STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Appendix B-2

Written Public Comment

Each meeting agenda for the Public Records Task Force stated as follows:

A person may submit comments to be attached to the minutes of the meeting, in writing, one business day before the meeting date, in addition to testifying in person, or in lieu of testifying in person. Written comments are limited to two pages. The attached written comments were submitted electronically by email at AGGeneralCounsel@ag.nv.gov.

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

First Meeting: February 26, 2026

Written Public Comment

From: WatchDogJeff
To: AGGeneralCounsel
Cc: Debra K. Turman
Subject: Public Comment SEE ATTACHED
Date: Thursday, February 26, 2026 12:58:33 PM
Attachments: Public Comment Pub Doc Task Force 2 2 6 26.doc

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

See attached

Jeff Church
WatchDogJeff.com

Public Document Task Force: Public Comment, 2-26-2026

I just saw this so am responding on very short notice. I was just forwarded this but believe today's meeting is in violation of NRS 241 as detailed in other correspondence.

Now that I have endeared myself to you, should any openings come up, I would be interested in serving on the task force.

Again on short notice but NRS 239 and subsequent court cases have gutted and rendered useless the Public Document Law. Agencies routinely ignore the law with no repercussions.

For example ,I filed under NRS 239 vs the Washe County School District (WCSD) Case No. CV23-02245. It cost me about $4,000 out of my own pocket and I won but it took eight ++ months and two judges and essentially WCSD continues to ignore the intent of the law. By then the issue was essentially moot. The cost to the taxpayer was likely over $100,000 for one minor case. They were represented by the previously prestigious (and expensive) law firm of McDonald Carano.

I'm open to ideas but I think clearly that NRS 241 and NRS 239 are siblings and should be handled the same. Persons should be able to file a complaint with the A.G. and the A.G. should be duty bound to address it promptly (currently that doesn't happen) an perhaps there might be a mediation step thrown in to save time and money. Sanctions in addition to attorney fees might be warranted where it does go to court (if you can find a judge in Washoe County).

Complainants should be indemnified. If not the A.G. then who: a contract with the ACLU or a legal services firm, etc?

I so much commend Bob Conrad of ThisIsReno, Attorney Luke Busby and the ACLU Nevada for challenging some of these. The ACLU just caught the State (DMV) so called 'pants down". Bob Conrad has taken them on but these take months or years and in many cases the court's rulings are bizarre at best.

No one is looking out for the public's interest. Likewise it is not in the government-agency interest to have expensive protracted litigation. I have not had time to look and see good models from other states.

Sincerely,

Jeff Church
RenoTaxRevolt.com
775 544-RENO (7366)
RenoTaxRevolt@Sbcglobal.net

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Second Meeting: April 27, 2026

Written Public Comment

From:	Oscar
To:	AGGeneralCounsel
Cc:	Ira Hansen; Lisa Krasner; Alexis Hansen; Jill Dickman; John Steinbeck; carrie.buck@sen.state.nv.us
Subject:	Comments for the Public Records Task Force
Date:	Friday, March 6, 2026 1:59:56 PM
Attachments:	Email Signature.png

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello. Please forward the following comments to the members of the Public Records Task Force:

Open Records for Elections:

a) Cyber-security inquiries: Data transmission and network security are areas that the public cannot ask nor receive information. Audits of the system are not public knowledge. This hurts public confidence in elections. Considering Nevada had a major breach in August 2025 for which many questions linger about the data affected and what not, the public needs to know a minimum of how their tax money is being spent on equipment, software, and services. Can this committee set guidelines for the Secretary of State to review on greater transparency?

b) Timely receipt of information: Including but not limited to county voter rolls, poll pad voter data, daily check-in list, Cast Vote Records, chain-of-custody forms, and tabulator tapes.

c) Access to ballot images: An important aspect of citizen audit of elections is having the before and after ballot images and related data files that prove the ballot is real and accurate. No voter data is shared--it's just ballot images and not the real ballot.

d) Fees for data/info: Election data/info should be accessible and affordable for all. High fees hinder transparency by deterring inquiry. Abolish data/info fees.

e) Repository for election data/info: The county or state could establish a login section of their website(s) to access voter data/info.

Thank you for your interest and cooperation

Respectfully submitted on behalf of Nevada Voters Alliance and Conservative Republicans of Northern Nevada (CRNN).

--

Oscar Williams
Nevada Voters Alliance



From:	David
To:	AGGeneralCounsel
Subject:	Structural Transparency Failures Resulting from Delegated Authority, Vendor-Controlled Systems, and Institutional
Date:	Tuesday, April 14, 2026 1:31:28 PM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

PUBLIC COMMENT — April 2026

Submitted for the Record on Behalf of All Nevadans

Submitted by: David Lee Nace | Case Reference: NV-SEFA-001
To: AB128 Public Records Task Force
Date: April 14, 2026
RE: Structural Transparency Failures Resulting from Delegated Authority, Vendor-Controlled Systems, and Institutional Inaction

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This comment is submitted for the official record on behalf of all Nevadans who rely on government transparency, accountability, and the faithful discharge of fiduciary obligations. The absence of intervention by the State Bar of Nevada (approximately 12,000 licensed members) and the ACLU of Nevada — despite documented, ongoing public-records failures — compels this submission as a matter of civic duty and public necessity.

I. Purpose of Comment

Nevadans cannot exercise their right to public records when the State no longer controls the systems that create, store, or process those records. My filings document a statewide pattern: essential government functions — including financial custody, identity verification, claim adjudication, and data storage — have been delegated to private vendors who are not subject to direct public oversight.

This comment asks the Task Force to address the structural problem at the center of Nevada's transparency failures: **custodianship and control have been outsourced**, and existing institutions empowered to correct this — including the State Bar of Nevada and the ACLU of Nevada — have not engaged on the systemic fiscal-fiduciary dimension of these failures.

II. Legislative and Institutional Context

AB128 and This Task Force. The Nevada Legislature passed Assembly Bill 128 unanimously during the 2025 session, creating this Public Records Task Force to study challenges and submit recommendations to the Legislature by October 2026. The Task Force held its first meeting on February 26, 2026, in Boulder City. This body represents Nevada's

best near-term opportunity to address the structural transparency failures documented herein.

The U.S. DOJ Public Corruption Strike Force. In January 2026, the U.S. Attorney's Office for the District of Nevada announced the creation of a first-of-its-kind Public Corruption Strike Force within its Criminal Division. The Strike Force is mandated to investigate and prosecute federal crimes involving government integrity — including bribery of public officials and related offenses — and has pledged that "no public official and/or agency is above the law." The issues raised in this comment fall within the scope of federal oversight this Strike Force is empowered to exercise.

Federal Anti-Fraud Executive Order. On March 16, 2026, President Trump issued an executive order establishing a nationwide Task Force to Eliminate Fraud, chaired by the Vice President and coordinating DOJ, Treasury, HHS, OMB, and multiple Inspectors General. This order mandates enhanced oversight of state-administered, federally funded programs — directly implicating Nevada's administration of federal grant funds through the courts and the Treasurer's Office.

Institutional Silence. The ACLU of Nevada has demonstrated active capacity to litigate public-records failures in other contexts — including suing the Nevada DMV (August 2025) and LVMPD (July 2025) for withholding records, and filing briefs before the Nevada Supreme Court on transparency issues (December 2025). The State Bar of Nevada, governing approximately 12,000 licensed attorneys, has regulatory authority over lawyer trust accounts and unclaimed property obligations under NRS 120A and Nevada Rule of Professional Conduct 1.15(f). The absence of institutional intervention on the fiscal and fiduciary transparency issues raised here is itself a matter of public record.

III. Evidence of Systemic Transparency Failures

A. Court-Held Funds and Internal Control Deficiencies

The Eighth Judicial District Court's FY2023 audit documents:

- **$30.2 million** in custodial funds under court administration
- A **Significant Deficiency** in internal controls
- Heavy reliance on federal awards and grant-funded programs

When internal controls are weak and systems are fragmented, public-records access becomes structurally unreliable — not merely procedurally inconvenient.

B. Vendor-Controlled Systems Over Core Public Functions

Nevada's financial and unclaimed-property systems rely on multiple private vendors:

Vendor	Function
Kelmar Associates	Unclaimed property audits; KAPS® management system (now in 43+ state programs);

MissingMoney.com national database

Avenu Insights & Analytics

Designated State Custodian for securities reporting; identity analytics; claims processing

Kroll Government Solutions

Streamline audit platform

Neumo/ACP

Identity verification

Switch/DigitalBridge

Data-center infrastructure

Note on Avenu: Nevada's own Holder Reporting Manual formally designates Avenu Insights & Analytics as "State Custodian" for certain securities reporting functions — meaning a private vendor is performing a statutory custodial role. State procurement documents confirm Avenu's contract is approximately $90,000 annually with a 3% annual cost-of-living adjustment. These vendors influence claim outcomes, audit selection, and data custody, yet they are not required to testify publicly or disclose their proprietary algorithms.

Note on Kelmar and KAPS®: Nevada's own procurement documents reveal that state officials previously expressed concern that Kelmar's KAPS® pricing was "over 265 times more expensive" than the incumbent vendor — raising questions about cost-justification and competitive procurement that have not been publicly resolved.

Note on Nevada's unclaimed property portfolio: The Nevada State Treasurer's Office is currently holding **over $940 million** in unclaimed property on behalf of rightful owners. The scale of these custodial obligations makes vendor transparency not an administrative nicety but a fiduciary imperative.

C. MAS Audit Non-Compliance

RFQ 2022-01 sought to standardize Minimum Accounting Standards (MAS) audits across 74 Nevada courts. However:

- Many courts remain non-compliant
- EJDC has no publicly released MAS audit
- Agencies cannot reliably identify custodians of record for NRS 239 purposes

D. SEFA Reporting Risks

EJDC administered $92.9 million in grant revenue, including $2.08 million in federal awards subject to Uniform Guidance under 2 CFR Part 200. The reconciliation pathway between courts, the Treasurer, and agencies remains unclear, raising compliance concerns under:

- **2 CFR 200.302** (financial management standards)
- **2 CFR 200.303** (internal controls)
- **2 CFR 200.510** (Schedule of Expenditures of Federal Awards accuracy)

Under the March 2026 federal anti-fraud executive order, state-administered federal programs face heightened scrutiny, and deficiencies of this nature may trigger formal federal review.

E. Public-Records Failures Under NRS 239

Agencies responding to NRS 239 requests related to these matters have:

- Failed to identify custodians of record
- Redirected requestors to solicitation documents rather than operational records
- Prematurely closed requests without statutory justification
- Been unable to produce vendor logs, audit files, or data-handling documentation

This is not a procedural problem. It is structural: the State cannot produce records it does not control.

IV. Why Institutional Intervention Is Required

The public-records failures documented here are not isolated. They occur at the intersection of:

1. **Fiduciary duty** — NRS 120A imposes custodial obligations on the State Treasurer. When vendor systems obscure that custody, beneficiaries lose legal protection.

2. **Federal compliance** — Federal Uniform Guidance requires transparent financial management and internal controls. SEFA gaps expose Nevada to audit findings, repayment demands, and loss of federal funding.

3. **Constitutional access** — NRS 239 codifies the public's fundamental right to government records. When those records exist only in private vendor systems, the constitutional right becomes unenforceable.

4. **Bar obligations** — NRPC 1.15(f) and SCR 78 govern lawyer trust account obligations and the State Bar's Clients' Security Fund. The Bar has direct regulatory authority over the approximately $940 million ecosystem of trust, custodial, and abandoned property funds flowing through attorneys and courts statewide.

The ACLU of Nevada has litigated public-records denials involving immigration enforcement, school district misconduct, and police records. The structural fiscal transparency issues documented here — vendor control over $940 million in unclaimed property, $30.2 million in court-held custodial funds, and $92.9 million in grant revenue — represent at least an equal public-interest imperative.

V. Requested Actions

I respectfully request that the Task Force:

1. **Require direct vendor testimony** from Kelmar Associates, Kroll Government Solutions, Avenu Insights & Analytics, Neumo/ACP, and Switch/DigitalBridge regarding their roles, data access, and adjudication practices.

2. **Mandate disclosure** of all vendor contracts, data-handling logs, adjudication criteria, and algorithmic processes affecting public functions.

3. **Require agencies to identify custodians** in every NRS 239 response, including whether custody has been delegated to a private vendor.

4. **Prohibit premature closure** of public-records requests and require written statutory justification for any denial.

5. **Require publication of MAS audit reports** for all Nevada courts administering federal or custodial funds, consistent with 2 CFR 200.303 and Nevada's own Minimum Accounting Standards.

6. **Clarify SEFA reporting responsibility** across courts, the Treasurer's Office, and state agencies to ensure compliance with 2 CFR 200.510.

7. **Formally evaluate whether Nevada has lost effective custody** of certain categories of public records through privatization — and recommend legislative remedies if so.

8. **Transmit these findings** to the U.S. Attorney's Public Corruption Strike Force (District of Nevada), the federal Task Force to Eliminate Fraud, and the Nevada Treasurer's Office for appropriate follow-up.

9. **Formally request engagement** from the State Bar of Nevada regarding its oversight obligations under NRPC 1.15(f), SCR 78, and NRS 120A as they relate to lawyer trust accounts, court-held funds, and the Clients' Security Fund.

VI. Applicable Legal Framework

Authority	Provision	Relevance
NRS 239	Public Records Act	Right of access; custodian obligations
NRS 120A	Uniform Disposition of Unclaimed Property	Fiduciary duties; $940M+ portfolio
NRS 239.0107	Operational records retention	Vendor-generated logs
2 CFR 200.302		

Federal financial management
Court/agency grant administration
2 CFR 200.303
Internal controls
EJDC deficiency finding
2 CFR 200.510
SEFA accuracy
$92.9M grant revenue reconciliation
NRPC 1.15(f)
Attorney trust accounts
Bar's custodial oversight role
SCR 78
State Bar Clients' Security Fund
Abandoned attorney trust funds

VII. Conclusion

Nevada's transparency challenges are structural, not procedural. They arise from the deliberate delegation of core governmental functions — financial custody, identity verification, claim adjudication, data storage — to private vendors operating outside public accountability.

The State Treasurer's Office holds over $940 million in trust for Nevada's rightful owners. Courts administer tens of millions more in custodial funds and federal grants. When private vendors control the systems through which these obligations are managed, and when the State cannot produce its own records on demand, the foundational promise of democratic government — accountability to the public — is broken.

Nevadans deserve a government that can produce its own records and honor its own custodial obligations. This Task Force has both the authority and the opportunity to recommend the structural reforms required to restore that accountability.

I respectfully request that this submission be entered into the official record and incorporated into the Task Force's final report to the Legislature.

Submitted by: David Lee Nace | Case Ref: NV-SEFA-001
Date: April 14, 2026
Submitted for the record on behalf of all Nevadans

[S]David Lee Nace
(702)689-0580

David Lee Nace

From: Oscar
To: AGGeneralCounsel
Subject: Two things for the Public Records Task Force:
Date: Tuesday, April 14, 2026 4:49:17 PM
Attachments: Email Signature.png

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello. Please share my comments and concerns with the members of the Public Records Task Force:

1. Washoe County has not posted video online of processing ballots of the 2024 general election. Posting video coverage should be mandatory.

2. Washoe County's Election Administration Valuation Survey (EAVS) data is being unduly withheld and denied the public. This data includes official results certified by the Secretary of State within 30-days of a general election. There is no valid reason to delay or deny voters the EAVS data from their elections. Providing the EAVS data to the public after state certification of results should be mandatory.

Thank you for your interest and cooperation.

-Oscar Williams, 775-240-3456

--

Oscar Williams
Nevada Voters Alliance



Office of the General Counsel

Sara K. Montalvo, Esq., Chief General Counsel
Kevin A. Pick, Esq., Deputy Chief General Counsel
Travis B. Lucia, Esq., General Counsel
Andrea L. Schulewitch, Esq., Associate General Counsel
P.O. Box 30425, Reno, NV 89520-3425
Phone (775) 348-0300 / Fax (775) 333-6010
legal@washoeschools.net

April 24, 2026

Sent via email to AGGeneralCounsel@ag.nv.gov

Public Records Task Force

Re: Public Records Task Force April 27, 2026 Meeting – Public Comment

Dear Public Records Task Force:

We appreciate the opportunity to comment on proposed reforms to Nevada's Public Records Act and respectfully urge the task force to recommend two related clarifications: (1) express statutory authority for public entities to recover reasonable staff time costs incurred in responding to excessive or complex public records requests; and (2) codification and expansion of confidentiality protections for employee personnel records, including those of political subdivisions.

A. RECOMMENDED CLARIFICATIONS TO NEVADA'S PUBLIC RECORDS ACT

1. Fee Authority for Excessive Staff Time.

Nevada's Public Records Act has long recognized that public entities may recover the actual costs of producing public records. Legislative history confirms that earlier versions of the statute expressly allowed recovery of extraordinary personnel costs, and that, when the Legislature amended the statute and removed that specific phrase, it did so to simplify and consolidate cost-recovery provisions—not to require public agencies to absorb unlimited staff time at public expense.

The statutory amendments relocating allowable costs into the definition of "actual cost," and the removal of language prohibiting recovery of staff time, reflect a legislative intent to permit reasonable cost recovery rather than to silently eliminate it. Under well-established principles of statutory construction, when the Legislature removes an express prohibition, it is presumed to have intended to allow what was previously barred.

This clarification is increasingly necessary given the nature of modern public records requests. Many requests now require substantial staff time for:

- Locating records stored across multiple systems or departments;
- Reviewing records for attorney-client privilege, statutory exemptions, or confidential information;
- Redacting protected information before release; and
- Coordinating production to ensure completeness and accuracy.

When public entities are required to divert staff for hours—or days—from core governmental functions to respond to unusually broad or complex requests without the ability to recover reasonable costs, the result is diminished public service, delayed responsiveness to other requesters, and improper subsidization of private interests by taxpayers. Allowing cost recovery for excessive staff time promotes fairness, discourages abusive or overbroad requests, and ensures that limited public resources are used responsibly.

Making this authority explicit in statute would reduce disputes, provide transparency to requesters, and promote consistent application across agencies, while preserving public access to records through reasonable and predictable fee structures.

2. Confidentiality of Employee Personnel Records.

In addition, we respectfully recommend that the Legislature codify NAC 284.718, which deems state personnel records confidential, and extend equivalent statutory confidentiality protections to the personnel records of employees of political subdivisions, including school districts, counties, cities, and special districts.

The policy rationale underlying NAC 284.718 is sound and widely accepted: unrestricted disclosure of personnel records can subject public employees to harassment, retaliation, identity misuse, and reputational harm, while offering little insight into governmental decision-making. Personnel files typically contain sensitive information—including performance evaluations, disciplinary investigations that do not result in formal action, medical information, and personal identifiers—that does not advance transparency when disclosed.

Codifying this regulation would strengthen legal clarity and durability, ensuring that these important protections are not dependent on regulatory interpretation. Extending comparable protections to political subdivision employees would also correct an inconsistency in current practice that leaves many public servants more exposed simply because of the structure of their employer.

Importantly, protecting personnel record confidentiality does not undermine transparency or accountability. Nevada courts already recognize that the Public Records Act requires a balancing of interests, and public access to records reflecting official actions, final disciplinary outcomes, and governmental policy decisions would remain intact. Confidentiality simply ensures

that disclosure serves a legitimate public purpose rather than facilitating harassment or misuse of personal information.

B. CONCLUSION

Clarifying fee authority for excessive staff time and codifying personnel-record confidentiality work together to modernize Nevada's Public Records Act. These reforms would promote transparency while acknowledging operational realities, safeguard privacy and employee safety, reduce unnecessary conflict and litigation, and support the responsible stewardship of public resources.

I encourage the task force to advance both recommendations as part of a thoughtful and balanced update to Nevada's public records framework. Thank you for your consideration.

Sincerely,

/s/Sara K. Montalvo, Esq.
Sara K. Montalvo, Esq.
Chief General Counsel

From: Freedom Liberty
To: McCarty, Colleen
Cc: Leslie M. Nino Piro; AGGeneralCounsel; Vinson Guthreau; Grogitsky, Michael
Subject: Re: Public Records Task Force — request for participation info and upcoming meetings
Date: Monday, April 27, 2026 10:24:06 AM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms. McCarty,

I am writing to request clarification regarding the opportunities for public engagement with the Public Records Task Force.

Specifically, could you please advise if there will be opportunities for non-governmental representatives, public records advocates, and private citizens to provide formal presentations to the Task Force? I would appreciate it if this matter could be addressed **during the meeting currently in progress**.

Thank you for your time and for your work on this initiative.

Sincerely,

Christian Salmon
702-903-2555

On Mon, Mar 16, 2026, 8:03 PM McCarty, Colleen <mccartyc@ballardspahr.com> wrote:

> Good evening, Mr. Salmon,
>
> Thank you so much for your inquiry about the Public Records Task Force on behalf of yourself and the homeowners you represent. The members sincerely appreciate the amount of interest the launch of the Task Force has generated.
>
> In candor, we are still figuring out some of our infrastructure as far as receiving information in advance of future meetings, such as the real-world examples you mentioned, and hope to post that information soon. In the meantime, I am happy to report that the Attorney General's Office has created an information page where you will see future meeting dates and the meeting agendas when they are posted, which you will find at this link:
>
> https://ag.nv.gov/Hot_Topics/Public_Records_Task_Force_Information_Page/

Although not yet formally confirmed, I am also happy to share that the next Task Force meeting is tentatively scheduled to take place on Monday, April 27, 2026 from 9:00 a.m. to 1:00 p.m. at the Washoe County Administration Complex in Reno. Official notice will be provided as required prior to the meeting date as well. Thank you again for your inquiry and your future constructive input.

Best….Colleen McCarty

Colleen E. McCarty

One Summerlin, 1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135-2958

702.868.7535 DIRECT
702.471.7070 FAX

mccartyc@ballardspahr.com
VCARD

www.ballardspahr.com

From: Freedom Liberty <freedomlibertynevada@gmail.com>
Sent: Wednesday, March 4, 2026 7:24 PM
To: McCarty, Colleen <mccartyc@ballardspahr.com>; vguthreau@nvnaco.org
Cc: LNinoPiro@ag.nv.gov; AGGeneralCounsel@ag.nv.gov
Subject: Public Records Task Force — request for participation info and upcoming meetings

⚠ **EXTERNAL**

Hello Chair McCarty and Vice Chair Guthreau,

I'm a Nevada resident and public-records requester working on behalf of a large group of homeowners. We have experienced repeated delays and incomplete production from a public agency on a Nevada Public Records Act (NRS Chapter 239) request, and I'm very

interested in the work of the Public Records Task Force created under AB128.

Could you please point me to:

- the schedule for upcoming Task Force meetings (or how the public can be notified when meetings/agendas are posted),
- the process for public participation (in-person, Zoom, written submissions, and any deadlines or formatting rules),
- where to send brief real-world examples of delayed/incomplete responses for the Task Force's consideration.

My goal is to participate constructively and advocate for reforms that strengthen transparency, enforce timely and complete responses, and ensure the public-records laws are not weakened.

Thank you for your time, and I appreciate any direction you can provide.

In Liberty ,
Christian Salmon

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Third Meeting: June 8, 2026

Written Public Comment

From: Jared M. Frost
To: Leslie M. Nino Piro
Subject: FW: Input for Public Records Task Force
Date: Tuesday, June 2, 2026 4:28:37 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

Hi Leslie here is some initial DMV feedback regarding the Public Records Task Force.

Jared M. Frost
Senior Deputy Attorney General
Transportation Division - DMV/DPS
702-486-3177
jfrost@ag.nv.gov

From: Josh Parker <JWParker@dmv.nv.gov>
Sent: Tuesday, June 2, 2026 12:30 PM
To: Jared M. Frost <JFrost@ag.nv.gov>; Hailey Foster <HFoster@dmv.nv.gov>; Amanda Manzo <AManzo@dmv.nv.gov>
Cc: Angela Smith <ASmith@dmv.nv.gov>; Tonya Laney <TLaney@dmv.nv.gov>; Brittany Messer <BMesser@dmv.nv.gov>; Margie White <MRWhite@dmv.nv.gov>; Roseann Smith <RoseannSmith@dmv.nv.gov>
Subject: RE: Input for Public Records Task Force

Hi Jared,

Thank you for your message. This is both interesting and exciting.

It seems apparent that agencies struggle with volume, complexity, and inconsistency in processing requests. Clearer statutory definitions and pathways for resolving disputes would likely drastically reduce conflict and litigation.

I've captured the following via copilot from what you shared and can identify with each.

Here are the **Top 5 Recommended Reforms** based strictly on the three documents you provided:

1. **Clarify and modernize statutory definitions and exemptions**
    - Define "public record" more precisely.
    - Provide clearer authority for redaction and withholding when privacy, safety, or victim protections apply.
2. **Standardize statewide processes, fees, and timelines**
    - Create uniform cost-recovery rules, fee caps, and timeline expectations across all jurisdictions.

- Reduce current inconsistencies and confusion.

3. **Implement structured mechanisms for handling overbroad or vexatious requests**
   - Allow documented refinement and scoping phases.
   - Establish reviewable controls for repetitive or harassing request patterns, with appeal rights.
4. **Create a dispute-resolution pathway short of litigation**
   - Provide a fast, affordable, administrative way to resolve disagreements between agencies and requesters.
5. **Address modern data risks, including AI-enabled exploitation and commercial bulk extraction**
   - Consider differentiated fees for commercial requesters.
   - Limit redisclosure of sensitive fields.
   - Recognize AI-driven reidentification, doxing, and data-harvesting risks.

It is reassuring to know there is a structured body discussing and strategizing around these statewide issues. Thank you for the opportunity and transparency.



JOSH PARKER | Chief Data Officer
Nevada Department of Motor Vehicles
555 Wright Way, Carson City, NV 89711
Work: (775)684-4676
Email: jwparker@dmv.nv.gov



From: Jared M. Frost <JFrost@ag.nv.gov>
Sent: Monday, June 1, 2026 8:36 AM
To: Josh Parker <JWParker@dmv.nv.gov>; Hailey Foster <HFoster@dmv.nv.gov>; Amanda Manzo <AManzo@dmv.nv.gov>
Cc: Angela Smith <ASmith@dmv.nv.gov>; Tonya Laney <TLaney@dmv.nv.gov>
Subject: Input for Public Records Task Force

Hello DMV records team,

The OAG's general counsel has requested agency input for upcoming Public Records Task Force meetings on changes you would like to see in the NPRA. The attached materials from a meeting in April outline issues other government entities have flagged for discussion. I've also attached minutes from the first meeting in February

that includes more information about the composition of the group. Thanks and let me know if you have comments you would like me to pass along.

Kind regards,

Jared M. Frost
Senior Deputy Attorney General
Transportation Division - DMV/DPS
702-486-3177
jfrost@ag.nv.gov

From: Oscar
To: AGGeneralCounsel; Yoon C. Lee; Work, Kalie M
Subject: My concerns about protecting PII for the Public Records Task Force
Date: Tuesday, June 2, 2026 3:15:51 PM
Attachments: Complaint to McDonald--PII Violation 1-8-26.docx

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WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello. I'm excited by the agenda for the June 8th meeting. The issue of PII in elections is one I am concerned about. I've written to the Washoe ROV Andrew McDonald about my concerns and have attached that document to this message for your edification and discussion on certain federal laws, regulations, and guidance on the issue.

Please take a look.

Contact me if you have any questions or concerns.

Thank you for your interest and cooperation.

Sincerely,

Oscar Williams
1540 Whisper Rock Way
Reno, NV 89523
C: 775-240-3456

COMPLAINT AGAINST WASHOE COUNTY'S BALLOT RETURN ENVELOPES AND REGISTRATION POSTCARDS

FROM: Oscar Williams
1540 Whisper Rock Way
Reno, NV 89523
Email: oscard@oscardeywilliams.com

TO: Andrew McDonald
1001 E. Ninth St.
Reno, NV 89512

CC: Dep. Secretary of State Mark Wlaschin

DATE: January 8, 2026

Subject: Lack of Voter Privacy/Protection, Aiding & Abetting ID Theft and Forgery

---

I. Introduction

Too much of a voter's Personally Identifiable Information (PII) goes unprotected in Washoe County, putting voters at risk of identity theft and forgery in violation of voter and consumer rights, federal laws, and state laws.

A handwritten signature is a biometric identifier and a universally recognized authentication factor for legal, financial, medical, and governmental transactions, including voter registration and voting.

Washoe County previously concealed voter signatures with a privacy flap on the return envelope, but the county discontinued those protections in 2024. [Exh. Images of ballot return envelopes] Change of Address and Voter Verification postcards expose signatures as well. [Exh. Images of postcards]

This complaint respectfully requests you revert to the 2022 envelope design that has an opaque privacy flap covering the signature. There is no impediment to this design change now.

This complaint also requests implementation of federally required privacy/security notices and opt-out of data sharing with third parties on election materials.

The impact that Washoe County's election system has on a voter's privacy is not assessed by the Secretary of State. A voter's PII wafts in the wind, so to speak, as a result.

The issue is not merely one of elections for identity theft and forgery go a long way, accelerated by the advent of Artificial Intelligence and high-resolution cameras on cell phones.

According to a report at TechSpot by Skye Jacobs (https://www.techspot.com/news/108250-cybercriminals-using-ai-enroll-ghost-students-steal-financial.html), stating:

> "Cybercriminals are using AI-driven bots to impersonate students, enroll in online college courses, and divert financial aid, leaving real individuals with stolen identities and fraudulent debt."

The stakes are high. In 2022, the total of victim losses due to identity theft in Nevada amounted to $127,315,394, according to the FBI's 2022 Internet Crime Report, page 26. (https://www.ic3.gov/AnnualReport/Reports/2022_IC3Report.pdf)

This complaint intends to safeguard against identity theft and forgery in pursuit of the purity of elections for all Nevadans.

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II. Complaint Points

A. Washoe County's Lapses in Protection of PII

Washoe County protects the secrecy of *how* one votes but not the voter's Personally Identifiable Information (PII) required to accept and record their votes or verify/update their registration.

1. Numerous Nevada laws provide for privacy in voting and ballot secrecy (*see* IV. State Standards below), but there are lapses in the protection of PII as follows:

When signed and returned, Washoe County's ballot envelopes, Change of Address, and Voter Verification postcards publicly display:

- handwritten signature
- full name
- residential address
- precinct information
- Voter ID number and other registration identifiers
- ballot barcodes tied to a voter's record

Individuals with access to the above information may include:

- household members
- coworkers
- USPS personnel

- ballot harvesters
- election staff and trainees
- temporary election workers
- volunteers
- vendor representatives
- ballot storage handlers
- observers

It's ironic that Washoe's signature-verification system in elections relies on a handwritten biometric identifier that you have chosen not to protect — even while mandating ballot secrecy.

2. Nevada's primary data-protection statute, NRS 603A.040, applies to private businesses ("data collectors") and the Secretary of State. It defines limited categories of protected information:

- SSNs
- Driver's license/ID numbers
- Financial account numbers
- Medical IDs
- Email + password combinations

The Gap: NRS 603A.040 does NOT protect:

- handwritten signatures
- handwritten signatures in conjunction with name, address, etc.
- authentication-signature data

The disparity between the secrecy of *how* one votes and protection of a voter's PII is a central flaw in the design of Nevada's elections due to the state's lapses in providing necessary and expected consumer and voter protections.

B. Nevada and Washoe County's Lapses in Consumer Notifications and Opt-Out Options by Method of Voting

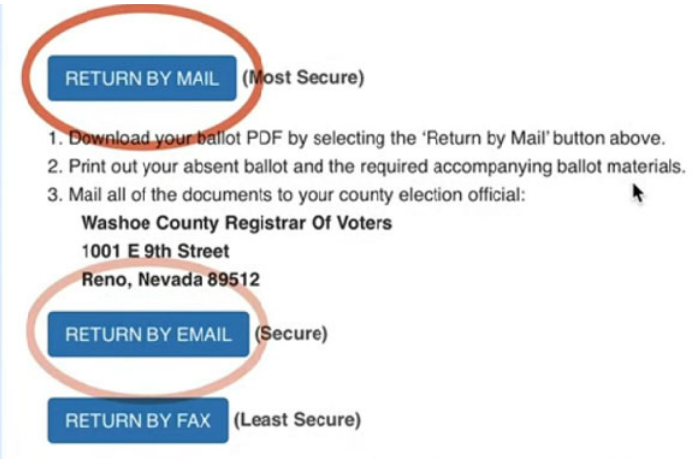
Former New York Governor Andrew Coumo once said:

> "People showing up, people actually showing ID, is still the easiest system to assure total integrity."

In-person voting assures total integrity, according to Cuomo. It is widely regarded as the safest, most secure way to verify voters and to cast and collect ballots.

The following screenshot of Nevada's official NVease.gov portal labels return-by-mail as:

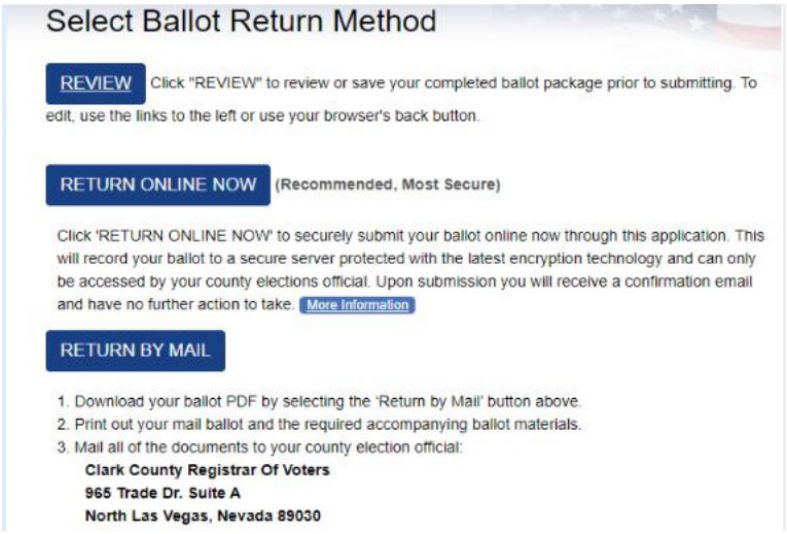
"RETURN BY MAIL — Most Secure"



This notice is only visible online during an election when a covered voter, whose qualification to use the web portal is self-affirming, requests an electronic ballot (eBallot) and they are given choices as how to return their ballot.

Yet, all other forms of voting, including by mail or hand delivery and in-person, have no such security notice.

In the Secretary's posted Visual Guide to NVease.gov[1], the security is different and no return by fax is shown:



This change in messaging and misinformation regarding the security of eBallots and no others is legally significant and relevant to federal inquiry because:

[1] https://www.nvsos.gov/sos/home/showpublisheddocument/16072/638799869669100000

- Voters rely on the State's representation of security.
- Voters are not warned that universal mail balloting exposes their PII.
- The State provides no opt-out from sharing their PII with third parties.
- Voters are not told that in-person voting is the most secure.

Counting votes requires voter verification which relies on signatures and other PII. Nevada and Washoe County have differing systems to verify voters depending on eBallot, paper ballot, and in-person digitized ballot.

Nevada and Washoe County have inconsistent security messaging between the three forms of voting, with those voting by mail and in-person receiving no security notices.

Nevada and Washoe County have no privacy notices or third party opt-out options in elections in violation of consumer protection and anti-ID theft and forgery laws regarding risks to PII and ways to avoid them.

C. USPS Mail Imaging & Interstate Routing

Mail is routinely scanned for metadata; general procedures derive from 39 U.S.C. §§ 401, 403, and USPS operational directives.

The scanned return envelope images that capture a voter's PII and signature may be stored, accessed, or analyzed by personnel or contractors beyond Washoe County's control.

The security of the records and length of retention are not openly disclosed to the voter.

This uncontrolled exposure raises federal privacy implications.

Mail ballots are an interstate matter with Washoe County sending and receiving mail ballots to/from out-of-state and with mail being routed through Sacramento. Federal laws apply.

D. eBallots v. Others

In Nevada, an eBallot (PDF format) can be obtained via NVease.gov[2] or the Clerk/ROV can email it. The PDF ballots are offered to active-duty members of the United States Armed Forces, their spouses and dependents, Nevada voters who are outside of the country (NRS Chapter 293D), tribal voters who live on a colony or reservation in Nevada (NRS 293.269952(1)(a)(2)), and Nevada residents claiming a disability without proof (NRS 293.269951(1)(a)(a); NAC 293.206).

[2] https://www.nvsos.gov/sos/elections/voters/uniformed-overseas-citizens/ease-overview

Online electronic ballots encompass a competing method of voting to vote-by-mail and in-person voting and have a different set of issues regarding protection of a voter's PII. For example, a voter who uses NVease.gov self-affirms a digital image of their signature. Or, they can replace the signature on file. An imposter with the right credentials on a voter can gain access to the signature image by simply applying for an eBallot. Then they self-affirm and obtain a ballot. Or, forge a signature and upload it, then self-affirm, and obtain a ballot.

A cast eBallot may be saved and stored on digital media such as a voter's hard drive. No other form of voting allows a voter to receive a copy of their cast ballot.

Electronic ballots sent electronically are handled and processed internally, out of public view, whereas official mail ballots are sent through the postal service or delivered by hand to a drop box or county office and are processed at intake in a publicly observable way.

Inconsistent with official paper ballots, an electronic ballot returned by mail or fax is self-printed and does not require approved ballot stock nor an official ballot return envelope. The unofficial envelope does not have to be signed. Self-printed ballots require extra processing for extraction, verification, and duplication compared to official ballots and return envelopes, and in-person voting.

Out of the many contrasts and inequalities between eBallots and other forms of voting, the risks to a voter's PII are occurring in cyberspace as opposed to more traditional and tangible forms of voting.

NVease.gov used to label ballots returned by mail as "Most Secure". Now NVEase.gov recommends 'RETURN ONLINE NOW' as "Most Secure". Nevadans rely on those assertions. But in reality, in-person is the most secure and always has been. NVease.gov fails to inform voters of the superior security of in-person voting. But at least the NVease.gov voters get a notice where others do not.

E. Exploits of Unprotected PII

The scope of the problem:

- Easy access to a voter's PII with binding signature significantly increases the risk of identity theft and forgery.
- Voter Assistants and mail handlers public and private have access to the cast ballot return envelope.
- Nevada mails ballots to all active voters, some out-of-state, and with Washoe County's mail going through Sacramento — magnifying systemic exposure.

- USPS imaging and data retention adds external exposure risk.
- Likely, most Nevada voters are unaware of the risks and potential damages from ID theft and forgery when casting mail ballot.

Associated risks potentially resulting in ID theft and financial loss include but are not limited to:

- photograph the signature and envelope
- scan or photocopy the signature and envelope
- sell or share the PII-signature image
- compliment personal data to that found and sold on the Dark Web
- use the signature and other information for identity theft
- AI has already led to identity theft, a tool so powerful the risks cannot be overstated

The ROV, with approval of the Secretary of State, has created a situation ripe for exploitation by persons with ill intent in spite of the problems and risks associated with not protecting PII. Voting-by-mail is a catalyst for identity theft and forgery, with implications that go far beyond elections.

F. Secretary's Failure to Uphold State and Federal Laws that Protect PII

There is confusion as to who has authority over the design of ballot return envelopes. The following statutes indicate that the Secretary designs and approves ballot envelopes with privacy in mind:

> NRS 293.269913(5). The Secretary of State shall prescribe: (a) The form of all envelopes in which mail ballots are sent to voters and return envelopes.
>
> NRS 293D.200(3). The Secretary of State shall develop standardized absentee-voting materials, including, without limitation, privacy and transmission envelopes and their electronic equivalents. (emphasis added)

A signature on a return ballot envelope is required pursuant to NRS 293.269917(1)(c):

> Affix his or her signature on the return envelope in the space provided for the signature.

Prior to the 2024 Primary, the ROV changed the envelope design to expose signatures without legislative approval or a public process. [Exh. Images of ballot return envelopes]

Former Washoe County Deputy DA Mary Kandaras explained to me in her email of 7-17-24:

> The reason the signature block was moved to the outside of the envelope related to significant delays caused by the continual malfunction of the laser that cuts the envelope to expose the signature under the flap. It simply couldn't consistently cut large quantities of envelopes reliably.

Whether or not Ms. Kandaras' insight as to the failure of what was a new Model 72 RED with Rapid Extraction by Opex[3] is true, her statements go to the ROV's actions without legislative or public process, putting full responsibility for failure to protect a voter's PII onto Washoe County.

The ROV changed the 2024 envelope to expose the signature. They can just as easily revert back to the prior 2022 version or something akin to it that protects one's signature. There is no legislative impediment that I'm aware of.

If the Secretary ignored his statutory duty to design the ballot return envelope with privacy in mind, I will address that issue under separate cover.

If true, then it is all the more important that you follow the law even if the Secretary doesn't.

G. Erosion of public trust

The lack of protection of PII creates an erosion of trust, while aiding and abetting foreseeable, preventable risks to identity theft and forgery. The lack of proper messaging keeps the public uninformed of the risks in a conscious act to mollify the electorate into thinking their PII is safe and protected when it is not.

Due to a lack of messaging by Washoe County, its voters may be ignorant to the risks associated with exposure of their PII and how that may affect them. If voters knew the risks, it could alter their choice of voting method.

Voters deserve accurate information from which they can make a choice on how to vote.

The Washoe County Registrar of Voters has the power the change the equation by reviewing policies related to a voter's PII and instituting proper notice and safeguards to protect PII, including a change in the ballot return envelope to hide signatures.

[3] https://washoe.cobblestone.software/public/ViewFile.aspx?fid=1873&cid=1438

III. Elections Covered by Commerce and Consumer Laws

Often referred to as suffrage or the franchise, voting and elections are transactional and contractual and are covered by state and federal commerce and consumer protection laws.

- Voters are taxpayers who foot the bill for elections.
- Voters are consumers of a service and a product when registering to vote and voting.
- Voters have a contract with the city/county and state.
- Cities have a contract with the county.
- Counties have contracts with the state.

A voter's use of the franchise is rights-based and supported by numerous U.S. Supreme Court rulings. In *Yick Wo v. Hopkins*, 118 U.S. 356 (1886), the high court ruled that elections are "preservative of all rights," emphasizing the importance of voting to protect one's various rights.

A U.S. citizen and county resident submits a completed voter registration form to the county. Once accepted, the voter is entitled to receive a ballot. NRS 293.485(1) Qualifications: "...who has registered in the manner provided in this chapter, is entitled to vote at that election." The ballot becomes the property of the voter while it is in their possession.

The voter then casts and returns their ballot and is entitled to a fair, secure, accurate, and timely recording of their votes by the county.

Statewide, voters are entitled to a "uniform, statewide standard of counting and recounting all votes..." Nev. Const. art. 2 § 1A(10); NRS 293.2546(10). Other state constitutional rights in art. 2 § 1A go to accuracy, safety, non-discrimination, spoiled ballot replacement, assistance and instruction, complaint resolution, and more.

City-County contracts are interlocal agreements where the city pays the county to conduct their elections for a fee.

County-State contracts relate to funding, ballots, voter registration systems, reporting of results, certifying results, cybersecurity, and the NASPO Purchasing Agreement, along with numerous statutory performance commitments.

IV. State Standards Protecting Signatures and Authentication Identifiers

Nevada law contains a comprehensive body of statutory protections demonstrating clear legislative intent to safeguard voter privacy, ballot secrecy, and confidentiality of personal information associated with elections.

A. Privacy and independence in the act of voting

NRS 293B.065 — Voting systems must secure voter privacy and independence.

B. Voter privileged to a secret ballot

NRS 49.315 "Every person has a privilege to refuse to disclose the tenor of his or her vote at a political election conducted by secret ballot..."

NRS 293.2555 Extends the privilege to all circumstances, prohibiting compelled disclosure of how a voter cast their ballot in any context.

C. Secrecy of mail ballots, electronic equivalents

NRS 293.269913(1)(c) — Ballots must include "an envelope or sleeve... to ensure its secrecy."

NRS 293.269935(2) — Clerks must ensure "each mail ballot is kept secret."

NRS 293.3606(4) — County clerks must ensure ballots are "kept secret."

NRS 293D.200(3) — Secretary shall develop privacy and transmission envelopes and their electronic equivalents.

D. Protection of personal information within election systems

NRS 293.3086(2) — Ballot tracking must ensure secrecy and protect "the confidentiality and integrity of personal information contained therein."

NRS 293.5882(2) — Reinforces identical obligations for all statewide free-access systems.

NRS 602A.040 — Requires data collectors to protect personal data, including the Secretary.

V. Federal Standards Protecting Signatures and Authentication Identifiers

Federal frameworks uniformly recognize handwritten signatures as sensitive identifiers requiring protection.

A. Federal PII frameworks

- OMB Circular A-130 — requires minimizing exposure of biometric identifiers.
- NIST SP 800-122 — classifies signatures as sensitive PII with high misuse risk.
- NIST SP 800-63-3 — Digital Identity Guidelines (Biometric & Authentication Factor Security).

- DOJ/FBI identity-crime guidance — lists signatures as primary fraud vectors. (Referenced for general principles; not a single codified document.)
- 12 CFR 1016 Privacy of Consumer Financial Information: periodic privacy notice (1016.4), opt-out (1016.7)
- 21 CFR Part 11 Electronic Records; Electronic Signatures: agency obligations, definitions, controls for data security

B. Federal statutes implicated

Several federal authorities are relevant:

- Identity Theft and Assumption Deterrence Act of 1998, Pub. L. No. 105-318, 112 Stat. 3007; (f) — aiding & abetting ID theft and forgery
- 52 U.S.C. § 20511— criminal deprivation of a fair election process
- 18 U.S.C. §§ 1028 & 1028A — identity theft & aggravated identity theft
- 18 U.S.C. § 2(a) — aiding & abetting, counseling, commanding, inducing, or procuring an offense
- 15 U.S.C. § 6801 — safeguarding nonpublic personal information
- 15 U.S.C. § 7001(b) — meaningful notice required when using authentication-related identifiers
- 5 U.S.C. § 552a — federal requirements for handling sensitive personal information (Privacy Act)
- 5 U.S.C. § 552a(e)(3) — duty to warn

C. Pertinent federal case law

- *Clapper v. Amnesty International,* 568 U.S. 398 (2013) — substantial future harm is sufficient injury.
- *Remijas v. Neiman Marcus,* 794 F.3d 688 (7th Cir. 2015) — exposure of identifiers creates actionable risk.
- *OPM Data Breach Litigation,* 928 F.3d 42 (D.C. Cir. 2019) — biometric identifiers demand heightened protection.

These authorities demonstrate that exposed signatures constitute a recognized federal privacy risk, particularly when combined with other identifiers.

VI. Requested Action

I respectfully request that you:

1. Review your practices to protect Personally Identifiable Information (PII), including the exposing of handwritten signatures on ballot envelopes and other election mailers, to determine which rights and laws are being violated.
2. A) Change the ballot return envelope design to conceal signatures, similar to the 2022 envelope. B) Provide privacy for return of other election mailers.
3. Assess whether Nevada's "Most Secure" online representations, without warnings, or without invite to vote in-person based on what is most secure, complies with federal consumer and privacy protections.
4. Provide clear disclosures regarding identity theft and forgery risks associated with exposed PII on ballot envelopes and other election mailers.
5. Provide an opt-out option to sharing personal information with third parties.
6. Demand NVease.gov to give notice of the security of in-person voting or official vote-by-mail as an alternative to eBallots.
7. Demand a statewide Privacy Impact Assessment.

VII. Conclusion

Thanks to Washoe County's policy of exposing signatures on election materials, identity theft and forgery are easier and more likely to occur.

With uncontrolled imaging by USPS, ballot harvesters, and anyone with a cell phone who has access to a voter's PII, the situation poses a serious risk of identity theft and forgery — risks that federal statutes aim to prevent.

Moreover, mailed election materials provide no notice of risk of identity theft and no option to opt-out of sharing PII with third parties either, irrespective of consumer and voter protections laws.

The economy of scanning an exposed signature does not outweigh the risks to a voter's PII from an exposed signature with name, address, and so on.

Please, accept this complaint and act accordingly to safeguard Washoe County voters and their PII, including me.

The information provided is accurate and true to the best of my knowledge.

Respectfully submitted,

Oscar Williams

Exhibits:

2-Images of 2020 General Envelope

2-Images of 2022 General Envelope

Image of 2024 Primary Envelope

Image of Change of Address postcard

Image of Voter Verification postcard

From:	WatchDogJeff
To:	AGGeneralCounsel
Cc:	Leslie M. Nino Piro
Subject:	Re: Public Records Task Force
Date:	Friday, June 5, 2026 3:48:11 PM
Attachments:	Public Comment Pub Doc Task Force 6 8 26.doc image002.png

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WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Attached my Public Comment.

FYI: Essentially, other states use an Ombudsman that can render advisory decisions. Great idea that saves everyone time and money and improved satisfaction. The TF needs to research this. Maybe a University student or class?

I can tell you that the NV RED. HOA Ombudsman is an example in how NOT to do it.

Jeff Church
WatchDogJeff.com

On Friday, June 5, 2026 at 02:33:33 PM PDT, AGGeneralCounsel <aggeneralcounsel@ag.nv.gov> wrote:

Good afternoon,

Please see attached updated agenda and new materials for the upcoming Public Records Task Force meeting being held on Monday, June 8, 2026.

Thank you.

Sincerely,

State of Nevada
Office of the Attorney General

Office of General Counsel
Leslie M. Nino Piro, General Counsel
Sophia G. Long, Deputy General Counsel
Jeffrey W. Chronister, Deputy General Counsel

Email: AGGeneralCounsel@ag.nv.gov

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From: AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov>
Sent: Tuesday, June 2, 2026 1:51 PM
To: AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov>
Subject: Public Records Task Force

Good morning,

Please see attached Agenda, meeting minutes and supporting materials for the upcoming Public Records Task Force meeting being held on Monday, June 8, 2026.

Thank you.

Sincerely,

Yoon (Eunice) Lee
Executive Assistant
General Counsel Leslie M. Nino Piro
Office of the Nevada Attorney General
1 State of Nevada Way, Suite 100
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Public Document Task Force: Public Comment, 6-8-2026

First, the present system is not working. It is burdensome for local agencies and the only option for citizens is expensive litigation. That bogs down the courts and by the time the issue is decided, it is often moot.

The best option may be an ombudsperson or admin magistrate. As per below it is used in other states! Massive improvement in cost savings for all, time and satisfaction!

I'm open to ideas. Previously I considered the A.G. similar to OML but the A.G. is conflicted represented state agencies and the current A.G is approx. one full year ++ behind on decisions rendering them moot.

No one is looking out for the public's interest. I have not had time to look and see good models from other states. Another concern is the stock answer "There are no documents relevant to your request" making it a guessing game and back and forth when in essence the citizen is requesting an answer or has a question rather than wrapping the response in whether there exists a formal document consistent to the response.

Q: "When is the next XYZ meeting?
A: There are no documents responsive to your request."
Recently I wanted to know if an employee was still employed and how much he made. They were not responsive but I then asked for his paystub (a document) and got it. Do it really have to be this cat and mouse game?

It would seem that the best options may be a ombudsman provided it is done right to expedite the process. A similar idea is a statewide administrative magistrate or similar along the lines of small claims to quickly hear the issue without a lot of discovery and the losing party can always then file with the courts. Result: Greatly increased community and media satisfaction; massive cost savings to local government vs litigation; massive savings to the Courts by having a hearing officer or advocate that can render decisions and mediate.

Has anyone done this research for you? If not why not?
I think it is essential that any ombudsman act quickly and be able to issue (advisory) opinions that could be appealed to the courts. So this is a tested option, nothing something outside the box or new.

From AI on an ombudsman; Examples in the United States
The Public Access Ombudsman is a valuable resource for ensuring transparency and accountability in government. By providing mediation, guidance, and education, the office helps citizens exercise their right to access public records while assisting agencies in complying with state laws. This role is particularly useful for resolving disputes informally and promoting a culture of openness in government operations.

Maryland: The Office of the Public Access Ombudsman was established in 2016. The Ombudsman is appointed by the Attorney General and helps resolve disputes under the Maryland Public Information Act (PIA). Maryland.gov.
Maine: The Maine Legislature created a Public Access Ombudsman to review complaints under the Freedom of Access Act, mediate disputes, provide educational materials, and issue advisory opinions. maine.gov
Oregon: https://www.oregon.gov/pra/Pages/default.aspx
The Office of the Public Records Advocate was created pursuant to SB 106 during the 2017 legislative session. Under the law, which can be found in Oregon Revised Statutes Chapter 192, the Advocate is responsible for: providing dispute resolution services at the request of government bodies or public records requesters; providing training on public records laws and best practices; providing guidance and advice on the public records law upon request; and serving as a voting member, and executive director, of the Public Records Advisory Council.
Indiana: https://www.in.gov/pac/ and https://www.in.gov/pac/files/formal-complaint-form.pdf

Sincerely,

Watchdog Jeff

Jeff Church
RenoTaxRevolt.com
775 544-RENO (7366)
RenoTaxRevolt@Sbcglobal.net

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Fourth Meeting: July 22, 2026

Written Public Comment

From:	Jared M. Frost
To:	Leslie M. Nino Piro
Subject:	FW: Input for Public Records Task Force
Date:	Tuesday, June 9, 2026 2:37:14 PM
Attachments:	Outlook-A picture .png

More input for the Task Force.

Jared M. Frost
Senior Deputy Attorney General
Transportation Division - DMV/DPS
702-486-3177
jfrost@ag.nv.gov

From: Kristi Defer <kdefer@dps.state.nv.us>
Sent: Tuesday, June 9, 2026 2:25 PM
To: Jared M. Frost <JFrost@ag.nv.gov>
Cc: Gordon R. Goolsby <GGoolsby@ag.nv.gov>; George Togliatti <gtogliatti@dps.state.nv.us>; Melissa Sabatini <msabatini@dps.state.nv.us>; John Fansler <jfansler@dps.state.nv.us>
Subject: Re: Input for Public Records Task Force

Good afternoon Jared,

Thank you for forwarding the information and requesting input from DPS.

From a Department of Public Safety perspective, we would encourage the Task Force to consider several issues unique to public safety agencies:

• Clarification regarding records associated with active criminal, administrative, intelligence, and threat assessment investigations.

• Increased guidance regarding body-worn camera, dash camera, and other digital evidence requests, including recovery of reasonable costs associated with review and redaction.

• Development of a process for handling extraordinarily burdensome records requests requiring significant agency resources.

• Expanded protections for security-sensitive information, including critical infrastructure, emergency response plans, dignitary protection operations, and law enforcement tactical or operational records.

• Clear statutory guidance regarding electronic communications, including text messages, Teams messages, and other collaboration platforms.

• Additional protections for personal identifying information of public safety employees where disclosure could create safety concerns.

• Greater consistency regarding response timelines for complex requests that require extensive legal review and redaction.

In addition, DPS believes there should be further discussion regarding how to balance government transparency with the growing operational burden associated with public records requests. DPS fully supports public access to government records and recognizes the importance of transparency and accountability. However, public safety agencies are increasingly receiving large-scale requests for electronic communications, video footage, datasets, and other records that require significant staff time to locate, review, redact, and produce.

In many cases, these requests appear to be made for commercial purposes, social media content generation, data aggregation, or other uses that are not directly related to increasing public understanding of government operations. Unlike many other jurisdictions, Nevada agencies have limited ability to recover the actual costs associated with fulfilling these requests. As a result, agencies must divert existing staff and resources away from core public safety functions to respond to increasingly complex requests.

DPS has sought additional resources to assist with public records compliance but, like many agencies, continues to face resource constraints. We encourage the Task Force to explore options that preserve transparency while recognizing the significant workload associated with large or complex requests. Potential considerations could include reasonable cost recovery for requests requiring substantial staff time, extensive redaction, or production of large volumes of digital records, as well as consideration of whether requests made for commercial purposes should be treated differently than those made in the public interest.

Public records compliance is an important function of government; however, agencies should not be forced to choose between responding to large-scale records requests and carrying out critical public safety missions. We believe there is an opportunity to improve the current framework in a manner that protects both transparency and the efficient delivery of government services.

We appreciate the opportunity to provide feedback and would be happy to discuss any of these issues further as the Task Force continues its work.

Thank you,

Kristi Defer, CPM
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Find Careers at www.NevadaStatePolice.com

From: Jared M. Frost <JFrost@ag.nv.gov>
Sent: Monday, June 1, 2026 8:37 AM
To: Kristi Defer <kdefer@dps.state.nv.us>

Cc: Gordon R. Goolsby <GGoolsby@ag.nv.gov>
Subject: Input for Public Records Task Force

Hello DD Defer,

The OAG's general counsel has requested input for upcoming Public Records Task Force meetings on changes your agency would like to see in the NPRA. The attached materials from a meeting in April outline issues other government entities have flagged for discussion. I've also attached minutes from the first meeting in February that includes more information about the composition of the group. Thanks and let me know if you and your team have comments you would like me to pass along.

Kind regards,

Jared M. Frost
Senior Deputy Attorney General
Transportation Division - DMV/DPS
702-486-3177
jfrost@ag.nv.gov

From:	WatchDogJeff
To:	Jeffrey Church
Cc:	Jeffrey Church
Subject:	A Good Public Doc Example
Date:	Monday, June 8, 2026 10:04:15 AM

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(The PDR Task Force is meeting now, Monday morning, excellent presentations worth review)

This was discovered by a citizen and only after a battle to make such records public, just a typical example (I am a former SDSO Deputy and am in San Diego now for Padres so I should get the sympathy vote):

San Diego Sheriff's Captain Overpaid in Pension

A former San Diego County Sheriff's Captain, **John Burroughs**, was found to have been **overpaid by nearly $500,000** in pension benefits over a 13-year period due to a clerical error ar15.com . The San Diego County Employees Retirement Association (SDCERA) acknowledged the mistake and filed a lawsuit to recover the funds

Jeff Church
WatchDogJeff.com

From:	Kathleen Faye Light
To:	AGGeneralCounsel
Subject:	Public Records Task Force Meeting comment
Date:	Tuesday, June 9, 2026 9:36:26 AM
Attachments:	NPRA Comment 2.pdf Npra narrative with rec.pdf Aministrative synopsis.pdf Screening Decision to C 076-2025 (1).pdf

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Hello,
I appeared in person yesterday, and I wasn't able to complete my comment. Please find my comment, an expanded narrative, and supporting public records attached.

--



RapeIsRape.org
702-469-7523

Joe Lombardo
Governor

George Togliatti
Director

Sheri Brueggemann
Deputy Director

Mike Edgell
Chief

Nevada Department of Public Safety
Dedication Pride Service

Investigation Division
555 Wright Way
Carson City, Nevada 89711
Telephone (775) 684-7412 - Fax (775) 684-7409

Administrative Synopsis

DATE: July 18, 2024

TO: Nevada Department of Human Resource Management

FROM: Mike Edgell, Investigation Division, Chief

SUBJECT: Synopsis of complaint against David Cassetty

On July 8, 2024, the Nevada State Police, Investigation Division received notification from Capitol Police regarding an email that was sent to Todd Rich, the Nevada Division of Insurance, Chief Deputy Commissioner of Accounting Services, alleging illegal/immoral acts by a state employee. The email stated "Sir- I want to make you aware of the moral character of your deputy. Mr. Cassetty is a sexual predator. He is an alcoholic who regularly shows up at work under the influence of alcohol." The purported sexual predator was identified as David Cassetty, the Deputy Commissioner of the Nevada Division of Insurance. Attached to this email was also a short, pornographic video.

This email was generated by the purported victim of the sexual assault, claiming that Mr. Cassetty had sexually assaulted her in February 2024, at a "cocaine fueled party." The video shows Mr. Cassetty performing a sexual act causing pain to the female, where the female begs/tells him to stop, which he did not. It is very graphic and disturbing.

A criminal investigation was initiated by the Nevada State, Police Investigation Division. During the investigation the author of the email was interviewed extensively regarding the criminal acts she had reported. During the interview the victim identified herself as the female in the video being assaulted. She stated that the sexual encounter started off consensually, but he was hurting her so she told him to stop.

The criminal investigation has been presented to the Clark County District Attorney for review.

Separate from the criminal investigation there are serious concerns regarding the fitness of a state division administrator. Though the criminal act was not committed on State property, one could

speculate that an unclassified division administrator is always on State time and should always represent themselves and their division appropriately. Division administrators are scrutinized for their on/off duty conduct as their activities could be perceived as incompatible with the employee's conditions of employment.

As such, the disgraceful conduct displayed in the video that was sent to many people in Mr. Cassetty's division not only could impair the performance of his duties, but also cause discredit to the agency. Should Deputy Commissioner Cassetty's identity be publicized from this pornographic video that was sent to an investigative reporter at Channel 8 News, in Las Vegas, it would undoubtedly bring discredit to his division, and quite possibly, the Governor's office.

AFTER COMMENT

Hello again, my name is Kathleen Light

I would like to explain the personal toll and collateral damage in my public records case

One record I eventually obtained only by mistake on the part of the agency was an administrative synopsis written by MIke EDGELL the **Chief** of the Nevada State Police.

It described the conduct of the deputy insurance commissioner at issue as **immoral, disgraceful, and criminal.**

The synopsis also noted that if the matter became **public,** it could reflect poorly on the State, and that I had spoken to the press. The police knew that because I allowed them to search my phone while they interviewed me.

The press was waiting for an arrest before running the story.

There was no arrest. Thus, There was no story.

That former Deputy Insurance Commissioner was asked to resigned shortly thereafter with a neutral reference according public record and went on to be an Assistant Attorney General in Vermont. He was again asked to resign based upon my very credibe allegations. His disbarment due to this matter is currently pending in Vermont. He is trying to give up his law licesnse so there is no PUBLIC record of what happened.

Nearly two years later, I am still trying to determine who received the evidence, who, if anyone, reviewed it, and why they decided that a violent crime recorded on video would not result in charges.

The only explanation I received came from District Attorney Steve Wolfson. He told me that because I had stayed in that relationship, a relationship that was fraught with further sexual assaults, threats of physical violence, and threats of murder-suicide, QUOTE his office could prosecute men who raped prostitutes, but that I had stayed with him. END QUOTE

Under Nevada law, that does not negate my screams that night.

Nor should it.

The Attorney General's office has refused in opposition to Matcy's law to even acknowledge any call or email or social media post I have made for the past two years. They simply refuse to

respond to me when all I want to know is why **a public official** who **raped me** on video was not prosecuted.

For me, these records are not abstract.

They are not curiosity.

They are not politics.

They are the only path I have left to understanding what happened

The night I was raped, I screamed and begged to be heard.

No one stopped it.

Years later, I am still in that night, screaming through records requests, complaints, court filings, and hearings.

These are not public records to me.

They are my records.

They are how I am trying to understand why I was not heard that night, and why I am still fighting to be heard by the Attorney General now.

This body has been entrusted with the responsibility of making certain that the public records process is fair to the public. I am the public and I do not want any other woman to ever go through what I have in this process and you have the power to see to that. Please remember my story and that I am not the only one as you make your recommendations.

As a rape victim, I would gladly give up my information, social security number, blood type, or whatever else anyone wanted to know for my rapist to be charged or at least be publisized so I can find his other local victims.

I will openly and vehemently state that utilizing Marcy's law to prevent me from having that information and records is inexcusable.

I personally became infuriated at the last presentation in the meeting, Ms. Piro, to you directly, please let your boss know that regardless of any presentation about the victimization of crime victims and their trauma response, that does not mean that he gets to have it both ways, He does not get to weaponized Marsy's Law against me as a victim while ignoring the other mandates and provisions within those constitutional rights I have as the victim of a violent crime.

Nevada Revised Statute (NRS) 239.001 establishes that public records serve as the foundation of democratic accountability, mandating that the government provide prompt access to information to foster transparency. Yet, as I learned through my own harrowing experience, that statutory promise often dissolves when a citizen, particularly a crime victim, attempts to hold institutions accountable for their actions. My story—a journey through bureaucracy, lost documents, and systemic failures—began not as an academic exercise in research, but as an intimate struggle to reclaim the truth behind my own victimization.

The Gap Between Statute and Reality

My public-records journey began with a police report I should never have had to request through the public-records process at all. After reporting my rape in 2024, I asked law enforcement for a copy of the police report in my own case. I was told by the police that I needed to submit a public-records request to obtain it. As I later learned, that was not actually the process available to crime victims seeking records related to their own case. At the time, however, I had no reason to know that the information I was being given was incorrect. I trusted the agency responsible for handling the investigation and followed the process I was told to follow.

What followed was months of delay. I was told the investigation needed to be closed. I was told records could not yet be released. I was given various explanations as to why the report remained unavailable, including that it didn't exist. Eventually, after months of waiting, I received a heavily redacted police report, but the report did not answer the question that mattered. By that point, Nevada State Police had investigated allegations that I had been raped by the Deputy Insurance Commissioner for the State of Nevada. During the investigation, I was informed that an expedited warrant had been drafted and that an arrest was happening, at the moment they were calling me. The Deputy Insurance Commissioner was escorted from his public office by law enforcement, but no arrest occurred.

The Clark County District Attorney's Office declined prosecution and referred the matter to the Nevada Attorney General's Office. The Attorney General's Office subsequently declined prosecution as well, twice. The police report did not explain why. It also raised additional questions because it failed to account for a fourth video recording of the incident. By the time I received the report, I knew four videos existed. I had fought with the detective to make him take the fourth video from me, yet that video was not identified in the report at all. Its absence immediately raised an obvious question: if the video was not properly reflected in the report, who had reviewed it?

To this day, I do not know whether prosecutors reviewed that fourth video. I do not believe decision-makers within the Attorney General's Office reviewed it, and all I have on that question is a partially redacted email in which a deputy attorney general told a police sergeant that collecting additional evidence would not resolve the issues with the case. I do not know whether every person involved in evaluating the matter was even aware the fourth video existed. I know only that it existed, that I tried to make sure law enforcement had it, and that it was absent from the police report eventually provided to me.

The documents coming out of the Division of Insurance raised still more concerns. Those records stated that a confidentiality agreement had been crafted. The actual complaint that went to the Nevada State Police was delayed by three days, had no heading, and had no signature. There is no way to tell from that document who authored it, what office authored it, or why a complaint concerning a senior state official moved through government in that form. The police report also did not tell me why the prosecution was declined, who reviewed the evidence, or what happened after the investigation concluded. The report gave me records, but it did not give me answers. What it did say was who participated in the decision-making process, and those were some names. Ultimately, it gave me more questions, and those questions were not minor.

The Labyrinth of Institutional Secrecy

That absence of an answer is what led me to seek records from the agencies directly involved in the matter, including the Nevada Attorney General's Office, the Nevada Division of Insurance, and the Governor's Office. These agencies were not peripheral participants. They were directly involved in the handling of a matter concerning a senior state official. If records existed explaining what happened after the investigation, these agencies were the places where those records should have been found. I was not seeking opinions or asking anyone to justify a decision in a private conversation. I was seeking records showing who received information, who reviewed evidence, who forwarded documents, who discussed the matter, and who made decisions.

Nevada law recognizes the importance of those questions. NRS 239.001 states that the purpose of Nevada's Public Records Act is "to foster democratic principles by providing members of the public with prompt access to inspect, copy or receive a copy of public books and records to the extent permitted by law." It further provides that the chapter "must be construed liberally to carry out this important purpose" and that any exemption, exception, or balancing of interests limiting access "must be construed narrowly." The principle is not complicated: government cannot be accountable if citizens cannot determine how governmental decisions were made.

My experience was the opposite of transparency. The Attorney General's Office did not respond to my requests. The Division of Insurance did not respond to my requests. The Governor's Office did not respond to my requests. They did not provide partial responses, inadequate responses, confusing responses, or delayed responses. They provided no responses at all. The requests went unanswered, and when I submitted complaints regarding compliance with Nevada's Public Records Act to the agency to which public-records complaints are supposed to be submitted, the Attorney General's Office, those complaints also produced no response.

This created an obvious structural problem. Citizens are told they may seek assistance from the Attorney General's Office when agencies fail to comply with public-records law, yet the Attorney General's Office was itself one of the agencies from which I was seeking records and one of the agencies that had failed to respond. The system had no meaningful answer for that conflict. At

that point, the statutory right existed only on paper. If I wanted the agencies to comply with the law, I had to force the issue in court.

As a pro se litigant, I filed petitions seeking judicial enforcement of Nevada's Public Records Act. At my first hearing, the State appeared through three attorneys to oppose production. Only after litigation commenced did records begin to appear. First, I heard from the Governor's Office, which apologized and said the person who had been working on my request had left the position and my request had gotten lost in the shuffle. The Attorney General's Office told me that I had been caught in its email filter, Barracuda, although I later checked the Barracuda database and my email address was not included on its list. The Division of Insurance simply did not bother with an excuse.

Then the games began in getting the records. The explanations that followed only deepened my concerns because agencies cited delays, administrative issues, and production schedules that stretched months into the future. The Division of Insurance cited problems related to a cyberattack. Excuses accumulated, but what never changed was the basic fact that records were not produced until litigation forced the issue. If records can be located and produced after litigation begins, then those records existed before litigation began. If agencies are capable of responding once sued, then they were capable of responding when the requests were originally submitted.

Evidence Through Error

The records that finally emerged were not produced through agency diligence, but through agency error. In a striking lapse of bureaucratic protocol, the Governor's Office accidentally disclosed an administrative synopsis—prepared by the Chief of the Nevada State Police—describing the conduct under investigation as "immoral, disgraceful, and criminal." In the same inadvertent transmission, they included the video of my own rape. These errors were not merely procedural slips; they were the most consequential records I received, shattering the official narrative and revealing the stark reality that, to the system, these documents are data points to be managed rather than the lives of human beings.

The records that eventually emerged revealed facts that had previously been hidden. They revealed that the Deputy Insurance Commissioner resigned under a separation agreement that included confidentiality provisions and a neutral reference. They revealed that records existed documenting discussions occurring behind the scenes and that the public record surrounding this matter was larger than what had initially been disclosed. They also revealed something more troubling: some of the most important records I received were not produced because the system worked. They were produced because someone made a mistake.

The records also revealed something else I never expected to find. In response to a subsequent records request, I received information indicating that I had been the subject of attention from a counterterrorism unit based upon alleged indirect threats after I publicly discussed what had happened and criticized the government's handling of the matter. I had reported being raped by

a public official, attempted to understand why he was not arrested or prosecuted, and used Nevada's public-records laws to seek answers. Yet somewhere within that process, records suggested that attention had shifted toward me.

As a historian, I am accustomed to working with incomplete records. Historical research often involves reconstructing events through fragments of surviving evidence, but government records typically create redundancy. Emails are copied. Memoranda are forwarded. Reports are distributed. Multiple agencies retain overlapping versions of the same communications. That redundancy is often how researchers determine whether a record is complete, because when the same communication appears in multiple productions, it confirms that the record moved through government in a traceable way.

In my case, that redundancy was absent. Despite obtaining records from agencies directly involved in the matter, I found, remarkably, that no overlap among many of the records produced. Communications that should have appeared in multiple locations often appeared only once. Records that should have generated corresponding records elsewhere frequently lacked obvious counterparts. The result was not a complete documentary history but a collection of fragments, and although those fragments were important, they were also insufficient.

Nearly two years later, the central questions remain unanswered. Who received the evidence? Who reviewed the videos, including the fourth video? Who participated in discussions concerning the case? Who made recommendations? Who made final decisions? Who decided prosecution would not occur? Who decided what records would be released and what records would remain hidden? Why was a violent crime reported, investigated, documented, and then followed by silence?

This is not merely a personal grievance; it is a public problem. If a citizen with training, research experience, and the willingness to spend years litigating public-records cases still cannot obtain a complete record from her own government, then the average Nevadan has little practical recourse when agencies refuse to comply with the law. A right that exists only for those capable of enforcing it through litigation is not a meaningful right for most citizens.

Nevada law promises transparency. It promises liberal construction in favor of access, narrow construction of secrecy, and a public-records system through which citizens can understand the conduct of their government. Promises written into statutes, however, mean very little when agencies can ignore requests until a citizen sues them. For me, these records are not abstract, academic, or political. They are the only path I have left to understanding why a man I reported for rape, a man who occupied a senior position within Nevada government, was not arrested, was not prosecuted, and was allowed to leave public employment under circumstances that continue to raise more questions than answers.

The Fragility of Accountability

The consequences of this administrative silence, however, did not stop at the Nevada state line. The lack of an accurate, accessible public record created a dangerous bureaucratic blind spot. Because Nevada's records—or the lack thereof—provided no warning, the Deputy Insurance Commissioner was able to secure a new position as an Assistant Attorney General in Vermont just three months after my report. He was granted a position of public trust in a new jurisdiction simply because the state that hired him lacked the information to know otherwise.

When his tenure in Vermont ended five months later, it was not due to a proactive vetting process, but rather a reactionary discovery: internal accounts suggest he was forced to resign only after Vermont officials encountered my public account of the incident. This was an entirely preventable failure. The absence of a formal record in Nevada did not merely insulate an official from accountability; it exported that risk to another state, placing the public trust of Vermonters in jeopardy. This is the starkest illustration of why public records are a public safety necessity, not just a matter of administrative preference.

The response from Vermont authorities has mirrored this same preference for quiet resolution. While the Vermont Judiciary is currently investigating the matter, the process has been defined by an effort to contain the fallout. I was informed in late 2025 that the former official sought to voluntarily surrender his law license—effectively the functional equivalent of disbarment—under the condition that the proceedings remain sealed and without a public record. Currently, he remains administratively suspended, ineligible to practice. I have actively petitioned the disciplinary counsel to reject this quiet exit and instead convene a public hearing. We cannot allow accountability to be negotiated away behind closed doors; a matter of this gravity demands the light of a public record, not the convenience of a private settlement. A final resolution remains pending, caught in the tension between procedural closure and the necessity of public truth.

Transparency as a Public Necessity

Ultimately, the story of my public-records requests is not merely about documents; it is a case study in the fragility of democratic accountability. When a system designed to illuminate government conduct operates in the shadows—forcing citizens to navigate labyrinths of delay, accidental disclosures, and litigation just to learn the truth about their own lives—the promise of transparency becomes an empty formality. We cannot claim to have an open government when the truth is hidden behind a wall of procedural inertia, and we cannot demand accountability from our officials if we cannot see the evidence of their actions. My experience has shown that public records are often the only tool citizens have against institutional silence; without them, we are left not with justice, but with the haunting echoes of the questions we were never allowed to ask.

Recommendations to the Attorney General's Public Records Task Force

My experience demonstrates that Nevada's Public Records Act, while strong in principle under NRS 239.001's liberal construction mandate, lacks the enforcement mechanisms and structural safeguards necessary to make transparency a practical reality rather than an aspirational one. To prevent similar failures—particularly in cases involving senior officials, crime victims seeking records in their own matters, or allegations of institutional conflicts—I urge the Task Force to recommend the following to the Legislature:

1. Mandatory Response Timelines with Escalating Penalties: Require agencies to acknowledge requests within 3 business days and produce records (or a detailed denial with exemption citations) within 10-15 business days for standard requests, with shorter timelines (5 business days) for victims seeking records related to their own cases. Impose automatic daily fines (e.g., $100-$500 per day after the deadline) payable to the requester, plus full costs and attorney's fees (including for pro se litigants via a reasonable hourly rate equivalent) for prevailing parties in enforcement actions. Intentional delays or incomplete productions should trigger personal liability for responsible officials and potential disciplinary action.

2. Independent Dispute Resolution Mechanism (Ombudsman or Review Board): Establish a neutral, independent public records ombudsman or review board outside the Attorney General's Office to handle complaints, mediate disputes, and issue binding determinations with expedited timelines. This addresses the inherent conflict when the AG's Office is both a records custodian and the enforcement body—precisely the barrier I encountered.

3. Improved Custodianship, Retention, and Redundancy Standards: Mandate clear designation of records custodians in each agency, centralized electronic tracking systems for all requests (with public dashboards), and standardized retention policies ensuring redundancy for high-profile or sensitive matters. Require audit trails for any redactions, searches, or "lost" requests, and prohibit destruction of potentially responsive records once a request is received.

4. Transparency for Credible Accusations Against Public Officials: Narrow personnel record exemptions under the NPRA for senior public officials or those in positions of public trust when there are credible allegations of misconduct, particularly criminal acts, sexual misconduct, or abuse of authority. Agencies should be required to proactively disclose (or make readily available via public log) the existence of formal complaints, internal investigations, or credible accusations—redacted as needed to protect victim privacy and ongoing proceedings—along with outcomes such as resignations, firings, or NDAs. The public has a compelling interest in knowing when officials accused of serious wrongdoing continue to serve or move to new roles; "confidential personnel matters" should not serve as a shield for accountability. This balances individual privacy with the public's right to evaluate fitness for office, drawing on the principle that substantiated or video-supported claims (as in my case) demand disclosure over blanket secrecy.

5. Victim and Conflict-of-Interest Protections: Create specific presumptions favoring disclosure for crime victims requesting records in their own investigations or related agency actions.

Require recusal or independent review when an agency or official has a direct conflict (e.g., investigating its own personnel). Narrow exemptions strictly, with mandatory segregation of non-exempt portions.

6. Standardized Fees, Training, and Technology: Adopt a uniform, reasonable fee schedule with presumptive waivers for public interest, journalistic, or victim-advocacy requests. Require annual training for records officers and investment in modern records management technology to reduce burdens on both agencies and requesters.

7. Data Collection and Annual Reporting: Implement statewide tracking of request volumes, response times, denial rates, and litigation outcomes, with public annual reports to identify patterns of non-compliance.

These changes would transform the NPRA from a law that relies on litigation as the primary enforcement tool into one that delivers prompt, reliable access for all Nevadans. Without them, accountability remains fragile, and powerful interests continue to operate behind an “Archive of Silence.”

Vermont Supreme Court
Professional Responsibility Program

Andrew R. Strauss
Screening Counsel
andrew.strauss@vtcourts.gov

32 Cherry Street, Suite 213
Burlington, VT 05401
802-951-0139

December 18, 2024

Kathleen Light
Via email only to: mrskatielight@gmail.com

Re: PRB File No. 076-2025
David R. Cassetty, Respondent

Dear Ms. Light,

As required by Rule 12 of Supreme Court Administrative Order 9, I screened the disciplinary complaint that you filed against Attorney David Cassitty. In my judgment, the conduct which is the subject of the complaint appears to constitute misconduct that may require disciplinary sanctions. Therefore, pursuant to Rule 12.C of Administrative Order 9, I am referring the complaint to Disciplinary Counsel Jon T. Alexander for further investigation.

Disciplinary Counsel will investigate the complaint. Upon concluding the investigation, Disciplinary Counsel will either dismiss it, refer it for non-disciplinary dispute resolution, or commence formal proceedings against the Respondent's law license. Disciplinary Counsel will notify you of their decision.

Having made this referral, my involvement ends. Please direct all inquiries to Attorney Alexander at jon.alexander@vtcourts.gov or Administrative Coordinator Brandy Sickles at brandy.sickles@vtcourts.gov.

Respectfully,



Andrew R. Strauss
Screening Counsel

From: David
To: AGGeneralCounsel
Subject: Re: Public Records Task Force
Date: Tuesday, June 16, 2026 4:49:43 AM
Attachments: image002.png

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General Counsel's Office
Nevada Legislative Counsel Bureau, Legal Division
401 S. Carson Street
Carson City, NV 89701-4747
Via email: generalcounseloffice@lcb.state.nv.us
Re: NV-SEFA-001 — Response to Letters of May 1, 2026 and June 12, 2026
Dear General Counsel's Office:
I write in response to your letters of May 1, 2026, and June 12, 2026, regarding my April 24, 2026 public records request (NV-SEFA-001). I have reviewed both letters carefully and am raising the following concerns, which I ask you to address in writing before the current June 18, 2026 deadline.
1. Applicability of Davis v. Thompson. Your May 1 letter cites Davis v. Thompson, 1986 OK 38, 721 P.2d 789 (Okla. 1986), for the proposition that the LCB may determine for itself, subject to a rule of reason, how much time it will take to respond to my request. I have reviewed the full opinion. It does not address public records requests, response deadlines, or anything resembling NRS Chapter 239. It resolves a discrete dispute over whether the Oklahoma Legislature could finish voting on appropriation bills after midnight on the constitutionally limited ninetieth day of its regular session, under Article 5, Section 26 of the Oklahoma Constitution. The "rule of reason" language you quote was the court's standard for measuring how long a single legislative floor session may run past midnight — not a general rule about how long any legislative office may take to respond to a public information request. It is also Oklahoma persuasive authority, not binding on Nevada courts. I ask that you identify any Nevada authority, if one exists, that actually addresses the timeliness standard applicable to LCB's response to records requests, rather than relying on a case addressing an unrelated constitutional question from a different state.
2. Scope of the claimed exemption. Your letter asserts that NRS Chapter 239 "does not apply to any records requested from the Legislative Department," citing NRS 218F.150(1) and (3). That statute, by its terms, protects the nature or content of "any matter entrusted to" the Legislative Counsel Bureau and "work produced by" officers and employees of the Legal and Fiscal Analysis Divisions — it is not a blanket exemption for every record in the Legislative Department's custody. Several categories in my request (e.g., SEFA allocations and federal award expenditures, NVPERS and JRS fund transfers, vendor contracts) describe financial and administrative records, not legal work product or matters entrusted for legal advice. I ask that the LCB identify, category by category, which specific records you contend fall within the NRS 218F.150 privilege, rather than relying on a categorical assertion that the entire request is exempt.
3. Internally inconsistent position. Your letter states in the same breath that the Public Records Law "does not apply" to the Legislative Department, and that the LCB will nonetheless review materials to determine whether they contain "publicly disclosable information." Under NRS 239.0113, the burden of establishing that a record is confidential rests with the governmental

entity. I ask that you state plainly what standard governs the LCB's review, and confirm that all reasonably segregable non-exempt portions of responsive records will be produced.
4. Open-ended extensions. My request was submitted April 24, 2026. Your initial response set a production date of June 12, 2026; your June 12 letter then extended that date to June 18, 2026, using language that allows for further indefinite extension if the LCB "determines that it is unable" to meet the new date. I ask for a firm date certain for production of any responsive, disclosable materials, and, if any portion is withheld, a written explanation citing the specific statutory or constitutional basis relied upon for each withheld category.
I also note, for the record, that I separately received correspondence reflecting the Attorney General's Public Records Task Force, including materials titled "Protecting and Reinforcing the Public's Right to Know" and "Public Transparency with Private Dignity," prepared for the Task Force's June 8, 2026 meeting. Those materials reflect that the State's own current policy effort favors construing the public's right to know broadly and tailoring privacy-based exceptions narrowly — a framework in tension with a categorical, blanket non-applicability position supported by a case addressing an unrelated question of Oklahoma constitutional law.
I am not asking the LCB to disregard any legitimate privilege it may hold. I am asking for a response that applies accurate, on-point authority, is specific to the records at issue, and is bound by a firm date. Please respond in writing on or before June 18, 2026.
Sincerely,
David Lee Nace
Petitioner — NV-SEFA-001
4255 Channel 10 Drive, Apt. 96
Las Vegas, NV 89119
(702) 689-0580
lvsms.2006@gmail.com

David Lee Nace

On Fri, Jun 5, 2026 at 2:33 PM AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov> wrote:

> Good afternoon,
>
> Please see attached updated agenda and new materials for the upcoming Public Records Task Force meeting being held on Monday, June 8, 2026.
>
> Thank you.
>
> Sincerely,
>
> **State of Nevada**
>
> **Office of the Attorney General**

Office of General Counsel

Leslie M. Nino Piro, General Counsel

Sophia G. Long, Deputy General Counsel

Jeffrey W. Chronister, Deputy General Counsel

Email: AGGeneralCounsel@ag.nv.gov

PLEASE BE GREEN. *Please don't print this email unless necessary.*

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From: Discount Office Supply
To: AGGeneralCounsel
Subject: NEVADA PUBLIC RECORDS TASK FORCE JULY 22, 2026 MEETING
Date: Friday, July 17, 2026 5:12:38 PM
Attachments: Task Force.docx

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

See attached email
And please distribute to each Task Force member.

Thank You
Joe

NEVADA PUBLIC RECORDS TASK FORCE JULY 22, 2026 MEETING

Task Force Members:

My name is Joe Panicaro. I'm a lifelong resident of Reno, Nevada, a paralegal and longtime activist. Throughout my lifetime, I've filed many public records suits, having prevailed on each. However, the majority of these required my appealing the District Court's ruling to the Nevada Supreme Court. My last four Appeals took between 16 and 19 months from the filing of Appeal until Appellate Court Decision. This must change. When public records are requested, they are needed now not a year and a half later.

The Nevada Legislature has made it clear that contestation of public records must be expedited and prioritized as dictated by its language under NRS 239.011(2). Although the Legislature has mandated District Courts "give this matter priority over other civil matters to which priority is not given by other statutes", the Legislature has not mandated Appellate Courts do the same. I propose that the Task Force seek amendment to the Nevada Public Records Act mandating that Appellate Courts prioritize public records cases as District Courts have been mandated to do. Furthermore, public records Appeals need to be automatically exempted from the settlement conference procedure in keeping with the expeditious manner the Legislature has intended when adjudicating these cases.

I have also requested that I be allowed to speak on these issues at the July 22nd meeting.

Thank you for your consideration of this matter. Please feel free to call me.

Joe Panicaro
2255 Koldewey Drive
Reno, Nevada 89509
(775) 203-6852

From: Kathleen Faye Light
To: AGGeneralCounsel
Subject: Re: Public Records Task Force Meeting Public Comment
Date: Friday, July 17, 2026 5:30:07 PM
Attachments: image001.png
2pagesforpubrecords.pdf

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

No worries I completely understand. How about you guys take a look at the warrant.

The two main pages really set the scene for what happened. In fact I directly quote that on the homepage of my website.

Here you go.

Have a wonderful weekend!

Kathleen Light

Kathleen Faye Light

On Fri, Jul 17, 2026 at 5:06 PM AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov> wrote:

> Ms. Light,
>
> Your email is received. However, your attachments exceed the two-page allotted length and include non-written material (i.e., video). The agenda states:
>
> > A person may submit comments to be attached to the minutes of the meeting, ***in writing***, one business day before the meeting date, in addition to testifying in person, or in lieu of testifying in person. ***Written comments are limited to two pages***.
>
> The video cannot be included in written public comment. Please indicate which two pages you would like us to include.
>
> Thank you.

State of Nevada

Office of the Attorney General

Office of General Counsel

Leslie M. Nino Piro, General Counsel

Sophia Long, Deputy General Counsel

Jeffrey Chronister, Deputy General Counsel

Email: AGGeneralCounsel@ag.nv.gov

From: Kathleen Faye Light <vegasquill@gmail.com>
Sent: Friday, July 17, 2026 11:20 AM
To: AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov>
Subject: Re: Public Records Task Force Meeting Public Comment

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Hi there!

I noticed you have seemed to have been able to put my second comments up on the website but I just wanted to make certain you received these as well. I can't seem to find them publicly available there on the website. I'm sure it was my mistake so I am attaching them as pdf files here for you. I'm certain you'll take care to put those up as well.

See you all next week!

Kathleen Faye Light

Nevada State Police
Investigation Division

NV DPS ID Case No: 24I000512

STATE OF NEVADA)

COUNTY OF CLARK)

AFFIDAVIT FOR WARRANT OF ARREST

Jeffrey Musheno, being first duly sworn, deposes and states that he is the affiant herein and that he is a Detective with the Nevada State Police Investigation Division (NSP ID) and that he has been employed for a period of seventeen (17) years.

That affiant is currently assigned to the Southern Area Major Crimes Office and has been assigned since August 2019.

In support of your affiant's assertion, affiant has developed the following facts:

On July 5, 2024, Kathleen Light emailed Todd Rich, Chief Deputy Commissioner, Nevada Division of Insurance regarding [redacted] Deputy Commissioner of Consumer Services, Nevada Division of Insurance. In her email, Light stated she was sexually assaulted by [redacted] at a "cocaine fueled party." Light also provided a video of the incident, which "speaks for itself."

The video (1 minute 54 seconds in length) showed a white male adult (Identified by Light as [redacted] wearing dark colored pants, no shirt and a silver watch on a bed with Light, who is lying completely naked with her legs spread open. [redacted] entire right fist is inside Light's vagina, while he switched between his left index finger and left thumb and rubbed near her clitoris. [redacted] moved closer to Light on the bed and appeared to penetrate her vagina deeper with his fist. Light, who appeared to be in pain, rolled towards [redacted] with her legs visibly shaking, said multiple times, "ow," "no," and "please stop."

Despite her pleas to stop and even grabbing [redacted] wrist, he said multiple times, "You're in. Don't be stupid," while his fist remained inside Light's vagina and his left hand pushed her left leg down toward the bed. Light told [redacted] "Don't go any deeper, ok, please. Don't go deeper than that ok." [redacted] responded by saying multiple times, "You're good, relax." At that point, [redacted] took his hand off Light's left leg while his fist remained inside her vagina and pulled on Light's right nipple. Light said, "it hurts, it fucking hurts dude." [redacted] told Light to "shut up" multiple times and followed with "this is literally what your pussy is built for. It's built for that."

Light repeatedly demanded [redacted] pull it out while he pulled on her right nipple. [redacted] said, "I'm not going to pull out, I'm going to fuck you with it." [redacted] continued penetrating Light and even removed her hand from his wrist. Light said "ow," "please," and "God Dammit [redacted]" [redacted] told Light, "Don't be stupid, relax" multiple times. Light said, "I'm trying." [redacted] still with his entire right hand inside Light's vagina, put his mouth on her left breast. Light again said, "no" multiple times. [redacted] said multiple times, "you're good." Light repeatedly said, "we're done, we're done, we're done, right? It hurts like a bitch." At that point, Light used her left hand and removed [redacted] fist from her vagina. The video ended.

On July 9, 2024, Detective Musheno and Detective Crowe conducted an audio recorded interview with Light. Light, in part, stated the following: Light agreed to have a "three-way" sexual experience with [redacted] On February 2, 2024, Light, [redacted] went to the Fairfield Inn on Warm Springs Road. The incident captured on video, which was recorded by [redacted] with his cell phone and subsequently shared with Light, happened very early on in the encounter. Light stated [redacted] penetrated her vagina with his right hand. She asked him to stop repeatedly. Light said [redacted] told her to shut up and she was being stupid. Light stated she was in pain and described it as "being ripped open." Light felt she needed to "suck it up and make it through" so [redacted] would stop. "Let him have what he wants, and he will stop." Light confirmed that when she told [redacted] to stop that is exactly what she wanted to happen.

From: WatchDogJeff
To: AGGeneralCounsel
Cc: AGINFO; Leslie M. Nino Piro
Subject: Public Comment for PDR Task Force July 22
Date: Monday, July 20, 2026 8:59:24 PM
Attachments: PDR TF PC July 2026.doc

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see attached public comment for the NRS239 Task Force.

Jeff Church
RenoTaxRevolt.com

To: Public Records Task Force
Subj: Public Comment
Ref: Template 3.6 and 4.4
From: Jeff Church, RenoTaxRevolt.com
RenoTaxRevolt@SBCGlobal.net

CONCLUSION: We need an expedited process ombudsman, hearing officer etc) and in-camera review.

I want to mainly address the listed templates:

3.6 Dispute Resolution Mechanisms
• Identify existing processes
• List effectiveness and current gaps

4.4 Penalties for Delayed or Incomplete Responses
• Recommend enforcement mechanisms and accountability measures.

But first a few examples and updates:

On my PDR matter vs WCSD, after two years in addition to the usual emails we found that Mr (redacted) reached out to a female encouraging her to apply including offering to meet one on one with her,

"*…I was just thinking about you and … I am staff to the commission*." Followed by a private meeting from the future applicant, "*Hi (redacted), I got to the HUB UNR campus a bit early. … See you soon!"*

A clear sign of favoritism and ex-parte contacts that took two years and $40,000 to drag out but by then the issue was moot.

On about July 6, 2026 to Washoe County and DMV I submitted carefully crafted and limited requests for a copy of a single contract and tax calculations on an increase known as RTC5. Two weeks later, well beyond the 5 day requirement, no substantial response. Typical of Washoe, not the exception. This matter concerns about $110 million yearly in tax revenue. I clearly hit pay dirt and let the obstruction begin.

On another Washoe matter I simply asked for the application by a developer of a zoning change. I'm not delving into anything personal. It's his application, here is what is on line for the public as of today in spite of my many written complaints here is the main page of the application in spite of the first sentence that states: "**Your entire application is a public record**."
https://www.washoecounty.gov/csd/planning_and_development/applications/current-applications.php#docaccess-23e4791c42794fc3619626a2def5b0d3

"Hi Jeff,
I spoke with our admin staff and the title page is accurate, the contact information for the applicant and consultant are redacted."

Abnormality? No, common practice with apps
https://www.washoecounty.gov/csd/planning_and_development/applications/current-applications.php
The Washoe County mantra: ignore the law, obstruct, delay and make them sue us at considerable expense! It's only taxpayer money.

Washoe County Development Application

Your entire application is a public record. If you have a concern about releasing personal information, please contact Planning and Building staff at 775.328.6100.

Project Information	**Staff Assigned Case No.:** _____
Project Name:	Fawn Lane Master Plan & Regulatory Zoning Map Amendment
Project Description:	The applicant is seeking a Master Plan Amendment (MPA) to change the master plan designation from 92% Rural Residential (RR)/8% Open Space (OS) to 74% Suburban Residential (SR)/26% Open Space (OS), and a Regulatory Zone Amendment to change the current zoning designation from 92% Medium Density Rural (MDR)/8% Open Space (OS) to 74% Low Density Suburban (LDS)/26% Open Space (OS).
Project Address:	0 Fawn Lane
Project Area (acres or square feet):	± 40.01 Acres
Project Location (with point of reference to major cross streets **AND** area locator):	The project is approximately ±0.25 mile southeast of the intersection at Mount Rose Highway and Fawn Lane.

Assessor's Parcel No.(s):	Parcel Acreage:	Assessor's Parcel No.(s):	Parcel Acreage:
150-080-08	±40.01		

Indicate any previous Washoe County approvals associated with this application:
Case No.(s).

Applicant Information (attach additional sheets if necessary)

Property Owner:		**Professional Consultant:**	
Name: Mezger Trust		Name: Wood Rodgers	
Address:		Address:	
	Zip:		Zip:
Phone:	Fax:	Phone:	Fax:
Email:		Email:	
Cell:	Other:	Cell:	Other:
Contact Person: Chad Martinson		Contact Person: Eric Hasty	
Applicant/Developer:		**Other Persons to be Contacted:**	
Name: Same as Applicant		Name:	
Address:		Address:	
	Zip:		Zip:
Phone:	Fax:	Phone:	Fax:
Email:		Email:	
Cell:	Other:	Cell:	Other:
Contact Person:		Contact Person:	

For Office Use Only

Date Received:	Initial:	Planning Area:
County Commission District:		Master Plan Designation(s):
CAB(s):		Regulatory Zoning(s):

You can't make this stuff up. Stated as public record. A routine zoning and plan application, 99.9% redacted even the case # and date received.

Leading to the template. It has become obvious, telling the band on the Titanic to play a jazz tune is fruitless. We need true legislative reform. It has become obvious per 3.6:

1. **An ombudsman that can expeditiously have free rein to mediate, resolve and litigate.**
2. **A statewide hearing officer(s) to hold hearings (Zoom OK) within a short time frame (i.e. 30 days) and render a decision within a set timeframe (14 days).**
3. **Assign these matters to Small Claims. Different from most but small claims judges, as lawyers are and will become qualified to adjudicate these. All should mandate an en-camera review by any judge or hearing officer.**
4. **Mandating the District Court Judge to hold an expedited evidentiary finding hearing and do an in-camera review**

*Of course either can be appealed but hopefully this would address the vast majority of most matters.

Regarding 4.4 yes on attorney fees and some penalties but those are on the taxpayer's back so I'm not smart enough to figure a true detriment but something must be done and a penalty paid to the complainant is a step in that direction.

Whereas the A.G. defends state agencies on NRS 239 and whereas the A.G. is over one year behind in his mandatory "shall" OML investigations, rendering them moot, the idea of assigning responsivity to the A.G. must be abandoned, a non-starter.

Summary: PDR Task Force: Do Something!

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Fifth Meeting: August 5, 2026

Written Public Comment

From:	Kathleen Light
To:	AGGeneralCounsel
Subject:	Re: Public Records Task Force Comments
Date:	Wednesday, July 22, 2026 6:26:25 PM
Attachments:	Nevada_DOI_to_AGO_Two_Page_Analysis.pdf 193813 2.pdf 203813 2.pdf 20173813.pdf Cassetty.David - Separation Agreement - fully executed_Redacted.pdf Blue-LEO-SARS-Report-20241218-1816_FINAL.pdf Eb5subpena.pdf

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I forgot! Sorry let me add this:

Kathleen Faye Light

On Wed, Jul 22, 2026 at 5:12 PM Kathleen Light <vegasquill@gmail.com> wrote:

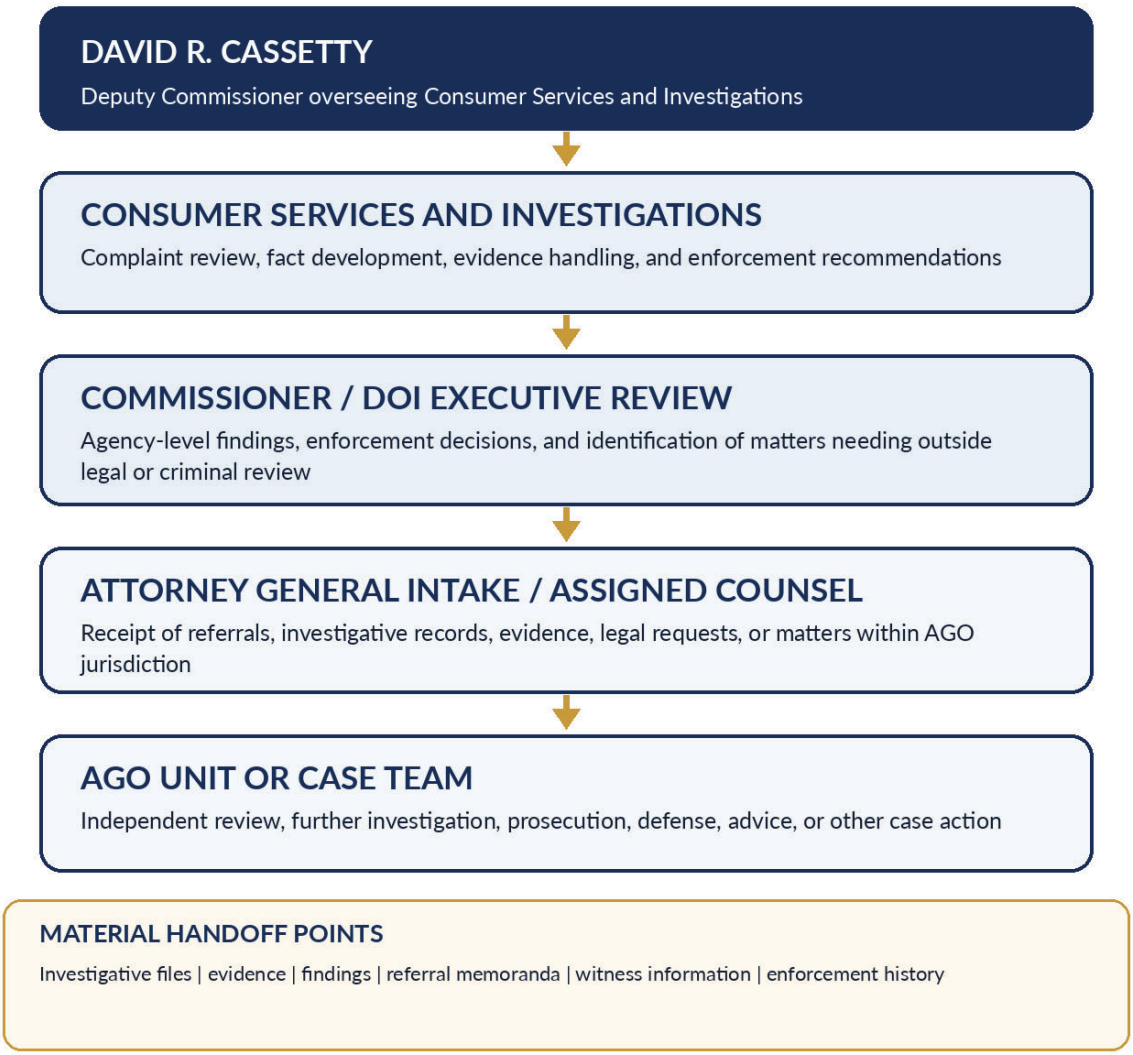
> Hi!
>
> Great to hear everyone's opinions today. Sorry my mic cut off unexpectedly before I finished.
>
> Here are my written comments.
>
> And for reference:
> https://aoa.vermont.gov/statewide-public-record-requests
>
> https://ago.vermont.gov/public-records-requests
>
> https://eb5.vermont.gov/legal-documents
>
> They are on the ball in Vermont. Love them.
>
> Kathleen Faye Light

Nevada DOI Investigation-to-AGO Case Path

INSTITUTIONAL MOVEMENT FROM THE INVESTIGATIONS FUNCTION OVERSEEN BY DAVID R. CASSETTY

This chart follows the movement of a matter. It does not place the Attorney General's Office inside DOI's reporting hierarchy.

MATTER FLOW, NOT COMMAND HIERARCHY

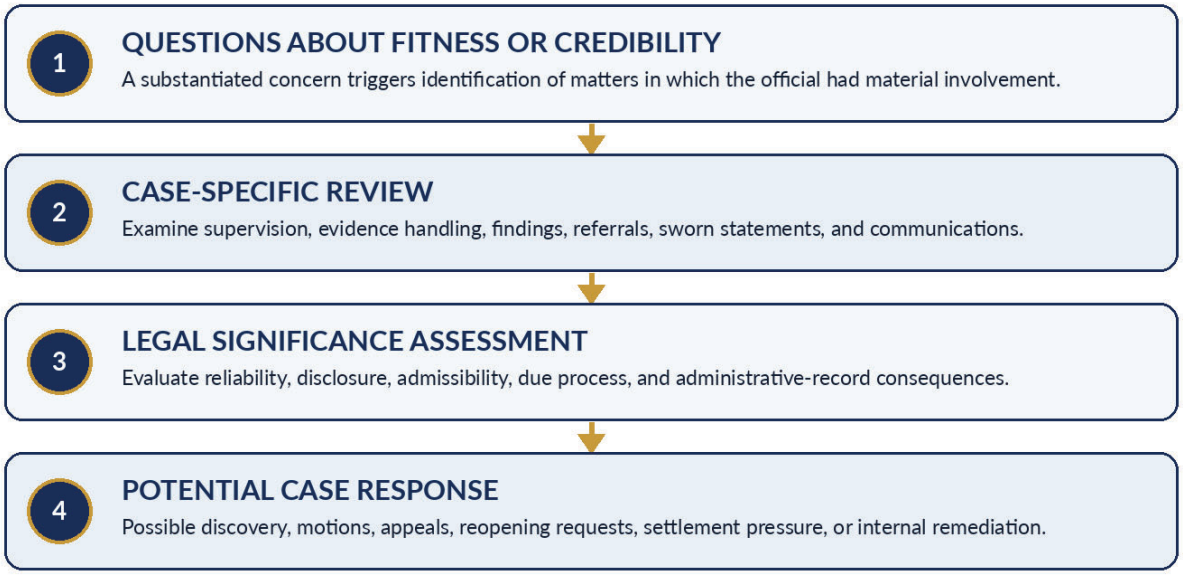


LEGAL SCOPE: NRS 228.412 gives the Attorney General primary jurisdiction over alleged insurance fraud and authorizes the AGO Fraud Control Unit to inspect DOI and Commissioner records upon written request. It does not state a blanket automatic referral rule for every DOI matter.

Potential Impact on Attorney General Matters

WHY FITNESS FOR A SENIOR INVESTIGATIVE POSITION CAN BECOME CASE-SIGNIFICANT

Questions about a senior official's fitness, credibility, judgment, or conduct can reach beyond employment consequences when that official materially shaped investigations later used by the Attorney General's Office. The impact is potentially serious, but it must be tied to particular matters and particular acts.



WHEN THE RISK IS GREATEST	POSSIBLE CASE CONSEQUENCES
• Direct participation in an investigation or referral • Control over evidence, records, or witness information • Approval of findings or enforcement recommendations • Sworn statements, testimony, or credibility relied upon by the AGO • A clear link between the questioned conduct and a material case decision	• Targeted discovery or public-record requests • Credibility or impeachment challenges • Challenges to completeness, authentication, or evidentiary reliability • Administrative review, motions, appeals, or reopening requests • In criminal matters, possible disclosure questions if the information is material

IMPORTANT LIMITATION: Questions about fitness do not automatically invalidate AGO cases. The strongest challenge requires a concrete nexus between Cassetty's involvement and a material item of evidence, investigative judgment, referral, witness account, or AGO decision.

Sources and framing: Nevada Division of Insurance, Consumer Services and Enforcement; NRS 228.412; NRS 228.120. This is an institutional issue-spotting document, not a conclusion that any particular case is invalid.

From:	WatchDogJeff
To:	AGGeneralCounsel
Cc:	Leslie M. Nino Piro; Yoon C. Lee; mccartyc@ballardspahr.com
Subject:	Public Comment/ PDR Task Force
Date:	Monday, August 3, 2026 9:48:17 AM
Attachments:	PDR TF Aug PublicComment by Jeff Church.docx

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

See attached for the August 5 meeting.
It appears that you are in violation (again) of OML in that the link on the NV Notices website shows No August meeting. (see attached). This ongoing violation represents not a technical issue, but indifference, laziness, and distain for the public. A technical issue is an internet connection gone bad. This is human caused be it intentional or incompetence. (I'd love to have to apologize).

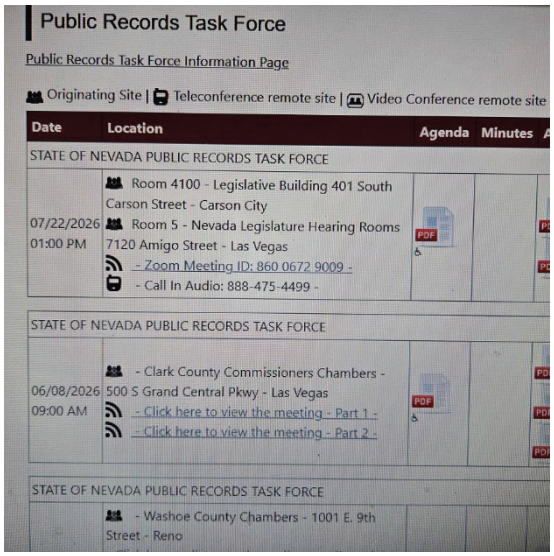
Jeff Church
WatchDogJeff.com
RenoTaxRevolt.com
775 544 7366

August, 2026
Public Document Task Force
Subj: Public Comment:

From: Jeff Church, RenoTaxRevolt,com, RenoTaxRevolt@Sbcglobal.net

Task Force:

Your distain for the public is shown not only here but in your ongoing violations of Open Meeting Law (OML) including the posting (see attached) for this August Task Force Meeting. At a minimum the failure to post this meeting via the NV Notice website is laziness and indifference. Did no one check? I know, call it another "technical error" and ignore the law and continue with the meeting. https://ag.nv.gov/Hot_Topics/Public_Records_Task_Force/



The link shows NO August meeting of the Task Force but press on anyway

Unless I missed something, you- AGAIN- are in violation of OML but who cares? The A.G. is over a year behind in addressing OML violations rendering them moot and the only other recourse is litigation. I pay an attorney and the government uses my tax dollars to defend it (and often lose). And who coordinates this group- the A.G.? (Leslie M. Nino Piro, Office of the Attorney General)

It is becoming obvious that nothing good will come of this "Task Force" to represent the interests of the public and in favor of transparency. It is a "circle the wagons" mentality.

Over and over diligent efforts of the media (and I praise ThisIsReno), myself and others have fought long battles to uncover the truth as government delays, obstructs and uses tax dollars to avoid transparency that often reveals corruption, mismanagement, favoritism, and similar. Example after example was presented and ignored.

Just last month I filed a fairly simple PDR request with three agencies and in two cases: no response in the 5 day time frame and the other is working on it- spell that delaying

and circling the wagons. Part if that with the three is simply asking for a copy of a contract (which I suspect does not exist). How hard is that to answer? And the main agency is famous for their avoidance of compliance with PDRs.

The system is broken. If anyone cares, there must be an expedited system of resolution and generally that would involve an in-camera review by a hearing officer, ombudsman or other legal resource short of District Court. There is no reason that a small claims (attorney) Judge could not hear these as they'd quickly learn the nuances of the law (OML as well).

What should you do, at a minimum?

1.Suggest a study (another delay) of other states processes
- I'd suggest reaching out to UNR and UNLV for a dual blind study, perhaps a student working on the Masters or PhD.

2. Create a hearing officer but a highly expedited process.
- The NV RED CIC is a perfect example of how NOT to do it. They make filing a complaint unnecessarily burdensome of the taxpayer/ citizen.
- I hate to create a new bureaucracy thus pondering small claims but also maybe under NCOE but any process must be expedited. Clearly it cannot be under the AG who is MIA on OML matters.
- Example: Request filed, 5 days and no detailed specific response. Written notice by the requestor and 5 more days (not certified mail that takes too long and too burdensome), Complaint filed and agency noticed by the hearing officer with 5 days, hearing held within 5 additional days (Zoom style acceptable) with in camera review. Decision in 5 days if not immediately. Hearing officer sets a time frame for compliance and penalties assessed if beyond. A result in less than 30 days and at a low cost.

3. Provide for an expedited in-camera review and decision.
- The confidential review by the hearing officer is important as it may evidence of wrong doing, cover-up, malfeasance, etc.
- Think it can't happen in an agency? Just "Google" Beaumont or Bell (both California) corruption. https://beaumontgate.org/ (7 felony convictions of high ranking City officials, including the City Attorney and Manager)

4. Allow penalties to be assessed. Especially in cases where the agency is a repeated offender or is shown to be acting with intentional disregard for the law/ cover-up.

5. Address OML in any law as the two are kissing cousins and issues are linked.

6. Clarify that saying within 5 days "we are working on it" does not satisfy the legislative intent. Response must be specific as to why, estimated compliance, etc.

7. If you don't advocate for any of these, why not? Circle the wagons. Why would you oppose an expedited system with in-camera review? Seriously, why? Do you believe the present system is working in favor of the citizens?

From: John Quintero
To: AGGeneralCounsel
Subject: Re: Public Records Task Force
Date: Sunday, August 2, 2026 1:25:35 PM
Attachments: image002.png
239Taskforce.docx

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi, I have attached a public comment, but I will be attending the meeting as well and may choose to summarize what I've submitted on the record in person. Thank you so much for delivering the agenda and the minutes from the last meeting.
John Quintero, 775-276-2773

Get Outlook for iOS

From: AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov>
Sent: Friday, 31 July 2026 10:22:36
To: AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov>
Subject: Public Records Task Force

Good morning,

Please see attached agenda, meeting minutes and supporting materials for the upcoming Public Records Task Force meeting being held on Wednesday, August 5, 2026.

Thank you.

Sincerely,

State of Nevada
Office of the Attorney General

Office of General Counsel

Leslie M. Nino Piro, General Counsel
Sophia G. Long, Deputy General Counsel
Jeffrey W. Chronister, Deputy General Counsel

Email: AGGeneralCounsel@ag.nv.gov

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received this message in error, please notify the sender immediately and destroy all copies.

The concern is that any proposed amendments to Nevada's public records statutes should be carefully drafted to avoid unintended consequences, including the creation of procedural barriers that could limit access for incarcerated individuals. The "any person" language in NRS Chapter 239 is a foundational feature of Nevada's public records framework and serves as a broad mechanism for transparency and accountability, including in institutional settings where direct public oversight is limited.

The history surrounding Senate Bill 57 (BDR 16-342) is best understood in its institutional context.

The following account is based on my firsthand experience as an incarcerated litigant and participant in the Nevada Department of Corrections grievance process during the relevant period.

Prior to approximately 2010, the Department operated under a different administrative approach. During that time, institutional programming included gardening and greenhouse work, expanded religious services, and a food service system that, in my observation, was nutritionally balanced and operationally efficient. At Northern Nevada Correctional Center, the kitchen program included a rotating menu incorporating multiple protein sources, vegetables, salads, and daily soups utilizing appropriate surplus ingredients. These practices are consistent with standard institutional food service operations and reflected structured nutritional planning and waste reduction.

Following a change in departmental leadership, incarcerated individuals observed shifts in institutional priorities. Food service was reduced, hot lunch service was largely discontinued, and access to certain religious programming was restricted. These changes were generally justified on the basis of institutional safety and security considerations.

As these changes occurred, incarcerated persons increasingly relied on the Department's grievance process. When grievances were not resolved, some individuals, including myself, pursued civil litigation in federal court. Because incarcerated litigants are rarely appointed counsel in civil rights cases, the Nevada Public Records Act (NRS Chapter 239) became one of the few available mechanisms to obtain documentary evidence relevant to institutional justifications for policy changes.

Requests for historical menus and related records were submitted to compare prior and current practices and to evaluate whether stated operational or fiscal justifications were supported by existing records. Similar requests were made for other policies that were the subject of litigation.

From my perspective as a participant in these events, the Department's support for Senate Bill 57 (BDR 16-342), which would have restricted incarcerated persons' access to public records, occurred in the context of increased reliance on NRS Chapter 239 by incarcerated litigants pursuing civil claims.

Whether that legislative proposal was motivated by those circumstances is a determination for the Legislature. However, the sequence is notable: increased use of public records requests by

incarcerated individuals was followed by a proposal that would have limited their access to the Public Records Act. The Legislature ultimately did not enact the measure.

Proposed considerations

Based on my experience with public records access and dispute resolution, I respectfully offer the following considerations for the Task Force's review:

1. **Attorney review of contested denials:** Consider requiring public records officers to consult with agency counsel before issuing denials that present close or ambiguous legal questions. Any such consultation and resulting determination should be documented and preserved as part of the administrative record for potential review.
2. **Structured dispute resolution:** Consider establishing a mandatory mediation process for contested public records denials, with the option of binding arbitration subject to judicial review by the district court and, if necessary, appellate review by the Nevada Supreme Court.
3. **Centralized review in correctional settings:** In the prison context, consider routing initial denials of public records requests through a designated review unit within the Attorney General's Public Safety Division prior to any internal administrative appeal process, to ensure consistency and legal oversight at the earliest stage.

From:	David
To:	AGGeneralCounsel
Subject:	Re: Public Records Task Force
Date:	Monday, August 3, 2026 1:38:36 PM
Attachments:	image002.png

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

State of Nevada Public Records Task Force
Meeting of August 5, 2026 | Agenda Items 5, 6, 7, 8, 9, 10, 11

Submitted By	Nevada Citizen — Public Interest Filing
Date	August 4, 2026 (submitted in writing, one business day prior per Task Force rules)
Contact	David Lee Nace | lvsms.2006@gmail.com | (702) 689-0580
Re: Agenda	Items 5 (Law Enforcement), 6 (Transparency), 7 (State Bar / Public Lawyers), 8 (NDOT), 9 (NNLE Records), 10 (Fee Schedules), 11 (Evaluations & Recommendations)
Word Count	Under 2,000 words (two-page submission per Task Force written comment rules)

I. THRESHOLD ISSUE: THE TASK FORCE CANNOT EVALUATE PUBLIC RECORDS ACCESS WITHOUT ADDRESSING VENDOR CAPTURE OF NEVADA'S RECORD-KEEPING INFRASTRUCTURE

The Task Force's mandate under AB 128 is to evaluate public access to government records. That evaluation is incomplete — and its conclusions will be structurally unsound — unless the Task Force confronts a foundational fact: Nevada's primary government computing infrastructure is no longer under Nevada public law.

On October 10, 2017 — the same date as Switch, Inc.'s NYSE IPO — the State of Nevada executed a Master Service Agreement (MSA) with Switch, Ltd. State CIO Michael Dietrich formalized this in Policy Directive AD 2018-01 (June 11, 2018), directing all Nevada state agencies to migrate their computing environments to Switch's Citadel campus in Reno through a centralized Virtual Compute Pool (VCP). No documented competitive procurement under NRS Chapter 333 has been produced or published. The MSA-IPO date alignment is a fact of public record, not a theory.

Switch was taken private in December 2022 by DigitalBridge (NYSE: DBRG, ~$115B AUM, subject to SEC disclosure) and IFM Investors (Melbourne, Australia, AU$266.1B AUM, subject to Australian and UK regulatory oversight — not Nevada law). A pending acquisition by SoftBank Group Corp. (Tokyo, Japan, via Duncan Holdco LLC) has not received confirmed CFIUS clearance as of this filing. Nevada government data — including the records that are the subject of

this Task Force's inquiry — now resides within an ownership chain that spans three foreign jurisdictions, with no contract clause imposing NRS Chapter 239 obligations on any entity beyond Switch, Ltd.

> DIRECT RELEVANCE TO THIS TASK FORCE: The Task Force is evaluating public records access, fee structures, dispute resolution, and agency response timelines. Each of those functions depends on the integrity and accessibility of the underlying record. If the record sits on infrastructure owned or operationally controlled by foreign entities not subject to Nevada public records law, the Task Force's recommendations — however well-crafted — address the symptom while ignoring the cause.

II. SPECIFIC COMMENTS ON AGENDA ITEMS

Agenda Item 5 — Law Enforcement Records (Las Vegas Police Protective Association)

The Task Force discussion of law enforcement records and NRS Chapter 239 exemptions must account for a specific structural problem: body-worn camera footage and law enforcement operational data that resides on Switch infrastructure is subject to the same foreign-ownership chain described above. The Metropolitan Police Department's published fee schedule of $89/hour for review and redaction (cited in the July 22, 2026 minutes) is a legitimate cost-recovery mechanism. However, the Task Force should recommend that any agency storing law enforcement records at a third-party facility under a sole-source contract include explicit NRS Chapter 239 audit-right provisions in that contract — provisions that are currently absent from the Switch MSA as publicly documented.

Agenda Item 6 — Transparency (Reporter's Committee for Freedom of the Press)

The Reporters Committee's presentation will address transparency entities' considerations under AB 128, Section 7.2(a). This commenter respectfully submits that transparency in Nevada government records is structurally compromised by the following documented conditions, each of which should be incorporated into the Task Force's written report under Section 7.9:

- **Sole-Source Vendor Lock-In:** Policy Directive AD 2018-01 created a de facto exclusive dealing arrangement with a single private vendor (Switch, Ltd.) for all state agency computing. Competitive procurement under NRS Chapter 333 requires documented sole-source justification. No such justification has been produced.
- **No Public Audit Rights Over State Data Hosted at Switch:** Switch's

proprietary SUPERLOOP network and LDC monitoring platform are not subject to independent audit under NRS Chapter 239. The public has no statutory right to inspect Switch's operational logs, access records, or data handling practices — despite the fact that Switch holds Nevada agency data under a publicly-funded MSA.

• **Attorney General Conflict:** The Nevada Ethics Commission voted on February 11, 2026 to advance a formal complaint against AG Aaron Ford to the full Commission (complaint opened September 2025 by Executive Director Ross Armstrong). The complaint concerns accepted travel funding from organizations funded by regulated industries. The AG's office is simultaneously: (a) an institutional Switch MSA beneficiary; (b) the state's primary public records enforcement authority; and (c) directed by a 2026 gubernatorial candidate. This structural conflict disqualifies the AG's office from any enforcement role involving Switch and must be disclosed in any Task Force report referencing the AG's office as an enforcement mechanism.

Agenda Items 7 & 8 — State Bar Public Lawyers and NDOT

Both presentations will address government entities' considerations. This commenter draws the Task Force's attention to a specific SEFA compliance concern that affects state agencies including NDOT: under 2 CFR Part 200 (OMB Uniform Guidance), any state agency expending federal award funds on a vendor operating under a contingency fee arrangement violates 2 CFR § 200.319(a)(6). The unclaimed property audit vendors identified below operate on contingency fee arrangements. If any Nevada state agency — including NDOT — has used federal award funds to pay these vendors, or to pay Switch MSA costs classified as federal award expenditures, those payments may constitute false claims under 31 U.S.C. § 3729 (False Claims Act).

Agenda Items 9 & 10 — Northern Nevada Law Enforcement Records; Fee Schedules

Member Colleen McCarty's compilation of fee schedules is directly relevant to the following documented pattern: Nevada's unclaimed property system experienced a ransomware attack beginning August 25, 2025, which shut down public access to the State Treasurer's unclaimed property portal. During that shutdown — which is ongoing as of this filing — Nevada residents with verified unclaimed property claims of documented amounts (in the case of this commenter, $26,003.72 in verified claims) were denied access to their property without alternative access mechanism, without a published restoration timeline, and without a published incident report accessible under NRS Chapter 239. The Task Force should address: (a) whether a ransomware-induced shutdown of a public records system triggers NRS Chapter 239 disclosure obligations; and (b) whether the fee schedule for accessing records through alternative means

during a system outage must be published at an open meeting as required by NRS.

Agenda Item 11 — Evaluations and Recommendations

This commenter respectfully urges the Task Force to incorporate the following specific recommendations into its written report under AB 128, Section 7.9:

Recommendation	Statutory Authority	Relevance to Task Force Mandate
Require all state agency MSAs with private computing vendors to include explicit NRS Chapter 239 audit-right provisions, with no sole-source exemption.	NRS Ch. 333; NRS Ch. 239; 41 U.S.C. § 2101	Sections 3.1, 4.1, 4.2 — custodianship and control; exemptions review
Require CFIUS notification disclosure whenever a foreign entity acquires operational control over infrastructure hosting Nevada government data.	50 U.S.C. § 4565 (CFIUS); NRS 239.010	Section 4.1 — clarification of custodianship and control
Prohibit contingency fee arrangements for unclaimed property audit vendors paid with federal award funds; require SEFA disclosure of all vendor payments.	2 CFR § 200.319; 31 U.S.C. § 3729; NRS Ch. 120A	Sections 3.5, 4.4 — fee structures; penalties for non-disclosure
Define 'custodian of public records' to expressly include private vendors operating under state MSAs, with co-equal NRS Chapter 239 obligations.	NRS 239.010; NRS 239.052	Section 4.1 — custodianship; Section 3.6 — dispute resolution
Mandate immutable blockchain-based public ledger for all state vendor payments, MSA expenditures, and unclaimed property audit vendor fees, accessible under NRS Chapter 239.	AB 128 § 7.2(a); NRS Ch. 239; 2 CFR § 200.510	Sections 3.7, 5.1-5.2 — data collection; proactive disclosure
Require any state agency that suffers a ransomware-induced system shutdown to publish a NRS Chapter 239-compliant incident report within 5 business days and provide alternative access to pending claims without fee escalation.	NRS Ch. 239; NRS Ch. 120A	Section 4.4 — penalties for delayed or incomplete responses

III. DOCUMENTED VENDOR NETWORK — FOR TASK FORCE RECORD

The following third-party unclaimed property audit vendors have been identified in public records and NAUPA filings as operating in Nevada. Each operates under contingency fee arrangements. The Task Force's compilation of fee schedules under Agenda Item 10 should include a request to the Nevada State Treasurer for the complete contracts of each:

- Avenu Insights & Analytics — revenue discovery; government analytics; opaque revenue-sharing arrangements
- Kroll / Kroll Government Solutions — unclaimed property audits; 2025 NAUPA award recipient
- Kelmar Associates, LLC — state unclaimed property audits; NAST

corporate affiliate

• Audit Services US LLC — relationship to Specialty Audit Services and Discovery Audit Services requires forensic examination

• Discovery Audit Services LLC — 2024 NAUPA Education award recipient; Baton Rouge LA

• Specialty Audit Services, LLC — overlapping industry associations with Kelmar, Discovery, and Kroll

• EECS LLC — identity verification required; subpoena of Nevada state contracts warranted

• Treasury Services Group, LLC — advises state treasurers while conducting audits under those treasurers' supervision (GAGAS § 3.22 self-review threat)

• Verus LLC — data-matching operations require access to state beneficiary records

• Social Entrepreneurs, Inc. (SEI) — mission-funding hybrid with public fund receipt; SEFA subrecipient classification unverified

FORENSIC CONCERN: All of the above vendors access Nevada beneficiary data through Switch infrastructure under the AD 2018-01 MSA. That data traverses Switch's SUPERLOOP network and LDC monitoring platform — neither of which is subject to independent NRS Chapter 239 audit. The combination of contingency fee vendor access and foreign-owned infrastructure hosting is the specific architecture this Task Force's report should address.

IV. CONCLUSION

The Task Force's final report, due by October 2026 per AB 128, will be relied upon by the Nevada Legislature in crafting public records law for the next session. This commenter respectfully submits that a report which evaluates public records access without addressing: (a) the sole-source vendor lock-in of state computing infrastructure; (b) the foreign acquisition of that infrastructure; (c) the absence of NRS Chapter 239 audit rights over that infrastructure; and (d) the contingency fee vendor network that accesses Nevada beneficiary data through that infrastructure — will be incomplete as a matter of law and policy.

The July 22, 2026 meeting minutes reflect that members themselves identified the difficulty of being 'fully exhaustive given the volume of statutes and cross-references.' This comment is submitted to assist the Task Force in being exhaustive on precisely those cross-references — between public records law, federal grant compliance, unclaimed property law, and state procurement integrity — that will otherwise fall outside any single presenter's scope.

This comment is submitted in good faith as a public interest filing. All factual claims are traceable to: Policy Directive AD 2018-01 (DEITS); Switch Form 10-K (SEC); DigitalBridge Form 10-K (SEC, Dec. 31, 2025); Nevada Ethics Commission records (complaint opened September 2025, advanced February 11, 2026); NAUPA public records; and 2 CFR Part 200. This document does not constitute legal advice and does not commence any legal proceeding.

Submitted electronically to AGGeneralCounsel@ag.nv.gov per Task Force written comment rules

David Lee Nace

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Sixth Meeting: September 29, 2026

Written Public Comment

COMMENTS BY CPJ

(Citizens for Participatory Justice)

775 276 2773

Boots on the ground observations:

REFERENCE to Mandate of Assembly Bill No. 128 Sec. 7 (2)(a)(1-7) and (b)(1-7)

Sec. 7(2) (a)(1) **Exemptions**

NRS 239.008 Designation of records official for certain state agencies; forms and procedures applicable to requests for public books or records.

NRS 239 "The State Library, Archives and Public Records Administrator, pursuant to NRS 378.255 and in cooperation with the Attorney General, shall prescribe:

(a) The form for a request by a person to inspect, copy or receive a copy of a public book or record of an agency of the Executive Department pursuant to NRS 239.0107;

Local district attorney offices are not globally exempt from NPRA nor from NRS 233B's requirement to extablish regulation which should be open to the public comment procedure by citizens of Nevada. Many DA websites do NOT announce availability of NPRA services to the public, and other agencies in the law enforcement community seem to NOT have any official form created by the mandate prescribed above.

I support the complaint testified in earlier meetings, by the lady who is trying to get records regarding the allegation of malfeasance against a government official. This governmental omission constitutes a "circle-the-wagon" attitude on a matter that ought to be taken up for investigation by appropriate agencies. The omission has an appearance of severe conflict of interest of protecting the government's appearance of propriety and maintaining a glamorous image rather than being exposed to serious flaws caused by certain employees of that government. This is done under the color of the ambiguous legal concept of "sensitive information" and "personal information". This behavior is rooted in the "indemnification" concept which seems to all employees at all time except and all circumstances.

I once observed a case of this when a defendant requested the body cam of an arrest through NPRA and the justice system refused until the Nevada Supreme Court ordered its disclosure.

Prior to approximately 2010, the Department operated under a different administrative approach. During that time, institutional programming included gardening and greenhouse work, expanded religious services, and a food service system that, in my observation, was nutritionally balanced and operationally efficient. At Northern Nevada Correctional Center, the kitchen program included a rotating menu incorporating multiple protein sources, vegetables, salads, and daily soups utilizing appropriate surplus ingredients. These practices are consistent with standard institutional food service operations and reflected structured nutritional planning and waste reduction.

Following a change in departmental leadership, incarcerated individuals observed shifts in institutional priorities. Food service was reduced, hot lunch service was largely discontinued, and access to certain religious programming was restricted. These changes were generally justified on the basis of institutional safety and security considerations.

As these changes occurred, incarcerated persons increasingly relied on the Department's grievance process. When grievances were not resolved, some individuals, including myself, pursued civil litigation in federal court. Because incarcerated litigants are rarely appointed counsel in civil rights cases, the Nevada Public Records Act (NRS Chapter 239) became one of the few available mechanisms to obtain documentary evidence relevant to institutional justifications for policy changes.

Requests for historical menus and related records were submitted to compare prior and current practices and to evaluate whether stated operational or fiscal justifications were supported by existing records. Similar requests were made for other policies that were the subject of litigation.

From my perspective as a participant in these events, the Department's support for Senate Bill 57 (BDR 16-342), which would have restricted incarcerated persons' access to public records, occurred in the context of increased reliance on NRS Chapter 239 by incarcerated litigants pursuing civil claims.

Whether that legislative proposal was motivated by those circumstances is a determination for the Legislature. However, the sequence is notable: increased use of public records requests by incarcerated individuals was followed by a proposal that would have limited their access to the Public Records Act. The Legislature ultimately did not enact the measure.

Proposed considerations

Based on my experience with public records access and dispute resolution, I respectfully offer the following considerations for the Task Force's review:

1. **Attorney review of contested denials:** Consider requiring public records officers to consult with agency counsel before issuing denials that present close or ambiguous legal questions. Any such consultation and resulting determination should be documented and preserved as part of the administrative record for potential review.
2. **Structured dispute resolution:** Consider establishing a mandatory mediation process for contested public records denials, with the option of binding arbitration subject to judicial review by the district court and, if necessary, appellate review by the Nevada Supreme Court.
3. **Centralized review in correctional settings:** In the prison context, consider routing initial denials of public records requests through a designated review unit within the Attorney General's Public Safety Division prior to any internal administrative appeal process, to ensure consistency and legal oversight at the earliest stage.

From: Ashley
To: AGGeneralCounsel
Subject: Nevada Public Records Task Force — Correctional Transparency & Practical Records Access
Date: Wednesday, September 9, 2026 12:40:40 PM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Members of the Nevada Public Records Task Force,

My name is Ashley Masiofo, Co-Founder of Prisoners Behind Broken Bars (Px3B), an independent Nevada prison transparency, reporting, advocacy and reentry organization.

I'm reaching out because the Task Force's work examining Nevada's public-records system intersects directly with an issue Px3B encounters repeatedly: the difference between information technically being public and that information being practically accessible and useful.

Px3B operates from both sides of Nevada's correctional system. My co-founder operates from within NDOC while I oversee our Free-World infrastructure.

Our Operations & Control Center preserves information from incarcerated people, families, witnesses, correctional employees, public records and other sources while connecting related incidents, facilities, staff and entities, evidence, medical or mental-health chronology, institutional responses and developing intelligence.

Public records are essential to that work.

They allow an outside organization to compare what people report from inside institutions with policies, contracts, audits, disciplinary information, financial records, court filings, mortality information, staffing information and other government documentation.

But correctional transparency presents unusual accessibility problems.

An incarcerated person may have extremely limited research capability, no ordinary internet access and little ability to navigate multiple agencies or complex records procedures. Families may not know what records exist or which government entity maintains them. Small advocacy organizations can encounter fragmented records across agencies, inconsistent terminology, extensive redactions, difficult-to-search formats and data that technically exists but cannot easily be connected across years or institutions.

Px3B therefore has a strong interest in the Task Force's work.

We're not asking the Task Force to adjudicate an individual public-records dispute or accept Px3B's interpretation of any particular request.

We would instead like to offer a correctional-transparency perspective as the Task Force considers how Nevada's public-records system functions in practice.

Several questions are especially important to us:

How can agencies make frequently requested correctional information proactively available rather than requiring repeated individual requests?

How can public datasets be published in formats that allow meaningful analysis instead of only visual inspection?

How should agencies preserve consistency in terminology and historical records so trends can be evaluated?

And how can Nevada improve practical records accessibility for members of the public—including incarcerated people and their families—who do not have sophisticated legal or technical resources?

Px3B would welcome an opportunity to provide the Task Force with examples of the types of correctional information our organization attempts to locate, organize and preserve, as well as practical barriers we encounter.

We would also be interested in learning whether the Task Force is seeking stakeholder submissions, recommendations or examples that may assist its eventual report to the Legislature.

Transparency isn't meaningful simply because a record technically exists.

It becomes meaningful when the public can reasonably find it, understand it and use it to evaluate government performance.

We appreciate the Task Force undertaking that work and would be glad to contribute a correctional-system perspective where useful.

Respectfully,

Ashley Masiofo
Co-Founder & Director of Operations
Prisoners Behind Broken Bars (Px3B)
www.Px3Bnv.org

From: David
To: AGGeneralCounsel
Subject: Re: Public Records Task Force
Date: Saturday, September 26, 2026 10:41:50 AM
Attachments: image001.png

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

PUBLIC COMMENT FOR THE PUBLIC RECORDS TASK FORCE

Submitted for the September 29, 2026 Meeting

By: David Lee Nace — Nevada Resident, Public-Interest Fiduciary Oversight

Chair Hicks, Vice-Chair Work, and Members of the Public Records Task Force:

Thank you for the opportunity to provide public comment. I submit this statement in good faith and in support of the Task Force's mandate under **AB 128** to strengthen transparency, improve public-records access, and ensure accountability across Nevada's public-trust systems.

My comment summarizes **findings of fact** drawn from the Task Force's **August 5, 2026 meeting minutes**, the **September 29, 2026 agenda**, and Nevada's broader public-records and fiduciary-risk environment. These findings highlight **structural red flags, omissions, and inconsistencies** that may be unintentionally limiting transparency, delaying accountability, and preventing reunification of misallocated public funds.

I. Findings of Fact Based on Task Force Records

1. Repeated Deferral of High-Impact Transparency Items

Across the August 5 minutes and the September 29 agenda, multiple items central to transparency were **postponed**, **moved to future agendas**, or **left without action**, including:

- Government entity considerations under AB 128
- Public records requests to Northern Nevada law enforcement
- Public-records fee schedules
- Exemptions under NRS 239

- Standardized fee schedules
- Data-sharing methods
- Technology committee formation

Finding: The Task Force has not yet taken action on several core transparency issues required for a complete AB 128 report.

2. Absence of Discussion on High-Risk Fiduciary Systems

Despite public-records being the gateway to accountability, the Task Force has not discussed:

- Unclaimed property (NRS 120A)
- SEFA federal-fund compliance
- Vendor custody chains (Kelmar, Avenu, Kroll, DAS)
- Foreign-custody risks (Switch → DigitalBridge → SoftBank)
- Identity-fragmentation patterns
- Court-registry fund transparency
- Procurement irregularities (AD 2018-01)
- Pension-trust inflows (NVPERS/JRS)

Finding: Key fiduciary-risk systems remain unexamined, despite their direct relevance to public-records access and public-trust integrity.

3. Ambiguous and Non-Committal Language in Task Force Proceedings

The minutes and agenda contain repeated use of ambiguous terms such as:

- “Possible action”
- “May be taken out of order”
- “May delay or remove an item”
- “No action was taken”
- “Moved to a future agenda”
- “Discussion postponed”

Finding: Ambiguity in procedural language may unintentionally enable indefinite postponement of transparency reforms.

4. No Mention of Misallocated Funds or SEFA Compliance

Nevada receives **$7.8B–$10.8B annually** in federal funds yet ranks:

- 48th–51st in education
- 51st in mental health
- 47th in child well-being
- Last in affordable housing

The Task Force has not discussed:

- SEFA misclassification
- Questioned costs under 2 CFR 200.511
- Single Audit obligations
- Federal-fund stewardship

Finding: Public-records oversight is not yet connected to federal-fund accountability, despite clear statutory overlap.

5. State Bar of Nevada's Role Focused on Confidentiality, Not Transparency

During the August 5 meeting, the State Bar representative presented on:

- Personnel confidentiality
- Privileges
- Cost barriers
- Third-party vendors
- Manual updates

The Bar did **not** address:

- Fiduciary-risk disclosure
- Public-trust stewardship
- Transparency obligations
- Misallocated funds
- Vendor custody risks

Finding: The Bar's contribution focused on limiting access rather than expanding transparency.

6. Public Concerns Acknowledged but Not Acted Upon

Public commenters raised concerns about:

- Obfuscated records
- Delayed responses
- Incorrect or unrelated documents
- Need for mediation
- Need for an ombudsman

The minutes show:

- Comments were acknowledged
- No follow-up actions were taken
- No integration into agenda items

Finding: Public concerns have not yet been incorporated into actionable transparency reforms.

II. Red Flags and Structural Risks Affecting Transparency & Accountability

Based on the Task Force's proceedings and Nevada's broader fiduciary environment, the following red flags are evident:

1. Transparency items repeatedly deferred

2. High-risk fiduciary systems omitted from discussion

3. Ambiguous procedural language enabling delays

4. No integration of public-records oversight with SEFA compliance

5. State Bar focus on confidentiality rather than stewardship

6. Vendor custody risks not addressed

7. Foreign-custody exposure not acknowledged

8. Identity-fragmentation patterns not examined

9. Regulatory commingling not discussed

10. Public concerns not converted into action items

These red flags may unintentionally hinder Nevada's ability to:

- Improve transparency
- Ensure accountability
- Reconcile misallocated funds
- Restore public trust
- Produce a complete AB 128 report

III. Request to the Task Force

In alignment with AB 128's mandate, I respectfully request that the Task Force:

1. **Acknowledge these findings of fact** in the September 29 meeting record.
2. **Integrate high-risk fiduciary systems** (unclaimed property, SEFA, vendor custody, identity systems) into future agendas.
3. **Address repeated deferrals** of core transparency topics.
4. **Review ambiguous procedural language** that may impede action.
5. **Evaluate the role of the State Bar** in transparency and fiduciary stewardship.
6. **Consider a statewide ombudsman** as raised in public comment.
7. **Ensure that public-records oversight includes financial-custody systems**, not only administrative workflows.

These steps will strengthen Nevada's transparency framework and support reunification of misallocated public funds.

IV. Closing Statement

Thank you for your time and for your service on the Public Records Task Force. This comment is submitted respectfully, in good faith, and for the benefit of all Nevada residents.

Submitted by: David Lee Nace Las Vegas, Nevada NV-SEFA-001 Email: lvsms.2006@gmail.com Phone: (702) 689-0580

From:	WatchDogJeff
To:	AGGeneralCounsel
Subject:	Re: Public Records Task Force
Date:	Sunday, September 27, 2026 9:32:15 PM
Attachments:	PC PRTF Sept 2026.doc image001.png

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Public Comment for Public Records September 29 Task Force

Jeff Church
WatchDogJeff.com

On Friday, September 25, 2026 at 08:23:28 AM PDT, AGGeneralCounsel <aggeneralcounsel@ag.nv.gov> wrote:

Good morning,

Please see attached agenda and meeting minutes for the upcoming Public Records Task Force meeting being held on Tuesday, September 29, 2026.

Thank you.

Sincerely,

State of Nevada
Office of the Attorney General

Office of General Counsel
Leslie M. Nino Piro, General Counsel
Sophia G. Long, Deputy General Counsel
Jeffrey W. Chronister, Deputy General Counsel

Email: AGGeneralCounsel@ag.nv.gov

PLEASE BE GREEN. *Please don't print this email unless necessary.*

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September 29 Public Comment for Public Records Task Force

FROM: Jeff Church, RenoTaxRevolt.com , RenoTaxRevolt@Sbcglobal.net

To Whom It May Concern:

I think it apparent that we will not see anything substantive coming out of this. A few band-aides at best. I am not aware of any attempt to look at other states. Court cases have gutted and rendered useless the Public Document Law. Agencies routinely ignore the law with no repercussions. No one is looking out for the public's interest. Likewise it is not in the government- agency interest to have expensive protracted litigation.

I suggest that creating an Ombudsman is likely the best option.

Otherwise expedite the process to allow for some quick judicial hearing similar to small claims. With modern technology that can be done by a hearing officer or Judge acting remotely.

Sincerely,

Jeff Church
RenoTaxRevolt.com
775 544-RENO (7366)
RenoTaxRevolt@Sbcglobal.net

Joe Lombardo
Governor

Joy Grimmer
Director

Mandy Hagler
Deputy Director

Mike Strom
Division Administrator

STATE OF NEVADA
DEPARTMENT OF ADMINISTRATION
Nevada State Library, Archives, and Public Records
100 N. Stewart Street | Carson City, NV 89701
Phone: (775) 684-3339 | TDD: (775) 687-8338 | Fax: (775) 684-3311

September 28, 2026

Pubic Records Task Force

Dear Task Force members,

I am writing in support of those who have testified before the Task Force recommending efforts to increase clarification of the public records request process. This includes drafting more specific definitions of terminology and providing increased guidance on the assessment of fees, particularly those concerning requests for digital records. Additional clarifications such as these will help state agencies and local governments process requests in a uniform manner and will assist the Nevada State Library, Archives and Public Records Division in providing consistent guidance during the records management training it provides. These would be good initial steps to take to promote an overall process that balances access to information, protection of sensitive information, and efficient use of staff time.

Sincerely,

Michael Strom
Division Administrator
Nevada State Library, Archives and Public Records
Department of Administration

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Seventh Meeting: October 19, 2026

Written Public Comment

From: Kathleen Mitchell
To: AGGeneralCounsel
Subject: Re: Public Records Task Force comments
Date: Thursday, October 1, 2026 7:16:58 AM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Given you cut my comments from the video available and I implore you to immediately if not sooner post the audio or the transcript. Immediately.

I will be filing a complaint regarding this, but given it is your office that has yet to respond to any complaint I have made, I will very much be reaching out to Channel 13 to see if their reporter who was sitting directly behind me recalls my comments as well as the gentlemen from the ACLU.

Please, look forward to my comments at the next meeting.

You are not the end all be all and whomever I have to get involved, I will do so.

Kathleen Light

From: Kathleen Mitchell <TheKatieMitchell@outlook.com>
Sent: Tuesday, September 29, 2026 9:01 AM
To: AGGeneralCounsel@ag.nv.gov <AGGeneralCounsel@ag.nv.gov>
Subject: Public Records Task Force comments

Hello!

I know I am limited to two pages, so I have gone ahead and shrunk this down to tow pages but I am include the full-size proposal as well

Thanks!
Kathleen Light

From: Kathleen Mitchell
To: AGGeneralCounsel
Subject: Public Records Task Force Remarks 9/29
Date: Tuesday, October 6, 2026 3:49:25 AM
Attachments: 0929prtfwrittebcimments.pdf

You don't often get email from thekatiemitchell@outlook.com. Learn why this is important

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please include the attached written comments, which closely reflect my remarks at the September 29, 2026 meeting, intact as an attachment to the minutes pursuant to NRS 241.035(1)(d).

I previously submitted a two-page written proposal. These two-page comments are a separate submission documenting my public testimony that was excluded from the recording of the meeting. Please do not combine them for purposes of the two-page limit or treat my proposal as having exhausted my opportunity to submit written comments.

Please clarify whether the agenda's advance-submission deadline concerns distribution of materials or is being used to restrict inclusion in the minutes. NRS 241.035(1)(d) does not expressly impose a prior-business-day submission deadline. If you contend that the deadline authorizes rejection of this submission, please identify the legal authority.

I also object to any interpretation that would require me to submit my intended remarks to the Attorney General's Office for substantive approval before I may address the Task Force. If advance submission is used to decide which viewpoints may be expressed, it would amount to pre-screening public criticism rather than merely processing meeting materials. This concern is particularly serious when the comments address the Attorney General's Office itself.

Nevada Attorney General guidance citing OMLO 99-11 cautions against unnecessarily restrictive advance sign-up requirements. ***Barrett v. Walker County School District***, 872 F.3d 1209 (11th Cir. 2017), invalidated an advance process that gave officials unchecked power to delay access to speak, while ***Reza v. Pearce***, 806 F.3d 497 (9th Cir. 2015), requires reasonable, viewpoint-neutral restrictions.

Please confirm receipt and inclusion of both documents in the appropriate meeting record. If either is refused, please provide the specific reason and legal authority in writing.

Sincerely,

Written Public Comments for Inclusion in the September 29, 2026 Meeting Minutes

Pursuant to NRS 241.035(1)(d), I, Kathleen Light, submit these written comments as a substantially accurate representation of my oral remarks at the September 29, 2026 meeting of the Nevada Public Records Task Force. Because my actual remarks are absent from the publicly available recording I reviewed, I request that this submission be included intact as an attachment incorporated into the meeting minutes to preserve the substance of my testimony. These comments are separate from my previously submitted written proposal.

First Comment

I have to start with this. I wasn't going to come in person today, but it concerned me that this task force has taken away the Zoom access to the meeting and left us with a phone-only option this time, when the phone option has yet to work, as witnessed by my friend Joe Panicaro in Reno. I don't want to be here, as we are directly across the street from where I was raped, and I'm silently having a panic attack, so bear with me.

Now I have written up a bit of a tome on the topics of transparency and preservation with sample legislative language. What can I say? I'm unemployed, and I was bored. Unfortunately, I am limited to two pages. So I wrote small. Zoom in or use the QR code in the footer to access the full-size documents.

Let's start with preservation.

I just lost my public records lawsuit against the attorney general's office, which has refused to give me any record of the investigation into my sexual assault by the former deputy insurance commissioner. They have ignored requests and just haven't produced any substantive records in my case.

This happened right at the two-year mark. And two years is how long Nevada retains emails.

Because it was a procedural issue—because I didn't serve them in person in Carson City—I can go back and file the public-records case again.

But here's the problem.

The majority of the records I was trying to obtain are potentially already gone.

Ta-da. That is how we solve problems in Nevada state government.

There is a phenomenon that I personally call lawyers doing lawyer stuff.

Sometimes you just have a series of perfectly legal procedural barriers that happen to produce the exact same result.

It took a full year to get the public records.

The records about the investigation into me personally that I received included evidence that I had called and no one responded. I had emailed and no one responded. I received copies of the lawsuit I had filed to get the records I was receiving. That is some form of bureaucratic irony: getting your own lawsuit back in the public records response you had sued them for. But not a word about the counterterrorism investigation into a rape victim.

Some of the records I was asking for were approaching, and now have reached, the end of their ordinary retention period.

That creates a fundamental problem because you have a very simple loophole: run out the clock.

What I propose is preservation periods. We have some in place; however, they should be codified and explicit. I.e., I am asking for all potentially responsive records to be preserved until all appeals have been exhausted. And a special rule for criminal matters extending that retention period to the length of the statute of limitations for the crime.

Please take a look, and hopefully you can discuss this at the next and final meeting. I'll be back to talk about transparency at the end.

Second Comment

As a failed academic, you guys are killing me.

Research bias is the word you are looking for.

Citations matter.

1. The Nevada Public Records Act provides for all citizens, for whatever reason, to be able to receive public records. It is literally part of the government's job description to do the work and provide those public records regardless of use. I could be wallpapering my bathroom with these documents.

Written Public Comments for Inclusion in the September 29, 2026 Meeting Minutes

Pursuant to NRS 241.035(1)(d), I, Kathleen Light, submit these written comments as a substantially accurate representation of my oral remarks at the September 29, 2026 meeting of the Nevada Public Records Task Force. Because my actual remarks are absent from the publicly available recording I reviewed, I request that this submission be included intact as an attachment incorporated into the meeting minutes to preserve the substance of my testimony. These comments are separate from my previously submitted written proposal.

2. The state of Vermont charged me $90 for four redacted emails about my rapist's resignation, but here's the thing: it took 3 days, start to finish. Make me wait a year? I'm not paying you. If you want to modernize, you might want to charge per byte of data rather than per page because the cost is in the data storage, not paper and toner.
3. The public is left with 180 seconds to articulate law and two pages. The language mightn't be legally precise, as opposed to written statements with no limits from government entities.
4. A victim needs the police report for several reasons, including victims' relief funds.

Back to transparency.

I allege that a public official raped me on video. That's not nothing. There was a felony warrant request in this case. I was told he was being arrested, but it was a jurisdictional issue. The only possibility for jurisdiction would be between the AG and the DA. I have spent years trying to reconstruct what happened through public records that the AG refuses to give me.

I am not asking this Task Force to decide whether my allegations are true. I'm stating in plain language that they exist, but the attorney general is now withholding the record that it ever happened.

I don't know why.

I will never know.

That is precisely the problem.

I'm not special. If it can happen to me, it has happened to others and will happen again unless we take steps to tighten the law and prevent obfuscation of the public records.

So what I propose is an addition to the law regarding elected, appointed, and potentially exempt employees.

People in those positions should be beyond reproach.

I could have easily, if I were a different type of person, extorted or blackmailed the deputy insurance commissioner.

In addition to that, there is the matter that the tens of millions of dollars he collected as the head of enforcement for the Division of Insurance during his tenure could be challenged due to his misconduct and possibly need to be returned to those who paid those fines and chose to challenge the decisions, at the taxpayers' expense.

This is the reality and the potential issues with what happened with me.

This is why we need transparency.

As a citizen, I do generally want to know when my public officials have been credibly accused to the point that administrative synopses have been authored to determine whether they should be immediately forced to resign, as was the case with my rapist.

I would want to know what happened there, particularly when the entire administration of the Division of Insurance was gone without a word or a trace within 6 months, while insurance across the board increased for all Nevadans during that time.

Something happened here.

So please take a look at what I wrote and take it into consideration as a possible recommendation.

Because what happened here isn't okay.

The end of it shouldn't be throwing your hands in the air and saying, "Who knows?" The answer to that question is the AG's office. The AG is the one who knows the answers and won't give them to me.

From:	Kathleen Light
To:	AGGeneralCounsel
Subject:	PRTF 9/29 meeting minutes
Date:	Wednesday, October 14, 2026 1:27:45 PM
Attachments:	AMNDOPPtoDissLightvAGO.pdf

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello-

I noticed you have the minutes up along with a video link, of course you did it in a docx so most people won't open it that way, but you are the lawyers.

There are inaccuracies in the minutes when it comes to the public comment, my public comments specifically. They are noted as being telephonic. I was in person. I struggled to make it there in person as it is right across the street from where I was raped and I stated as much in my comments.

Neither the written version of my comments nor my proposals are attached to the minutes or available in the website. I have specifically emailed you requesting they be attached. If they are not to be attached I have requested that you cite the reason why including the legal authority.

It's almost as though the Attorney General's Office is trying to make my comments disappear by playing within the finer points of open meeting law.

I'm certain the Attorney General wouldn't want such a thing to happen. He seemed so shaken up and concerned when I spoke in front of him yesterday at the CDVSA meeting. It was almost like he had never heard the story. That would be odd seeing as his email was a service contact in the Odyssey system when I filed motions into the public records suit I had against your office. He would have received it directly and I'm certain that the Attorney General of Nevada would read an 82 page filing with that amount of detail. I've attached the file. I'm sure you know where to put it.

I don't know, take a look. He was positively shaken yesterday.
https://youtu.be/0brCALt7iyc

And please, correct the minutes. I won't even go into the purpose and breadth of the synopsis you put together of them.

Kathleen Faye Light

From: Kenny Goranson
To: AGGeneralCounsel
Subject: Public Comment for October 19 PRTF Meeting: Election Records and EAVS Data
Date: Thursday, October 15, 2026 1:29:34 PM

You don't often get email from kennygoranson3@gmail.com. Learn why this is important

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Public Records Task Force,

Please include this written comment with the minutes of the October 19 meeting. I ask the Task Force to include election-administration records in its discussions and recommendations under agenda item 5.

I recently submitted a public-records request to the Washoe County Registrar of Voters for existing records used to prepare Washoe County's 2024 Election Administration and Voting Survey (EAVS) response. The request seeks the completed response, drafts and source records, related correspondence, and submission or correction dates.

EAVS information may be compiled and published by the U.S. Election Assistance Commission months after an election. In the meantime, the county's source records can help the public understand election administration soon after results are certified and transmitted to the Secretary of State. I ask the Task Force to consider recommending that local election records used to prepare EAVS responses be made available within 30 days after the county transmits its certified election data to the Secretary of State, subject to lawful, narrowly tailored redactions.

I believe the Task Force should clarify how public-records rules apply when a local government prepares information for a federal survey: which records remain in the local government's custody or control, how agencies should handle records they say belong to another entity, and what explanation and legal authority should be provided when access is denied or limited. Any recommendations on fees, bulk data, personally identifiable information, and dispute resolution should expressly account for election records as well as law-enforcement records.

I am not asking the Task Force to decide my pending request. I ask that it add election-administration records and EAVS-related records to a future meeting agenda and consider them in its final recommendations.

Thank you,

Kenny Goranson

From:	WatchDogJeff
To:	AGGeneralCounsel
Cc:	Leslie M. Nino Piro
Subject:	PRTF Public Comment/ Oct 19
Date:	Thursday, October 15, 2026 2:56:18 PM
Attachments:	PRTF Oct PC.pdf

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Please see attached

Jeff Church
RenoTaxRevolt.com

Public Comment, Public Records Task Force

I do not have high hopes of anything coming out of the PRTF supporting the legislative intent of NRS239.

That said, I note that the ACLU supported "a fully funded and staffed ombudsperson or inspector-general-style office with defined response timelines." I agree! I note from the minutes: "Members expressed broad, notably bipartisan support for establishing an independent ombudsperson, dispute-resolution, and/or advisory-council office, …"

The devil is in the details. It MUST NOT be in the A.G.'s office. The A.G. defends state agencies in PDR matters- the conflict is obvious. Also the A.G. is one year + behind in OML resolution, rendering all complaints void. The NV RED HOA Ombudsman is an example of how not to do it creating a bureaucratic and burdensome process that only an expert with a lot of time can untangle. **KISS: Keep It Simple (and) Speedy**.

Perhaps a new office or placed somewhere in the Judicial system. A hearing officer, via Zoom style, can be located anywhere in the state and quickly hear cases and render an advisory decision. That would allow for confidential in-camera review. Let's face it, at times it has been proven that the delay is caused by an agency hiding bad behavior (perhaps liability) and not for true NRS239 purposes.

One PDR I did showed the lead committee chair asking to meet an applicant privately "for coffee" suggesting a possible romantic intention and bias. Other matters might be more serious and support criminal and corruption concerns- allowing an in-camera review addresses that. Do not kid yourself into thinking that corruption does not or cannot exist here.

The 2027 Legislature is fast approaching and time is of the essence but perhaps as this overall recommendation moves forward, UNR or UNLV or the Guinn Institute might be able to look nationwide for best practices. Perhaps students working on their Masters or PhD thesis.

Yes to an Ombudsman/ Hearing Officer and KISS: Keep it simple and speedy! Allow confidential review by the hearing officer.

Jeff Church: RenoTaxRevolt@Sbcglobal.net 775 544-RENO (7366)

From:	Oscar
To:	AGGeneralCounsel
Subject:	Public comments for Public Records Task Force for meeting of Oct. 19
Date:	Friday, October 16, 2026 10:08:24 AM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello. I wish to provide the following comments regarding the Oct. 19 agenda and future meetings:

My interest is election related.

My comments cover the minutes of the last meeting and agenda item 5-Consideration of Topics and Next Meeting Dates and Related
Issues.

Regarding the minutes of the last meeting:

Staff Time and Fee Charging also relates to requests for voter roll data. Does the PRTF's proposal include that data? Or is it just for police records?

Please note that the Washoe ROV is charging $3,300 for a snapshot of unredacted voter roll data. A single snapshot is helpful but it's most limited. Meaningful analysis of voter rolls requires multiple and maybe sequential snapshots, imposing prohibitive costs to the requester.

The situation is not dissimilar to info requests to law enforcement that incur prohibitive fees.

Please, create policy regarding excessive fees for unredacted voter roll data. I wish to suggest a 1- or 2-year subscription with unlimited downloads; fees lowest possible.

Ombudsperson / Advisory Council is a good idea for all record requests that are denied or severely limited in response. We need one in Washoe County and they need to have authority in elections or election-related issues.

Personally Identifiable Information and Bulk/Compiled Data is an issue I've been concerned about for some time. Unfortunately, the PRTF has ignored PII violations in elections.

Recent news states ERIC and CEIR "allegedly violating the federal Driver's Privacy Protection Act by sharing state motor-vehicle and voter data."
https://standingrecord.com/entries/2026/09/02/federal-politicized-investigations-029f458b/

Please, consider making policy recommendation to state legislature to close the gaping holes in protecting PII, including handwritten signatures on ballot return envelopes that have no notice of risk of identity theft and forgery on them though such risks are present.

The discussion of *Criminal Investigative Records* appears similar to the lack of disclosure by the Washoe ROV.

In addition to the excessive voter rolls fees mentioned above, my main disclosure concerns are:

1) No objective person in place to resolve perceived violations of the Nevada Public Records Act. This goes to the need for Ombudsperson or Inspector General who's given authority to investigate and to render opinions and actions to resolve disputes of lack of disclosure, tardy disclosure, records retention/security, excessive fees, etc.

2) The post-election EAV Survey of election data that is later compiled and published by the EAC, eight months after the election. I want that data thirty-days after the election, when the certified election data is delivered to the SOS.

The Washoe ROV has denied my requests for this data in the past without adequate explanation. I was told that it was the EAC's data and could not be shared.

Really? The EAC has a form but the data is Washoe's and belongs to the people.

The election data is paid for by my tax dollars, is not proprietary, and causes no harm to the county to produce. So, why the denial?

Maybe I should I have my own form the ROV can fill out while they fill out the EAC's form?

This is a prime issue for the PRTF to discuss.

Closing:

Please, give my concerns your consideration. Thank you for your interest and understanding.

Sincerely,

Oscar Williams
1540 Whisper Rock Way
Reno, NV 89523
C: (775) 240-3456

From:	Pinnacle Legal Research
To:	AGGeneralCounsel
Subject:	Written Public Comment for October 19, 2026 Public Records Task Force Meeting
Date:	Friday, October 16, 2026 11:58:08 PM
Attachments:	Rebecca_Savio_Public_Records_Task_Force_Comment_2026-10-16.pdf

You don't often get email from pinnaclelegalresearch@gmail.com. Learn why this is important

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms. Lee and Members of the Public Records Task Force:

Please find attached my written public comment for the October 19, 2026 Public Records Task Force meeting.

The meeting notice states that written comments may be submitted one business day before the meeting. I did not see a specific submission time stated for that day, so I am submitting my comments this evening.

Because my recommendations address subjects the Task Force is evaluating under AB 128, Section 7, I respectfully request that the attached comments be provided to Task Force members for consideration in connection with Agenda Item 4 and in developing the Task Force's written recommendations under AB 128.

I also respectfully request that my attached written remarks be included with the minutes of the October 19 meeting pursuant to NRS 241.035.

Thank you for your consideration.

Sincerely,

Rebecca Savio
Founder & Research Analyst
Nevada Applied Victimology & Policy Analytics
Public-Interest Research | *Regulatory Analysis* | *Data & Policy Analytics*
Las Vegas, Nevada
NVPolicyAnalytics.com | LinkedIn

October 16, 2026

State of Nevada Public Records Task Force
Written Public Comment for October 19, 2026 Meeting
Regarding AB 128, Section 7 Evaluations and Recommendations

Members of the Task Force:

Thank you for the opportunity to provide public comment regarding the Task Force's work under AB 128. I submit these comments as a Nevada citizen, public-interest researcher, and member of the public with experience related to public records, including government transparency, patient privacy, and protection of confidential information. AB 128 directs the Task Force to evaluate public-records issues including the cost, burden, and time associated with redacting confidential information and to recommend ways to protect confidential information while promoting transparency. I respectfully offer three practical recommendations concerning redaction and version control, accessibility of public-meeting records, and preservation of written public comment.

1. Preserve authentic originals while maintaining reviewed public-release versions when appropriate

I was encouraged to see the draft report's consensus recommendation for improved redaction tools and training; this recommendation complements that work with safeguards for repeat production, version control, and privacy review. In reviewing a record produced in response to a public-records request involving a Nevada professional licensing board, I identified unredacted patient-identifying information in an electronic disciplinary pleading. After I brought the matter to the agency's attention, agency counsel explained that the original electronically filed pleading remains in its original unredacted form, that no standing redacted copy is maintained, and that redaction occurs only when, and if, the document is identified for production in response to a public records request. When I asked who, under the agency's ordinary process, is responsible for identifying information requiring redaction before public disclosure, agency counsel responded: "The individual responsible for identifying what may, can, or should be redacted in a response to a public records request is the person producing the document."

That process also underscores the importance of standardized training for personnel responsible for public-records production, including how to identify confidential or protected information, apply legally required redactions, review attachments and exhibits, and escalate uncertain issues for legal or supervisory review. Preserving an authentic, unaltered original is appropriate and important. However, requiring future staff to rediscover the same protected information and recreate the redaction each time the same record is requested may increase administrative burden and create repeated opportunities for human error, particularly when protected information is embedded deep within lengthy electronic records.

I respectfully suggest statewide guidance encouraging agencies, once protected information has been identified and reviewed, to preserve both the authentic unredacted original and a separately identified, quality-controlled public-release version. The original could be electronically flagged as restricted or requiring privacy review. The public-release version could be dated, linked to the original, and verified before future production rather than recreating the redaction process from scratch. Version control is also important when documents later appear within larger PDFs, meeting packets, exhibits, or other compilations.

Agencies should be able to track originals, derivative or compiled records, and approved public-release versions so protected information is not inadvertently reintroduced. For lengthy records, I also encourage electronic privacy flags, a review checklist, second-person quality control, standardized staff training, and a defined procedure for correcting inadvertent disclosure.

2. Improve accessibility and transparency of public-meeting records

I understand that NRS 241.035 presently requires a public body to make an audio recording or use another means of sound reproduction, or to have the meeting transcribed by a certified court reporter. It does not presently require the public body to create a video recording. My recommendation is prospective. An audio file alone can be technically available while remaining difficult for an ordinary member of the public to use. A person trying to locate one statement in a lengthy MP3 or other audio recording may have to listen through hours of material or independently obtain and learn how to use transcription software or services. Not all members of the public have the technical knowledge, software, time, or resources to convert an audio recording into a searchable transcript. That creates a practical access barrier to researching, locating, and accurately quoting public proceedings. Audio-only records can also create accessibility barriers for people who are deaf or hard of hearing.

Video may provide substantially greater context because it can preserve information that audio cannot. Public bodies may display exhibits, regulations, presentations, documents, or other materials during discussion. A later listener may hear participants refer to "this document," "this section," or material being shown on screen without any ability to see what the public body and meeting participants were viewing. Video platforms may also provide captions and searchable, timestamped transcript text, making it substantially easier for the public to locate, copy, quote, and verify portions of a meeting. I respectfully suggest that when a public body creates a video recording, statewide policy encourage retention and public availability of that video, particularly when visual materials are presented. If only an audio recording is retained, I ask the Task Force to consider recommending that the public body also provide a written, searchable transcript. Agencies should also clearly identify what type of recording was created, what is retained, and the applicable retention practice. **Public access should not depend on a person's ability to independently convert an audio file into usable text.** These measures would make public-meeting records more readily accessible, usable, and understandable rather than merely technically or partially available.

3. Tell members of the public exactly where their written comments will be preserved

Members of the public should be told clearly what will happen to written comments they submit. Terms such as "public record," "meeting record," "pre-meeting packet," and "minutes" may have distinct meanings to government personnel, but an ordinary citizen may reasonably believe they are interchangeable. NRS 241.035 requires written meeting minutes and provides that prepared written remarks are included if submitted for inclusion. A commenter may reasonably assume that remarks submitted before a meeting, or included in a pre-meeting packet, will also be included with the minutes. That distinction is unlikely to be obvious to someone unfamiliar with public-meeting procedures, and members of the public should not learn after the fact that their remarks were omitted simply because they did not know a specific request was required. I respectfully suggest that public bodies clearly explain, in meeting notices, comment instructions, or acknowledgement emails, where comments will be preserved. For example: "Your written comment will be maintained as part of the meeting record. If you also want your written remarks included with the meeting minutes pursuant to NRS 241.035, please indicate that request." The agency could then ask: "Do you request that these written remarks be included with the meeting minutes?" A simple yes-or-no instruction would help citizens make an informed choice and make submitted comments easier to locate. I respectfully ask the Task Force to consider these issues in developing its recommendations under AB 128.

Thank you for your consideration.

Respectfully submitted,

Rebecca Savio
Nevada Citizen & Criminal Justice and Public-Interest Researcher
Founder & Research Analyst, Nevada Applied Victimology & Policy Analytics
Submitted in my individual capacity

From: Doug Roberts
To: AGGeneralCounsel
Subject: Comments attached for meeting minutes - PUBLIC RECORDS TASK FORCE
Date: Sunday, October 18, 2026 8:50:11 PM
Attachments: W106945-091326.pdf

You don't often get email from droberts@livecoreproductions.com. Learn why this is important

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

I would like the attached exhibit to be included in the minutes for tomorrow's meeting of the Public Records Task Force. I plan to attend and give oral comments referencing the attached exhibit.

Thank you.
--
Doug Roberts
Live Core Productions
707-940-LIVE (707-940-5483)



City of Las Vegas
Office of the City Attorney

495 South Main Street, Sixth Floor
Las Vegas, Nevada 89101
Office (702) 229-6629
Fax (702) 386-1749

October 13, 2026

Doug Roberts
PO Box 23801
Las Vegas, NV 89105

VIA: GOVQA

RE: Public Records Request - W106945-091326

Dear Mr. Roberts:

The city of Las Vegas is in receipt of your public records request for:

Request copies of all body-worn camera video for the event ending in 54442 where marshals responded to 333 S Main St, Las Vegas, NV 89101 and/or Main Street and Lewis Avenue on September 12, 2026.

The City Attorney's Office has been diligently working on the above-referenced public records request. The Las Vegas City Council adopted R-48-2019 (attached for your reference) regarding public records requests. It sets forth the City's policy of providing ten hours of production at no charge and $32.00 per hour thereafter to recover the City's actual costs, even though $32.00 per hour is substantially less than the cost of the attorney and staff time.

Following is the City's estimate to complete your request:

Record Type	Footage Duration	Estimated Review Time	Chargeable Hours	Total Cost ($32 per hour)
Video	65.91 minutes	17.58 hours	7.58	$242.56

It will take more than 10 hours to process this public records request. For each hour of raw video footage, the City spends approximately 16 hours researching, retrieving, processing, redacting, and reviewing the video for public dissemination. The City has preliminarily identified approximately 65.91 minutes of video responsive to your request. The initial estimated cost to complete this records request based upon R-48-2019, is **$242.56** (17.58 hours – 10 free hours) x $32.00).

The actual time to process this request will be tracked. If it takes the City less than 40 hours to process this request, you will be issued a refund for the difference. Conversely, if this request takes more than 40 hours to process, you will be sent an additional estimate.

If you consent to the estimated costs, please let me know and deliver a cashier's check to the City Attorney's Office in the full amount of the estimate. Please make the check payable to the City of Las Vegas and reference the request number **W106945-091326**. Conversely, please contact me via GovQA if you wish to narrow the scope of your request.

Sincerely,

OFFICE OF THE CITY ATTORNEY

/s/ Jeffrey D. Andrews

JEFFREY D. ANDREWS
Management Analyst II

5.✓

R-48-2019

AMENDED RESOLUTION CONCERNING THE FEES CHARGEABLE FOR COPYING AND CERTIFYING PUBLIC RECORDS, AND FOR PROVIDING OTHER SERVICES REGARDING PUBLIC RECORDS

WHEREAS, in 2001 the City Council adopted Resolution No. R-103-2001, establishing fees to charge the public for copying and certification of general public records; and

WHEREAS, the City Council adopted updated and superseding resolutions in 2013 and 2016 to 1) account for intervening legislative and recordkeeping changes, 2) establish a means by which records requests could be processed in a consistent manner, and 3) reestablish in one place the charges for copying and certification, as well as the City's policies and charges applicable to the circumstances addressed by intervening legislation; and

WHEREAS, the City Council desires by means of this Resolution to continue the previous approach and to update the listing of fees and policies in accordance with applicable State legislation.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Las Vegas as follows:

1. The charge for copying records that are to be produced as paper copies shall continue to be one dollar ($1.00) per page up to a size of 11 inches by 17 inches, and the charge for certification of records shall continue to be two dollars ($2.00) per document.

2. The charge for copying records that are to be produced as paper copies with a size in excess of 11 inches by 17 inches shall continue to be three dollars ($3.00) per page.

3. Except as provided in Paragraph 7, there is no charge for providing copies electronically.

4. Per NRS 629.061(4) and (5), the photocopying fee for health care records, as defined in that chapter, cannot exceed sixty cents ($0.60) per page.

5. In accordance with State law, a copy of meeting minutes and a copy of an audio recording of a meeting (including a video recording where that recording constitutes the audio recording) shall be provided to a requester at no charge.

6. A flat research fee of thirty-two dollars ($32.00) per hour shall be charged for staff time spent in excess of ten hours, for the research, collection and compilation of information and documents pursuant to a public records request. There is no fee for the first ten hours, and the fee applies regardless of the staff

2✓

involved in the processing of the request. The flat research fee described in this Paragraph is deemed to be an actual cost incurred by the City in the provision of the public record, exclusive of and in addition to any costs that the City incurs regardless of whether or not a person requests a copy of a particular public record.

7. The charge for providing electronic files on a USB (aka thumb) drive is ten dollars ($10.00) per device.

8. If there are any additional material costs to the City for the production of a public record, such as other storage media for electronic files, those costs will be charged to the requester. These costs will be estimated and disclosed in advance.

9. The fee schedule for the Municipal Court is set by judicial order, and therefore it is acknowledged that some Municipal Court records requests fees may depart from the above-mentioned amounts.

10. The City Attorney and the City Clerk shall have the authority to consider and set departures from the standard copying and certification fees upon a showing of good cause.

11. This Resolution supersedes Resolution No. R-23-2016 previously adopted by the City Council.

PASSED, ADOPTED, AND APPROVED this 18th day of December, 2019.

CITY OF LAS VEGAS

BY _____
~~CAROLYN G. GOODMAN, Mayor~~
Michele Fiore, Mayor Pro-Tem

ATTEST:

_____
LUANN D. HOLMES, MMC
City Clerk

APPROVED AS TO FORM

_____ 11-26-19
Val Steed, Date
Deputy City Attorney

STATE OF NEVADA

PUBLIC RECORDS TASK FORCE

Eighth Meeting: November 10, 2026

Written Public Comment

From: elizabetht1012@icloud.com
To: AGGeneralCounsel
Subject: For Chair Colleen E. McCarty — Public Comment Regarding ADSD Records Request R007775-090926
Date: Friday, October 30, 2026 11:17:55 AM

[You don't often get email from elizabetht1012@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Chair McCarty and Members of the Nevada Public Records Task Force,

I am writing to bring to your attention a concern regarding the Nevada Aging and Disability Services Division (ADSD) and its handling of my public records request, R007775-090926, submitted on September 9, 2026.

My concern extends beyond the length of the anticipated processing period. It involves the agency's approach to prioritization and whether that process provides a meaningful opportunity for earlier access to essential public records.

On September 15, 2026, Kevin Jacobo-Giron, Public Information Assistant with ADSD, invited me to identify priority records or narrow my request, explaining that doing so might allow records to be provided sooner.

I followed his suggestion by identifying my priorities on September 18 and finalizing Items 1–4 for initial processing on September 22, 2026. I expressly clarified that this prioritization did not withdraw or limit any portion of my original request. I also requested electronic production of responsive records on a rolling basis.

On October 5, 2026, Mr. Jacobo-Giron confirmed that ADSD would consider my identified priorities during its search and review process. However, he stated that the agency's current approach was to provide responsive records upon completion of the request as a whole. ADSD maintained its estimated completion date of May 31, 2027, without providing an earlier estimated production date for the prioritized records.

I recognize that ADSD has cited workload, competing agency responsibilities, and records-review requirements as reasons for the anticipated processing period.

Nevertheless, this sequence raises a broader concern regarding the practical effectiveness of prioritization when a requester is invited to identify essential records for potentially earlier production but is subsequently informed that records are expected to be provided only upon completion of the entire request.

The records I prioritized include an administrative determination, the underlying assessment, supporting documentation, and records concerning notice and appeal procedures. Timely access to such records can be important when evaluating whether administrative procedures were properly followed.

I respectfully ask the Task Force to consider whether Nevada's public records framework provides sufficient clarity and accountability regarding prioritization, partial or rolling production, and estimated availability dates.

I am not asking the Task Force to adjudicate my individual request or to presume that ADSD has violated the law. Rather, I am presenting a documented example for consideration in its review of public-records practices.

Given the Task Force's October 31, 2026 reporting deadline, I respectfully request that this correspondence be forwarded promptly to Chair McCarty and the members. If the report has already been finalized, I ask that my comments be retained as public correspondence and shared, where appropriate, with officials considering future public-records reforms.

The correspondence referenced above is available upon request. I would be pleased to provide copies should the

Task Force wish to review the original communications.

Please confirm receipt and advise whether my submission can be included in the Task Force's public record.

Thank you for your time and consideration.

Sincerely,

Elizabeth Thornton

Public Records Request: R007775-090926

From:	WatchDogJeff
To:	AGGeneralCounsel
Cc:	Leslie M. Nino Piro
Subject:	PDTF Public Comment
Date:	Thursday, November 5, 2026 4:59:38 PM
Attachments:	PDTF Nov 2026 PC.doc

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Please see attached
I assume this is the final meeting of the PDTF?

Jeff Church

Public Document Task Force
Public Comment

Yes on creating an Ombudsman, Hearing Officer , Public Access Coordinator. Herein “PAC”.

I like what I see in the Illinois system but for a few RED FLAGS:

1) The system must mandate a short window for action/ response by the PAC

2) The current A.G. (soon Governor) has a one year ++ delay in addressing OML cases thus rendering them 100% moot. He has a 0% success rate in adjudicating any OML cases in the required window.

3) The A.G. can’t represent both sides and the A.G. defends all state agencies from NRS239 matters that they disagree on. It is an obvious conflict of interest that can’t be fixed.
- The PAC must fall under another office, likely a newly established one.

Sincerely,

Jeff “Watchdog” Church
RenoTaxRevolt.com
RenoTaxRevolt@Sbcglobal.net

Creating a Public Access Counselor Modeled off of the Illinois Public Access Counselor

Responsibilities of the Public Access Counselor
The Public Access Counselor (PAC) is an attorney in the Attorney General's Office who works to ensure compliance with FOIA and OMA. The PAC oversees the Public Access Bureau in the Attorney General's Office, which includes several Assistant Attorneys General and professional support staff members working to respond to FOIA and OMA issues raised by the public and government officials. Under Illinois, the PAC has several responsibilities:
Resolve or mediate disputes between members of the public and public bodies concerning FOIA requests and compliance with OMA (Requests for Review).
Issue binding opinions on FOIA and OMA in response to Requests for Review submitted by members of the public.
Provide electronic training to all FOIA Officers, all elected and appointed officials, and persons designated by public bodies to receive OMA training.
Provide educational presentations and materials to public bodies and to respond to informal inquiries from public bodies and the public.