester") alleging violations of the Nevada Ethics in Government Law set forth in NRS Chapter 281A ("Ethics Law") by Tracy Larkin Thomason ("Subject"). On June 2, 2025, the Commission instructed the Executive Director to investigate alleged violations of NRS 281A.400(2) and (7).

During all material times, Subject was a public officer as defined in NRS 281A.160. 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 officer and associated implications under the Ethics Law.

On November 12, 2025, a Review Panel consisting of Vice Chair Wallin (Presiding Officer) and Commissioners Reynolds and Smith 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.¹

The Review Panel unanimously finds and concludes the investigation did not present just and sufficient cause to refer the Complaint to the Commission for further proceedings. The Review Panel arrived at this determination after considering whether the benefits secured by Subject were "unwarranted" as defined in NRS 281A.400(2) and if the limited use exception to NRS 281A.400(7) applied.

Based on the application of the just and sufficient cause standard to the factual circumstances in this case, including that the Subject has terminated the equipment use at issue in this Complaint, the Review Panel concludes this matter should not be referred to the Commission for an opinion.

¹ 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.

However, in alignment with the Commission's aims in warning public officers that their conduct as alleged is sufficient to implicate provisions within the Ethics Law, and to provide education on how to avoid implicating the Ethics Law in the future, the Review Panel directs that a Letter of Caution be issued to Subject.

Having found that just and sufficient cause does not exist in this matter, the Review Panel dismisses the case upon issuance of the Letter of Caution.

DATED: this 13th day of November, 2025.

REVIEW PANEL OF THE NEVADA COMMISSION ON ETHICS

By: /s/ Kim Wallin
Kim Wallin, CPA, CMA, CFM
Vice Chair (Presiding Officer)

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

By: /s/ Brianna Smith
Brianna Smith, Esq.
Commissioner