



## STATE OF NEVADA

### BEFORE THE NEVADA COMMISSION ON ETHICS

In re **Catherine Hall**, Chair  
Mineral County Commission,  
State of Nevada,

Ethics Complaint  
Case Nos. 23-120C, 23-121C,  
23-128C, and 23-129C

\_\_\_\_\_ Subject. /

### STIPULATED AGREEMENT

1. **PURPOSE:** This Stipulated Agreement resolves consolidated Ethics Complaint Case Nos. 23-120C, 23-121C, 23-128C, and 23-129C before the Nevada Commission on Ethics (“Commission”) concerning Catherine Hall (“Hall”), Chair, Mineral County Commission.<sup>1</sup>
2. **JURISDICTION:** At all material times, Hall served as a Commissioner for the Mineral County Commission, a public officer 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 public officers whose conduct is alleged to have violated the provisions of NRS Chapter 281A. See NRS 281A.280. The Commission has jurisdiction over Hall in this matter.
3. **PROCEDURAL HISTORY BEFORE COMMISSION:**
  - a. On or between September 19, 2023, and October 12, 2023, the Commission received multiple complaints regarding the alleged conduct of Subject Catherine Hall (“Hall”).
  - b. On October 31, 2023, the Commission issued orders in each case consolidating the various complaint cases and directing the Executive Director to investigate Hall for potential violations of NRS 281A.400(2), (7), and (9) and NRS 281A.420(1) and (3).
  - c. On November 1, 2023, staff of the Commission issued a *Notice of Complaints, Additional Issues and Facts, and Investigation* to Hall pursuant to NRS

\_\_\_\_\_ <sup>1</sup> At the time of the execution of this agreement Hall is no longer serving as a public officer.

281A.720 and NAC 281A.410 and provided Hall with an opportunity to submit a response to the allegations.

d. On March 20, 2024, the Executive Director presented a recommendation relating to just and sufficient cause to a three-member review panel pursuant to NRS 281A.725.

e. A Review Panel Determination issued on March 20, 2024, found the facts established 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(2), (7), and (9) but determined that the facts did not establish credible evidence to refer the alleged violations of NRS 281A.420(1) and (3) to the Commission. Therefore, the alleged violations of NRS 281A.420(1) and (3) were dismissed and the alleged violations of NRS 281A.400(2), (7), and (9) were referred to the Commission for an opinion.

f. On April 22, 2024, the parties attended a voluntary settlement conference and reached an agreement to resolve this matter on the terms reflected in this Stipulated Agreement (“Agreement”).

g. In lieu of an adjudicatory hearing before the Commission, Hall and the Commission now enter into this Agreement.

#### **4. STIPULATED FACTS:**

a. Hall served as a duly elected County Commissioner for Mineral County from January 1, 2021 until her resignation on November 1, 2023.

b. Hall was the designated Nevada Association of Counties liaison for Mineral County during this time.

c. While serving as a Mineral County Commissioner, Hall owned and operated private food establishments.

d. Hall received a county-issued credit card (“County Card”) and agreed to adhere to county policies regarding proper use of the County Card.

e. Hall used the County Card to purchase supplies for her private business on three occasions as follows:

- 1) \$333.37 at Sam’s Club on May 19, 2022,
- 2) \$51.92 at Total Wine on May 19, 2022,
- 3) \$967.95 at Walmart on October 24, 2022.

f. Hall discovered and reported the error at the next Commission meeting following each respective card statement.

g. Hall's companies reimbursed the County for these purchases in June of 2022 for the May purchases and in December of 2022 for the October purchase.

h. Hall traveled several times in 2021, 2022, and 2023 on behalf of Mineral County. This travel included various conference and meetings in order to gain information and skills beneficial to Mineral County.

i. During these trips, Hall incurred expenses for "preferred seating" and "overweight luggage" fees.

j. Mineral County does not have a policy either allowing or forbidding these purchases. In some cases, third parties covered some of Hall's travel costs.

**5. TERMS / CONCLUSIONS OF LAW:** Based on the foregoing, Hall 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 Hall violated NRS 281A.400(9) are hereby dismissed by stipulation of the parties.

c. Hall had a commitment in a private capacity to her private businesses pursuant to NRS 281A.065.

d. Hall's actions in accessing the County's credit line and purchasing power to purchase supplies for her private businesses constitute a single course of conduct resulting in one violation of NRS 281A.400(2). Specifically, the Commission finds this benefit "unwarranted" as defined in statute because the use was expressly prohibited by policy and is without any other justification.

e. Hall's actions in using the County Card to benefit her private businesses constitutes a single course of conduct resulting in one violation of NRS 281A.400(7). Specifically, the Commission finds the County Card was government equipment and that the facts do not establish any of the limited use exceptions are met.

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f. Based upon the consideration and application of the statutory factors set forth in NRS 281A.775, Hall and the Commission agree that pursuant to NRS 281A.170 both violations shall be deemed non-willful:

- 1) Seriousness of Violation: The Commission has recognized the importance of avoiding the use of government time, property, equipment or other facility to benefit a public employee's significant personal or pecuniary interest. Hall's use of the County Card to benefit per private business on multiple occasions is a serious violation.
- 2) Previous History: Hall has not previously been the subject of any ethics complaint arising from alleged violations of the Ethics Law for which a Review Panel has determined there is just and sufficient cause for the Commission to render an opinion in the matter.
- 3) Cost of Investigation and Proceedings: Hall cooperated with and participated in the Commission's investigation and resolution of this matter. Because Hall was willing to resolve the matter prior to an adjudicatory hearing, significant Commission resources were preserved.
- 4) Restitution Paid: The cost of the supplies purchased for her private businesses to the County were reimbursed by Hall. Hall agreed to have the costs for oversized baggage fees deducted from a future paycheck from the County.
- 5) Prompt correction of the violation: Hall recognized the expenditures on review of the county statement and reported the mistake to the Comptroller in both instances. Hall indicates that she contacted the Attorney General's Office and POOL/PACT to report these issues after the second instance.
- 6) Financial Gain: Hall recognized financial gain for a short period of time as a result of her conduct. However, Hall did pay back the County for the purchases made to benefit her private business.
- 7) Other Mitigating Factors: Hall indicates the County card and personal card were the same color, a factor which led to Hall's use of the County card for personal expenditures.

g. For her non-willful violations of NRS 281A.400(2) and (7), Hall agrees to pay the sum of \$1,000.00 payable to the Commission. Proof of this payment is due to the Commission by December 31, 2024.

h. If Hall returns to any form of public employment as either a public officer, as defined in NRS 281A.160, or a public employee, as defined in NRS 281A.150, including employment with any board or commission of any State or local government, whether

funded by taxes or fees, she will notify the Executive Director of the Commission and will complete Ethics Law training as approved by the Executive Director within 60 days of the start of her employment.

i. This Agreement is based on the specific facts, circumstances, and law now before the Commission. Facts or circumstances that may come to light after its execution that are in addition to or differ from those contained herein may create a different resolution of this matter.

j. This Agreement is not intended to be applicable to or create any admission of liability by Hall for any other proceeding against or involving Hall. 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 on the merits in this matter.

**6. WAIVER**

a. Hall knowingly and voluntarily waives her right to a hearing before the full Commission on the allegations in Ethics Complaint Case No. 23-120C and all rights she may be accorded with 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. Hall knowingly and voluntarily waives her right to any judicial review of this matter as provided in NRS Chapter 281A, NRS Chapter 233B, or any other applicable provisions of law.

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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 June 26, 2024.<sup>2</sup>

DATED this 20<sup>th</sup> day of May, 2024.

Catherine Hall  
Catherine Hall

FOR CATHERINE HALL

DATED this 21<sup>st</sup> day of May, 2024.

Richard G. Campbell, Esq.  
Richard G. Campbell, Esq.  
Kaempfer Crowell

DATED this 15 day of May, 2024.

Ross E. Armstrong, Esq.  
Ross E. Armstrong, Esq.  
Executive Director

Approved as to form by:

FOR NEVADA COMMISSION ON ETHICS

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Elizabeth Bassett, Esq.  
Elizabeth Bassett, Esq.  
Commission Counsel

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

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

By: \_\_\_\_\_  
Kim Wallin, CPA, CMA, CFM  
Chair

By: \_\_\_\_\_  
Scott Sherer, Esq.  
Commissioner

By: \_\_\_\_\_  
Teresa Lowry, Esq.  
Commissioner

By: \_\_\_\_\_  
Stan R. Olsen  
Commissioner

By: \_\_\_\_\_  
Michael E. Langton, Esq.  
Commissioner

<sup>2</sup> 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 her character, alleged misconduct, professional competence, or physical or mental health.

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 June 26, 2024.<sup>2</sup>

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Catherine Hall

FOR CATHERINE HALL

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Richard G. Campbell, Esq.  
Kaempfer Crowell

DATED this 15 day of May, 2024.

  
\_\_\_\_\_  
Ross E. Armstrong, Esq.  
Executive Director

Approved as to form by:

FOR NEVADA COMMISSION ON ETHICS

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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Elizabeth Bassett, Esq.  
Commission Counsel

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Teresa Lowry, Esq.  
Commissioner

By: \_\_\_\_\_  
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Commissioner

By: \_\_\_\_\_  
Michael E. Langton, Esq.  
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DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Catherine Hall

FOR CATHERINE HALL

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Richard G. Campbell, Esq.  
Kaempfer Crowell

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Ross E. Armstrong, Esq.  
Executive Director

Approved as to form by:

FOR NEVADA COMMISSION ON ETHICS

DATED this 27<sup>th</sup> day of June, 2024.

/s/ Elizabeth Bassett  
\_\_\_\_\_  
Elizabeth Bassett, Esq.  
Commission Counsel

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

DATED this 26<sup>th</sup> day of June, 2024.

By: /s/ Kim Wallin  
\_\_\_\_\_  
Kim Wallin, CPA, CMA, CFM  
Chair

By: /s/ Scott Scherer  
\_\_\_\_\_  
Scott Scherer, Esq.  
Commissioner

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

By: /s/ Stan R. Olsen  
\_\_\_\_\_  
Stan R. Olsen  
Commissioner

By: /s/ Michael Langton  
\_\_\_\_\_  
Michael E. Langton, Esq.  
Commissioner

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STATE OF NEVADA

NEVADA COMMISSION ON ETHICS

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Mineral County Commission,  
State of Nevada,

Subject. /

Ethics Complaints  
Case Nos. 23-120C, 23-121C,  
23-128C, 23-129C

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada Commission on Ethics and that on this day in Carson City, Nevada, I transmitted a true and correct copy of the foregoing **Stipulated Agreement** via *Certified* and *Electronic Mail*:

Ross E. Armstrong, Esq.  
Executive Director  
Nevada Commission on Ethics  
704 W. Nye Lane, Suite 204  
Carson City, NV 89703

Email: [rarmstrong@ethics.nv.gov](mailto:rarmstrong@ethics.nv.gov)

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c/o Richard C. Campbell  
August Hotchkins  
Kaempfer Crowell  
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[ahotchkin@kcnvlaw.com](mailto:ahotchkin@kcnvlaw.com)

cc: [kmilks@kcnvlaw.com](mailto:kmilks@kcnvlaw.com)

Dated: 6/27/2024

  
\_\_\_\_\_  
Employee, Nevada Commission on Ethics