



STATE OF NEVADA PUBLIC RECORDS TASK FORCE

MEETING MATERIALS

Meeting Date and Time: September 29, 2026, 9:00 AM

1. Written Public Comment received as of September 29, 2026

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.

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 establish 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](#)

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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: lvms.2006@gmail.com Phone: (702) 689-0580

On Saturday, September 26, 2026, David <lvmsms.2006@gmail.com> wrote:
I will be attending the meeting.

On Fri, Sep 25, 2026, 8:23 AM 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



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David Lee Nace

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](#)

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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,

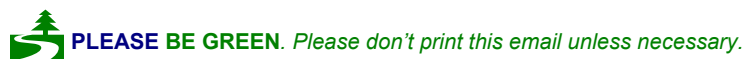


State of Nevada
Office of the Attorney General

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



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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)
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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
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September 28, 2026

Public 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,

A handwritten signature in black ink, appearing to read "Mike Strom", written over a light blue horizontal line.

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