

On March 12, 2023 CGC Rombardo gave false and misleading information to the Board and public.

The detailed factual rebuttal is contained herein

That said, because the Board deliberated and acted on repeated FALSE/ INACCURATE statements and data and because Trustees did not disclose prior (NRS281A) conflicts or pecuniary interests, it should be immediately moved and acted upon to rescind or amend the motion. These serious misstatements were not minor or insignificant.

<https://civility.co/motions-seconds/how-to-rescind-or-change-a-previous-action/>

**Unlike the motion to reconsider, there is no time limit on the motions to rescind or amend something previously adopted.**

**Sources:**

**Robert's Rules of Order newly revised  
The Standard Code of  
Parliamentary Procedure**

**THIS IS A RESPONSE TO 90 MINUTES OF ALLEGATIONS  
MADE ON THE RECORD BY WCSD GENERAL COUNSEL  
NEIL ROMBARDO, 3-12-24**

**JEFF CHURCH**

**THIS REPORT UPDATED 4-10-2024**

## FROM AARON FORD'S A.G. OML MANUAL:

The people of this state do not yield their sovereignty to the agencies which serve them. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know. The people insist on remaining informed so that they may retain control over instruments they have created.

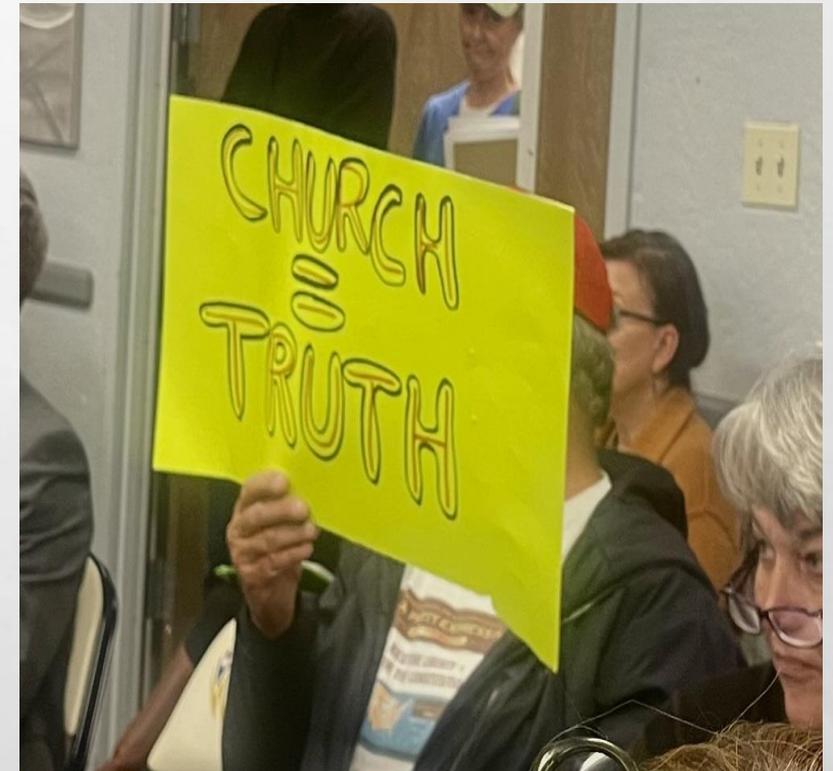
Stockton newspapers, inc. V. Redevelopment agency, 214 cal. Rptr. 561, 1985

**Jeff honorably serves “The People” not “The District” as dictated by the District! Yet note section (B) and ask if other Trustees abide by avoiding conflicts or are they seeking to use taxpayer dollars- up to \$500,000 to protect their political futures and pecuniary interests?**

NRS 281A.020 1. It is hereby declared to be the public policy of this state that:

(A) A public office is a public trust and shall be held **for the sole benefit of the people.**

(B) A public officer or employee must commit himself or herself to avoid conflicts between the private interests of the public officer or employee and those of the general public whom the public officer or employee serves.



# JEFF RUNS WATCHDOGJEFF.COM AND RENOTAXREVOLT.COM WHY?

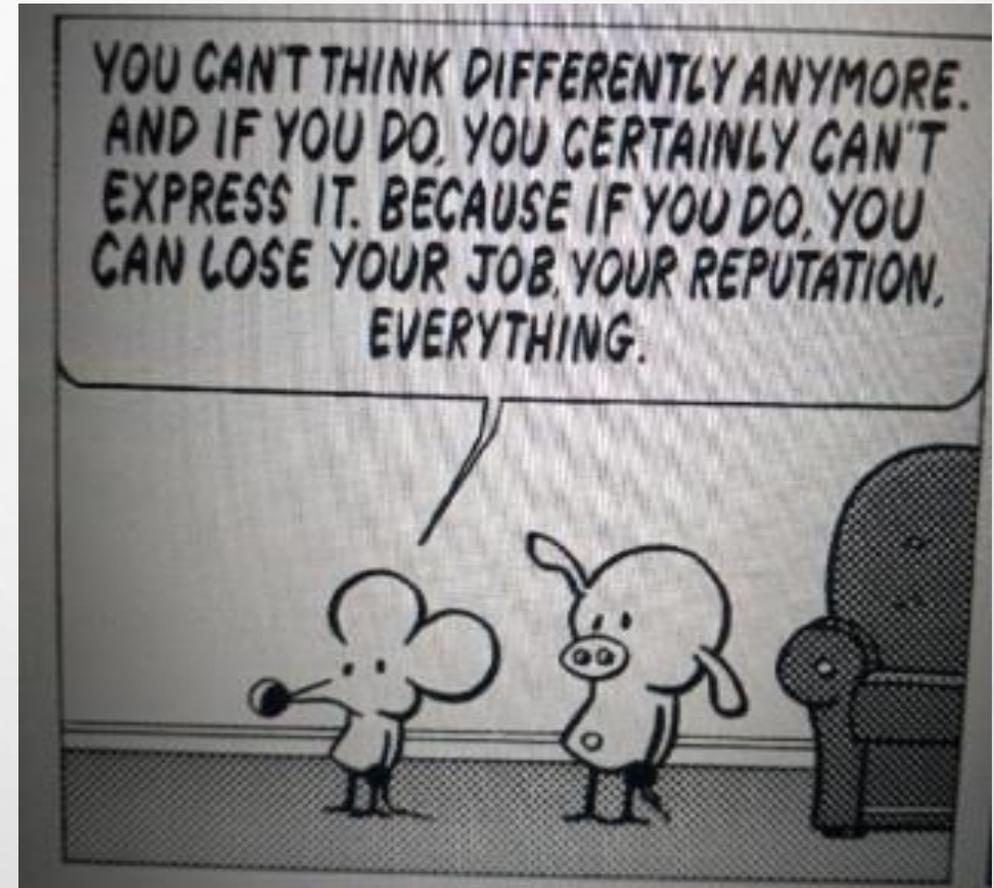
It's in his DNA, blessed, not wealthy but secure, he believes in giving back. In his case he opted to be a watchdog. USAF CORE value: Service Before Self. Jeff founded Reno's first 24 /7/ 365 homeless center @ 1990.

Comment: Is the ACLU bad for their multiple legal actions? No, so why is Jeff for his few complaints in the public's interest?

Yes, Jeff has proudly used his funds to address issues of community concern. When two parties disagree, Jeff has promoted mediation (just ask NMC). But the elected legislature has provided us with mechanisms for residents to seek redress including outside of court.

While SLAPP refers to actual court filings, the district is seeking to do the same to avoid transparency- scare him off with threats and consure. Each and every matter- successful or not must be viewed individually as to win or lose, was the concern genuine on a matter of public interest?

FYI: Mediation: Mark Baril: [contact@mediatenmc.org](mailto:contact@mediatenmc.org) (775) 788-2127



From: ThisIsReno (Edited- pre-election 2020)

### 1. Veiled legal threats

Criticize the Washoe County School District, and you may get hit back by the school district's attorneys with a veiled accusation of defamation. Just ask Jeff Church, the retired Reno cop who rails against local governments and often speaks during public comment at local government meetings. The school district has been a regular object of his criticism.

During the 2016 campaign for the WC1 ballot question, and after its passage, Church was, from the perspective of the school district, off-base in how he characterized the voter-approved tax increase to fund new schools.

*"[Chief Operating Officer Pete] Etchart and the District are placing Mr. Church on notice that if he continues to perpetuate this misrepresentation, he will be acting intentionally and in disregard to the truth, and thus he will be committing defamation, which may be pursued,"* .

Defamation, it turns out, is a repeated school district refrain.

.....

Jeff Church was even denied access to the factually questionable Rombardo Powerpoint before his hearing (or hanging). Sound Fair? Legal? Posted the day after his public hanging.

“Good afternoon, Trustee Church (all board members bcc’d to avoid OML issues),

The powerpoint you refer to is on the website. The powerpoint was finished Tuesday morning and therefore, it was late support material, which is legal under the OML. The presentation and all public comments related to the item were posted before 11:30am on Wednesday.

Thank you and enjoy your weekend,

Kristen

Kristen McNeill, Ed.D

Interim Superintendent

Washoe County School District”

**“The current Board of Trustees, including my own District D representative, have shown to be unwilling to speak with or hear the concerns of their constituents. I have asked to speak with Board members to discuss issues that I believe to be vital to the employees and students and have been ignored. Education should be open and transparent. I am seeking this position to advocate for accountability, transparency, open government and protection of our children and employees. The public deserves to know what is going on in the school district. Getting public information from the school district is nearly impossible.”**

**Ron Dreher (D), labor representative & candidate for District D vs Beth Smith**

**ROMBARDO WOULD HAVE THE COMMUNITY  
BELIEVE THAT JEFF CHURCH HAS A  
RASPUTIN-LIKE POWER OVER 'HIS PEOPLE'.  
WERE THAT TRUE I WOULD HYPNOTIZE THE  
BOARD INTO ADDRESSING  
QUALITY EDUCATION**

# Fact #1: Jeff Church innocent of fabricated harassment charges regarding two female employees in conspiracy with higher “public officials” or leadership.

## Does anyone truly think these two employees acted alone?

Jeff proven alone thanks to his forcing District to give up the video!

Video shows no males approached the females as claimed



**It is hereby ordered that respondent's motion to dismiss writ petition pursuant to NRCP 12(b)(5) or, in the alternative, motion for summary judgment pursuant to NRCP 56 is DENIED (april 4, 2024)**

**In his unfounded attack, Rombardo emphasized his legal prowess vs gagged Church that Church's actions were lawsuits in the common sense "filed lawsuits against the district". Let's see what the court said as Rombardo- not Church- wastes time and resources and legal costs:**

**"... the Church petition is merely a formal request and application to the court for its consideration, and to render a discretionary remedy if it chooses to." "Mr. Church is not seeking damages from the district" "Mr. Church asked for permission to view records pursuant to statutory guidelines. In response, the district denied said request. Once denied, Mr. Church applied to the court to compel the district to disclosure.." "Church petition does not constitute a pleading or complaint under nrpc 7(a)."**

**“Since being elected**, Trustee Church has supported 22 open meeting law complaints against the district, filed four open meeting law complaints himself against the district, supported three filed lawsuits against the district, filed two lawsuits himself against the district. And let's not forget that he demanded the Gunderson investigation where he insisted that the former board president and the Office of General Counsel did wrong. This is a total of 31 complaints that he has supported against the district for an approximate cost of \$345,000 over these three years, which was all handled internally.” (Rombardo)

FACT: I did not support 22 OML Complaints, I filed ONE not Four OML complaints- show me or apologize and correct the record. I did not actively support, offer information or financial assistance to three lawsuits vs WCSD (prove it!). Cost \$345,000? As this was handled internally by staff employees show me that break down. Rombardo needs to put up or correct the record.

CHURCH: ... Other than those two matters, you prevailed on every matter. Not one complaint was founded, not one complaint. OML complaint was...

ROMBARDO: "That's right."

CHURCH: So you believe that. And then you gave information that I supported a number of lawsuits. You mentioned Fred, somebody from Simon. Are you sure?

ROMBARDO: "I have enough information to stand by that allegation."

CHURCH: That I did support those lawsuits?

ROMBARDO: "I have information and belief."

As we'll see herein, I did have cause and/or prevail on a number of the actions cited although some did not exist as he falsely claimed, i.e. (4) OML complaints.

Making such slanderous allegations vs a sitting, elected Trustee is serious. I challenge Rombardo to put up and if he can document his claims of March 12, I will resign.

CHURCH: you made a comment. And again, I'll give you a chance to clarify 'cause maybe I wrote it down wrong, that a certain individual has funded my litigation. Are you sure?

**ROMBARDO: “I have that... I do that on information and belief.”**

\*No one has funded my litigation! No one as of today has donated to my 2024 campaign. Rombardo has an ethical obligation to show otherwise or apologize and correct the record. In fact what we are seeing here is a pattern of one-side, slanted, untrue and distorted allegations by Rombardo the week of election filing against WCSD's sole conservative Trustee that acts in the interest of the public in disclosing truthful information about the District.

SMITH: And it is very clear from that that Trustee Church has been filing lawsuits with the intent of financially harming the district, not just since 2021, but since 2016. So, I look at that when I consider a pattern of what I think could be emerging as a pattern of predatory litigation against the district with a focus on that.

Care to correct the statement? Not one lawsuit vs WCSD 2016 to September 2023! Substantiate intent? WCSD did violate OML as will be shown. Then the OML law was updated! The two current actions are Petitions, the most efficient and expeditious way to resolve valid differences of opinion.

SMITH: So we're not litigating. So we're not... So go ahead and ask your question, but we're not litigating the merits or why you filed it. It's just on whether or not we should allocate the money.

I merely show this as comical after 90 minutes of Rombardo's one-sided litigation of issues vs Church with NO prior notice of details to defend. But Smith shuts Church down on responding to best of his ability.

# **COMMUNITY MEMBER FUNDED CHURCH LITIGATION**

**No one funded any of my litigation!**

**Acting as an attorney and representative of WCSD making untrue statements is despicable.**

**Mistakes happen but if demeaning an elected trustee in such a public forum – one should be right.**

# **WCSD DID NOT PREVAIL ON FOUR ITEMS**

**Two petitions pending**

**He implied or stated, they had prevailed on all law suits. (Pending)**

**CHURCH JEFFREY @1231213, CV12-02645 (D15)**

**CHURCH JEFFREY @12086 CV24-00489 JEFFREY CHURCH VS KIRK STANLEY (D8)**

\*And upon review in Both cases, the court found good cause to hold a hearing!



**I searched Washoe Justice Court- if I did it right found nothing  
I have no tickets or arrests anywhere  
In Washoe District Court I found these: No previous cases vs WCSD!  
I will admit I lost big time in the divorce proceedings (Jeff Humor)**

CHURCH JEFFREY @12086 CV24-00489 JEFFREY CHURCH VS KIRK STANLEY (D8)  
CHURCH JEFFREY @12086 CV23-02245 JEFFREY CHURCH VS WC SCHOOL DISTRICT (D1) BOTH PENDING

CHURCH JEFFREY @833528 DV93-01596, IN RE: JEFFREY D. CHURCH AND PAMELA CHURCH (D11) Divorce  
CHURCH JEFFREY @1367088 DV21-00125 IN RE: JEFFREY D. & DARCY M. CHURCH (D13)(Divorce)  
CHURCH JEFFREY @1231213 CV12-02645 JEFFREY D CHURCH (D15) (Interesting public concern on Grand Jury  
matter involving federal grants and Judge ruled correctly it was a Federal Issue)  
CHURCH JEFFREY @12086 CV16-01827 JEFFREY CHURCH VS WASHOE COUNTY ET AL (D9) (WC1 as noted)  
CHURCH JEFFREY @12086 CV04-02492 JEFFREY D. CHURCH ET AL VS PAUL OLSON ET AL (I won 100%)  
CHURCH JEFFREY @12086 CV03-05234 JEFFREY D. CHURCH VS. CITY OF RENO; ETAL ( I think it moved  
Federal, we are talking 21 years ago)  
CHURCH JEFFREY @12086 CV99-00155 JEFFREY D. CHURCH VS. THE CITY OF RENO, ET AL (I think it moved  
Federal-USERRA issue, addressed later, we are talking 25 years ago)  
CHURCH JEFFREY @1105059 DV06-01436 IN RE:JEFFREY D CHURCH & ELLEN STERN (Divorce)

**\*As is seen herein, WatchdogJeff addresses matter of Public Concern**

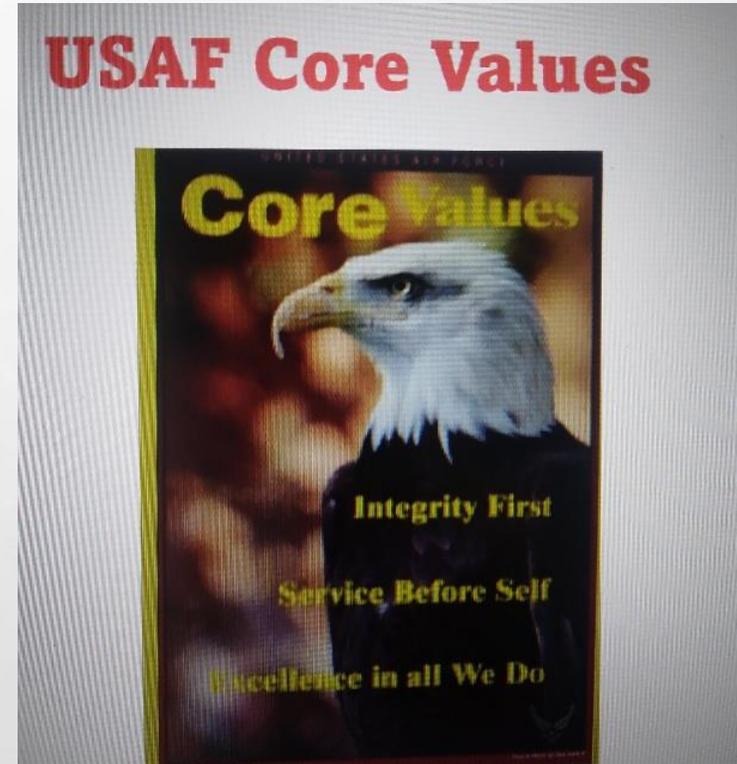
# **RENO HS COMPLAINT HAS MERIT X 2\* OF 5**

**“Merit” – the complaint was reviewed/investigated by our office, and we found the complaint to be valid**

**“Based upon the above, this issue is deemed to have merit.”**

**\*One other minor but violation**

**\*\*In reading the chief auditor reports one may question his objectiveness, I do**



# Jackie Calvert investigation

I strongly dispute Rombardo's version of the "Gunderson Investigation"  
Bottom Line this was a Board President & Board unanimous decision to investigate and a valid one:  
Rombardo seems to imply that we should have swept this under the rug

"WCSD Board votes to further investigations into former trustee Jacqueline Calvert The board also voted in favor of including a review of other legal matters related to serving as a trustee, including votes, compensation and paid benefits like health insurance.

"The other piece is what happens? What happens to votes and all those other things," said Taylor. "We don't know again because it's pretty unusual so, I really have no idea, but we didn't want to wait until the independent investigation is cleared up." NEWS 8 Report"

# **CHIEF AUDITOR COMP #2: 501C6**

**Pending: since Oct 2022, I dispute Rombardo's allegations on this.**

**It is a valid question I can address on use of tax dollars to support 501c6 lobbying**

**I have extensive research on request.**

**WCSD just changed trustee policy to not support 501c6 events! So in a way, Jeff prevailed.**

**The Question is so valid that Sparks has researched it and asked for an A.G. Opinion**

**(POC Nic Danna: [ndanna@cityofsparks.us](mailto:ndanna@cityofsparks.us))**

# Ethics fined Trustee Rodriguez \$500 represented pro-bono/ “in-kind” by Hosmer of McDonald Carano: no legal defense filing or CE Reporting



# As of March 2024 Facebook” “Elect Joe Rodriguez” and X: “Joe4Sparks” is he still at it?

From Rodriguez campaign website, would appear to be using uniforms in campaign: Trustee Mayberry (TMFPD) and him: State Fire Marshall



Note he is now a State Fire Marshal:  
note Fire Marshal truck





# MAYBERRY: ETHICS LETTER OF CAUTION

## Ask to see his Letter of Caution

Is this OK unredacted with two students, one JROTC?



  
STATE OF NEVADA  
BEFORE THE NEVADA COMMISSION ON ETHICS

In re **Adam Mayberry**, Trustee,  
Washoe County School District,  
State of Nevada,

Ethics Complaint  
Case No. 22-020C  
Confidential

Subject /

**ORDER ON JURISDICTION**  
Pursuant to NRS 281A.715

The Nevada Commission on Ethics ("Commission") received an Ethics Complaint on March 3, 2022 regarding Washoe County School District ("WCSD") Trustee Adam Mayberry ("Subject"). On April 12, 2022, pursuant to the requirements of the Nevada Ethics in Government Law set forth in NRS Chapter 281A ("Ethics Law") and NAC 281A.405, the Commission conducted its jurisdictional and evidentiary review of the record, including the Ethics Complaint, supporting evidence and the recommendation of the Executive Director.<sup>1</sup>

IT IS HEREBY ORDERED:

The Commission declines jurisdiction and dismisses the allegations in the Ethics Complaint regarding NRS 281A.400(5) (acquiring through public duties or relationships information that is not generally available), NRS 281A.400(9) (benefiting a personal or pecuniary interest through the influence of a subordinate), and NRS 281A.520 (causing a governmental entity to incur an expense or make an expenditure to support or oppose a ballot question or a candidate) for lack of sufficient evidence.<sup>2</sup>

However, the Commission accepts jurisdiction of the Ethics Complaint for allegations related to NRS 281A.400(2) and (7) and determines that good cause exists for the Commission to issue a Confidential Letter of Caution in lieu of an investigation. The letter shall instruct the Subject regarding his duty under the Ethics Law to refrain from using his public position as a WCSD Trustee or public property and resources for private campaign matters. These allegations shall be dismissed without prejudice upon issuance of the Confidential Letter of Caution.<sup>3</sup>

DATED this 12<sup>th</sup> day of April 2022.  
NEVADA COMMISSION ON ETHICS  
/s/ Kim Wallin  
Kim Wallin, CPA, CMA, CFM  
Commission Chair

<sup>1</sup> The following Commissioners participated in this jurisdictional review: Chair Wallin, Vice-Chair Duffrin and Commissioners Gruenewald, Lowry, Oscarson, Towler and Yen.  
<sup>2</sup> NRS 281A.710(2) requires an ethics complaint be submitted with sufficient evidence to support the allegations as that term is defined by NAC 281A.101.  
<sup>3</sup> The Complaint is dismissed without prejudice and the Commission reserves its authority to consider future ethics complaints that relate to the same or similar alleged conduct.

Order on Jurisdiction  
Page 1 of 2

# **CHURCH V. TRFMA ET AL (CASE NO. CV18-01082): WC1 OML FLOOD**

Ballot measure stipulated dismissal as the ballot measure failed issue moot church did not lose and no court dismissed it for cause  
There was no doubt that the committee chair failed to call for public comment on this matter. As the committee disbanded it could not be remedied.

From the Nevada Commission of Ethics reg: Smith, Mayberry and Rodriguez:

“...the Review Panel takes this opportunity to indicate that the WCSD policy should be clarified to establish boundaries for use of government property to compliment and assure compliance with the Ethics Law.”  
and

“...this determination should not be taken to indicate that mixed use accounts with a minimal disclaimer would be allowed by the Commission. Public officers, including Mayberry, would be wise to follow the educational aspects of this Review Panel Determination ...”  
and

“The best ethical practice for public officers or employees who are also candidates for office is to maintain separate official and campaign social media presences to make it crystal clear that communications from any official account are not related to promotion of a candidacy and those on the campaign account are for private campaign purposes. Moreover, a mixed use social media account creates concern under the Ethics Law and increases the likelihood that ethics complaints will be filed, each of which will be considered based upon the facts presented in the case...”

Do you really think that these Trustees and the District prevailed here or did Church's concerns have merit?

OML vs City of Reno 2019, before Church was on WCSD:

\*Not wrong but was “understandable and City took immediate corrective action.

**“CONCLUSION YOUR CONTENTION THAT THE ORIGINAL  
C.22 AGENDA COULD CREATE CONFUSION IS  
UNDERSTANDABLE, GIVEN THE SIMILARITY IN NAME  
FROM THE REVOKED ENTITY. ....THE CITY TOOK  
IMMEDIATE AMELIORATIVE ACTION AND TO CLARIFY THE  
NAMING REFERENCES.”**

**[HTTPS://AG.NV.GOV/UPLOADEDFILES/AGNVGOV/CONTENT/ABOUT/GOVERNMENTAL\\_AFFAIRS  
/AG%20FILE%20NO.%2013897-331.PDF](https://ag.nv.gov/uploadedfiles/agnv.gov/content/about/governmental_affairs/ag%20file%20no.%2013897-331.pdf)**

C.22 Staff Report (For Possible Action): Approval of Professional Services Agreement between the City of Reno and the designated Downtown Management Organization identified as the Downtown Reno Partnership.

DOWNTOWN RENO PARTNERSHIP

Status: Permanently Revoked File Date: 05/24/2000

Type: Domestic Non-Profit Corporation Entity Number:  
C14590-2000

NV Business ID: NV20001315672 Name: SANDRA O. WILSON,

ESQ. Address 1: 611 SIERRA ROSE DRIVE, STE A

Address 2: City: RENO State: NV

OML 23897-274 vs WCSD Oversight panel...  
(before I was on the board) In this matter the finding was that violation was after the 120 day window. The law has been changed based on this!

“...the Panel violated the OML...The OAG does caution the Panel not to deliberate or take action outside of its public meetings.”

# CHURCH VS CITY OF RENO CHURCH WON REPEATEDLY

Please read this article:

[HTTPS://READINGROOM.LAW.GSU.EDU/CGI/VIEWCONTENT.CGI?ARTICLE=2671&CONTEXT=GSULR](https://readingroom.law.gsu.edu/cgi/viewcontent.cgi?article=2671&context=gsulr)

**SINCE 1982 CHURCH V RENO:**

**OUT OF COURT PAYMENT**

**CONSENT DECREE**

**ATTORNEY FEES AWARDED BY JUDGE REED AND THOMPSON, JUDGE REED CALLED  
CHURCH 'WATCHDOG'**

**SANCTIONS**

**HOSTILE WORK ENVIRONMENT WENT TO 9<sup>TH</sup> CIR/ US SUP CT CARDER/ CONGRESS  
CLARIFIED**

**\*CHURCH HAD TO PAY 9<sup>TH</sup> CIRCUIT PER DIEM COSTS NOT ATTORNEY FEES AND  
AFTER CONGRESS "CLARIFIED THE LAW, I REFILED AND LOST ON A TECHNICAL  
ISSUE.**

## **Judge rules city of Reno must pay police officer's legal fees**

The city of Reno must pay \$15,308 in legal fees after being held in contempt for a police sergeant's evaluation, a federal judge has ruled.

U.S. District Court Judge Edward Reed ruled Thursday the city is liable for \$15,308 of the legal fees accumulated by lawyers for Sgt. Jeff Church.

Reed in September held the city in contempt for a job evaluation of Church that included references to his work as an Air Force reservist.

Church sued the city more than a decade ago, and got a court order in 1987 to force the city to honor requirements that it give employees in the military reserves and National Guard salary, seniority, accrued vacation and sick time and other job opportunities.

The deputy city attorney handling the case had no comment Friday on the judge's ruling on legal fees.

# Nevada SoS Complaint 2018: Founded!

## Complaint vs Truckee River Flood PAC

**FINDING:** Founded, the PAC was forced to remove City of Sparks implications that it endorsed the ballot measure.

Just another example that WatchDogJeff.com acts as a citizen watchdog thus explaining various complaints. If not Jeff then who?

Prior to being on the Board, Church filed Two OML Complaints  
in 2018: 13897-293 and 13897-306

Here is the total cost of the Office of General Counsel. To date not a penny was spent to defend any legal actions by Church on outside counsel even though the Board voted for such on 3-12-24. Rombardo has grossly inflated “what if” costs to falsely depict any alleged costs. De Facto Church has only two Petitions filed vs WCSO that are handled ‘in house’, are valid public matter concerns, and the petition route is the quickest method to economically resolve valid disputes. In both cases, after Judicial review, both Judges found good cause to hold a hearing! (Below source a Citizen)

11 employees with \$1.0 M in Gross Pay

| Name                           | Title                          | Base Pay            | Over-time | Bonus              | Payout             | Gross Pay             | Paid Benefits       |
|--------------------------------|--------------------------------|---------------------|-----------|--------------------|--------------------|-----------------------|---------------------|
| ANDERSEN, KAAREN D             | PARALEGAL/LEGAL SECRETARY      | \$28,276.94         |           |                    |                    | \$28,276.94           | \$13,441.73         |
| ESTRELLADO, EDWARD             | OFFICE GEN COUNS INVESTIGATOR  | \$16,035.01         |           |                    |                    | \$16,035.01           | \$8,165.28          |
| MCGUIRE, JULIE ANN             | OFFICE GEN COUNS INVESTIGATOR  | \$50,111.29         |           | \$4,233.33         | \$2,611.88         | \$56,956.50           | \$25,973.28         |
| MONTALVO, SARA K               | DEPUTY CHIEF GENERAL COUNSEL   | \$162,368.76        |           | \$12,700.00        | \$6,119.12         | \$181,187.88          | \$64,803.83         |
| NEWMAN, DEBRA L                | PARALEGAL/LEGAL SECRETARY      | \$44,807.64         |           | \$3,000.00         | \$1,419.30         | \$49,226.94           | \$14,851.03         |
| PICK, KEVIN A                  | GENERAL COUNSEL                | \$121,411.34        |           | \$4,200.00         |                    | \$125,611.34          | \$47,253.45         |
| PRUTZMAN, JUDY A               | DIRECTOR CIVIL RIGHTS/COMPLIAN | \$125,864.88        |           | \$4,200.00         |                    | \$130,064.88          | \$49,664.17         |
| READ, BREANNE                  | PARALEGAL/LEGAL SECRETARY      | \$89,380.22         |           | \$1,500.00         | \$1,679.98         | \$92,560.20           | \$40,790.33         |
| REICH, CHRISTOPHER B           | DEPUTY CHIEF GENERAL COUNSEL   | \$31,153.11         |           | -\$300.00          |                    | \$30,853.11           | \$12,410.51         |
| ROMBARDO, NEIL                 | CHIEF GENERAL COUNSEL          | \$183,293.16        |           | \$2,700.00         | \$8,239.68         | \$194,232.84          | \$72,011.13         |
| SCHULEWITZ, ANDREA L           | ASSOCIATE GENERAL COUNSEL      | \$126,611.64        |           | \$2,700.00         |                    | \$129,311.64          | \$53,455.72         |
| <b>Totals for 11 employees</b> |                                | <b>\$979,313.99</b> |           | <b>\$34,933.33</b> | <b>\$20,069.96</b> | <b>\$1,034,317.28</b> | <b>\$402,820.46</b> |

While the district and trustees feign aghast at the cost of legal actions by Church, per this from a concerned citizen, not a penny appears to have been spent on Church while close to \$1 million spent on outside legal counsel and investigations this FY. And while Trustee Rodriguez costs Nevada taxpayers thousands upon thousands and he gets pro-bono legal from McDonald Carano at the same time they are paid by WCSD for representation! And no NRS281A disclosures!

FISCAL YEAR 2023-2024 WCSD Legal Expenditures/General Council

| Vendor Name              | Purchase Order |            | VS.               | Checks Written    |                  |                   |
|--------------------------|----------------|------------|-------------------|-------------------|------------------|-------------------|
|                          | PO#            | Date       | Amount            | Date Range        | #                | Amount            |
| Alexander,etal           |                |            |                   | 07/21/23          | 1                | 6,400.00          |
| <b>SUB TOTAL</b>         |                |            | <b>-0-</b>        |                   |                  | <b>6,400.00</b>   |
| Dotson Law               | 130578         | 06/27/23   | 50,000.00         | 07/28/23-03/15/24 | 7                | 75,891.03         |
| <b>SUB TOTAL</b>         |                |            | <b>50,000.00</b>  |                   |                  | <b>75,891.03</b>  |
| Dreher Law               |                |            |                   |                   |                  | 17.50             |
| <b>SUB TOTAL</b>         |                |            | <b>-0-</b>        |                   |                  | <b>17.50</b>      |
| Elite Investigations     |                |            |                   | 10/27/23-03/22/24 | 9                | 27,227.81         |
| Elite Investigations No. |                |            |                   | 09/01/23-02/23/24 | 7                | 28,819.08         |
| <b>SUB TOTAL</b>         |                |            | <b>-0-</b>        |                   |                  | <b>56,046.89</b>  |
| McDONALD, CARANGetal     | 130537         | 06/20/23   | 35,000.00         | 09/15/23-02/09/24 | 6                | 31,344.45         |
|                          | 131910         | 10/10/23   | 50,000.00         |                   |                  |                   |
|                          | 929684         | 03/16/23   | 38,000.00         |                   |                  |                   |
| <b>SUB TOTAL</b>         |                |            | <b>123,000.00</b> |                   |                  | <b>31,344.45</b>  |
| Parsons, Behle, etal     |                |            |                   | 12/22/23-03/22/24 |                  | 96,610.38         |
| <b>SUB TOTAL</b>         |                |            | <b>-0-</b>        |                   |                  | <b>96,610.38</b>  |
| Platt Law Group          | 131854         | 10/10/23   | 2,000.00          |                   |                  | 5,872.50          |
|                          |                | 10/24/23   | 5,000.00          |                   |                  | 1,350.00          |
|                          |                | 11/30/23   | 50,000.00         |                   |                  |                   |
| <b>SUB TOTAL</b>         |                |            | <b>57,000.00</b>  |                   |                  | <b>7,222.50</b>   |
| Simons,Hall etal         | 130538         | 06/20/23   | 50,000.00         | 07/28/23-03/28/24 | 12               | 73,461.00         |
|                          | 130675         | 06/28/23   | 50,000.00         | 09/29/23-03/15/24 | 14               | 202,640.38        |
|                          | 131564         | 08/24/23   | 50,000.00         |                   |                  |                   |
|                          | 131565         | 08/24/23   | 99,000.00         |                   |                  |                   |
|                          | 131900         | 10/10/23   | 50,000.00         |                   |                  |                   |
|                          | 132674         | 01/09/24   | 50,000.00         |                   |                  |                   |
|                          | 132891         | 02/01/24   | 50,000.00         |                   |                  |                   |
|                          | 132929         | 02/12/24   | 50,000.00         |                   |                  |                   |
|                          | 927638         | 08/16/22   | 25,420.00         |                   |                  |                   |
|                          | 929683         | 03/16/23   | 35,000.00         |                   |                  |                   |
| <b>SUB TOTAL</b>         |                |            | <b>509,420.00</b> |                   |                  | <b>276,101.38</b> |
| Thorndal, etal           | 130539         | 06/20/23   | 50,000.00         | 07/21/23-03/22/24 |                  | 9,391.40          |
|                          | 130910         | 07/13/23   | 50,000.00         |                   |                  |                   |
|                          | 929725         | 03/17/23   | 10,000.00         |                   |                  |                   |
| <b>SUB TOTAL</b>         |                |            | <b>110,000.00</b> |                   |                  | <b>9391.40</b>    |
|                          |                |            | <b>TOTALS td</b>  |                   | <b>TOTALS td</b> | <b>559,025.53</b> |
| <b>In-house Legal</b>    |                |            |                   |                   |                  |                   |
| GenCounsel Payroll**     |                | 2023       | 1,034,317.28      |                   |                  |                   |
| GenCounsel Dept exp      |                | 2023/24 td | 47,067.06         |                   |                  |                   |
| GenCounsel Payroll est   |                | 2024       | 1,042,474.04*     |                   |                  |                   |

td=to date for the fiscal year  
bonuses or overtime calculated

\*projected based on first quarter payroll and despite 2 fewer departmental employees than the prior year with no  
\*\*payroll is based on calendar year NOT fiscal year.

When Church attempts to defend himself and report the information received from a true whistleblower and identify the Public Official involved directly in the conspiracy per the informant, note Smith's repeated attempts to silence him:

SMITH: Trustee Church, this is, we're way off of the motion.... & "For the motion to do this. "To the motion. Okay?" & "This is not related to this motion."

**Further, in possible violation of NRS281A, unlike Church who made disclosures, neither Smith nor any Trustee makes any disclosures on their pro-bono legal representation nor their conflict as seeking to protect their pecuniary interests in using up to \$500,000 in taxpayer dollars to prevent an independent investigation. Remember that Smith reportedly called Church a "liar" in the media opening herself to slander liability that an investigation may disprove. Smith makes every attempt to silence him or these reasons and because Smith is DIRECTLY IMPLICATED and INVOLVED in the matter. She is seeking to retain her \$9,000 + health insurance seat on the Board with an obvious eye to future elected positions that can be derailed if the TRUTH comes out. The truth being her knowledge and involvement in the fabrications.**

These Trustees should explain their acceptance of any pro-bono/ “In-Kind” legal work from McDonald Carano and if they reported it in their SoS Disclosures. Further, disclose why they seek to suppress this factfinding report/investigation!

In Smith’s last campaign she reported donations of: \$91,440.34! Where did that come from? But wait, there’s more: Just 4 months before Smith’s March 12 vote:

“McDonald Carano Government Affairs & Advocacy Group LLC 11/09/2023 \$1,000.00”

NRS 281A.400 A code of ethical standards ...to govern the conduct of public officers ...

1. A public officer or employee shall not seek or accept any gift, service, favor, employment, engagement, emolument or economic opportunity, for the public officer or employee or any person to whom the public officer or employee has a commitment in a private capacity, ...

2. A public officer or employee shall not use the public officer’s or employee’s position in government to secure or grant unwarranted privileges, preferences, exemptions or advantages for the public officer or employee, any business entity in which the public officer or employee has a significant pecuniary interest or any person to whom the public officer or employee has a commitment in a private capacity.

6. A public officer or employee shall not suppress any governmental report or other official document because it might tend to affect unfavorably a significant pecuniary interest of the public officer ...

NRS 241.0353      2. Subject to a qualified privilege, a witness who is testifying before a public body may publish defamatory matter as part of a public meeting. It is unlawful to misrepresent any fact knowingly when testifying before a public body.

3.3 (a) A lawyer shall not knowingly: (1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;

(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or

(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness called by the lawyer, has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter, that the lawyer reasonably believes is false.

(d) In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.

#### CA Rule 1.0.1 Terminology

“Tribunal” means: (i) a court, an arbitrator, an administrative law judge, or an administrative body acting in an adjudicative capacity and authorized to make a decision that can be binding on the parties involved; or (ii) a special master or other person\* to whom a court refers one or more issues and whose decision or recommendation can be binding on the parties if approved by the court.