

**MINUTES OF THE
SENATE COMMITTEE ON LEGISLATIVE OPERATIONS AND ELECTIONS**

**Seventy-ninth Session
February 27, 2017**

The Senate Committee on Legislative Operations and Elections was called to order by Chair Nicole J. Cannizzaro at 3:33 p.m. on Monday, February 27, 2017, in Room 2144 of the Legislative Building, Carson City, Nevada. The meeting was videoconferenced to Room 4412E of the Grant Sawyer State Office Building, 555 East Washington Avenue, Las Vegas, Nevada. [Exhibit A](#) is the Agenda. [Exhibit B](#) is the Attendance Roster. All exhibits are available and on file in the Research Library of the Legislative Counsel Bureau.

COMMITTEE MEMBERS PRESENT:

Senator Nicole J. Cannizzaro, Chair
Senator Tick Segerblom, Vice Chair
Senator Kelvin Atkinson
Senator James A. Settelmeyer
Senator Heidi S. Gansert

STAFF MEMBERS PRESENT:

Michael Stewart, Policy Analyst
Brenda Erdoes, Legislative Counsel
Kevin Powers, Counsel
Jan Brase, Committee Secretary

OTHERS PRESENT:

Yvonne Nevarez-Goodson, Executive Director, Nevada Commission on Ethics
Josh Reid, City Attorney, City of Henderson
Robert Roshak, Nevada Sheriffs' and Chiefs' Association

CHAIR CANNIZZARO:

I will open the hearing on Senate Bill (S.B.) 84.

SENATE BILL 84: Makes various changes relating to ethics in government.
(BDR 23-250)

YVONNE NEVAREZ-GOODSON (Executive Director, Nevada Commission on Ethics):

I will provide an overview of the role of the Nevada Commission on Ethics in terms of its mandate by the Legislature to interpret and enforce the provisions of the Ethics in Government Law. I have submitted a presentation ([Exhibit C](#)). Senate Bill 84 is the Commission's proposal for amendments to the Ethics in Government Law, sponsored by Governor Brian Sandoval.

The Nevada Commission on Ethics is presently an eight-member public body, four appointed by the Legislative Commission and four appointed by the governor. The Commission's mandate under *Nevada Revised Statutes* (NRS) 281A is to interpret and enforce the provisions of Nevada's Ethics in Government Law. The law primarily constitutes enforcing the public's trust in government, such that government is free from conflicts of interest between public duties and private interests.

Because we are a citizen-based government, officials in Nevada have a wide ranging network of potentially conflicting relationships. The Ethics in Government Law is designed to acknowledge that those conflicts exist and to recognize when a conflict is disqualifying or impermissible.

The Commission's jurisdiction applies to Nevada's public officers and employees. There are some limitations. Nevada's judicial officers are governed by the Nevada Commission on Judicial Discipline. Legislators have limited responsibilities under the Ethics in Government Law in regard to core legislative functions and actions otherwise deemed to be protected by legislative privilege and immunity.

Public officers are, primarily, anyone in the executive branches of State and local governments, governing members of general improvement districts and public employees whose position is financed by public funds.

The Commission is responsible for three functions. First is the interpretation and enforcement of the provisions of NRS 281A, known as First-Party Requests for Opinion. During a First-Party Request for Opinion, any public officer or employee may request a confidential advisory opinion from the Commission. The advice offered is confidential unless waived by the requester. It is an opportunity for the Commission to explain whether a conflict of interest exists, and if so, to outline the guidelines of the Ethics Law.

Second is the enforcement arm of the Commission, the interpretation and enforcement of the provisions of NRS 281A in response to a complaint filed with the Commission. In this arena, the Commission engages in a host of procedures in which it will review a complaint, make a determination regarding jurisdiction, investigate, hold a hearing and render a final opinion. This process is also known as a Third-Party Request for Opinion. Senate Bill 84 focuses mainly on amending and streamlining this process.

Third, the Commission accepts various filings and public acknowledgments of ethical standards and other representations in government by public officers.

The term “personal interest” is defined in two ways. The first, and the most tangible, is pecuniary interest. This includes anything public officers or employees are asked to do in their official capacities that could potentially affect their personal finances, either as benefits or as detriments.

Less clearly understood is the second definition of personal interest, “commitments in a private capacity.” The Legislature has determined that, as public officers and employees, we have certain relationships with certain persons that are so close and personal in nature that the law will statutorily attribute their interests to ours. Some examples are familial relationships, business partners, employers, members of our household and other substantially similar relationships. The Commission has examined the issue of the types of relationships qualifying under the category of substantially similar relationships. The types of commitments considered, for example, are fiduciary relationships. This might apply to a public officer who also serves on the board of directors of a nonprofit organization. Under the Commission’s precedent, the officer is presumed to have a commitment to the nonprofit organization. Most important in understanding personal interest conflicts is that most of the provisions of the Ethics Law are geared toward avoiding these conflicts.

Nevada Revised Statutes 281A.400 addresses standards of conduct and outlines prohibited conduct by public officers and employees. The first type of prohibited conduct concerns gifts. We are often asked why the statute does not clearly define “gift.” The provision provides that it is inappropriate for a public officer or employee to accept a gift which would improperly influence a reasonable person in his or her situation to depart from the faithful and objective gift for one public officer may not constitute an improper influence for someone

else in another situation. This is the reason for the conditional language in the statute.

In a recent case, a State public employee accepted a purse and a couple of lunches from an existing vendor of a State agency in the midst of a request for proposal. The Commission ruled the action improper because, while the gifts were nominal, they were accepted in the context of a competitive bidding environment. The case is illustrative of a situation that may be considered improper influence affecting official judgment.

Other types of prohibited conduct include: an improper use of public positions to grant or secure an unwarranted benefit; an improper contract or employment opportunity; additional compensation from private sources; using or suppressing nonpublic government information; using government resources for a private purpose; improperly influencing subordinates to benefit personal interests; accepting honorariums; or using government resources to support ballot questions and candidates.

The Commission most often investigates cases involving the misuse of a public position to secure unwarranted benefits. When the Commission interprets this particular provision the focus is on the conditional language as it relates to unwarranted benefit.

I will present an overview of cooling-off prohibitions and disclosure and abstention requirements by public officers. Under the current provisions for cooling off, certain former public officers and employees are prohibited, for one year, from accepting employment in the private sector in an industry regulated by the public employees' government agencies. The restrictions originated from actions taken by the gaming and the public utility sectors. Government employees were recruited by these industries after the employees had been trained by public agencies. The Commission is granted discretion to grant relief in appropriate circumstances. Cases involving the cooling-off prohibition generally come to the Commission in an advisory context rather than as complaints.

Nevada Revised Statutes 281A.410 is a secondary cooling-off provision. The statute governs representation or counseling of private persons on issues which had been before a public employee during his or her tenure. It is a broad cooling-off requirement. Where the Commission is offered discretion to grant

relief under a general employment context, relief is not an option under NRS 281A.410.

The Commission has also addressed cooling-off issues in the context of what it means to be employed in the private sector. We have fielded many questions regarding individuals who want to serve in the private sector, for example, as independent contractors. The question is whether serving as an independent contractor or consultant is a loophole to the employment considerations in NRS 281A. The Commission has historically interpreted the relationship to include agreements through independent contract and other types of personal services agreement.

The disclosure and abstention requirements are more easily understood in the context of a public officer who is serving on a public body. Officers are obliged to disclose conflicts of interest when they are addressing public matters which affect their personal interest. Depending on the nature of that conflict, officers have a decision to make about whether abstention is appropriate. Disclosure and abstention prohibitions also apply to public employees from the perspective that public employees are often in positions to make governmental decisions. Those decisions should not be made when they are in conflict with a personal interest. Public employees do not make disclosures to the public as a public officer would, but rather to their supervisors. Abstention considerations, while not directly applicable to a public employee, are captured through other provisions of NRS 281A.

The law requires that public officers or employees are responsible for disclosing either to the public or to their supervisors matters in which they are being asked to make governmental decisions that impact a significant pecuniary interest, a matter in which they have accepted gifts or loans or matters which would reasonably affect people to whom they have one of these legal commitments. The Commission will often advise disclosure as the recommended course of action. Ultimately, the language of the statute indicates disclosure is necessary where there is a reasonable impact on a public officer's personal interests. Alternatively, abstention is required in circumstances in which those interests may be materially affected by a public officer's decision.

What types of relationships trigger a conflict? The Legislature was careful not to include friendships and general acquaintances because the definition is so broad.

When the Commission looks at these issues, we are looking at the nature and the scope of a relationship.

The Commission in its enforcement capacity has the ability to impose various sanctions for willful violations. Penalties vary from \$5,000 to \$25,000.

The safe harbor provision was amended last Session and provides guidance. The Commission cannot, legally, find willful violation of the Ethics in Government Law if the public officer or employee relied in good faith upon the advice of the legal counsel retained by his or her public body, agency or employer and the legal advice was provided before the conduct and not contrary to prior published opinion on the Commission's Website. The Commission encourages public officers and employees to familiarize themselves with the safe harbor provision as a first line of defense.

Senate Bill 84 proposes to streamline the Commission's case management and investigatory processes of third-party complaint cases.

The Nevada Certified Public Manager Program is sponsored by the State to provide certifications for public managers in government. The goal of the program is to train managers in the effective management of government resources. I recently participated in the program and studied the Commission on Ethics's lengthy complaint resolution process. Some of the proposed changes in S.B. 84 are a result of my research. I have submitted my testimony ([Exhibit D](#)).

Primarily, the types of complaints received by the Commission allege nominal violations of the Ethics in Government Law. Nominal is defined as situations where there is no evidence of malicious or bad-faith intent. Generally, violations are the result of a lack of clear understanding of the law and/or the concept of conflict of interest. It is sometimes more than a year before nominal cases are resolved. The Commission has instituted internal changes including changing notices and updating the jurisdictional review process.

The Commission proposes to mirror the processes for complaint cases, in part, with the procedures undertaken by the Nevada Commission on Judicial Discipline (CJD). The Judicial Discipline staff has the ability to bring information before the CJD without staff decisions, notices or formal investigations as required in the Commission's process.

Primarily, we propose that Commission staff review complaints for jurisdictional requirements and for sufficiency of evidence, then make recommendations directly to the Commission. The matter may be appropriate for formal investigation or for dismissal with or without a letter of caution. An amendment to S.B. 84 may be needed on the subject of the letter of caution.

Under law, when a complaint is filed, the executive director of the Commission is required to conduct an investigation and make a recommendation to an investigatory panel consisting of two members of the Commission about whether there is just and sufficient cause for the Commission to render an opinion in the matter. In S.B. 84, the Commission is requesting the ability to bypass the panel proceeding and forward matters directly to the full Commission.

CHAIR CANNIZZARO:

You are suggesting streamlining the process by eliminating an investigatory panel. Under S.B. 84 the Commission would now serve as the investigatory panel and the body making a determination regarding additional action. Can you outline due process protections in the proposed changes?

MS. NEVAREZ-GOODSON:

The Commission is concerned about due process. The Nevada Supreme Court has delineated the due process rights applicable to subjects of complaints as attaching after an investigation in *Jones v. Nevada Commission on Judicial Discipline*, 318 P.3d 1078, 2014 Nev. LEXIS 16, 130 Nev. Adv. Rep. 11, 2014 WL 784104 (Nev. 2014). The Commission is confident that this court decision validates the operations of the CJD and protects subjects' due process rights.

CHAIR CANNIZZARO:

I understand that the changes emulate the process used by the Nevada Commission on Judicial Discipline. My concern is that the Commissioners who determine the sufficiency of evidence will be the same Commissioners who make a determination on the outcome of the matter.

MS. NEVAREZ-GOODSON:

As confirmed in *Jones*, due process rights are conferred only after the investigatory process is completed and the Commission has determined there is sufficient evidence to go forward with adjudication. The process can be likened to a court proceeding in which judges make decisions on preliminary motions

and ultimately issue a ruling in the same case. The Commission is confident subjects' due process rights will be protected.

CHAIR CANNIZZARO:

In a judicial context, generally, a separate law enforcement agency is conducting the investigation and presenting facts to a judicial officer. At the point of preliminary determination, both parties have a right to counsel, to present their arguments and to present evidence.

MS. NEVAREZ-GOODSON:

There is a difference between the CJD process and the Commission's. The CJD hires outside independent investigators and a prosecuting counsel. Under the Commission's process the executive director is listed as a party to the proceedings in a third-party context. The executive director, then, investigates complaints and also serves as a party presenting the evidence as the process continues.

One potential concern about S.B. 84 is that it appears to make multiple additions to NRS 281A. Many provisions of NRS 281A.440 are proposed for deletion and replaced as new sections. The majority of the sections have not changed. I have submitted a table which outlines the proposed changes ([Exhibit E](#)). The table is meant to make clear changes to existing law and proposed new language.

Senate Bill 84 authorizes the Commission to enter into what is known as deferral orders. Short of a full evidentiary hearing or a finding by the Commission of a violation of the Ethics in Government Law, the Commission can enter into a deferral order. The deferral order is an opportunity to provide education or training to a public officer or impose other conditions on a finding of a violation. Other conditions might be a public apology, a public censure, a public reprimand or a public admonishment.

A deferral order will allow the Commission to resolve complaint cases more efficiently. Since 2013, when the Commission acquired its associate counsel position, most, if not all, of the third-party cases have been resolved through stipulated agreements. Stipulated agreements are not necessarily efficient. They often go through legal motions and various challenges before an agreement is entered into before the Commission. The expectation is that deferral orders will

alleviate some of the delays and inefficiencies as well as meet the Commission's mission of outreach and education.

Senate Bill 84 addresses the definition of "public officer." Under law independent contractors serving State agencies are not subject to the Ethics in Government Law, though their salary is paid with taxpayer funds. Independent contractors who are responsible for expending significant government resources or for the formulation of public policy should be bound by the Ethics in Government Law. Senate Bill 84 amends NRS 281A.182 to reflect this change.

CHAIR CANNIZZARO:

Please provide an example of these positions.

MS. NEVAREZ-GOODSON:

In rural communities, high school principals are sometimes hired on an independent contractual arrangement because of a shortage of highly qualified candidates. Former administrators and former public officers who are retired and collecting benefits under the Public Employees Retirement System are recruited. As independent contractors, their employment does not interfere with retirement agreements. Under current law, they are not classified as a public officer. When conflict of interest questions are raised, the Commission can only find that the Ethics in Government Law does not apply to those who are not public officers. This is a public policy concern. Principals of our schools should be considered public officers in the context of NRS 281A.

Continuing with an overview of S.B. 84, the bill addresses the issue of confidentiality. Public officers and employees are reluctant to bring a complaint against a coworker for fear of retribution and retaliation. In 2015, the Legislature amended the Ethics in Government Law to protect the identity of a requester of a complaint if the person worked in the same governmental agency as the subject of the complaint. Section 8, subsections 2 and 3 of S.B. 84 further address these concerns. Once a hearing is scheduled, the person who brought the complaint will be listed as a witness but not identified as the originator of the complaint.

CHAIR CANNIZZARO:

In my understanding under this provision, the subject of an inquiry would never know the identity of the requester. In my view, the subject is at a disadvantage when he or she does not know who brought the complaint and is not able to

examine the requester's credibility. This information may prove to be exculpatory. As an attorney, I am required to disclose statements that might have a bearing on a witness's credibility, motive or bias.

MS. NEVAREZ-GOODSON:

The checks and balances in current processes are the evidentiary threshold at the beginning of the process, the requirement of a preponderance of evidence to support a violation of the Ethics in Government Law and the ability to depose witnesses during the hearing.

CHAIR CANNIZZARO:

Would the identity of the requester be disclosed in the discovery phase?

MS. NEVAREZ-GOODSON:

Under S.B. 84, the requester's identity would not be disclosed. The requester would be listed as a witness. The anticipated testimony would be available. The executive director would disclose the justification for bringing the witness. The subject and his or her counsel would have the opportunity to question the witness in either a deposition or a formal cross-examination.

CHAIR CANNIZZARO:

The bill does not contain language preventing the Commission from bringing a complaint based solely upon a requester's testimony. I continue to be concerned about the subject's inability to evaluate the credibility of the requester. The person who is accused of having committed an ethical violation never knows that a witness is in fact the requester. Having this information may be material to the case.

MS. NEVAREZ-GOODSON:

From the public policy perspective, the motivation for a person bringing a complaint is not deemed relevant as long as there is evidence to support the allegation beyond the complaint. The Commission has found that public officers and employees continue to be reluctant to bring complaints without confidentiality protections.

It has not been my experience that the Commission has relied wholly on the testimony of one person. I would be willing to work to amend S.B. 84 to address your concerns.

Continuing with provisions of S.B. 84, we want to clarify the Commission's jurisdictional boundaries. The goal is not to capture those types of employment law circumstances that are more properly addressed on the local level. We are trying to target the type of behaviors that constitute the abuse of power or that are inconsistent or outside the scope of appropriate public duties.

Senate Bill 84 amends 281A.400 in several ways. Regarding standards of conduct set forth in 281A.400, the Commission seeks consistency with each of these statutory standards of conduct to ensure public duties are not in conflict with pecuniary interests and commitments in private capacity. Under current provisions, there is a lack of consistency between statutes about which personal interests apply. From the Commission's perspective, those personal interests would include either pecuniary interests or commitments in a private capacity in any context.

Law prohibits improper use of a government position to obtain an unwarranted benefit for oneself or for a person to whom one has a commitment in a private capacity. Senate Bill 84 broadens the limitation to include prohibitions to obtaining an unwarranted benefit for any person.

Senate Bill 84 addresses circumstances in which public officers were abusing their positions contrary to the public policy that is identified by the Commission in 281A.020. An example involves a local government elected public officer who targeted and retaliated against employees who did not support the public officer's reelection. The Commission felt the conduct was clearly inappropriate but were unable to place the conduct within existing statute.

CHAIR CANNIZZARO:

Regarding the change you are requesting to include prohibiting improper use of a government position to obtain an unwarranted benefit for any other person: "any other person" is vague and broad language and may be misinterpreted. Would there be any limitations? Can you clarify?

MS. NEVAREZ-GOODSON:

The language the Commission and the Legislature focused on was the unwarranted benefit. When we looked at other jurisdictions that applied the "any other person" standard, it was only applied when an unwarranted benefit is granted by a person in a public position. Public officers and employees

commonly make decisions that benefit others. A conflict arises when the benefit is unwarranted by virtue of the public officer's position.

CHAIR CANNIZZARO:

Senate Bill 84, section 20, subsection 2, paragraph (a) states, "Coerce, harass, retaliate against or punish any other person or business entity for a purpose which is inconsistent with the proper performance of the officer's or employee's public duties." Regarding the phrase "inconsistent with the proper performance", can you explain what would be deemed to be inconsistent? What would constitute proper performance? The definitions may change depending on the person considering the conduct.

MS. NEVAREZ-GOODSON:

I agree that the language should be made more clear. What is meant by this provision is conduct deemed to be outside the course and scope of public duties. An example is a public official who makes employment decisions by circumventing appropriate channels. If a city charter designates the city manager as having responsibility for hiring and firing staff, and a member of the City Council uses his or her position to influence the employment process, we view that conduct as an abuse outside the course and scope of public duties.

In a recent situation, a public officer requested that a public employee adjust statistics to benefit a certain perspective on government operations. The skewed statistics would not benefit the public officer financially. We do not have a statute covering the type of conduct that does not directly trigger a personal interest conflict but otherwise constitutes an abuse of position. These complaints would be examined on a case-by-case basis. The Commission would evaluate the duties of the official, job descriptions, practices and policies, and agency procedures to determine whether the conduct was contrary to the performance of public duties.

The purpose of this change is to capture circumstances that do not fit squarely within a pecuniary interest or a commitment in a private capacity.

CHAIR CANNIZZARO:

Your explanation makes sense. I am concerned about finding the most effective way of communicating the changes.

Ms. NEVAREZ-GOODSON:

I agree. The Commission will not act if an individual simply disagrees with a public official's decision. For example, if a license is denied, the Commission will investigate only if there is evidence that the public official made a decision and acted outside the scope of official duties. The Commission will work with the Committee to clarify the legislation.

CHAIR CANNIZZARO:

The term "contrary to public policy" is referenced in section 20, subsection 11. The term relates to NRS 281A.020, which gives us some direction, but there may be an opportunity to clarify the language.

Ms. NEVAREZ-GOODSON:

I will take your direction on the matter. Local government officials may have questions. The language is not meant to encompass general grievance procedures undertaken as an employment issue or licensing and permitting issues.

On the matter of cooling-off provisions, we want to clarify that the context of employment also encompasses circumstances in which a person might be seeking employment in the private sector through an independent contractual relationship or other type of services agreement. The public policy prevents former employees from working for private business or industry that was regulated by their former government agencies for one year.

Relief granted under the provisions of NRS 281A.550 does not absolve the former public officer or employee from the requirements of NRS 281A.410, which prohibit representation or counseling of a private client on issues that were under consideration by the government agency during the former employee's tenure.

Amendments may be needed in regard to confidentiality of deferral orders and letters of caution. Under the Commission's processes, everything in a third-party complaint remains confidential until an investigatory panel makes a determination of sufficiency of evidence for a hearing and opinion by the Commission. The question becomes, if the Commission enters into a deferral order with the subject of the investigation that is deemed to be confidential, does the case remain confidential until that deferral period has concluded? This process in some instances is a year or longer. For transparency purposes the

time frame should be reviewed. We want to protect the integrity of the investigation and the complaint while protecting the interests of the subject of investigation. Transparency is also important in informing the requester of a complaint and the public of the Commission's final decision.

The language of the bill seems to suggest that a deferral order is deemed to be a final action of the Commission subject to judicial review. A deferral order is not the final decision of the Commission. If the compliance period has been adhered to, it will result in a dismissal of the complaint at some point in time. If there is failure to comply, the deferral order will be vacated and the matter will go to a formal hearing and final decision by the Commission.

The Nevada Commission on Judicial Discipline utilizes a similar method known as a deferral agreement. With a deferral agreement all parties will agree to a deferral by the CJD. A deferral order is a unilateral action by the Commission and may subject the Commission's decisions to judicial review. An amendment to S.B. 84 may be necessary and useful.

Senate Bill 84, section 13, outlines a public reprimand which is a severe written reproof of a willful violation where mitigating factors apply. However, by definition a violation will not be willful if mitigating factors apply. The language may need to be clarified.

JOSH REID (City Attorney, City of Henderson):

The City of Henderson supports S.B. 84 and the procedural changes suggested. We have some concerns with the language in section 20, subsection 2, paragraph (a). The section states: "Coerce, harass, retaliate against or punish any other person or business entity for a purpose which is inconsistent with the proper performance of the officer's or employee's public duties." These are terms used in other statutes. Coercion is addressed in criminal statute, harassment is addressed in both criminal statutes and in the employment context, and retaliate is also found in employment law. The term punish is not clearly defined. There is a concern that S.B. 84 may expand the jurisdiction of the Commission on Ethics. Ms. Nevarez-Goodson stated this is not the intent of the legislation.

Generally, when undefined terms are added to a code of ethical conduct, problems may arise. Local public attorneys have a duty to advise public officials and employees with regard to the ethics laws. Changing and unclear terms can

lead to uncertainty. For example, the term "commitment in a private capacity" has changed over time. Two years ago, an Ethics Commission decision ruled that anyone who serves in a public capacity and on a nonprofit board is required to abstain from any action concerning the nonprofit. This ruling is a disincentive to serving on the board of a nonprofit organization. The ruling was the result of uncertainty about the term "commitment in a private capacity."

The definition of a public officer is addressed in S.B. 84, section 16, subsection 1, paragraph (d). There are many definitions of public officer in NRS which are not consistent. It is important to remember that when a definition is changed in one portion of statute, there may be ramifications in other contexts.

ROBERT ROSHAK (Nevada Sheriffs' and Chiefs' Association):

We support S.B. 84. We appreciate clarity relating to deferral orders. We do have some concerns. Those being investigated should have an opportunity to request a hearing rather than accepting a reprimand. Due process is a concern. We would not support police conducting an investigation and then holding a trial. This type of situation may result from streamlining the process.

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CHAIR CANNIZZARO:
I adjourn this meeting at 4:55 p.m.

RESPECTFULLY SUBMITTED:

Jan Brase,
Committee Secretary

APPROVED BY:

Senator Nicole J. Cannizzaro, Chair

DATE: _____

EXHIBIT SUMMARY				
Bill	Exhibit / # of pages		Witness / Entity	Description
	A	1		Agenda
	B	3		Attendance Roster
	C	28	Yvonne Nevarez-Goodson / Nevada Commission on Ethics	Presentation
S.B. 84	D	5	Yvonne Nevarez-Goodson / Nevada Commission on Ethics	Written Testimony
S.B. 84	E	4	Yvonne Nevarez-Goodson / Nevada Commission on Ethics	Table of Proposed Changes