



STATE OF NEVADA

BEFORE THE NEVADA COMMISSION ON ETHICS

In re **Doug Thornley**,
Former City Manager,
City of Reno, State of Nevada,

Ethics Complaint
Case No. 25-004C
Confidential

Subject. /

REVIEW PANEL DETERMINATION

NRS 281A.730; NAC 281A.440

On January 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 Doug Thornley ("Subject"). On March 3, 2025, the Commission instructed the Executive Director to investigate alleged violations of NRS 281A.410 and NRS 281A.550.

During all material times, Subject was a public officer pursuant to NRS 281A.160 and after leaving office meets the definition of that term pursuant to NRS 281A.280. 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 May 20, 2025, a Review Panel consisting of Commissioners Reynolds (Presiding Officer), Lowry and Miller 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

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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.

The Review Panel unanimously finds and concludes the facts and evidence do not establish credible evidence that Subject failed to comply with the requirements of NRS 281A.410 or NRS 281A.550, and do not support a determination that just and sufficient cause exists for the matter to be referred to the Commission to render an opinion. Specifically, the Review Panel determined that the contract between the City of Reno and Holland & Hard was entered into more than a year before Subject's departure from the City, eliminating the applicability of NRS 281A.550. In addition, the data center application at issue in the Complaint was filed after the departure of Subject from the City of Reno and therefore it was not an "issue which was under consideration by the agency during [Subject's] service" for purposes of NRS 281A.410.

Having found that just and sufficient cause does not exist in this matter, the Review Panel dismisses the case without any further action.

DATED: this 20th day of May, 2025.

REVIEW PANEL OF THE NEVADA COMMISSION ON ETHICS

By: /s/ Terry J. Reynolds
Terry J. Reynolds
Commissioner (Presiding Officer)

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

By: /s/ John Miller
John Miller
Commissioner