BEFORE THE NEVADA COMMISSION ON ETHICS

STATE OF NEVADA

ETHICS COMPLAINT

In the Matter of Tya Mathis-Coleman

Complainant: Morgun Sholty

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Respondent: Tya Mathis-Coleman, Deputy Treasurer for College Savings, Office of the Nevada State Treasurer.

Date: October 23, 2026

I. NATURE OF THE COMPLAINT

1. Morgun Sholty, brings this complaint alleging that Tya Mathis-Coleman's State position and the Treasurer's official communications resources may have been used to provide an unwarranted advantage to her campaign. The complaint also identifies specific campaign events requiring examination of State work time, travel, and expenditure records. It seeks investigation and enforcement under NRS 281A.400 and NRS 281A.520, not a ruling on the merits of her candidacy.

2. Taxpayer-funded communications are not an employee's campaign assets. The announcement-day leadership promotion, repeated official exposure, and official-personal account collaboration raise a substantial question about where public service ended and campaign assistance began. The public deserves an answer grounded in the actual approvals, staff assignments, and expenditures, not an assumption that every use of an official account necessarily served an official purpose.

II. FACTUAL BASIS

3. Candidacy and endorsement. On February 11, 2026, Mathis-Coleman publicly announced her campaign for Nevada State Treasurer with Conine's endorsement. Nevada Current later reported Mathis-Coleman's account that Conine had encouraged her to seek the office. The endorsement establishes his political support; whether governmental resources were used to advance that support is the question presented. (Exs. S-1, S-3.)

4. Official publicity on announcement day. That same day, the Treasurer's official X, Facebook, and Instagram accounts published material concerning a College Savings Division retreat. The X caption expressly credited her leadership: "Under the leadership of Deputy Treasurer Dr. Tya Mathis-Coleman" the team was focused on its work. The image was a group photograph; the caption nevertheless singled out her leadership. The timing and individualized credit provide a concrete basis to examine who selected, approved, and scheduled the content and whether the campaign launch influenced those decisions. (Exs. A-1, B-1, C-14.)

5. A sustained publication record. The binder contains 18 X post URLs, 22 Facebook posts or reels, and 15 Instagram items associated with the review of Mathis-Coleman's official exposure. This is an inventory of 55 located items, including cross-platform repetitions and routine program content, not

55 proven campaign advertisements. The record includes June 8 publications concerning College Savings Division school activities, immediately before the primary election. The proper inquiry is whether the selection, emphasis, timing, or distribution of particular items served a campaign purpose at public expense. (Exs. A-1-A-18, including A-9; B-1-B-22, including B-16; C-1-C-15.)

6. **Reported increase in individual prominence.** The preliminary comparison reports approximately ten appearances per official platform during the twelve months before the announcement, more than half in group posts, followed by more frequent individual features. The comparison is not a completed audit: the periods differ in length, and reported appearances are not interchangeable with located URLs. Even so, the reported shift identifies a specific issue for account-level review: whether Treasury's editorial choices changed to elevate its employee-candidate, rather than to meet documented program needs. Different deputy portfolios and overall posting volume must be accounted for. (Ex. D-1.)

7. **Official and personal accounts linked.** The August 19 Instagram collaborator display identifies both the official Treasurer account and an account bearing Mathis-Coleman's name alongside the originating broadcaster's account. This is a documented connection between official content and her personal account, not merely her appearance in a photograph. The art-contest subject may explain legitimate program outreach, and the personal account has not been established as a campaign account. The unanswered questions are who authorized the collaboration, who controlled each account, and whether the arrangement supplied publicly funded content or distribution for private electoral benefit. (Ex. C-15a.)

8. **October 1 school appearance.** A campaign-page link supplied with the complaint is described as showing Mathis-Coleman at a high school with other Democratic candidates on October 1, 2026, in a candidate capacity. The precise event time, location, and her work or leave status remain unverified. The link identifies a discrete occasion for comparison with contemporaneous calendars, authorized field assignments, and leave records; a weekday appearance alone does not establish misuse of paid time. (Ex. S-4.)

9. **April 7 Reno fundraiser.** A second campaign-page link is described as concerning an April 7, 2026 Reno fundraiser. The materials do not establish her travel arrangements, who paid, or whether any State work time was involved. Those questions are capable of a direct documentary answer through itineraries, expense claims, payment records, and any allocation between official and campaign activities. A campaign event is not proof of a taxpayer-funded flight or hotel. (Ex. S-5.)

10. **Employee accounts requiring corroboration.** The materials supplied to the complainant recount separate concerns attributed to two current Treasury employees, one said to work regularly with Mathis-Coleman, about absences associated with campaigning, fundraising, and outside teaching. These are uncorroborated accounts, not sworn testimony. Their relevance is to the examination of schedules, assignments, and recorded leave. An absence from the office or lawful outside employment is not itself an ethics violation.

11. **The records needed to resolve the allegations remain unavailable.** Beginning October 2, 2026, requests sought calendars, work schedules, leave, account administration, communications, access logs, and travel and expenditure records. Treasury denied some categories, sought clarification of others, and assigned anticipated review or response dates extending to December 4, 2026 and, for certain categories, March 12, 2027. Both dates fall after the November 3 election. These were dates for review or response, not unqualified commitments to produce the requested records. (Exs. F-M.)

12. **Why that history matters.** The practical result is that important records needed to distinguish authorized public work from campaign activity remain unavailable during the period of greatest public scrutiny. The correspondence is not proof that Mathis-Coleman ordered a delay or concealed evidence, and this complaint does not ask the Commission to adjudicate a public-records dispute. It explains why the identified questions require independent investigation rather than remaining unanswered because the relevant records are held by the office under examination.

III. POTENTIAL VIOLATIONS OF NEVADA LAW

13. **Government resources and unwarranted advantage.** NRS 281A.400(7) restricts use of governmental time, property, equipment, or facilities to benefit a significant personal or pecuniary interest, subject to its exceptions. Subsection (2) restricts use of public position to secure unwarranted advantages for covered interests. The alleged conduct is campaign-directed use of State resources or preferential official assistance, not ordinary performance of College Savings duties. Any claim of routine outreach should be tested against contemporaneous editorial plans, assignments, and actual use.

14. **Government expenditures supporting a candidate.** NRS 281A.520(1) restricts causing governmental expenses or expenditures to support a candidate. Its candidate definition and exceptions must be satisfied, including NRS 281A.050 and 281A.520(4)-(6). The additional publication rule in subsections (2)-(3) requires qualifying public-officer status and formal candidacy filing. The March 2-13 filing window does not establish the precise filing date; February 11 was an announcement. Those distinctions do not foreclose separate examination of resource use under NRS 281A.400. (Ex. S-2.)

15. **Personal participation and subordinate assistance.** The inquiry must identify what Mathis-Coleman requested, approved, used, or coordinated. Receipt of favorable publicity alone does not establish those acts. If she influenced subordinates to perform campaign work, NRS 281A.400(9) also warrants examination under its separate requirements. Relevant evidence includes content requests, account permissions, approvals, staff directions, and any campaign reuse coordinated with Treasury personnel.

IV. CONDUCT REQUIRING INVESTIGATION

16. **Publication decisions and coordination.** The Commission should establish who proposed, drafted, approved, and scheduled the February 11 posts and subsequent individual features; whether Mathis-Coleman or campaign personnel requested coverage; and whether public employees supplied content or distribution for campaign use. The August 19 collaboration presents a specific account-level lead. A government program label does not answer who authorized a personal-account connection or what purpose it served.

17. **Work time and outside commitments.** The October 1 appearance and other independently established campaign events should be matched to actual work schedules, approved leave, telework, and authorized field duties. The relevant question is whether government time or resources supported private campaigning, not whether a salaried employee was physically absent from an office. Outside-teaching arrangements are relevant only to an actual conflict involving State time, resources, or required authorization.

18. **Travel and expenditure allocation.** The April 7 event should be examined through travel dates, official and campaign itineraries, payment records, lodging, vehicle use, per diem, and reimbursements. A mixed-purpose trip requires examination of the expenses actually attributable to State business and those attributable to campaign activity. Any campaign-related public cost must be traced to the person requesting it, the approving official, and the recipient of the benefit.

19. **Comparison against actual agency practice.** A complete posting history should show whether individual promotion changed after the announcement, how other deputy officials were treated, and whether the differences were explained by program duties and documented communications needs. The present comparison identifies the question; it does not establish a legal requirement of equal publicity or substitute for the underlying record.

V. REQUEST FOR INVESTIGATION AND RELIEF

20. Complainant submits that the documented publications and account connection, considered with the specifically identified event leads and records history, warrant investigation under NRS 281A.715. He requests prompt preservation and lawful production of original posts, drafts, account and collaborator histories, approvals, staff assignments, relevant communications, work and leave records, and event-related travel and expenditure records. Where appropriate, the Commission should use its authority under NRS 281A.300 to obtain records and testimony.

21. If the evidence establishes a violation, Complainant requests findings identifying the responsible acts, the public resources involved, and any resulting benefit, together with the corrective measures and sanctions authorized by law. The absence of internal records from a public production should not become an evidentiary dead end. Nevadans are entitled to know whether their resources served Treasury's work or the private campaign of its deputy.

VI. EXHIBITS AND SOURCES

22. The accompanying 76-page consolidated binder, Nevada_Ethics_Evidence_Binder_Clean_Final_2026-10-21.pdf, is incorporated by reference. Exhibits A-1-A-18 contain X captures; B-1-B-22 contain Facebook captures; C-1-C-15 and C-15a contain Instagram material and the collaborator display; and F-M reproduce identified public-records correspondence. S-1-S-6 identify supplemental sources, and D-1 records the preliminary comparison. The campaign links in S-4 and S-5 are not authenticated evidence of event times or payment; S-6 is not relied upon for an allegation concerning travel or compensation.

Respectfully submitted,

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