



**STATE OF NEVADA**

**BEFORE THE NEVADA COMMISSION ON ETHICS**

In re **Jeffrey Church**, Trustee,  
Washoe County School District,  
State of Nevada,

Ethics Complaint  
Case No. 24-046C  
**Confidential**

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

**REVIEW PANEL DETERMINATION**

NRS 281A.730; NAC 281A.440

The Nevada Commission on Ethics (“Commission”) received this Ethics Complaint (“Complaint”) from a member of the public on April 10, 2024, regarding the alleged conduct of Subject Jeffrey Church (“Subject”). On May 28, 2024, the Commission instructed the Executive Director to investigate alleged violations of NRS 281A.400(2) and NRS 281A.420(1) and (3).

Subject is a public officer as defined in NRS 281A.160, and the Commission has jurisdiction over this matter pursuant to NRS 281A.280 because the allegations contained in the Complaint relate to Church’s conduct as a public officer and associated implications of the Ethics Law.

On August 8, 2024, a Review Panel consisting of Vice Chair Wallin (Presiding Officer) and Commissioners Langton and Reynolds 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 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(2). Specifically, although Subject attempted to secure an unwarranted privilege or advantage for himself, he was not successful. NRS 281A.400(2) requires successfully securing the unwarranted privilege or advantage.

Furthermore, the Review Panel unanimously finds and concludes that although the facts establish credible evidence that Subject failed to strictly comply with the requirements of NRS 281A.420(1) and (3) in disclosing and abstaining from action on a matter involving his pecuniary interests, the facts and evidence do not support a determination that just and sufficient cause exists for the matter to be referred to the

<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.750.

Commission to render an opinion in the matter regarding the alleged violations of NRS 281A.420(1) and (3).

A Review Panel may issue a Confidential Letter of Caution to “warn a public officer or employee that his or her conduct as alleged in the ethics complaint is sufficient to implicate a violation of chapter 281A of NRS” and the facts and evidence presented in this matter indicate that issuing a Confidential Letter of Caution to Subject is appropriate so that Subject is aware of the requirements for strict compliance with NRS 281A.420(1) and (3).

Upon issuance of the Confidential Letter of Caution to Subject, this matter is dismissed.

DATED this 8th day of August, 2024.

REVIEW PANEL OF THE NEVADA COMMISSION ON ETHICS

By: /s/ Kim Wallin  
Kim Wallin  
Vice Chair (Presiding Officer)

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

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