



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.)*

Subject Name: <i>(Last, First)</i>	Robertson, Mark		Title of Public Office: <i>(Position)</i>	Candidate for US Congress District One
Public Entity: <i>(Name of the entity employing this position)</i>	Candidate for US Congress District One			
Address:	54 N. Pecos Road, Suite A		City, State, Zip Code:	Henderson, NV 89074
Telephone:	<i>Work:</i> 702-375-9989	<i>Other (home/cell):</i>	Email:	Mark@RobertsonForCongress.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.)*

Mark Robertson is a retired full-bird Army Colonel and a candidate for Nevada Congressional District 1. On May 18, 2023 Robertson attended the Boulder City Republican Women's monthly luncheon, which is a political organization. Mr. Robertson arrived dressed in his full Army uniform. DOD policy for service members is contained in Department of Defense Directive 1344.10, Political Activities for Members of the Armed Forces. It is DOD policy to encourage members of the armed forces to carry out the obligations of citizenship while keeping with the traditional concept that members on active duty should not engage in partisan political activity. All members of the armed forces, including active-duty members, members of the reserve components not on active duty, and retired members are prohibited from wearing military uniforms at political campaign or election events. In addition, we think this is action is also a violation of NRS 281A.400(2). It states, "a law enforcement uniform and badge signify the power and prestige of the office and are considered governmental property for purposes of the Ethics Law. It further states, "no state or government law enforcement official including an elected, incumbent official may wear his/her uniform, badge or other physical accouterments of office...including his/her own campaign or an endorsement". His uniform represents government property and his being used to benefit is person and financial interests. Such use constitutes a violation of NRS 281A.400(7).

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 checked="" 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 3rd degree of consanguinity/affinity.
4. Employer or spouses/domestic partner/houshold 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:	Steve Sanson		
Address:		City, State, Zip:	Las Vegas, NV 70198
Telephone:	<u>Work:</u>	<u>Other (home/cell):</u> 702-283-8088	Email: vipipresident@cs.com

Nature of Testimony:	<p>From an article written by Veterans In Politics Staff dated 5/29/23 located on their website: https://veteransinpolitics.org/2023/05/congressional-candidate-puts-self-interest-before-code-dragging-republican-club-president-in-the-process/ (VIPI) Veterans In Politics International President Steve Sanson attended the Boulder City Republican Women monthly luncheon on May 18, 2023. The last time Sanson attended this event the Boulder City bypass was just a conversation. The club President Jennifer Tuggle announced both Republican Nevada State Party Chairman Michael McDonald and Clark County Republican Party Chairman Jesse Law were in attendance. Anyone with half a brain would be able to do the connection and realize that this is a Political Republican organization. Although it is open to the public the name alone would tell anyone that they are "Republican Women in Boulder City" I wonder what gave that away. We are positive that their members are registered Republicans only. With that said Sanson was surprised to see Mark Robertson soon to announce his second attempt for congressional district one and retired full-bird Army Colnole wearing his military uniform as the keynote speaker to this political organization's monthly luncheon. Sanson decided to quietly inform the club president Jennifer Tuggle of the rules regarding the (UCMJ) Uniform Code of Military Justice. All members of the armed forces, including active-duty members, members of the reserve components not on active duty, and retired members are prohibited from wearing military uniforms at political campaigns or election events. Tuggle was abrasive and rude she watered down everything Sanson was saying and added with her narcissistic attitude that she is the final decision maker. Sanson decided to reach out to Mark Robertson to correct him on his violation. Robertson responded as long as he didn't discuss politics he was correct to wear the uniform I never saw any disclaimer in the UCMJ that states that. I guess it's like going to a Ku Klux Klan rally and being okay as long as you don't talk about hanging black Americans. Sanson figured he wasn't getting anywhere with these two and decided to go public. The bottom line is Robertson willfully violated that military policy so what else is he willing to violate if he gets into office? If Robertson appeared at this political organization in civilian clothes like every other veteran that attended this event there wouldn't be an issue. The fact that the club was honoring veterans and politics was not discussed are not disclaimers to violate the policy. Because Sanson publicly called out Robertson for violating the UCMJ. Tuggle with her narcissistic attitude told a Republican member that Sanson is no longer welcome to attend the club's functions. Tuggle narcissistic as can be didn't have the gonads to tell Sanson herself! Sanson tried to find the By-Laws of the Boulder City Republican Women, but do understand that it takes a voting body to remove someone. Republicans are supposed to be fierce protectors of our US Constitution but in this case, it can be violated if it serves your self-interest. The First Amendment gives Americans five basic freedoms: Freedom of speech, press, petition, assembly, and religion.</p>
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7. Requesters Information:

Your Name:	Robert Medoff		
Your Address:		City, State, Zip:	Las Vegas, NV 89114
Your Telephone:	Day: 702-449-1554	Evening:	Email: medoffr@yahoo.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.

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: 06-16-2023

Signature:

Print Name: Dr. Robert Medoff

You may file a Complaint using the Commission's online form submission at 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, or **fax** to (775) 687-1279