



# NEVADA COMMISSION ON ETHICS

## ETHICS COMPLAINT

[NRS 281A.700 to 281A.790](#)

1. **SUBJECT OF THE COMPLAINT** - person you allege violated provisions of NRS Chapter 281A, the Nevada Ethics in Government Law. *(Please use a separate form for each individual.)*

<b>Subject Name:</b> <i>(Last, First)</i>	Wolfson, Steve	<b>Title of Public Office:</b> <i>(Position)</i>	Clark County District Attorney
<b>Public Entity:</b> <i>(Name of the entity employing this position)</i>	Clark County District Attorney's Office		
<b>Address:</b>	200 Lewis Avenue	<b>City, State, Zip Code:</b>	Las Vegas, NV 89101
<b>Telephone:</b>	<i>Work:</i> 702-671-2500	<i>Other (home/cell):</i>	<b>Email:</b> DAInfo@ClarkCountyDA.com

2. Describe the alleged conduct of the public officer or employee (subject) that you believe violated NRS Chapter 281A. *(Include specific facts and circumstances to support your allegation: times, places, and the name and position of each person involved.)*

Steve Wolfson is currently the elected Clark County District Attorney. He was appointed to the position in 2012, and his current term ends in December 2026. Steve Wolfson's daughter, Rebecca Wolfson is currently running for Judge, Las Vegas Municipal Court, Department 5. On May 1, a TV commercial began airing, and continues to air, for Rebecca Wolfson. Steve Wolfson, Rebecca Wolfson's father appears in the commercial and declared she will be "a great Municipal Court Judge." This commercial and the DA's appearance and testimonial for his daughter are a violation of NRS 281.400(2). Steve Wolfson, in his capacity as an elected official and Clark County's top prosecutor, used his elected position in government and the community to secure privilege, preference, and advantage for his daughter, Rebecca Wolfson, in her campaign for Judge. By being elected a Las Vegas Municipal Court Judge, Rebecca Wolfson gains two primary advantages: Increased salary, from her current yearly salary of \$110,699 as a Deputy City Attorney II, to total pay and benefits of a judge, which range from yearly of \$216,113.24 to \$241,064.47, in addition to the stature of being an elected judge. Using his position as District Attorney to secure such preference, advantage, and privilege for his daughter is a violation of NRS 281A.400(2).

3. Is the alleged conduct currently pending before another administrative, law enforcement or judicial body? If yes, describe:

No

4. NRS Chapter 281A requires public officers and employees to hold public office as a public trust and avoid conflicts between public duties and private interests. (NRS 281A.020) What provisions of NRS Chapter 281A are relevant to the conduct alleged? **Please check all that apply.**

<input type="checkbox"/> NRS 281A.400(1)	Seeking or accepting any gift, service, favor, employment, engagement, emolument or economic opportunity for himself or person to whom he has a commitment in a private capacity which would tend improperly to influence a reasonable person in his position to depart from the faithful and impartial discharge of his public duties.
<input checked="" type="checkbox"/> NRS 281A.400(2)	Using his position in government to secure or grant unwarranted privileges, preferences, exemptions or advantages for himself, any business entity in which he has a significant pecuniary interest, or any person to whom he has a commitment in a private capacity.
<input type="checkbox"/> NRS 281A.400(3)	Participating as an agent of government in the negotiation or execution of a contract between the government and himself, any business entity in which he has a significant pecuniary interest or any person to whom he has a commitment in a private capacity.
<input type="checkbox"/> NRS 281A.400(4)	Accepting any salary, retainer, augmentation, expense allowance or other compensation from any private source for himself or any person to whom he has a commitment in a private capacity for the performance of his duties as a public officer or employee.
<input type="checkbox"/> NRS 281A.400(5)	Acquiring, through his public duties or relationships, any information which by law or practice is not at the time available to people generally, and using the information to further the pecuniary interests of himself or any other person or business entity.
<input type="checkbox"/> NRS 281A.400(6)	Suppressing any governmental report or other document because it might tend to affect unfavorably his pecuniary interests or the interests of any person to whom he has a commitment in a private capacity.
<input type="checkbox"/> NRS 281A.400(7)	Using governmental time, property, equipment or other facility to benefit his significant personal or pecuniary interest, or any person to whom he has a commitment in a private capacity. (Some exceptions apply).
<input type="checkbox"/> NRS 281A.400(8)	A State Legislator using governmental time, property, equipment or other facility for a nongovernmental purpose or for the private benefit of himself or any other person, or requiring or authorizing a legislative employee, while on duty, to perform personal services or assist in a private activity. (Some exceptions apply).
<input type="checkbox"/> NRS 281A.400(9)	Attempting to benefit his personal or pecuniary interest or the interests of any person to whom he has a commitment in a private capacity through the influence of a subordinate.
<input type="checkbox"/> NRS 281A.400(10)	Seeking other employment or contracts for himself or any person to whom he has a commitment in a private capacity through the use of his official position.
<input type="checkbox"/> NRS 281A.410	Representing or counseling a private person for compensation on an issue pending before a public agency while employed, or within 1 year after leaving the service of a public agency, including before any state agency of the Executive or Legislative Department. (State and local legislators and part-time public officers and employees may represent/counsel private persons before agencies they do not serve, except local legislators may not represent/counsel private persons before other local agencies within the same county.)
<input type="checkbox"/> NRS 281A.420(1)	Failing to sufficiently disclose his acceptance of a gift or loan, pecuniary interest, commitment in a private capacity to the interest of another person or the nature of any representation or counseling provided to a private person for compensation before another agency in the preceeding year that is reasonably affected by an official matter.
<input type="checkbox"/> NRS 281A.420(3)	Failing to abstain from acting on an official matter which is materially affected by his acceptance of a gift or loan, pecuniary interest, or commitment in a private capacity to the interest of another person.
<input type="checkbox"/> NRS 281A.430	Bidding on or entering into a government contract in which he has a significant pecuniary interest. (Some exceptions apply).
<input type="checkbox"/> NRS 281A.500	Failing to file or timely file a Nevada Acknowledgment of Ethical Standards for Public Officers form.
<input type="checkbox"/> NRS 281A.510	Accepting or receiving an improper honorarium.
<input type="checkbox"/> NRS 281A.520	Requesting or otherwise causing a governmental entity to incur an expense or make an expenditure to support or oppose a ballot question or candidate during the relevant timeframe.

<input type="checkbox"/> NRS 281A.550	Negotiating or accepting employment from a business or industry regulated by or contracted with former public agency within one year after leaving the service of the agency. (Failing to honor the applicable "cooling off" period after leaving public service).
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\*Pursuant to NRS 281A.065, a public officer or employee has a commitment in a private capacity to the following persons:

1. Spouse; domestic partner
2. Household member
3. Family member within 3<sup>rd</sup> degree of consanguinity/affinity.
4. Employer or spouses/domestic partner/household member's employer
5. Substantial and continuing business relationships, i.e. partner, associate, or business entity.
6. Substantially similar relationships to those listed above, including close, personal relationships akin to family and fiduciary relationships to business entities.

**5. YOU MUST SUBMIT EVIDENCE TO SUPPORT YOUR ALLEGATIONS.** (NRS 281A.710 through 281A.715.)

Attach all documents or items you believe support your allegations, including witness statements, public or private records, audio or visual recordings, documents, exhibits, concrete objects, or other forms of proof.

**6. Witnesses:** Identify all persons who have knowledge of the facts and circumstances you have described, as well as the nature of the testimony the person will provide.

Name and Title:	<b>Tom Letizia</b>		
Address:		City, State, Zip:	Las Vegas, NV 71198
Telephone:	<u>Work:</u>	<u>Other (home/cell):</u>	<u>Email:</u>
		702-545-8777	
Nature of Testimony:	Rebecca Wolfson on X: "I am excited to share that my campaign commercials started airing on TV today. It's an honor to run for Municipal Court and I hope I can earn your vote! Early voting starts in 24 days and the primary is June 11th. Let me know if you see me on your TV! #wolfson4judge https://t.co/yZfS5WSko7 / X https://twitter.com/wolfson4judge/status/1785723898434294134"		

Name and Title:	<b>Steve Wolfson</b>		
Address:		City, State, Zip:	Las Vegas, NV 10198
Telephone:	<u>Work:</u>	<u>Other (home/cell):</u>	<u>Email:</u>
		702-671-2500	DAInfo@ClarkCountyDA.com
Nature of Testimony:	https://twitter.com/wolfson4judge/status/1785723898434294134		

**7. Requesters Information:**

Your Name:	<b>Roger Kaplan</b>		
Your Address:		City, State, Zip:	Las Vegas, NV 89145
Your Telephone:	<u>Day:</u>	<u>Evening:</u>	<u>Email:</u>
	702-810-1895	702-810-1895	rogerkaplan4@aol.com

***Your identity as the Requester will be provided to the Subject if the Commission accepts jurisdiction of this matter, unless:***

Pursuant to NRS 281A.750, I request that my identity as the requester of this Ethics Complaint remain confidential because (please check appropriate box):

I am a public officer or employee who works for the same public body, agency or employer as the subject of this Ethics Complaint. Provide evidence in the text box below, or as an attachment, of your employment with the same public body, agency or employer.

**OR**

I can show a reasonable likelihood that disclosure of my identity will subject me or a member of my house-hold to a bona fide threat of physical force or violence. Describe in the text box below, or in an attachment, the facts and circumstances that support a reasonable likelihood of a bona fide threat of physical force or violence.

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A copy of this Complaint will be provided to the Subject. If your request for confidentiality is approved by the Commission, the Complaint will be redacted to protect your identity as the Requester. The Commission may decline to maintain the confidentiality of your identity as the Requester for lack of sufficient evidence of your employment status with the same public body, agency or employer, or proof of a bona fide threat of physical force or violence.

If the Commission declines to maintain my confidentiality, I wish to:

- Withdraw my Complaint, **OR**
- Submit the Complaint understanding that the Subject will know my identity as the Requester.

**By my signature below, I affirm that the facts set forth in this document and all of its attachments are true and correct to the best of my knowledge and belief. I am willing to provide sworn testimony regarding these allegations. I acknowledge that this Ethics Complaint, the materials submitted in support of the allegations, and the Commission's investigation are confidential unless and until the Commission's Review Panel renders a determination. Certain Commission proceedings and materials, including the Investigatory File remain confidential pursuant to NRS 281A.750 through 281A.760.**



Date: 05-13-2024

Signature:

Print Name: Roger Kaplan

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You may file a Complaint using the Commission's online form submission at [ethics.nv.gov](https://ethics.nv.gov) (Preferred) or You must submit this form bearing your signature to the Executive Director via: **delivery/mail** to Nevada Commission on Ethics, 704 W. Nye Lane, Suite 204, Carson City, Nevada, 89703, **email** to [NCOE@ethics.nv.gov](mailto:NCOE@ethics.nv.gov), or **fax** to (775) 687-1279