PUBLIC COMMENT

Nevada Department of Taxation ("NDOT")
Committee on Local Government Finance ("CLGF")
Honorable Marvin Leavitt, Chairperson
c/o Patricia Olmstead, Public Information Officer
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Re: December 10, 2025 CLGF Meeting, Agenda Item III(A)(1) - Incline Village General Improvement District ["IVGID"] – Monthly Financial Report Update Requested Due to Fiscal Watch Status Pursuant to NRS 354.685

Chairperson Leavitt and Other Honorable Members of the CLGF:

As the CLGF knows, I am a long time resident and property owner in Incline Village. I am also a critic of IVGID's perpetual financial gamesmanship, evidenced in part, by the contents of this letter. Notwithstanding the CLGF has agendized this matter to "review (IVGID's) financial operations" pursuant to NRS 354.685(b)(c)¹, arrogantly, the District has provided *none*. And as the CLGF will learn, the reason is because IVGID continues to create deceitful financial reports of its operations that are not in compliance with Generally Accepted Accounting Principles ("GAAP"). Notwithstanding NRS 354.612(2) instructs that a local government's "financial statements and other schedules required for (its) funds must be prepared in accordance with generally accepted accounting principles."

Financial reports of the District's Fiscal Year 2026 through October, 2025 appear in the packet of materials prepared by staff in anticipation of the IVGID Board of Trustees' ("BOT's") meeting of December 10, 2025². And for the benefit of the CLGF, they are included herein³.

The District's General Fund: Notwithstanding the District survives on massive central services cost transfers, they are not clearly disclosed. Instead, they're deceitfully labeled "transfers." I have placed an asterisk on the sheet next to the entry.

The District's Community Services Fund: According to NRS 354.613(8) allocated central services cost transfers from the District's General Fund are *expenses* of its enterprise funds to which they are assigned. Yet here they are mis-labeled and thus hidden in financial reporting

 $^{^1}$ "If the Committee deems necessary, (it may) periodically review the status of and conduct additional hearings to review the financial operations of the local government."

² Go to https://ivgid.portal.civicclerk.com/event/588/files/attachment/3419.

³ Sources and uses for Fiscal Year 2026 through October, 2025, for the District's General Proprietary, Community Services Enterprise, Beach Enterprise and Internal Services Enterprise Funds.

for the Community Services Fund. As the CLGF can see, I have placed an asterisk next to "transfers out" entry.

Additionally, here facility fees are reported as operating revenue. Even though IVGID staff know they are not. Given I've previously demonstrated where the District and its consultants have consistently described these fees as the product of non-exchange transactions, here they are wrongly reported as operating income. When the District clearly provides another use category (I've placed an asterisk on the sheet labeled "NonOperating revenue"). And what's the harm? The District is able to publish propaganda that it's enterprise activities are making money, when in truth and in fact they are not. Thus requiring the involuntary subsidy of facility fees.

The District's Beach Fund: Notwithstanding allocated central services cost transfers from the District's General Fund are *expenses* of its enterprise funds, here they are mis-labeled and thus hidden in financial reporting for the Community Services Fund. As the CLGF can see, I have placed an asterisk next to "transfers out."

Additionally, here facility fees are again reported as operating revenue. Even though IVGID staff know they are not. Given I've previously demonstrated where the District and its consultants have consistently described these fees as the product of non-exchange transactions, here they are wrongly reported as operating income. When the District clearly provides another use category (I've placed an asterisk on the sheet labeled "NonOperating revenue"). And what's the harm? The District is able to publish propaganda that it's enterprise activities are making money, when in truth and in fact they are not. Thus requiring the involuntary subsidy of facility fees.

The District's Internal Services Fund: NRS 354.613(8)(a) instructs that each central services cost allocation must be equitably distributed amongst *all activities* of a local government. That means including those of the Internal Services Fund. Because here the CLGF can see that those costs have not been distributed to the District's Internal Services Fund, by definition, the District's proposed allocation is neither reasonable nor equitable. Meaning no plan.

The District Has Never Adopted a FY 2026 Central Services Plan: NRS 354.613(1)(c) instructs that central services cost allocation plans can only be "approved by the governing body under a nonconsent item that is *separately listed on the agenda for a regular meeting of the governing body.*" I previously presented evidence to the CLGF that the "so called" plan approved by the IVGID BOT was not separately listed on the agenda. Nor was it approved at a *special* meeting. Translation: there is no plan.

The District Never Adopted a FY 2026 Central Services Plan Before April 15, 2025: NAC 354.8668(7) instructs that central services cost allocation plans must be updated annually, before the local government submits its tentative budget to the Department. I previously presented evidence to the CLGF that the District's attempt to update its FY 2026 central services cost allocation plan didn't take place until May 30, 2025. Translation: there is no plan.

The District's FY 2026 Central Services Cost Allocation Plan Has Never Been Attested to in Writing by Its Chief Financial Officer: Even though NAC 354.8668(8) expressly provides that it must. Given I previously presented evidence to the CLGF of this omission, there is no plan.

Notwithstanding the District is on fiscal watch, it's behavior hasn't changed, Arrogantly. For these reasons I again ask the CLGF to obtain instruction from the Executive Director to commence public hearings as a pre-cursor to declaring a severe financial emergency. And notifying the Washoe County Board of Commissioners, pursuant to NRS 318.515(1), that IVGID is not being properly managed.

Respectfully submitted,

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Description	2026 Budget	2026 October Actual	2025 October Actual	2026 YTD Actual	2025 YTD Actual	Available Balance	Percent Spent/Used
100 - General Fund							
Revenue-Tax	4,462,486	220,652	177,920	1,667,753	1,274,197	2,794,733	37.37%
Other Revenue	-	-	27,661	-	126,141	-	0.00%
NonOperating Revenue	50,000	3,209	4,558	18,395	27,748	31,605	36.79%
Transfers In	4,050,500	362,585	-	1,450,340	-	2,600,160	35.81%
Sources Total	8,562,986	586,446	210,139	3,136,488	1,428,086	5,426,498	36.63%
Salaries & Wages	4,125,100	379,346	276,311	1,019,554	1,088,876	3,105,546	24.72%
Benefits	2,063,116	162,328	116,360	478,183	526,180	1,584,933	23.18%
Services & Supplies	2,237,254	93,854	185,707	506,078	469,792	1,731,176	22.62%
NonOperating Expense	128,000	-	-	-	-	128,000	0.00%
Transfers Out	-	-	(311,837)	-	(975,478)	-	0.00%
Capital	-	-	51,093	-	287,803	-	0.00%
Uses Total	8,553,470	635,529	317,634	2,003,814	1,397,174	6,549,656	23.43%
100 - General Fund Total	9,516	(49,082)	(107,496)	1,132,674	30,913	(1,123,158)	11902.84%



Description	2026 Budget	2026 October Actual	2025 October Actual	2026 YTD Actual	2025 YTD Actual	Available Balance	Percent Spent/Used
300 - Community Services							
Revenue-Tax	17,000	4,250	2,833	4,250	4,250	12,750	25.00%
Facility Fee	5,947,920	-	-	2,382,415	511,315	3,565,505	40.05%
Passes	4,008,000	18,180	315,234	349,058	717,386	3,658,942	8.71%
Admissions & Fees	9,871,600	253,107	304,270	2,790,492	2,836,288	7,081,108	28.27%
Allowances	(358,800)	(30,526)	(38,138)	(262,098)	(236,151)	(96,702)	73.05%
Charitable Allowance	(28,100)	(812)	(3,295)	(14,343)	(15,955)	(13,757)	51.04%
Programs	685,850	13,996	10,702	201,131	186,098	484,719	29.33%
Food & Beverage	4,702,800	212,632	137,476	1,536,403	1,425,982	3,166,397	32.67%
Other Revenue	5,894,000	197,908	127,077	1,389,717	1,162,805	4,504,283	23.58%
NonOperating Revenue	662,000	88,355	39,830	356,456	243,321	305,544	53.85%
Sources Total	31,402,270	757,091	895,991	8,733,479	6,835,340	22,668,791	27.81%
Salaries & Wages	8,832,000	966,771	589,039	3,014,489	2,360,193	5,817,511	34.13%
Benefits	3,083,900	306,780	206,899	965,984	737,371	2,117,916	31.32%
Services & Supplies	10,508,680	714,857	556,418	2,916,303	3,180,852	7,592,377	27.75%
NonOperating Expense	739,370	-	156	156	625	739,214	0.02%
Transfers Out	2,221,200	204,640	170,498	818,560	552,189	1,402,640	36.85%
Capital	8,981,000	1,164	208,114	362,854	272,831	8,618,146	4.04%
Uses Total	34,366,150	2,194,212	1,731,125	8,078,347	7,104,061	26,287,803	23.51%
300 - Community Services Total	(2,963,880)	(1,437,121)	(835,134)	655,132	(268,721)	(3,619,012)	-22.10%



	2026	2026 October	2025 October	2026	2025	Available	Percent
Description	Budget	Actual	Actual	YTD Actual	YTD Actual	Balance	Spent/Used
390 - Beach Fund							
Facility Fee	5,110,310	-	-	2,032,043	966,397	3,078,267	39.76%
Admissions & Fees	1,758,000	45,305	20,895	1,162,337	794,558	595,663	66.12%
Allowances	(551,900)	-	-	(6,516)	(1,625)	(545,384)	1.18%
Programs	117,450	4,200	-	108,326	141,008	9,124	92.23%
Food & Beverage	429,720	-	-	441,050	288,540	(11,330)	102.64%
Other Revenue	290,000	1,843	520	58,018	71,005	231,982	20.01%
NonOperating Revenue	100,000	21,994	14,402	98,937	89,483	1,063	98.94%
Sources Total	7,253,580	73,342	35,817	3,894,194	2,349,365	3,359,386	53.69%
Salaries & Wages	1,355,200	141,405	104,850	674,668	704,518	680,532	49.78%
Benefits	367,300	35,447	26,704	153,429	148,064	213,871	41.77%
Services & Supplies	1,150,800	65,912	74,312	459,578	390,985	691,222	39.94%
Transfers Out	218,900	30,139	18,702	120,554	74,972	98,346	55.07%
Capital	11,400,000	-	-	241,539	1,147	11,158,461	2.12%
Uses Total	14,538,200	272,902	224,569	1,649,769	1,319,686	12,888,431	11.35%
390 - Beach Fund Total	(7,284,620)	(199,560)	(188,752)	2,244,426	1,029,678	(9,529,046)	-30.81%



Description	2026 Budget	2026 October Actual	2025 October Actual	2026 YTD Actual	2025 YTD Actual	Available Balance	Percent Spent/Used
400 - Internal Services							
Other Revenue	4,530,600	262,320	285,109	1,230,685	975,488	3,299,915	27.16%
NonOperating Revenue	-	24	-	24	51	(24)	0.00%
Sources Total	4,530,600	262,344	285,109	1,230,709	975,539	3,299,891	27.16%
Salaries & Wages	2,024,200	224,959	121,578	630,457	454,683	1,393,743	31.15%
Benefits	1,052,600	104,386	63,081	320,629	237,217	731,971	30.46%
Services & Supplies	1,453,800	112,213	90,364	400,171	212,788	1,053,629	27.53%
Uses Total	4,530,600	441,559	275,023	1,351,257	904,688	3,179,343	29.83%
400 - Internal Services Total	-	(179,216)	10,086	(120,548)	70,850	120,548	0.00%
IVGID TOTAL SOURCES	96,378,236	3,651,847	3,072,566	24,791,718	18,321,471	71,586,518	25.72%
IVGID TOTAL USES	106,032,140	4,901,794	4,357,574	26,650,660	20,983,575	79,381,480	25.13%
IVGID Net Total Sources and Uses	(9,653,904)	(1,249,946)	(1,285,008)	(1,858,942)	(2,662,104)	(7,794,962)	19.26%