



**DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INDUSTRIAL RELATIONS**

**NOTICE OF PUBLIC MEETING
of the
Occupational Safety and Health Review Board
April 21, 2026
2:00p.m.**

You are hereby given notice that the Occupational Safety and Health Review Board (Board) will conduct a public meeting on Tuesday April 21, 2026, at 2:00p.m. This meeting will be held online via Teams and by phone:

Teams Access:

<https://teams.microsoft.com/meet/28212939078835?p=TEgcNyZLE6H1zcLQY9>

Meeting ID: 282 129 390 788 35

Passcode: S4YF6Vx7

To Join by Phone:

1-775-321-6111

Phone conference ID: 906 260 097#

NOTICE

1. Items listed on the Agenda may be taken out of order;
2. Two or more items on the Agenda may be combined;
3. Items of the Agenda may be removed or delayed at any time; and
4. Public comment may be limited to two (2) minutes per speaker at the discretion of the chair. No action may be taken on any matter raised during public comment. Public comment will not be restricted based on viewpoint, but must be relevant to, and within, the authority of the Board.
5. Closed session may be held for Item 3 to consider professional competence pursuant to NRS 241.030.

AGENDA

1. Call to Order; Roll Call; and establishment of a quorum (Chair).
2. Public Comment. (*see* Notice 4) (Chair)
3. **FOR POSSIBLE ACTION:** Review of solicited proposals submitted to provide legal counsel to advise the Board concerning matters which come before it, and then selection of which candidate to submit to the Division of Industrial Relations, Department of Business and Industry for contract negotiations pursuant to NRS Chapters 232 and 618. (*see* Notice 5) (Chair)

Proposals were submitted from the following:

- a) Colleen Platt, Platt Law Group
 - b) Charles R. Zeh and Pete Cladianos III, The Law Offices of Charles R. Zeh, Esq.
4. Public Comment. (*see* Notice 4) (Chair)
 5. Adjournment. (Chair)

Any person with a disability as defined by the Americans with Disabilities Act who requires special assistance to participate in the meeting may contact, at least five (5) business days prior to the meeting, Marisa Santizo by emailing ADACoordinator@dir.nv.gov, or by calling (702) 486-9100 to arrange for reasonable accommodations.

Copies of the supporting material which is not privileged or confidential may be obtained upon request by emailing heather.wilson@dir.nv.gov, calling Heather Wilson at (702) 486-9100, or by mailing a request to the Division of Industrial Relations, 2300 West Sahara Avenue, Suite 300, Las Vegas, NV 89102, Attention Heather Wilson.

This Notice and Agenda has been posted at the following locations:

- Division of Industrial Relations, 2300 West Sahara Ave., Suite 300, Las Vegas, Nevada 89102
- Division of Industrial Relations, 1886 College Parkway, Carson City, Nevada 89706

This Notice and Agenda has also been posted at the following website addresses:

- Division of Industrial Relations Notice of Meeting at <http://dir.nv.gov/meetings/meetings>
- Nevada Public Notices at <https://notice.nv.gov>



PLATT LAW GROUP

February 17, 2026

Nevada Division of Industrial Relations
c/o Julie A. White
jawhite@dir.nv.gov

Dear Ms. White,

I am writing to you to express my interest in applying for the independent contractor position to provide legal services to the Nevada Occupational Safety and Health Review Board (Board). I believe my experience makes me uniquely qualified to provide the legal services the Board is seeking.

I have lived and worked in Nevada since 2007. I started with the Nevada Legislative Counsel Bureau as a Deputy Legislative Counsel, I drafted legislative measures, administrative regulations, and researched and drafted legal memoranda. I was promoted to Senior Deputy Legislative Counsel and in addition to the prior duties I had as a Deputy Legislative Counsel, I staffed both Legislative and Interim Committees. As Committee counsel I worked closely with the Legislators and other staff to provide guidance and counsel on the matters before the Committee.

In 2013, I accepted a position with the Nevada Attorney General's Office as a Deputy Attorney General. At the Attorney General's Office, I represented state agencies, including the Department of Business and Industry and the Housing Division, as well as state professional licensing boards, including, the Nevada State Board of Massage Therapy, Nevada State Board of Examiners for Alcohol, Drug and Gambling Counselors. I counseled my clients on the Open Meeting Law, drafted legal memoranda and administrative regulations, conducted administrative hearings, drafted findings of facts, conclusions of law and orders, and reviewed and drafted bond documents for the issuance of bonds by the Department of Business and Industry and the Housing Division. I also provided legal guidance to the Director of the Department of Business and Industry as it related to the various divisions within the Department. In addition, I represented my clients in district court and before the Nevada Supreme Court in petitions for judicial review and other lawsuits.

In 2015, I made the ambitious decision to open my own law practice. As a solo practitioner I had to develop a budget, maintain the budget, and run the office. At my practice I represented state agencies and state professional licensing boards and other private clients. I also worked with Richard Perkins and the Perkins Company for the 2017 Legislative Session. Collaborating with the Perkins Company allowed me to gain priceless knowledge of the inner workings of lobbying and advocating for the client.

In 2018, after the death of my mother, I took a hard introspective look at where I was in my career and realized I could do more. I accepted the job of General Counsel with Northern Nevada HOPES, a federally qualified health center in Reno, Nevada. In the role of General Counsel, I wore many hats. I developed and drafted policies and procedures, developed a risk management plan and a compliance program, reviewed and revised internal employment documents, including the code of conduct. When the COVID-19 pandemic struck, I was charged with ensuring that Northern Nevada HOPES was compliant with all requirements to ensure the public remained safe as well as the employees. I had to be flexible and understanding as guidance changed daily. Northern Nevada HOPES has almost 200 employees and as General Counsel I also ensured that the organization was compliant not only with state law, but federal law involving health and safety of employees and clients, employment matters, including, Family and Medical Leave Act, wage and compensation, Equal Opportunities Commission, and Drug Free Work Place.

In the summer of 2021, I left Northern Nevada HOPES to focus on my private practice again. In my practice I again represent many of the same clients.

I am familiar with the requirements of OSHA, having spent time as a general counsel for a local health clinic where it was subject to OSHA and its regulations. As general counsel I was required to develop and implement risk management plans that included compliance with OSHA as well as conducted training for employees on OSHA compliance. While the health clinic did not have any OSHA findings while I was general counsel, I am familiar with the appeals process, having reviewed the statutes and regulations governing the OSH.

To say I have been lucky in my career is an understatement. I have been privileged to work for amazing entities and continue to do so in my private practice. I believe that my experience, knowledge and commitment make me the ideal candidate. This proposal is submitted to represent the Board in the entire state. While I understand that the contract cannot include costs of travel, I would still provide my services in person when the Board meets in Las Vegas because I feel that as Board counsel it is important for the Board to have the ability to speak to its counsel during a Board meeting. The cost of the travel would be borne by myself and not charged to the Board. Thank you for your consideration and I look forward to discussing my qualifications further.

Sincerely,

Colleen Platt

Comprehensive Knowledge and Experience in Regulatory, Legislative, Education and Healthcare Legal Matters
Results driven attorney who is compassionate and motivated to help those in need. Over 18 years of legal experience, with 14 years in Nevada, backed by 3.5 years of medical research and a Master of Biology. Experience in legislative drafting, government affairs, regulatory requirements at both state and federal levels and comprehensive understanding of state licensing laws. Licensed by the Nevada Bar and maintains a Certificate of Healthcare Compliance by the Healthcare Compliance Association. Recipient of the Nevada Legal Elite 2016, 2017.

PROFESSIONAL EXPERIENCE

Platt Law Group, Reno, Nevada

Owner, August 2015-present

- Provide legal counsel to various clients, including, Nevada Housing Division and various State of Nevada Licensing Boards
- Hearing Officer for the Nevada Department of Education: conduct hearings, issue orders and findings of fact, conclusions of law and orders for Due Process Complaints submitted regarding the Individuals with Disabilities Education Act
- Provide government affairs services, including lobbying before the Nevada Legislature
- Provide HIPAA training to professional licensees and businesses
- Develop policies and procedures governing the internal workings of State Agencies and Licensing Boards and private businesses
- Develop programs and guidelines for State Agencies and private businesses
- Assist the Nevada Department of Business and Industry in the issuance of private activity bonds for economic opportunities in Nevada
- Assist the Nevada Housing Division in the issuance of bonds for the development of housing for low-income families
- Represented clients before the Washoe Board of Equalization on a property tax matters
- Represent licensees in administrative hearings before professional licensing boards
- Draft legislation and regulation for clients
- Provide consultation services to healthcare providers regarding compliance with state and federal statutes and regulations concerning healthcare

Northern Nevada HOPES

General Counsel

October 2018-August 2021

- Oversee compliance and risk management for a federally qualified health center
- Provide HIPAA training to employees and providers
- Create policies and procedures
- Draft legal memoranda
- Research legal issues involving health clinics, employee matters, workers compensation, and issues unique to its clients
- Negotiate contracts, leases
- Provide legal guidance to the Board of Directors and each department within the organization, such as Human Resources, Information Technology, and Pharmacy
- Develop risk management and compliance plan, implement and revise the plans
- Oversaw compliance with the COVID-19 pandemic

The Perkins Company

Of Counsel, January 2017-August 2019

- Government affairs work during the 2017 Legislative Session
- Research, analyze and draft memoranda on client specific questions
- Advocate for clients and build and maintain relationships for those clients

- Represented the Nevada State Medical Association, Nevada Health Care Association and other clients in the 2017 Legislative Session

Nevada Attorney General, Carson City, Nevada

Deputy Attorney General, March 2013-July 2015

- Represented State of Nevada Housing Division
- Represented State of Nevada Department of Business and Industry, including providing overall legal guidance for its Division, including, the Nevada Housing Division, Division of Insurance, and the Division of Industrial Relations
- Provided legal counsel to various State of Nevada Licensing Boards
- Conducted administrative hearings before various State of Nevada Licensing Boards
- Drafted legislation for the Attorney General's Office, presented legislation to Assembly and Senate Committees
- Received the "Rookie of the Year Award 2013" from Attorney General Catherine Cortez Masto

Legislative Counsel Bureau, Carson City, Nevada

Senior Deputy Legislative Counsel, November 2007-March 2013

- Research, analyze and draft legislation for the Nevada Legislature
- Research, analyze and draft regulations for regulatory agencies of the State of Nevada, including, the Department of Education, State Board of Education, the Commission on Professional Standards in Education, the State Board of Health
- Research and draft memoranda and opinion letters for the State of Nevada
- Prepare and draft contracts
- Provide staff support for Legislative Committee on Education, the Nevada Youth Legislature and the Senate Committee on Education

Illinois Department of Commerce and Economic Opportunity, Chicago, Illinois

Contract Attorney, May 2005-October 2007

- Investigated misuses of grant funds by grantees
- Drafted settlement agreements, contracts, and discovery motions, negotiated contracts
- Drafted and conducted depositions
- Assisted in trademark applications with USPTO
- Conducted administrative hearings, including opening statement, direct and cross examinations and closing arguments

University of Illinois at Chicago, Chicago, Illinois

Researcher, June 2001-June 2003

- Conducted research on viruses to determine whether certain aspects of the virus could kill cancer cells

Rush Presbyterian St. Luke's Medical Center, Chicago, Illinois

Researcher, February 2000-June 2001

- Conducted HIV research for various governmental and pharmaceutical protocols

EDUCATION

Chicago-Kent College of Law, Chicago, Illinois

Juris Doctor, May 2006

- Recipient of Legal Marketing Association Scholarship

Illinois Institute of Technology, Chicago, Illinois

Master of Biology, December 2006

Elmhurst College, Elmhurst, Illinois

Bachelor of Science in Biology, May 1999

- Beta Beta Beta Biology Honor Society; Omicron Delta Kappa Honor Society

Certified in Healthcare Compliance, Healthcare Compliance Association

The Law Offices of Charles R. Zeh, Esq.
Attorneys and Counselors at Law

Charles R. Zeh, Esq.
Pete Cladinos III, Esq.



Sender's e-mail address

February 17, 2026

Via e-mail only: ContractsOSHA@dir.nv.gov

Julie White, Management Analyst
Nevada Division of Industrial Relations
2300 W Sahara Ave., Suite 300
Las Vegas, NV 89102-0691

Re: *Legal Services for OSH Review Board*

Dear Ms. White:

Our firm is pleased to submit the following to continue as general legal counsel to the State of Nevada OSH Review Board (the Board). We have been general legal counsel to the Board since August 8-9, 2018, when we were recruited to fill this position upon the retirement of Fred Scarpello, Esq., after his 20 years as Board legal counsel. We look forward to continuing our relationship as general legal counsel to the Board. As before, we propose to provide our services statewide in Nevada.

Our firm has substantial experience in the field of administrative law. Before they went in-house for legal counsel, we were general legal counsel for the Board for the Administration of the Subsequent Injury Account for Self-Insured Employers (the Employers' Board) and the Board for the Administration of the Subsequent Injury Account for Associations of Self-Insured Public or Private Employers (the Associations' Board). We were general legal counsel with the Employers' Board for 20 years. We represented the Associations' Board for 18 years. For both Boards, we attended their hearings which were conducted according to the Nevada Administrative Procedures Act and the Nevada Open Meeting Law. Before the hearing, we proofed Agendas according to the Nevada Open Meeting Law and managed their posting consistent with the Nevada Open Meeting Law. During the course of the hearings, we gave advice to the Board on evidentiary questions that might arise and also gave advice framing the legal issues in the cases presented. Typically, attorneys represented the Employers and Associations in matters before the Boards. A relaxed version of the Nevada Rules of Evidence was employed during the course of the hearings.

Following the hearings, after receiving a transcript of the proceedings, we drafted the decisions explaining the Board's findings and legal rationale for its disposition of the matter. The draft decision was then presented to the Board during an open meeting for review and approval of the draft decision as to whether it accurately stated the action of the Board. Not once during our tenure as legal counsel to the Board was our draft decision rejected by either Board.

For these Boards, there were actually two hearings on each matter, with the first being a preliminary hearing. If the Employer or Associations Board disagreed with the Board's preliminary disposition, the Employer or Association could ask for a *de novo* hearing on the merits. Post this hearing, an appeal of the Board's disposition could be taken to the State District Court by the aggrieved Employer Association or State. Our office would then defend the disposition of the Board which was memorialized in the decision we had written. Sometimes the appeals at the District Court required oral argument and sometimes the District Court decided the appeals on the pleadings. These proceedings took place in Carson City, Reno, and Las Vegas, where we appeared before the District Court in all three jurisdictions.

Reflecting the quality of the members of these two Boards and their devotion to Board business, we enjoyed considerable success defending their decisions when challenged on appeal to the District Courts and the Nevada Supreme Court. For the Employers' Board, 16 Board decisions were appealed by employers to the District Court. From there, four cases were appealed to the Nevada Supreme Court. Of the Nevada Supreme Court cases, one was resolved by settlement and three were decided in favor of the Employers Board, meaning that the Employers' Board was also successful on 15 of the 16 cases appealed to the District Court.

For the Associations' Board, 10 cases were appealed by the Associations to the District Court. Of those cases, one was appealed to the Nevada Supreme Court. For that case, the Nevada Supreme Court did not outright reverse the Board. Instead, it reversed and remanded the case for further proceedings. As for the 10 District Court decisions, the Associations' Board was successful on all 10 of the appeals to the District Courts.

During our tenure as Board legal counsel, we gave advice to assist with and wrote the revised regulations for both Boards, consistent with the Boards' direction and after holding hearings for public input on the amended regulations. Drafting regulations is a tedious process that also must follow the Nevada Open Meeting law. We successfully helped both Boards negotiate the regulatory amendment process.

For the Board of Review, our work is of a similar nature, though the hearing process to rule on complaints filed by Nevada's Chief Administrator of Nevada State OSH is far more rigorous before the Board of Review. Here, we are the clerk of the Board where cases, motions, orders, dispositions and the like are filed with the office of the Board's legal counsel. Board counsel is then responsible for accounting for each case before the Board as well as the pleadings

and disposition of each matter brought to the Board. Board counsel's office also monitors the posting of the Agendas for each Board meeting. Board counsel's legal office drafts each agenda so that it is handicap compliance for each meeting of the Board. Board counsel also keeps an accounting of each of the cases that have been heard, or pending, and/or are to be heard once continued. Board legal counsel prepares the notice of each hearing to be submitted to each party appearing before the Board, noticing them of the date, time and place where the matter will be heard. The notice includes directions to the parties for the submission of exhibits they intend to offer into evidence during the course of the hearing on the matter before the Board. Board counsel also collects all pleadings filed in each case, and accounts for them to make sure each case submitted is ultimately heard and finalized. Board counsel is responsible for assuring that each matter brought before the Board's attention is finally resolved.

Between hearings, Board counsel confers with the Board Chairman to help decide the numerous motions that are made, including, but not limited to, motions to vacate and continue cases, to conduct discovery, motions for summary judgment, and motions to dismiss. We draft the pleadings such as orders to vacate, once a decision by the Board Chairman on the pending motions is made.

During the pandemic, we conceived of procedures for handling proposed evidentiary exhibits as a work around due to the virtual hearing process that the Board employed during the pandemic. We are proud of the process which the Board conceived of in order to keep the Board functioning in the face of the pandemic. We draft legal memos to the Board when cases present novel or complicated legal issues. During the course of the hearing on the merits of the cases, we are present to give advice on the frequent evidentiary objections that inevitably arise during the course of the hearing, We also give advice on the legal issues that the cases raise, during the hearing or in response to Board inquiries during Board deliberations. Of course, we also give advice and monitor proceedings according to the Nevada Open Meeting law which applies to this quasi-judicial Board.

The Board was "paused" for a period of six months for reasons not the fault of the Board. When the Board was again functioning at the conclusion of the six month pause, Board counsel made arrangements to successfully absorb the backlog of cases that were building up at the administrative level during the pause. When the Board was open again for business, the process conceived allowed the Board to successfully absorb each of the cases that were generated while the Board was paused. The Board was able to successfully account for each case that the Board received as a result of the pause while still maintaining an accounting of the existing cases that were pending at the time of the pause.

Unfortunately the Board has paused during the current year for business due to quorum issues, not the fault of the Board. Once again, the caseload continued to generate new matters for the Board to consider. Working with the Board Chairman, Board members and others, we are adsorbing the work this second pause has generated.

Once a case is heard and decided, armed with the transcript of the case, we draft the Board's decision based upon the law and evidence adduced at the hearing. This decision with findings is reviewed by the Board. And, if it meets with Board approval, the decision becomes a final decision of the Board from which the aggrieved party may directly appeal to the State District Courts. As with the Self-Insured Employers Board and Associations Board, the OSHA Board has not rejected or modified a decision we have drafted for the Board. The Board's role is limited on appeal. Its major function for appeals is to decide the case correctly and have a decision written that is defensible on appeal.

The defense of a Board's decision on appeal is handled by the party that prevailed before the Board. The appeal is taken by the aggrieved party to the State District Court. If a party is dissatisfied with the District Court decision, the appeal, then, is to the Nevada Supreme Court. Briefing, there, is by the parties to the case. The Board does not defend itself, there, where the outcome of an appeal could be to uphold the Board, reverse the Board, or reverse and remand for further hearing in light of the correct legal standard.

Board cases also have a Federal law element to them. For example, in *Savage Services Corp.*, Docket No. RNO 18-1937, a case involving employees working atop free-standing railroad cars without fall protection at heights of 15-17 feet, the employer moved to dismiss the case on Federal preemption grounds, claiming the Board of review lacked jurisdiction over this matter. The source of the Federal preemption claim was the Federal Railroad Safety Act (FRSA). The employer argued the FRSA occupied the field, it was broad enough to cover employees working under these conditions and because the FRSA did not require employees to wear personal protective equipment (PPE) under these conditions, because of Federal preemption, the employer and employees fell under the FRSA. Therefore, because the Federal government had occupied the field, the Board lacked jurisdiction and the case had to be dismissed as the FRSA was not a bar to working without the prerequisite PPE.

After oral argument and considerable briefing, in a written decision of the Board, which we drafted, the Board held for *Savage*. The complaint was then dismissed with prejudice on Federal preemption grounds due to the FRSA.

The State appealed the case to the State District Court. *Savage* moved to remove the case to Federal Court because of the Federal preemption issues (that is Federal law). *See, Chief Administrative Officer of the Occupational Safety and Health Administration, Division of Industrial Relations of the Department of Business and Industry v. Savage, U.S.D.C. Nev., Case*

No. 3:19-cv-000147-LRH-WGC, 12/02/19. The State opposed the removal, seeking a remand to the State District Court.

The Federal District Court denied the State's motion to remand to the State District Court, stating that Federal preemption, the basis of the Review Board's decision, raised a clear question of Federal law which must be decided in a Federal forum. The Federal District Court then addressed the merits of the motion, concluding with the Board that the Federal government had occupied the field in such a way as to preclude requiring Savage to provide PPE to its employees working atop free-standing railroad cars, holding "... the Board of Review was correct in finding that it did not have jurisdiction to hear NIOSH's [the State's] citation of Savage." Order, p. 10.

The Board's legal and physical jurisdiction is statewide. Our representation follows the Board. The Board hears cases about employers who have a physical presence in Nevada where the alleged objectionable conduct occurred. More specifically, jurisdiction is defined in NRS 618.315 where it states:

1. The Division has authority over working conditions in all places of employment except as limited by subsection 2.
2. The authority of the Division does not extend to working conditions which:
 - (a) Exist in household domestic service;
 - (b) Exist in motor vehicles operating on public highways of this State;
or
 - (c) Are regulated pursuant to the Federal Mine Safety and Health Act of 1977, 30 U.S.C. §§ 801, *et seq.*, the Federal Safety Appliance Act, 49 U.S.C. §§ 20301, *et seq.*, or the Federal Railroad Safety Act of 1970, 49 U.S.C. §§ 20101, *et seq.*, and any amendments thereto.

It should be noted that the term employer is defined to include a "person." NRS 618.095(3).

The Savage case is an example of the carve out of the Federal Railroad Safety Act. The Board holds hearings in Reno, when there are enough Reno claims to justify hearings, there. Otherwise, the hearings on complaints are conducted in Las Vegas.

RÉSUMÉ OF CHARLES R. ZEH, ESQ.

Charles R. Zeh practices primarily in the areas of Administrative Law, Tribal Law, Business, Civil Litigation, Employment, Government, Tribes and their Housing Authorities, Land Use and Economic Development. He has also represented clients before the Nevada Gaming Control Board and the Nevada Gaming Commission. His work on behalf of State administrative bodies includes appearances before the Courts in Clark County, Washoe County, Carson City and the Nevada Supreme Court, when defending the Board decisions.

Before commencing the practice of law, Mr. Zeh graduated from Dartmouth College in 1965 and received his Juris Doctorate from Cornell University in 1969. After law school, Mr. Zeh came to Nevada as a VISTA, Volunteers in Service of America or the Domestic Peace Corp. As a VISTA, he was assigned to the Washoe County Legal Aid Society. Upon completing an extended term as a VISTA volunteer attorney, Mr. Zeh became Executive Director of the Washoe Legal Services program. During his tenure as Executive Director, he litigated extensively, class actions in state and federal courts including, *Craig v. Hocker*, 405 F.Supp. 656 (D. Nev., 1975). That case restructured operation of the Nevada Maximum Security Prison and moved it into the 20th Century. Then, in *Willie Washington v. City of Reno*, Case No. CV-N-78-0051, U.S. District Court, District of Nevada, this case integrated the City of Reno Fire Department. Prior to this case, no Black or woman had been employed by the Fire Department of the City of Reno as a firefighter.

After leaving Washoe Legal Services, Mr. Zeh formed the small and successful law firm of Leeder, Sferrazza & Zeh. Pete Sferrazza was the Mayor of Reno, Nevada, at the time. Mr. Zeh left Leeder, Sferrazza & Zeh, when the workload out paced the size of the firm, and joined Beckley, Singleton, Delanoy, Jemison & List, as a Senior Associate of the firm. He handled a broad array of matters there, including insurance defense and employment related matters. Mr. Zeh left Beckley, Singleton, Delanoy, Jemison & List to again form his own law firm which is currently, the Law Offices of Charles R. Zeh, Esq.

Mr. Zeh was the Chairperson of the Reno Planning Commission for four consecutive terms and was a member of the Reno Planning Commission for eight years. He served as Chairperson of the Regional Planning Commission for three terms, also a record at the time. As Chairperson of the Regional Planning Commission, during his third term he was responsible for completing the ten-year update of the Regional Plan for Washoe County, the seminal land use and environment document for the Region. He conceived of and chaired the Regional Plan Update Sub-Committee, the group which forged, through a major series of public meetings, the basic document which became the revised Regional Plan. While Regional Planning Commissioner, he served as a member of the Joint Annexation Committee of the Regional Governing Board, a committee charged with resolving fiscal equity issues in the annexation and development process for the area. For his efforts in community planning, Mr. Zeh was recognized as a Silver Star recipient, awarded by Truckee Meadows Tomorrow to members of the community who have shown leadership on quality of life issues.

Mr. Zeh has represented casinos with gaming, employment and development issues. As outside legal counsel to the Sand Regency Hotel and Casino, he was instrumental in reorganizing the corporate structure and then taking the company public.

Until the State of Nevada went in-house for legal counsel, Mr. Zeh was legal counsel to the Board for the Administration of the Subsequent Injury Account for Self-insured Employers and the Board for the Administration of the Subsequent Injury Account for the Associations of Public and Private Employers. These State Boards are quasi-judicial administrative bodies. Mr. Zeh successfully defended the Boards' decisions before the District Courts of Nevada and also successfully defended the Boards in two cases before the Nevada Supreme Court. *See, The Board for Administration of the Subsequent Injury Account for Self-insured Employers v. Las Vegas Metropolitan Police Department*, Unpublished Disposition, 2013 WL 324151 (Nev.); *The Board of Administration of the Subsequent Injury Account for Self-insured Employers; and State of Nevada Department of Business and Industry, Division of Industrial Relations vs. Harrah's Laughlin*; and *Cannon Cochran Management Services, Inc.*, Nevada Supreme Court Case No. 57841, February 28, 2013. Mr. Zeh also advised these Boards for compliance with the Nevada Open Meeting Law.

Mr. Zeh has also represented the State of Nevada Occupational, Safety and Health Review Board. This is a quasi-judicial administrative body that reviews NVOSHA citations for violations of work place safety regulations under State and Federal law.

For 20 years Mr. Zeh also acted as outside general counsel for the Housing Authority of the City of Reno (RHA). In that capacity, he gave counsel and advice to the RHA in all civil matters. Mr. Zeh successfully defended the RHA in Federal Court, where five plaintiff's sued the RHA under the Fair Labor Standards Act for back pay and overtime in excess of \$3 million dollars. Mr. Zeh and his co-counsel got the case dismissed upon a motion for summary judgment. *See, Rocas, et al v. Reno Housing Authority*, In the United States District Court for the District of Nevada, Lead Case No.: 3:15-cv-00408-RCJ-WGC, Order dated, March 27, 2018. The plaintiffs filed a Notice of Appeal to the Ninth Circuit Court of Appeals, after which the case was settled.

Mr. Zeh's practice ranges from appearances on Tribal Reservations in Courtrooms barely heated, to the District Courts of the State, to the Federal District Court, and the Ninth Circuit Court of Appeals, enjoying success at each level for his clients.

Mr. Zeh has a long-standing association with Tribes in Nevada. He defended the Pyramid Lake Paiute Tribe, in Federal Court in the case of *High Desert Recreation, Inc., a Nevada Corporation v. Pyramid Lake Paiute Tribe, Does I through Does 100*, United States District Court for the District of Nevada, Case No. 3:06-CV-0588. The Federal District Court granted his motion to dismiss the case. Then, he successfully defended the Tribe when the plaintiff took the case up on appeal, to the Ninth Circuit Court of Appeals. The Ninth Circuit dismissed the appeal, based upon the brief filed in that case. *See, High Desert Recreation, Inc. v. Pyramid Lake Paiute Tribe*, United States Court of Appeals, Ninth Circuit, Case No. 07-16254.


Mr. Zeh also successfully defended Tribes in Tribal Court, the Tribal Court of Appeals, and also, again, in the Federal District Court in *Boney v. Valline*, 597 F.Supp.2d. 1167 (D.Nev., 2009). This case was significant for the successful defense of Tribal sovereign immunity. Had the Tribe not prevailed in this case, the mere fact that a Tribe received Federal funds should operate to waive a Tribe's sovereign immunity the plaintiff argued. As most Tribes receive Federal funds, this would have been a catastrophe for Tribes had the plaintiff prevailed.

In addition, Mr. Zeh defended the Tribal defendants (the Walker River Paiute Tribe Tribal Chairman, Tribal Police Chief, and Tribal Police Officers) in *Lantry v. Walker River Paiute Tribal Police*, 2011 WL 769974 (D. Nev. 2/25/2011). This was another police brutality case, amongst other issues, he defended on sovereign immunity grounds upon a motion to dismiss that was granted by the Court.

Finally, Mr. Zeh sued the City of Fallon in Federal Court on behalf of the Fallon Paiute Shoshone Tribe, when the City of Fallon refused to provide the Tribe with public sewer service to the Tribe's Trust Status land located within the corporate boundaries of the City of Fallon. The Federal District Court granted the Tribe's motion for summary judgment against the City of Fallon and its City Council members based upon the Equal Protection Clause of the United States Constitution. *See, Fallon Paiute-Shoshone Tribe, et al. v. City of Fallon, Nevada, et al*, 174 F.Supp.2d 1088 (D.Nev., 2001).

Mr. Zeh is active in civic affairs of the community in addition to his planning commission work. He is the former Chairperson of the YMCA of the Sierra Board of Directors and served for five consecutive terms as Chairperson of the Board of Managers of the Reno Family YMCA. He chaired the Environment and Land Use Sub-Committee of "One Region, One Vision." He is also the former Chairman and Chairman Emeritus of the Board of Directors of the Washoe Association for Retarded Citizens (WARC).

He is a member of the State Bar of Nevada and is admitted to practice before the United States District Court for the Districts of Nevada and Minnesota. He is also admitted before the United States Ninth Circuit Court of Appeals and the United States Supreme Court. Mr. Zeh is a member of the Nevada and Washoe County Bar Associations.



PETE CLADIANOS III, ESQ.



EXPERIENCE

2003 - Present *The Law Offices of Charles R. Zeh, Esq.*

- Representation of Indian Tribes in Contract and Governmental affairs matters.
- Representation in Business Litigation.
- Representation in Probate and Guardianship litigation.

1987 - 1997

Sands Hotel Casino
Vice President Sales

- Increased convention bookings by over three hundred percent.
- Increased average hotel room rates.

1985 - 1987

Sands Hotel Casino
Cage and Credit Manager

- Created tracing system linking debts to receivable Accounts Receivable resulting in significant increase in collections.

EDUCATION

2003

Admitted to Nevada State Bar

1999 - 2003

McGeorge School of Law
Jurist Doctorate

•

1977 - 1981

University of Colorado Boulder
B. A. Business Finance

•

VOLUNTEER INVOLVEMENT

2004 - 2018

Pro Bono Legal Services

1992 - 1998

Citizen's Advisory Committee to Downtown Redevelopment Agency

