

Filing Code: OPP
Your Name: Kathleen Light
225 South Stephanie Street #2111
Henderson, Nevada 89012
Telephone: 702-469-7523
Email Address: mrskatielight@gmail.com
Self-Represented

DISTRICT COURT
CLARK COUNTY NEVADA

KATHLEEN LIGHT,
Plaintiff

v.

OFFICE OF THE ATTORNEY
GENERAL OF NEVADA,
Respondent.

CASE NO: A-25-922319-J

DEPT: 31

REQUEST FOR HEARING

**PETITIONER'S AMENDED OPPOSITION TO RESPONDENT'S MOTION TO
DISMISS**

INTRODUCTION

Respondent's Motion to Dismiss asks this Court to focus on procedure while avoiding the actual cause of this action became necessary.

This case did not arise because Petitioner misunderstood the purpose of Nevada's Public Records Act. It arose because Petitioner attempted repeatedly to obtain records from government agencies concerning a matter involving a public official, and those attempts did not result in meaningful transparency.

This action arose from a violent act of which Petitioner was the victim. The case arose from a violent sexual assault on video. This action arose out of questions about the oversight of the government overseeing itself

Petitioner sought records because she was entitled to them as a victim. However, in cases that involved five or more government agencies, the public has a right to know how government handles a matter involving the conduct of a senior state official. Petitioner sought records showing what government knew, who reviewed information, what decisions were made, how those decisions were reached, and specifically who made the final decision.

Instead of receiving those answers, Petitioner was forced to pursue litigation.

The Attorney General's Office now asks this Court to dismiss based on procedural grounds. However, it was the Attorney General's office that was initially in error procedurally, not the Petitioner. Respondent's argument ignores the central issue: Petitioner could not obtain the records necessary to understand government action without court intervention. And Petitioner still stands without any substantive public records concerning a violent attack on her body. Nevadans stand without any substantive records regarding a case that ultimately resulted in all the senior administrators at the Nevada Division of Insurance being replaced in less than a year. The People of the State of Nevada deserve to know why and what happened.

A. The Sexual Assault and Petitioner's Initial Efforts to Seek Accountability

On February 2, 2024, Petitioner Kathleen Faye Light alleges that she was sexually assaulted by then Deputy Insurance Commissioner David Cassetty. At the time, Mr. Cassetty was serving as Deputy Insurance Commissioner for Consumer Affairs and Enforcement for the Nevada Division of Insurance. Petitioner alleges that the assault was documented and that video evidence existed regarding the incident.

Following the assault, Petitioner was faced with the difficult decision of how to report the conduct and seek accountability. As a survivor of sexual assault, Petitioner experienced trauma, fear, and uncertainty regarding the consequences of reporting. Petitioner was fearful of going directly to law enforcement and fearful of the potential consequences of reporting the conduct. However, Petitioner also understood that the conduct alleged was egregious and involved an individual holding a position of public trust.

Even while experiencing the effects of trauma, Petitioner believed that, at a minimum, an ethics complaint was necessary. Mr. Cassetty was not merely a private individual; he was a Deputy Insurance Commissioner serving within state government. Petitioner believed that alleged conduct of this nature by a government official required review by the appropriate oversight officials.

On July 5, 2024, Petitioner attempted to submit an ethics complaint regarding Mr. Cassetty's conduct to Insurance Commissioner Scott Kipper. Petitioner attempted to send the ethics complaint to Commissioner Kipper on three separate occasions; however, the communications were returned as blocked. Petitioner became concerned that the complaint was not reaching its intended recipient and that she was unable to use the appropriate channel to report the conduct.

Because Petitioner was unable to successfully transmit the ethics complaint directly to Commissioner Kipper, she took additional steps to ensure that the complaint reached responsible officials within the Division of Insurance. Petitioner forwarded the complaint to Deputy Insurance Commissioner Todd Rich, Deputy Insurance Commissioner Nick Stostic, and appropriate legal personnel within the Division of Insurance.

Petitioner also provided notice to the Office of Governor Joe Lombardo because Mr. Cassetty was a gubernatorial appointee. Petitioner believed that the Governor's Office, as the appointing authority, needed to be aware of allegations concerning the conduct of an individual serving in a state-appointed position.

The complaint was subsequently routed through state government channels. The records reflect that the Governor's Office forwarded the complaint regarding "Deputy Insurance Commissioner David Cassetty" internally and that the information was provided to Director Christopher Sanchez through that process. Petitioner did not directly send the complaint to Director Sanchez.

The inability to successfully transmit the ethics complaint to Commissioner Kipper became one of the issues for which Petitioner later sought public records. Petitioner sought records regarding the attempted delivery of the complaint, the routing of the complaint after those attempts failed, and the actions taken after state officials became aware of the allegations.

B. The Ethics Complaint Is Received by Chief Deputy Commissioner Todd Rich and Routed Through State Channels

On July 5, 2024, Petitioner's ethics complaint regarding Deputy Insurance Commissioner David Cassetty was received by Chief Deputy Commissioner Todd Rich of the Nevada Division of Insurance. The complaint was submitted by email and included a video attachment.

Chief Deputy Commissioner Rich reviewed the email and opened the attached video. After viewing enough of the material to recognize its sensitive nature, Chief Deputy Commissioner Rich forwarded the communication for agency review. The email was forwarded to Human Resources and copied to Insurance Commissioner Scott Kipper.

The complaint then moved through multiple state channels. Human Resources became involved, the matter was elevated within the Department of Administration, and the information was circulated among appropriate leadership, human resources, legal, and investigative personnel. The records reflect that confidentiality measures were initiated due to the sensitive nature of the materials, including instructions regarding handling of the video and related communications. This would include instructing staff to delete the email prior to law enforcement involvement.

Three days later, on July 8, 2024, the matter was referred for law enforcement review. The referral provided to the Nevada State Police included the email communication and attached video materials. The referral stated that confidentiality measures were being implemented; however, the document itself did not contain a header, signature, or identifying information showing who transmitted the referral, from what department it originated, or who specifically authorized the submission.

The result was that a complaint initially submitted as an ethics matter regarding a sitting Deputy Insurance Commissioner moved rapidly through several state agencies, Human Resources, administrative channels, and ultimately to law enforcement review.

C. Law Enforcement Receives the Complaint and Begins Investigation

Throughout the week of July 8, 2024, Deputy Insurance Commissioner David Cassetty was present in the Las Vegas office of the Nevada Division of Insurance. During that time Petitioner states Mr. Cassetty threatened her repeatedly with felony criminal charges for “revenge porn,”

despite the clear exemptions of the video from those laws. It has been reported to Petitioner that Deputy Commission Cassetty may have intimidated staff who had refused to sign confidentiality agreements.

On July 9, 2024, Petitioner was interviewed by law enforcement regarding her allegations against Deputy Insurance Commissioner David Cassetty. Prior to the interview Sergeant Patrick Halligan and detectives spend more than an hour trying to convince Petitioner to speak with them as she was in fear of being arrested. Sergeant Halligan made several accommodations for the Petitioner to make her comfortable and feel safe. During the interview, Petitioner provided information regarding the alleged assault, the circumstances surrounding the incident, and the available video evidence. Petitioner cooperated with the investigation and provided the information requested by investigators; this included sending them two more videos at that time for a then-total of three videos.

On July 12, 2024, Petitioner received a text message from Deputy Insurance Commissioner Cassetty stating that he had been escorted from the office by Capitol Police. According to the communication received by Petitioner, Deputy Insurance Commissioner Cassetty stated that his badge and keys had been taken, that he was not permitted to contact anyone in the office, and that his vehicle was being searched.

Simultaneous to receiving that communication, Petitioner received a phone call from a victim advocate who informed Petitioner that Deputy Insurance Commissioner Cassetty was being arrested. During that conversation, Petitioner informed the victim advocate that Mr. Cassetty was still texting her. Petitioner questioned how Mr. Cassetty could still have access to his phone and

communicate with her if he was in the process of being arrested. The victim advocate informed Petitioner that the arrest would occur momentarily.

On July 14, 2024, Petitioner continued receiving communications from Deputy Insurance Commissioner Cassetty and had not received confirmation that an arrest had occurred. Petitioner informed Mr. Cassetty that his arrest was imminent. Petitioner wanted Mr. Cassetty to have an opportunity to speak with his family beforehand. Shortly thereafter, Mr. Cassetty contacted an attorney.

The events following the referral created additional uncertainty for Petitioner regarding the status of the investigation, the actions being taken, and the communication between government officials, law enforcement, and Mr. Cassetty.

D. The Arrest Does Not Occur and the Matter Moves Through Prosecutorial Review

On Monday, July 15, 2024, Petitioner contacted the victim advocate to obtain an update regarding the status of the investigation and the anticipated arrest of Deputy Insurance Commissioner David Cassetty. Petitioner was informed that there was a jurisdictional issue affecting the process. However, Petitioner was also advised that Deputy Insurance Commissioner Cassetty was still expected to be arrested.

The following day, July 16, 2024, records reflect that a meeting occurred involving members of the Clark County District Attorney's Office and the Nevada State Police regarding the matter. During that meeting, Clark County District Attorney Steve Wolfson advised that the decision regarding prosecution would need to be made by the Nevada Attorney General's Office.

On Tuesday afternoon, July 16, 2024, Petitioner received a call from the victim advocate informing her that charges had been declined and that the matter was being referred to the Nevada Attorney General's Office for review.

On Wednesday, July 17, 2024, Petitioner was informed that the Nevada Attorney General's Office had also declined charges and that the criminal matter was closed.

The sequence of events left Petitioner with significant questions regarding the handling of the matter, including the transition from an anticipated arrest, to a jurisdictional issue, to review by multiple prosecutorial offices, and ultimately to a decision not to pursue criminal charges.

E. Additional Evidence, Continued Investigation, and Subsequent Review

Following the initial declination of charges, Petitioner sent an emotional and frustrated email to the victim advocate attaching screenshots of text communications between Petitioner and Deputy Insurance Commissioner Cassetty. Petitioner did not expect a response and sent the communication as an expression of frustration regarding the handling of the matter.

In response, Detective Jeffrey Musheno contacted Petitioner and advised that the District Attorney's Office wanted to conduct a voluntary forensic examination of Petitioner's phone. Petitioner considered the request. While considering whether to voluntarily provide her phone for forensic examination, Petitioner located additional video evidence that was significantly longer than the video previously provided. Petitioner located a fourth video approximately forty minutes in length that she believed provided additional context regarding the events.

Petitioner contacted law enforcement and asked whether providing the longer video would be sufficient in place of a forensic examination of her phone. Initially, law enforcement did not

accept the additional video evidence. Petitioner was advised that the issue involved the time and resources required to review the evidence. Petitioner offered to shorten the video, but Detective Musheno explained that the full context was necessary and that the video could not simply be shortened without potentially removing relevant information.

Petitioner continued working to provide the additional video evidence. After further discussion, law enforcement agreed to accept the video. Petitioner attempted to transmit the video through multiple methods; however, those attempts were unsuccessful. Petitioner then created a Gmail account and uploaded the video to Google Drive so that investigators could access and review the evidence.

After providing the additional video, Petitioner repeatedly followed up regarding whether the evidence had been reviewed and whether it would be sufficient for charges to proceed. After several days, Detective Musheno confirmed that he had watched the video but would not provide Petitioner with his assessment of the evidence. Detective Musheno advised Petitioner that he was going to speak with his supervisor, Sergeant Patrick Halligan.

Sergeant Patrick Halligan subsequently communicated with Petitioner regarding the additional evidence. During that conversation, Sergeant Halligan stated that he was going to “send the matter up packaged the same way as before.” Sergeant Halligan further stated that he was going to let them decline it and then “slide” in the fourth video.

Petitioner understood from this conversation that the additional video evidence would be included in the renewed review process after the prior declination. Petitioner waited additional time for a response regarding the review of the additional evidence. Petitioner was ultimately informed that prosecution would again be declined at the end of August.

After the second declination, Petitioner sought to obtain the investigative records regarding the handling of her complaint. Petitioner asked Detective Jeffrey Musheno how she could obtain a copy of the police report. Detective Musheno advised Petitioner that she would need to submit a public records request. Petitioner requested the case report number from Detective Musheno and used that information to submit a public records request seeking the investigative records.

F. Petitioner's Efforts to Obtain an Explanation From the Clark County District Attorney's Office

After being informed that charges had been declined, Petitioner believed the matter had been handled through the Clark County District Attorney's Office as that is to whom she told her phone would go and sought an explanation regarding the decision. Petitioner had previously been advised that because there was no active criminal case, she could not call the District Attorney's Office and would need to communicate through email.

For approximately six to eight weeks, Petitioner emailed the Clark County District Attorney's Office weekly seeking answers. Petitioner provided additional information, legal authority, supporting materials, and additional video evidence. Petitioner attempted to explain why she believed the evidence established that the matter was prosecutable and repeatedly requested an explanation of what evidence had been considered and why charges had not been pursued.

After receiving no response, Petitioner went in person to the Clark County District Attorney's Office and requested a meeting. Petitioner was ultimately granted a meeting with Clark County District Attorney Steve Wolfson, Deputy District Attorney Michelle Jobe, and Chief Deputy District Attorney Robert Daskas.

The meeting quickly became focused on the evidence and whether the District Attorney's Office had reviewed all available materials. Petitioner raised the existence of the additional video evidence, including the longer fourth video she had previously sent. During the discussion, it became apparent to Petitioner that the District Attorney's Office was unaware the additional video existed. The video had been sent directly to the District Attorney's Office by Petitioner, and Petitioner believed it had been included in the investigative materials provided by law enforcement for review.

Mr. Wolfson directed staff to locate the materials Petitioner had sent, including the video link. The issue of the missing video became a significant point of discussion during the meeting.

Petitioner continued to explain that the case was not merely a credibility dispute because the events were recorded. Petitioner repeatedly stated, "it's on video," because she believed the evidence directly addressed the concerns being raised regarding prosecution. During the meeting, Petitioner asked whether Mr. Wolfson had actually reviewed the first video. Mr. Wolfson stated that he had not watched the video, despite having participated in the decision not to pursue charges.

Petitioner attempted to play the video during the meeting so that the District Attorney could review the evidence directly. Mr. Wolfson stated that if Petitioner played the video, he would terminate the meeting. Petitioner proceeded to play the video regardless and Mr. Wolfson then left the room.

Petitioner followed Mr. Wolfson out of the room. During the resulting interaction, Petitioner was informed by Chief Deputy District Attorney Robert Daskas that she being be removed from the building for "forcing" Mr. Wolfson to watch the video. Petitioner responded with a statement

regarding her willingness to be removed, stating, “Do I appear to be someone who has never been in cuffs before?” Petitioner’s comment broke the tension of the interaction, and Mr. Wolfson ultimately agreed to review the video. However, Chief Deputy District Attorney Drakas objected to Mr. Wolfson watching the video at that time.

Security was then present and escorted Petitioner from the building. Before leaving, the parties agreed to schedule a follow-up video meeting for the following week. At the subsequent video meeting, Mr. Wolfson asked Petitioner whether she had continued having sexual contact with Mr. Cassetty after the incident shown in the video. Petitioner explained that she and Mr. Cassetty had remained in a romantic relationship after that night.

Petitioner further explained that, during the months following the incident, she alleges that she was continuing to experience sexual assaults and threats of murder-suicide from Mr. Cassetty. Petitioner states that her continued contact with Mr. Cassetty occurred in the context of that ongoing trauma and alleged coercive circumstances.

Mr. Wolfson then stated: “I can prosecute men who raped prostitutes, but you stayed with him.”

It is of note that Petitioner is not and has never been a sex worker.

G. Receipt of Police Records, Discovery of Missing Evidence, and the Beginning of Petitioner’s Public Records Efforts

Shortly after Thanksgiving 2024, Petitioner received the redacted police report and related investigative records concerning her complaint against now former Deputy insurance Commissioner Cassetty. Upon reviewing the materials, Petitioner identified several issues that

caused her significant concern regarding the handling of the investigation and prosecutorial review.

First, Petitioner found no reference in the records to the longer fourth video that she had provided to law enforcement and repeatedly attempted to have reviewed. The absence of the fourth video from the investigative materials caused Petitioner to question whether the additional evidence had been included in the materials provided for prosecutorial review.

Second, Petitioner reviewed communications between the Nevada Attorney General's Office and Sergeant Patrick Halligan regarding the prosecution decision. Based on those communications, Petitioner became concerned that the additional video evidence had not been reviewed by the Attorney General's Office before the decision not to pursue charges was made.

The records caused Petitioner to question whether the complete body of evidence had been reviewed at all before prosecutorial decisions were made.

After reviewing the records, Petitioner began contacting the Nevada Attorney General's Office seeking answers regarding the handling of her sexual assault complaint. Despite repeated attempts, Petitioner did not receive a response regarding the status, review, or outcome of her complaint. Petitioner has never received a response from the Attorney General's Office regarding her sexual assault report.

Petitioner believed this lack of communication was inconsistent with the rights afforded to crime victims under Nevada's 2018 Crime Victims' Bill of Rights, including the right to confer with prosecutors regarding charging decisions.

Because direct communication did not result in answers, Petitioner began making public statements and posting on social media in an effort to obtain acknowledgment from government officials. Petitioner's intent was to bring attention to the lack of response and obtain information regarding the handling of her complaint.

Petitioner then submitted a public records request to Nevada State Police seeking records related to the investigation. After receiving records from that request, Petitioner submitted a second, more specific public records request seeking information regarding the fourth video and the anticipated arrest of Mr. Cassetty.

Several months later, in reviewing the records produced in response to those requests, Petitioner discovered information indicating that the Fusion Center had become involved regarding allegations that Petitioner had made an indirect threat toward Attorney General Aaron Ford on Facebook.

Petitioner subsequently submitted a public records request to the Las Vegas Metropolitan Police Department because LVMPD's public records division handles records associated with the Fusion Center. Petitioner was informed that no responsive records existed. Petitioner then provided the email from Fusion Center investigator Chris Rivers requesting Petitioner's information and subsequently obtained a Suspicious Activity Report relating to the matter.

The records referenced Petitioner's political activity and a social media communication regarding attendance at a campaign event for Attorney General Ford. Petitioner is a registered Democrat and has always been and remains to be politically active.

H. Public Records Requests and the Absence of Records Regarding the Handling of Petitioner's Sexual Assault Complaint

After reviewing the investigative materials she received, Petitioner continued attempting to obtain answers regarding what occurred after her complaint was referred through law enforcement channels.

Petitioner submitted public records requests seeking records related to the handling of her sexual assault complaint, including communications, reports, investigative materials, and records involving Mr. Cassetty and the Nevada Attorney General's Office as well as Department of Human Resources, Division of Insurance, and Governor's office. Petitioner also specifically sought records concerning communications between agencies and records relating to the July 5, 2024 complaint submitted to the Nevada Division of Insurance, including the content of the communication, attachments, metadata, and any responses. There was no response from any Nevada State Agency regarding the public records requests. Complaints to the Attorney General's Office regarding all requests followed and there was no response.

At that point this litigation arose.

Petitioner continued seeking information because she had never received an explanation from the Attorney General's Office regarding the handling of her complaint.

In March 2026, after months of waiting, Petitioner finally received a production in response to her public records efforts. The production consisted of a single page of records. The sole substantive record produced was an email from Mr. Cassetty's daughter stating that she believed Petitioner had contacted her repeatedly through different phone numbers and characterizing those

contacts as harassment. She also referred to the petitioner as “unwell.” Petitioner denies those allegations. Petitioner further notes that the production contained no supporting documentation, including no call logs, screenshots, attachments, communication records, or other evidence supporting the allegations contained in that email.

For a complaint involving allegations of sexual assault by a former public official, Petitioner was shocked that the production contained no records explaining the handling of the underlying complaint, no records regarding prosecutorial review, no records regarding charging decisions, no records regarding communications with the Attorney General’s Office, and no records acknowledging Petitioner’s repeated attempts to communicate with that office.

Petitioner had repeatedly attempted to obtain information through official channels. She had submitted complaints, contacted government offices, provided evidence, and sought an explanation regarding what occurred with her case. Yet Petitioner received no response from the Attorney General’s Office regarding her sexual assault complaint.

The absence of records was particularly concerning because Petitioner had continued communicating with members of the press regarding her experience and the lack of governmental response. Petitioner became concerned that the allegations made against her a year prior to her receiving that sole record, including claims that she was unstable or irrational, created a chilling effect on officials’ willingness to engage with her or respond to her complaints.

Petitioner disputes any characterization of her as irrational or unreliable. Petitioner acknowledges that she has been persistent, outspoken, and at times emotional. However, Petitioner’s position is that those reactions occurred in the context of a person who reported sexual violence, continued to seek answers through institutional channels, and was attempting to understand why her

complaint appears to have disappeared without explanation and a single piece of paper from a person not even involved in the case that discredited a sexual assault victim while ignoring the person actually accused of a violent and deeply personal crime.

II. ARGUMENT

A. Respondent's Motion Does Not Address The Failure That Required Petitioner To Seek Judicial Relief

Petitioner did not begin this process by filing a lawsuit. Petitioner attempted to obtain records through the procedures established by the Nevada Public Records Act.

Those requests concerned the government's handling of a reported sexual assault involving former Deputy Insurance Commissioner David Cassetty. Petitioner sought records related to government decision-making, communications, and the handling of evidence in a case where she was the victim.

Petitioner's requests were not attempts to obtain private information or unsupported accusations. They were attempts to obtain government records concerning government actions.

The Attorney General's Office had notice of this matter through multiple channels, including public records requests, formal complaints, and correspondence before this litigation involving multiple Nevada agencies. Petitioner also recently attempted to ensure that Attorney General Aaron Ford personally received notice so there could be no later claim that the elected head of the office was unaware of the matter.

Despite that notice, Petitioner was unable to obtain a complete record explaining what occurred.

B. The Attorney General's Office Failed To Provide A Meaningful Response While Simultaneously Serving As The Office Responsible For Public Records Enforcement

A fundamental problem existed throughout this process: Petitioner sought records from agencies involved in the underlying matter, including the Attorney General's Office, while also seeking enforcement of public records obligations through the same governmental structure.

The result was that Petitioner was left without a meaningful mechanism to obtain answers. Petitioner was required to pursue litigation simply to compel a response to the request for production of records that should have been available through Nevada's transparency laws. The Attorney General's Office cannot rely on procedural arguments to avoid addressing why a citizen had to resort to court intervention before receiving any acknowledgement.

C. The Records Produced Demonstrate Why Access Was Necessary

The limited records eventually produced demonstrate the importance of Petitioner's requests.

One significant document was an administrative synopsis prepared by the Nevada State Police. That document described the allegations involving a state official and documented government concerns regarding the conduct under investigation and its potential impact on public trust.

That document was not produced because the public records process functioned properly. It became available only after records disputes and litigation. And it was produced in error as the office that sent it did not realize the synopsis was still digitally attached to the email. The same occurred with the video of the sexual assault. Both are now fully public record.

The document confirmed that government records existed concerning the matter and that Petitioner's requests were seeking information that was actually maintained by government agencies.

D. The Production Of A Single Record Containing Statements About Petitioner Did Not Satisfy The Requirements Of Transparency

After extensive efforts to obtain records, Petitioner received a single-page production that did not explain the government's handling of the sexual assault complaint, did not explain why prosecution did not occur, and did not provide a meaningful record of agency decision-making.

Instead, the production contained statements disparaging the Petitioner.

A public records response cannot be considered meaningful transparency when the only record produced fails to answer the questions the public has a right to ask and instead shifts attention toward the person seeking accountability.

E. Procedure Should Not Override The Public's Right To Accountability

Respondent argues that Petitioner pursued the wrong procedural mechanism. But the existence of procedural requirements does not eliminate the underlying obligation of government to provide access to public records. The purpose of Nevada's Public Records Act is not to create barriers that prevent citizens from understanding government action. It exists because government accountability requires public access.

Petitioner respectfully requests that the Court consider the circumstances that required this action and deny Respondent's Motion to Dismiss.

CONCLUSION

Petitioner did not seek judicial intervention because it was convenient. Petitioner sought judicial intervention because the ordinary public records process failed. The Attorney General's Motion to Dismiss focuses on the manner in which Petitioner sought relief while avoiding the reason relief was necessary.

For these reasons, Petitioner respectfully requests that Respondent's Motion to Dismiss be denied.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 20th day of August, 2026

/s/Kathleen Light

Kathleen Light, Pro se

On July 8, 2024, at 1142 hours, I received a call from Jack Robb, the Director of the Department of Administration. He shared that Human Resources had received a concerning email with a sexually explicit video attached. The email was sent by someone claiming to be [REDACTED] Light and was sent from [REDACTED]

[REDACTED] Light sent the email to Todd Rich, who is a Chief Deputy Commissioner with Accounting Services.

Her email to Mr. Rich stated the following "Sir- I want to make you aware of the moral character of your deputy. [REDACTED] is a sexual predator. He is an alcoholic who regularly shows up at work under the influence of alcohol. He has 3 DWI's several arrests and has admitted to sexually assaulting women in college. I was also sexually assaulted by [REDACTED] at a cocaine fueled party. I have attached a video of the incident that I believe speaks for itself. Do with this information as you will. I may be a jilted lover and admittedly I have mental health issues. If I were to take this to the police, they wouldn't believe me and, giving credit where credit due, [REDACTED] is far too good of a lawyer. But being an appointee of the governor of the great state of Nevada and serving at his leisure, I felt perhaps you should be made aware of this character."

Mr. Rich in turn shared with Monique Williams with Department of Administration, HR, and cc'd Scott Kipper, who is the Insurance Commissioner, [REDACTED] boss. The email was then shared with Bachera Washington, who is the Administrator of DHRM, who called in Jack Robb. Mrs. Bachera sent me the video. The video will be forwarded to Chief Edgell of the Investigations Division. I also recommended Administration craft a Order of Confidentiality and have all of those employees who were sent or have seen the video sign. They will have that done today.

I had a meeting with Deputy Director Brueggemann and Chief Edgell and apprised them of the incident. Investigations will be taking the lead.

Jeffrey Musheno

From: Alissa C. Engler
Sent: Thursday, August 29, 2024 2:03 PM
To: Patrick F. Halligan; Jeffrey Musheno
Subject: RE: NSP ID Case 24I000512

Yes, I thought about it more and I don't see how the collection of that additional evidence will cure the other looming issues in the case. I am certainly sympathetic to the victim, but unfortunately this not a case that can be proven beyond a reasonable doubt.

Alissa C. Engler

Chief Deputy Attorney General
Criminal Prosecution Division
Office of the Nevada Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101

aengler@ag.nv.gov



Notice: This e-mail message and any attachments thereto may contain confidential, privileged or non-public information. Use, dissemination, distribution or reproduction of this information by unintended recipients is strictly prohibited. If you have received this message in error, please notify the sender immediately and destroy all copies

From: Patrick F. Halligan <phalligan@dps.state.nv.us>
Sent: Thursday, August 29, 2024 12:51 PM
To: Alissa C. Engler <AEngler@ag.nv.gov>; Jeffrey Musheno <jmusheno@dps.state.nv.us>
Subject: RE: NSP ID Case 24I000512

Good afternoon-

Reference our conversation yesterday, should we not move forward with collecting anything further? If that is the case, we will just the email as our notice of denial and close out our side as well. Thank you!

Patrick Halligan, Sergeant

Nevada State Police – Investigation Division
Las Vegas Major Crimes Office

phalligan@dps.state.nv.us

Office: [REDACTED]

Cell: [REDACTED]



Confidentiality Statement: This e-mail and any attachment(s) are intended only for those to which it is addressed and may contain information which is privileged, confidential and prohibited from disclosure and unauthorized use under applicable law. Any review, retransmission, dissemination or other use of, or taking any action in reliance upon, this information by anyone other than the intended recipient is not authorized. If you are not the intended recipient and/or you are not entitled to receive attorney client privileged material including attorney work product, the release to you of this privileged information is inadvertent, and the release is not intended to waive the attorney client privilege or the subject matter thereof. If you have received this transmission in error, please return the material received to the sender and delete all copies from your system.

From: Alissa C. Engler <AEngler@ag.nv.gov>

Sent: Thursday, August 29, 2024 10:44 AM

To: Jeffrey Musheno <jmusheno@dps.state.nv.us>; Patrick F. Halligan <phalligan@dps.state.nv.us>

Subject: NSP ID Case 24I000512

Good morning,

I have reviewed the investigative referral and will be declining to prosecute. Please let me know if you would like to discuss further.

Thank you,

Alissa C. Engler

Chief Deputy Attorney General

Criminal Prosecution Division

Office of the Nevada Attorney General

555 E. Washington Ave., Ste. 3900

Las Vegas, Nevada 89101

[REDACTED]
F: (702) 486-3768

aengler@ag.nv.gov



Notice: This e-mail message and any attachments thereto may contain confidential, privileged or non-public information. Use, dissemination, distribution or reproduction of this information by unintended recipients is strictly prohibited. If you have received this message in error, please notify the sender immediately and destroy all copies



Nevada Department of
Public Safety
Investigation Division
Director George Togliatti
Division Chief Ryan Miller

INVESTIGATION DIVISION
Las Vegas Major Crimes

NDI Case Number: 24I000512
Case Nature: Sexual Assault

County of Occurrence: Clark
Requesting Agency: Department of Administration
Requesting Official: Bachera Washington

Incident Date: February 2, 2024

Location(s) of Incident(s): Fairfield Inn & Suites
Las Vegas Airport South
355 E. Warm Springs Road,
Las Vegas, NV 89119

Suspect(s): [REDACTED]

Assigned Detective: Detective Jeff Musheno

Supervisor: Sergeant Patrick Halligan

Date of Report: August 9, 2024

 I498

Detective Jeff Musheno



Sergeant Patrick Halligan

ATTENTION – OFFICIAL USE ONLY

The information contained in this report is confidential and the property of the Nevada Department of Public Safety, Investigation Division, neither the report or any of its contents may be disseminated without the expressed authorization of the Nevada Department of Public Safety, Investigation Division. It is intended to be read only by the person or entity to whom it is delivered or by the designee of such person or entity if such person or entity if the reader of this report is not the intended recipient. You are notified the distribution of this report or its contents in any form is strictly prohibited. Dissemination is restricted to Criminal Justice agencies and authorized non-criminal justice agencies only. Secondary dissemination to unauthorized agencies or persons is prohibited by privacy and security laws.

TABLE OF CONTENTS

A. CRIMINAL REFERRAL	3
B. PERSONS INVOLVED	3
1. Suspect: [REDACTED]	3
2. Victim: Kathleen Light	3
C. INVESTIGATION	4
1. Sexual Assault Video Review	4
2. Kathleen Light Interview	4
3. Investigative Follow Up to Interview	5
a. Fairfield Inn & Suites Subpoena	5
D. INVESTIGATION	6
1. Digital Evidence	6
E. CONCLUSIONS	6

A. CRIMINAL REFERRAL

On July 5, 2024, Kathleen Light emailed Todd Rich, Chief Deputy Commissioner, Nevada Division of Insurance regarding [REDACTED] Deputy Commissioner of Consumer Services, Nevada Division of Insurance. In her email, Light stated she was sexually assaulted by [REDACTED] at a “cocaine fueled party.” Light also provided a video of the incident, which “speaks for itself.” On July 9, 2024, the information was emailed to the Nevada State Police Investigation Division.

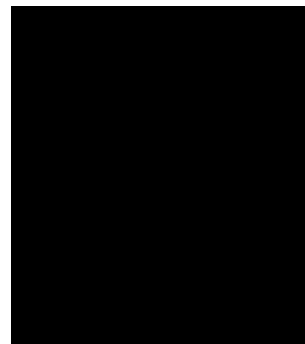
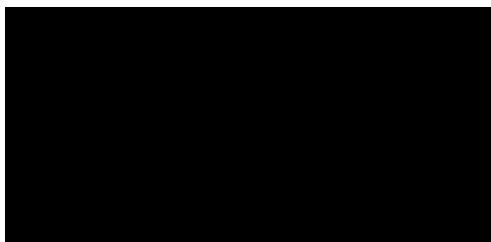
B. PERSONS INVOLVED

1. Suspect:

DOB:

Address:

Telephone:



2. Victim:

Kathleen Light

DOB:

Address:

Telephone:



C. INVESTIGATION

1. Sexual Assault Video Review

The video (1 minute 54 seconds in length) showed a white male adult (Identified by Light as [REDACTED] wearing dark colored pants, no shirt and a silver watch on a bed with Light, who is lying completely naked with her legs spread open. [REDACTED] entire right fist is inside Light's vagina, while he switched between his left index finger and left thumb and rubbed near her clitoris. [REDACTED] moved closer to Light on the bed and appeared to penetrate her vagina deeper with his fist. Light, who appeared to be in pain, rolled towards [REDACTED] with her legs visibly shaking, said multiple times, "ow", "no", and "please stop."

Despite her pleas to stop and even grabbing [REDACTED] wrist, he said multiple times "You're in. Don't be stupid," while his fist remained in Light's vagina and his left hand pushed her left leg down toward the bed. Light told [REDACTED] "Don't go any deeper, ok, please. Don't go deeper than that ok." [REDACTED] responded by saying multiple times, "You're good, relax." At that point, [REDACTED] took his hand off Light's left leg while his fist remained in her vagina and pulled on Light's right nipple. Light said, "it hurts, it fucking hurts dude." [REDACTED] told Light to "shut up" multiple times and followed that by saying, "this is literally what your pussy is built for. It's built for that."

Light repeatedly demanded [REDACTED] pull it out while he pulled on her right nipple. [REDACTED] said, "I'm not going to pull out, I'm going to fuck you with it." [REDACTED] continued penetrating Light and even removed her hand from his wrist. Light said "ow", "please", and "God Dammit [REDACTED]" [REDACTED] told Light "Don't be stupid, relax" multiple times. Light said, "I'm trying." [REDACTED] still with his entire right hand in Light's vagina, put his mouth on her left breast. Light again said, "no" multiple times. [REDACTED] said multiple times, "you're good." Light repeatedly said, "we're done, we're done, we're done, right? It hurts like a bitch." At this point, Light used her left hand and removed [REDACTED] fist from her vagina. The video ended.

2. Kathleen Light Interview

On July 10, 2024, at approximately 3:15 p.m., Detective Musheno conducted an audio recorded interview with Kathleen Light. The interview was conducted at 2080 E. Flamingo Road, Suite 118, Las Vegas, NV 89119. Detective Robert Crowe was also present for the interview.

Light, in part, stated the following:

She agreed to have a "three-way" sexual experience with [REDACTED] On February 2, 2024, Light, [REDACTED] went to the Fairfield Inn on Warm Springs Road. The incident captured on video, which was recorded by [REDACTED] with his cell phone and subsequently shared with Light, happened very early during the encounter. Light stated [REDACTED] penetrated her vagina with his right hand. She asked him to stop repeatedly.

Light said [REDACTED] told her to shut up and she was being stupid. Light stated she was in pain and described it as “being ripped open.” Light felt she needed to “suck it up and make it through” so [REDACTED] would stop. “Let him have what he wants, and he will stop.” Light confirmed that when she told [REDACTED] to stop that is exactly what she wanted to happen.

Detective Musheno also took photos of three (3) tattoos on Light’s body (left thigh, upper left arm, and right wrist) to compare to the tattoos that were observed on the female in the sexual assault video. The tattoos observed on the female in the video are consistent with the tattoos Detective Musheno photographed on Light’s body.

Additionally, Light gave consent for Detectives [REDACTED] to review and photograph the communication between her and [REDACTED]. Detective Crowe took forty-one photographs of the communication.

Detective Musheno concluded the interview with Light at approximately 5:02 p.m.

To review the audio recording, transcripts, photographs or cell phone communication in their entirety, refer to **SECTION C** of the electronic case file.

3. Investigative Follow Up to Interview

a. Fairfield Inn & Suites Subpoena

On July 15, 2024, Detective Musheno requested a subpoena for Fairfield Inn & Suites Las Vegas Airport South via email for **ANY** and **ALL** reservation information to include personal identifiers, addresses, telephone numbers, email accounts, social media accounts, IP addresses, and billing information to include, but not limited to, the means and source of payment (including any credit or bank account numbers) for February 2, 2024, for the following location:

355 E. Warm Springs Road, Room 239, Las Vegas, NV 89119

On July 16, 2024, the subpoena was approved; however, the subpoena was not served as the Clark County District Attorney’s Office had denied the case for prosecution.

D. INVESTIGATION

1. Digital Evidence

Description	Date Recovered	Location
Sexual Assault Video (Fairfield Inn & Suites)	July 8, 2024	C
Photo of call logs with Kathleen Light	July 10, 2024	C
Photos of text messages with Kathleen Light	July 10, 2024	C
Kathleen Light audio recorded interview	July 10, 2024	C
Kathleen Light audio recorded interview (backup copy)	July 10, 2024	C
Three (3) videos of Sexual Assault (Fairfield Inn & Suites) **One (1) of the videos is a duplicate of the original video**	July 10, 2024	C
Three (3) Photos of Light's tattoos	July 10, 2024	C
Forty-one cell phone screenshots Kathleen Light's phone	July 10, 2024	C

E. CONCLUSIONS

On July 9, 2024, the Nevada State Police Investigation Division (NSP ID) received a request for investigative assistance regarding a sexual assault. The request stemmed from a video received via email by the Nevada Division of Insurance depicting a graphic sexual act wherein the female victim was audibly screaming for the act to stop and appeared to be trembling in pain. The video evidence and official request was forwarded to the NSP ID to conduct immediate follow-up.

After a review of the evidence and an in-person interview with the victim who identified [REDACTED], Detective Musheno drafted an arrest warrant for [REDACTED]. On July 11, 2024, the arrest warrant for [REDACTED] was submitted through the Clark County District Attorney's (CCDA) Office for one (1) count of Sexual Assault, a violation of NRS 200.366.

On July 16, 2024, the Clark County District Attorney's Office scheduled a meeting, at 200 Lewis Avenue, 3rd Floor, Room 3444; Las Vegas, NV 89101, with the NSP ID to further discuss the case and any applicable charges. At that time, the NSP ID was informed the affidavit for the arrest of [REDACTED] and his ultimate prosecution was declined.

After further discussion with NSP Command staff, it was requested the investigation and request for prosecution be submitted to the Nevada Attorney General's Office for review and determination the criminal culpability of [REDACTED].

REQUEST FOR PROSECUTION

PAGE 1 OF 3

{1A}

AGENCY NO. 24I000512

SUBMITTING

AGENCY	Nevada State Police	PHONE #	(702) 280-1465	AGENCY NOTES	
DETAIL	Investigation Division	FAX #	(702) 486-6925		
OFFICER	Jeff Musheno	#	1498		

DEFENDANT

▲	NAME		ID No.		ARR
	AKA				PAO
	☒ Affidavit for Warrant ☐ Declaration of Arrest ☐ Request Summons ☐ SCOPE ☐ FBI				RGI
▲	NAME		ID No.		ARR
	AKA				PAO
	☐ Affidavit for Warrant ☐ Declaration of Arrest ☐ Request Summons ☐ SCOPE ☐ FBI				RGI

DA OFFICE USE ONLY

CASE NO.	TRACK	ATTN	DATE
----------	-------	------	------

CHARGE

SEQ	▲	CHARGE	NRS	EVENT NO.	DATE / TIME	LOCATION / ZIP	VICTIM
		Sexual Assault ☒ ☐ F ☐ GM ☐ M	202.366	24I000512	02-02-2024	Fairfield Inn 355 Warm Springs Rd., Las Vegas, NV	Kathleen Light

ATTY
NOTES

		☐ ☐ ☐ F GM M					
--	--	---	--	--	--	--	--

ATTY
NOTES

		☐ ☐ ☐ F GM M					
--	--	---	--	--	--	--	--

ATTY
NOTES

		☐ ☐ ☐ F GM M					
--	--	---	--	--	--	--	--

ATTY
NOTES

WITNESS LIST

PAGE 2 OF 3
 AGENCY CASE NO. 24I000512

CODES	ID / P# / ADDRESS	PHONE #
Wit Codes V	NAME <u>Kathleen Light</u> ID/ P NO <u>[REDACTED]</u>	<i>Residence</i>
	SSN _____ DOB _____	
	RES <u>[REDACTED]</u> <u>Henderson</u> <u>NV</u> <u>89012</u>	<i>Employment</i>
	EMPL <u>[REDACTED]</u> <u>Henderson</u> <u>NV</u> <u>89012</u>	<i>FAX</i>
Wit Codes O	NAME <u>Jeff Musheno</u> ID/ P NO _____	<i>Residence</i>
	SSN _____ DOB _____	
	RES _____ <u>(702) 668-3260</u>	<i>Employment</i>
	EMPL <u>2080 E. Flamingo Road, Suite 118</u> <u>Las Vegas</u> <u>NV</u> <u>89119</u>	<i>FAX</i>
Wit Codes O	NAME <u>Robert Crowe</u> ID/ P NO _____	<i>Residence</i>
	SSN _____ DOB _____	
	RES _____ <u>(702) 668-3260</u>	<i>Employment</i>
	EMPL <u>2080 E. Flamingo Road, Suite 118</u> <u>Las Vegas</u> <u>NV</u> <u>89119</u>	<i>FAX</i>
Wit Codes VR	NAME <u>Todd Rich</u> ID/ P NO _____	<i>Residence</i>
	SSN _____ DOB _____	
	RES _____ <u>(775) 687-0783</u>	<i>Employment</i>
	EMPL <u>1818 E. College Parkway, Suite 103</u> <u>Carson City</u> <u>NV</u> <u>89706</u>	<i>FAX</i>
Wit Codes	NAME _____ ID/ P NO _____	<i>Residence</i>
	SSN _____ DOB _____	
	RES _____	<i>Employment</i>
	EMPL _____	<i>FAX</i>

Witness Codes	V: Victim	VR: Victim Related	O: Officer
OOS: Out-Of-State	H: Hostile	DR: Defendant Related	M: Minor

DEFENDANT INFORMATION WORKSHEET

PAGE 3 OF 3

DO NOT USE IF PRINTED CRIMINAL HISTORY IS ATTACHED

AGENCY CASE NO. 241000512

DEFENDANT INFORMATION

Name (last, first, middle) aka						
Defendant's place of birth		City Pasadena	State CA	SS #		
Location of crime – Street No		City Las Vegas	State NV	Zip 89119	Room	AptSpace
Defendant's current address – Street No.		City Las Vegas	State NV	Zip 89109	Room	AptSpace
RACE W	SEX M	HGT 5'7	WT 170	HAIR Blonde	EYES Blue	DOB

DEFENDANT INFORMATION

Name (last, first, middle) aka						
Defendant's place of birth		City	State	SS #		
Location of crime – Street No		City	State	Zip	Room	AptSpace
Defendant's current address – Street No.		City	State	Zip	Room	AptSpace
RACE	SEX	HGT	WT	HAIR	EYES	DOB

DEFENDANT INFORMATION

Name (last, first, middle) aka						
Defendant's place of birth		City	State	SS #		
Location of crime – Street No		City	State	Zip	Room	AptSpace
Defendant's current address – Street No.		City	State	Zip	Room	AptSpace
RACE	SEX	HGT	WT	HAIR	EYES	DOB

DEFENDANT INFORMATION

Name (last, first, middle) aka						
Defendant's place of birth		City	State	SS #		
Location of crime – Street No		City	State	Zip	Room	AptSpace
Defendant's current address – Street No.		City	State	Zip	Room	AptSpace
RACE	SEX	HGT	WT	HAIR	EYES	DOB

Nevada State Police Investigation Division

NV DPS ID Case No: 24I000512

STATE OF NEVADA)

COUNTY OF CLARK)

AFFIDAVIT FOR WARRANT OF ARREST

Jeffrey Musheno, being first duly sworn, deposes and states that he is the affiant herein and that he is a Detective with the Nevada State Police Investigation Division (NSP ID) and that he has been employed for a period of seventeen (17) years.

That affiant is currently assigned to the Southern Area Major Crimes Office and has been assigned since August 2019.

In support of your affiant's assertion, affiant has developed the following facts:

On July 5, 2024, Kathleen Light emailed Todd Rich, Chief Deputy Commissioner, Nevada Division of Insurance regarding [REDACTED] Deputy Commissioner of Consumer Services, Nevada Division of Insurance. In her email, Light stated she was sexually assaulted by [REDACTED] at a "cocaine fueled party." Light also provided a video of the incident, which "speaks for itself."

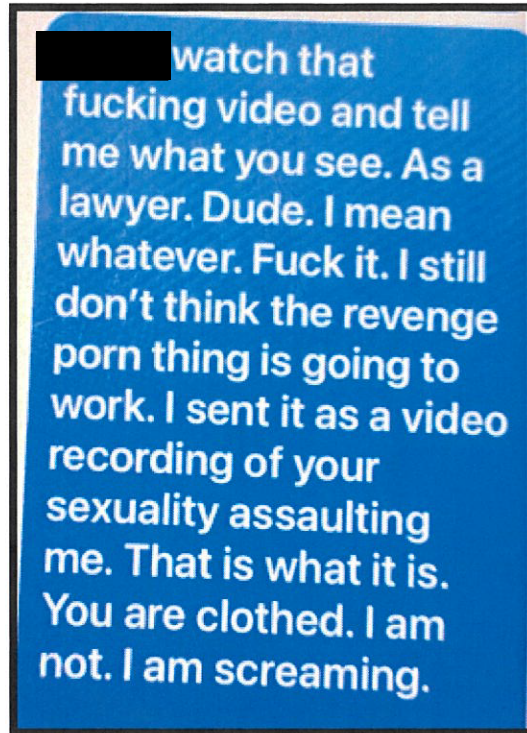
The video (1 minute 54 seconds in length) showed a white male adult (Identified by Light as [REDACTED] wearing dark colored pants, no shirt and a silver watch on a bed with Light, who is lying completely naked with her legs spread open. [REDACTED] entire right fist is inside Light's vagina, while he switched between his left index finger and left thumb and rubbed near her clitoris. [REDACTED] moved closer to Light on the bed and appeared to penetrate her vagina deeper with his fist. Light, who appeared to be in pain, rolled towards [REDACTED] with her legs visibly shaking, said multiple times, "ow," "no," and "please stop."

Despite her pleas to stop and even grabbing [REDACTED] wrist, he said multiple times, "You're in. Don't be stupid," while his fist remained inside Light's vagina and his left hand pushed her left leg down toward the bed. Light told [REDACTED] "Don't go any deeper, ok, please. Don't go deeper than that ok." [REDACTED] responded by saying multiple times, "You're good, relax." At that point, [REDACTED] took his hand off Light's left leg while his fist remained inside her vagina and pulled on Light's right nipple. Light said, "it hurts, it fucking hurts dude." [REDACTED] told Light to "shut up" multiple times and followed with "this is literally what your pussy is built for. It's built for that."

Light repeatedly demanded [REDACTED] pull it out while he pulled on her right nipple. [REDACTED] said, "I'm not going to pull out, I'm going to fuck you with it." [REDACTED] continued penetrating Light and even removed her hand from his wrist. Light said "ow," "please," and "God Dammit [REDACTED]" [REDACTED] told Light, "Don't be stupid, relax" multiple times. Light said, "I'm trying." [REDACTED] still with his entire right hand inside Light's vagina, put his mouth on her left breast. Light again said, "no" multiple times. [REDACTED] said multiple times, "you're good." Light repeatedly said, "we're done, we're done, we're done, right? It hurts like a bitch." At that point, Light used her left hand and removed [REDACTED] fist from her vagina. The video ended.

On July 9, 2024, Detective Musheno and Detective Crowe conducted an audio recorded interview with Light. Light, in part, stated the following: Light agreed to have a "three-way" sexual experience with [REDACTED] On February 2, 2024, Light, [REDACTED] went to the Fairfield Inn on Warm Springs Road. The incident captured on video, which was recorded by [REDACTED] with his cell phone and subsequently shared with Light, happened very early on in the encounter. Light stated [REDACTED] penetrated her vagina with his right hand. She asked him to stop repeatedly. Light said [REDACTED] told her to shut up and she was being stupid. Light stated she was in pain and described it as "being ripped open." Light felt she needed to "suck it up and make it through" so [REDACTED] would stop. "Let him have what he wants, and he will stop." Light confirmed that when she told [REDACTED] to stop that is exactly what she wanted to happen.

During her interview, Light consented to a search of her cell phone. Detectives were able to review the content of her text message exchange with [REDACTED]. In part, Detectives located the following message from Light to [REDACTED]



Due to the fact that Light repeatedly told [REDACTED] to stop, he disregarded her pleas and continued to penetrate her vagina with his fist, Your Affiant believes [REDACTED] sexually assaulted Kathleen Light.

Your Affiant hopes and prays an arrest warrant will be issued for [REDACTED] for the following charge(s):

- Sexual Assault, per NRS 200.366

I do, hereby, swear, under penalty of perjury that the Assertions of this Affidavit are true.

 1498

Jeffrey Musheno
Nevada State Police
Investigation Division
July 11, 2024

NRS 200.366 Sexual assault: Definition; penalties; exclusions.

1. A person is guilty of sexual assault if the person:
 - (a) Subjects another person to sexual penetration, or forces another person to make a sexual penetration on themselves or another, or on a beast, against the will of the victim or under conditions in which the perpetrator knows or should know that the victim is mentally or physically incapable of resisting or understanding the nature of the perpetrator's conduct; or
 - (b) Commits a sexual penetration upon a child under the age of 14 years or causes a child under the age of 14 years to make a sexual penetration on themselves or another, or on a beast.
2. Except as otherwise provided in subsections 3 and 4, a person who commits a sexual assault is guilty of a category A felony and shall be punished:
 - (a) If substantial bodily harm to the victim results from the actions of the defendant committed in connection with or as a part of the sexual assault, by imprisonment in the state prison:
 - (1) For life without the possibility of parole; or
 - (2) For life with the possibility of parole, with eligibility for parole beginning when a minimum of 15 years has been served.
 - (b) If no substantial bodily harm to the victim results, by imprisonment in the state prison for life with the possibility of parole, with eligibility for parole beginning when a minimum of 10 years has been served.
3. Except as otherwise provided in subsection 4, a person who commits a sexual assault against a child under the age of 16 years is guilty of a category A felony and shall be punished:
 - (a) If the crime results in substantial bodily harm to the child, by imprisonment in the state prison for life without the possibility of parole.
 - (b) Except as otherwise provided in paragraph (c), if the crime does not result in substantial bodily harm to the child, by imprisonment in the state prison for life with the possibility of parole, with eligibility for parole beginning when a minimum of 25 years has been served.
 - (c) If the crime is committed against a child under the age of 14 years and does not result in substantial bodily harm to the child, by imprisonment in the state prison for life with the possibility of parole, with eligibility for parole beginning when a minimum of 35 years has been served.
4. A person who commits a sexual assault against a child under the age of 16 years and who has been previously convicted of:
 - (a) A sexual assault pursuant to this section or any other sexual offense against a child; or
 - (b) An offense committed in another jurisdiction that, if committed in this State, would constitute a sexual assault pursuant to this section or any other sexual offense against a child,is guilty of a category A felony and shall be punished by imprisonment in the state prison for life without the possibility of parole.
5. The provisions of this section do not apply to a person who is less than 18 years of age and who commits any of the acts described in paragraph (b) of subsection 1 if the person is not more than 2 years older than the person upon whom the act was committed unless:
 - (a) The person committing the act uses force or threatens the use of force; or
 - (b) The person committing the act knows or should know that the victim is mentally or physically incapable of resisting or understanding the nature of the perpetrator's conduct.
6. For the purpose of this section, "other sexual offense against a child" means any act committed by an adult upon a child constituting:
 - (a) Incest pursuant to [NRS 201.180](#);
 - (b) Lewdness with a child pursuant to [NRS 201.230](#);
 - (c) Sado-masochistic abuse pursuant to [NRS 201.262](#); or
 - (d) Luring a child using a computer, system or network pursuant to [NRS 201.560](#), if punished as a felony.

Joe Lombardo
Governor



George Togliatti
Director

Sheri Brueggemann
Deputy Director

Investigation Division

555 Wright Way
Carson City, Nevada 89711
Telephone (775) 684-7412 - Fax (775) 684-7409

Mike Edgell
Chief

Administrative Synopsis

DATE: July 18, 2024

TO: Nevada Department of Human Resource Management

FROM: Mike Edgell, Investigation Division, Chief

SUBJECT: Synopsis of complaint against David Cassetty

On July 8, 2024, the Nevada State Police, Investigation Division received notification from Capitol Police regarding an email that was sent to Todd Rich, the Nevada Division of Insurance, Chief Deputy Commissioner of Accounting Services, alleging illegal/immoral acts by a state employee. The email stated "Sir- I want to make you aware of the moral character of your deputy. Mr. Cassetty is a sexual predator. He is an alcoholic who regularly shows up at work under the influence of alcohol." The purported sexual predator was identified as David Cassetty, the Deputy Commissioner of the Nevada Division of Insurance. Attached to this email was also a short, pornographic video.

This email was generated by the purported victim of the sexual assault, claiming that Mr. Cassetty had sexually assaulted her in February 2024, at a "cocaine fueled party." The video shows Mr. Cassetty performing a sexual act causing pain to the female, where the female begs/tells him to stop, which he did not. It is very graphic and disturbing.

A criminal investigation was initiated by the Nevada State, Police Investigation Division. During the investigation the author of the email was interviewed extensively regarding the criminal acts she had reported. During the interview the victim identified herself as the female in the video being assaulted. She stated that the sexual encounter started off consensually, but he was hurting her so she told him to stop.

The criminal investigation has been presented to the Clark County District Attorney for review.

Separate from the criminal investigation there are serious concerns regarding the fitness of a state division administrator. Though the criminal act was not committed on State property, one could

speculate that an unclassified division administrator is always on State time and should always represent themselves and their division appropriately. Division administrators are scrutinized for their on/off duty conduct as their activities could be perceived as incompatible with the employee's conditions of employment.

As such, the disgraceful conduct displayed in the video that was sent to many people in Mr. Cassetty's division not only could impair the performance of his duties, but also cause discredit to the agency. Should Deputy Commissioner Cassetty's identity be publicized from this pornographic video that was sent to an investigative reporter at Channel 8 News, in Las Vegas, it would undoubtedly bring discredit to his division, and quite possibly, the Governor's office.

SAR INFORMATION 2024-12-18 10:16:00

SUBMITTER

First Name: [REDACTED]

Last Name: [REDACTED]

Phone Number: + [REDACTED]

Email: [REDACTED]

Incident Information

Time of Incident: 2024-12-18 10:16:00

Address: 1 State of Nevada Way

City: Las Vegas

State: None

Zip Code: 89119

Type of Suspicious Activity: Expressed or Implied Threat

Type of Criminal Activity: Other Activity

Incident Narrative: On December 16, 2024, Attorney General Ford received an indirect threat message on his Facebook page. Kathleen Faye Light posted the following comment:

"Not on my watch. I will be at every campaign event. Who I was is gone as a result of my rape. I'm almost out of fight, but not quite yet. I'll be there. Don't worry. I will be there because I was raped and you won't do a damn thing about it. Here is the arrest warrant that was denied. 6 months. No answers."

Light's sexual assault complaint was previously investigated by the Nevada State Police Investigation Division. The case was submitted to the Clark County District Attorney's Office (CCDA) for prosecution, which ultimately declined to pursue charges. The case was then referred to the Office of the Attorney General (OAG) for review, where prosecution was also declined.

[REDACTED]

Subjects

Name: Kathleen Faye Light

DOB: 1979 [REDACTED] 07:00:00+00:00

Approximate Age: 45

Address: [REDACTED] Henderson, NV 89012

Phone:

Description: Subject ID# [REDACTED]. [REDACTED]

Additional Information

Event or Case Number (If applicable): 11801-3797

Sector Represented: Law Enforcement

Description of Vehicle: o 2014 Toyota Sedan, NV Plate [REDACTED] (expired registration)

o 2020 Toyota SUV, NV Plate [REDACTED] (expired registration)

[REDACTED]

[REDACTED]

LEP

Law Enforcement Privilege

The record(s) you seek are law enforcement records that contain sensitive information.

A law enforcement agency may withhold records under the Nevada Public Records Act when its interest in nondisclosure clearly outweighs the public's presumed right to access. *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 880, 266 P.3d 623, 628 (2011). There is a presumption that records are not confidential, that exceptions must be narrowly construed, that redactions are preferred over withholding, and that the purpose of the Nevada Public Records Act is to facilitate government transparency. However, Nevada law and public policy recognize the importance of maintaining the integrity of law enforcement records. See, for example:

- NRS 179A.070 – 179A.100 (strictly regulating the dissemination of records of criminal history; in particular, there is no requirement to disseminate records of criminal history to the general public; moreover, records of criminal history are not public records pursuant to NRS 239.010(1) (listing statutes that are exempted from the Nevada Public Records Act, including NRS 179A.070).
- *Donrey v. Bradshaw*, 106 Nev. 630, 636, 798 P.2d 144, 148 (1990) (in a public records case, recognizing that law enforcement files could be confidential when pertaining to a “pending or anticipated criminal proceeding” or if there is a danger of “denying someone a fair trial” and concluding that records could be made public because there was “no pending or anticipated criminal proceeding; there [were] no confidential sources or investigative techniques to protect; there was no possibility of denying someone a fair trial; and there was no potential jeopardy to law enforcement personnel.” *Id.* at 636, 798 P.2d at 148.
- *Reno Newspapers v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 627 (2011). (recognizing that the balancing test first announced in *Donrey* had been modified by legislative changes to the Nevada Public Records Act, but nonetheless noting that the result in *Donrey* was “based on the facts that no criminal proceeding was pending or anticipated, no confidential sources or investigative techniques were contained in the

report, there was no possibility of denying anyone a fair trial, and disclosure did not jeopardize law enforcement personnel”).

- NRS 49.335 – 49.355 (making the identity of informants who provide information to law enforcement confidential until they testify).
- *Las Vegas Metro. Police Dep't v. Anderson (In re 12067 Oakland Hills, Las Vegas)*, 134 Nev. 799, 806, 435 P.3d 672, 678 (Nev. Ct. App. 2018) (noting that, generally, the police do not need to return evidence seized from its owner if the “property [is] related to an ongoing criminal investigation”).
- Att. Gen. Op. 83-3 (recognizing the “legitimate public policy interests in maintaining confidentiality of criminal investigation records and criminal reports, including records concerning subjects who have never been arrested”).
- Nev. Const., art. I, § 8A (Marsy’s Law, constitutionalizing victims’ rights to privacy, safety, and a diligent pursuit of justice).
- NRS 174.235 (making the disclosure of police files and evidence collected subject to strict discovery rules in open criminal prosecutions); see also *Tennessean v. Metro. Gov't of Nashville & Davidson Cty.*, 485 S.W.3d 857 (Tenn. 2016) (interpreting criminal rule of procedure similar to NRS 174.235 and holding that discovery of materials gathered by state for use in criminal prosecution may be obtained by defendant pursuant to rules of discovery, not by newspaper through a public records request); *Wilson v. Layne*, 526 U.S. 603, 119 S. Ct. 1692 (1999) (holding that when balancing a person’s Fourth Amendment right to be secure in their persons, houses, papers, and effects, probable cause may justify a *police* entry and seizure but it does not justify the *media’s* entry and/or seizure).
- NRS 179.045(4) (making search warrant applications, which regularly contain detailed facts gathered in open criminal investigations, confidential upon a showing of good cause).
- *In re Search Warrants Regarding Seizure of Documents*, 2023 WL 2861201 (Nev. Ct. App. 2023) (unpublished) (holding that good cause existed to keep search warrant application under seal because dissemination would threaten the integrity of an active and ongoing criminal investigation).
- NRS 172.245. Evidence and information obtained by grand juries during their investigations are confidential. The purposes of confidentiality include: (1) To prevent the escape of those whose indictment may be contemplated. (2) To insure the utmost freedom to the grand jury in its deliberations and to prevent persons subject to indictment, or their friends, from importuning the grand jurors. (3) To prevent subornation of perjury or tampering with the witnesses who may testify before the grand jury and later appear at the trial of those indicted by it. (4) To encourage free

and untrammelled disclosures by persons who have information with respect to the commission of crimes. (5) To protect an innocent accused, who is exonerated, from disclosure of the fact that he has been under investigation. *Shelby v. Sixth Judicial Dist. Court*, 82 Nev. 204, 210, 414 P.2d 942, 945 (1966).

- *Houston v. County of Maricopa*, — F.4th —, 2024 U.S. App. LEXIS 22564, 2024 WL 4048897 (9th Cir. Sep. 5, 2024) (holding that dissemination of a pretrial detainees' booking photo to the public is generally unconstitutional under the substantive due process clause of the 14th Amendment because it constitutes punishment without due process).

Given the totality of the law governing the disclosure of information concerning law enforcement records, the following non-exclusive factors are considered in evaluating whether law enforcement interests in confidentiality clearly outweigh the public's presumed interest in access:

- Whether protecting the integrity of the investigation better enables detectives and prosecutors to evaluate the credibility of any information that may come in the future. If a future witness were to know what other witnesses have said, or what other evidence has revealed, the future witness' statements will not be as reliable.
- Whether witnesses and informants have provided information that, if disclosed, could create danger or at least embarrassment to them.
- Whether any privacy interests and/or constitutional rights of any victims, witnesses, or subjects (including subjects never arrested) would be impacted by disclosure.
- Whether premature disclosure would have a chilling effect on future witnesses coming forward to provide information in this or other cases.
- Whether law enforcement officers have acted in an undercover capacity, or whether any witnesses have provided information as confidential informants.
- Whether disclosure would reveal confidential techniques or tactics that would risk enabling subjects to circumvent the law in the future.

In this case, after a careful examination of all factors, law enforcement's interest in nondisclosure clearly outweighs the public's presumed interest in access. Therefore, the information you seek is confidential.

PRVCY

Privacy Interests

The record(s) you seek contain information the disclosure of which would constitute an unwarranted invasion of a person's privacy interests.

In *Reno Newspapers v. Sheriff*, 126 Nev. 211, 218, 234 P.3d 922, 927 (2010), the Nevada Supreme Court recognized that an individual's privacy must be balanced with the public's general right to open government, "especially because private and personal information may be recorded in government files"). Later, in *Clark County Sch. Dist. v. Las Vegas Review-Journal*, — Nev. —, 429 P.3d 313, 319-20 (2018), the Court adopted a balancing test in which the burden shifts to the requester of a record if the public agency demonstrates a "nontrivial personal privacy interest" including "intrusion[s] into a person's reasonable expectation of privacy, seclusion, or solitude." Privacy interests include information that may cause "embarrassment, shame, stigma, [or] harassment" or "endangerment, or similar harm." *Las Vegas Metro. Police Dep't v. Las Vegas Review-Journal*, 136 Nev. Ad. Op. 86, — P.3d — (2020). Medical information, personnel files, details about sexual orientation, and other information about a person's life give rise to privacy interests. *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, 136 Nev. Adv. Op. 5, — P.3d — (2020).

The Nevada Supreme Court equates the type of information that should be withheld under the Nevada Public Records Act with the common law tort of invasion of privacy. *Clark County Sch. Dist.*, *supra*, at 708, 549 P.3d at 320. "The tort of invasion of privacy embraces four different tort actions: '(a) unreasonable intrusion upon the seclusion of another; or (b) appropriation of the other's name or likeness; or (c) unreasonable publicity given to the other's

private life; or (d) publicity that unreasonably places the other in a false light before the public.’” *Franchise Tax Bd. of Cal. v. Hyatt*, 133 Nev. 826, 842, 407 P.3d 717, 733 (2017), *overturned on other grounds by Franchise Tax Bd. v. Hyatt*, 139 S. Ct. 1485 (2019) *quoting* RESTATEMENT (SECOND) OF TORTS § 652A (1977); see also *PETA v. Bobby Berosini, Ltd.*, 111 Nev. 615, 629, 895 P.2d 1269, 1278 (1995), *overruled on other grounds by City of Las Vegas Downtown Redev. Agency v. Hecht*, 113 Nev. 644, 650, 940 P.2d 134, 138 (1997).

Here, the record(s) you seek contain information the disclosure of which would constitute an unwarranted invasion of a person’s privacy interests. Therefore, they are confidential and must be withheld or redacted.

From: Kathleen Light kreitmayer@icloud.com
Subject: Formal Written Notice Regarding My Sexual
Assault Complaint and the Conduct of Your
Office

Date: Aug 17, 2026 at 2:13:07 PM

To: ADFord@ag.nv.gov

Cc: Jon Ralston ralston@thenvindy.com,
nbrigham@reviewjournal.com, Wolfson
steven.wolfson@clarkcountyda.com,
aplasvegas@ap.org, Office of Governor Joe
Lombardo constituents@gov.nv.gov,
Carrie.Buck@sen.state.nv.us, Nevada
Commission on Ethics ncoe@ethics.nv.gov,
Nevada Political Journal
nevadapoliticaljournal@gmail.com,
News@news3lv.com, NOW now@now.org,
nevadaweek@vegaspbs.org, tips@cnn.com

Attorney General Ford,

This email is not directed generally to your staff. It is not a public-records request. It is not a comment to the Public Records Task Force. It is not correspondence intended only for one of your deputies or attorneys. **I am writing this to Aaron Ford personally so there is a written record that I told you.**

I was sexually assaulted by David Cassetty, then the Deputy Insurance Commissioner for Consumer Affairs and Enforcement. The assault was recorded on video. This is not a case in which the central question is whether I communicated that I wanted the sexual act to stop. On that video, I stated, **“Pull it out!”** David Cassetty responded, **“No! I’m not going to pull it out. I am going to fuck you with it.”** He said it **twice**. I was screaming, telling him

to stop, and physically attempting to remove his hand from my body. He was never even charged. Your office declined prosecution **twice**.

Your office rejected a fourth, nearly forty-minute video of David Cassetty and Michael Crumb raping me. Afterward, Cassetty and Crumb call me a “champ,” and Cassetty then brags: **“When I saw her the other night, she told me I couldn’t fuck her ass. So I took that as a CHALLENGE and I fucked her ass.”** That alone should concern you.

Rather than the State of Nevada directing its investigative attention toward David Cassetty or Michael Crumb, whose conduct was captured on video, **I became the subject of a counterterrorism investigation for alleged “indirect threats.”** The supposed threatening conduct was that I said I intended to attend a campaign event I had been **invited to via email by your**

own campaign. I am a politically active Nevada Democrat. Attending political events is not unusual behavior for me. I'm from the Washington DC area. I've met every sitting president since I was born. I've a great story about my son putting Bill Clinton's tie in his mouth. Yet saying I intended to attend a political event to which I had been invited somehow became grounds for scrutiny by a counterterrorism unit.

I have been trying ever since to obtain the records that explain how that happened.

Your office ignored my public-records requests concerning the actual matter-the rape itself. I was trying to determine what the State knew, what it investigated, what decisions were made, why those decisions were made, and how the person reporting a sexual assault by a state official somehow became

the person being investigated.

There have also been numerous formal complaints submitted to your office concerning this matter, and those complaints have been ignored. These were formal attempts to put the circumstances before your office through the channels available for doing exactly that. Between those complaints, my records requests, correspondence, litigation, public testimony, and contacts involving multiple Nevada agencies, this has not been some obscure matter buried where no one could reasonably know about it.

There is another fact that makes my inability to obtain the underlying records particularly troubling. **I was told by a person at the Division of Insurance that David Cassetty had been sexually involved with a member of the Attorney General's staff.** I received that information from someone at the

Division of Insurance who was not bound by the nondisclosure agreement that employees had been required to sign before the matter was even referred to Nevada State Police.

I sued you for the public records. Then I waited a year. When your office finally produced a record, it consisted of **one page**. There was nothing about David Cassetty's actions, nothing explaining the handling of my sexual-assault complaint, nothing explaining why no charges resulted from conduct captured on video, and nothing explaining the actions taken by state officials. Instead, the one page I received contained **false and unsubstantiated statements about me**.

I have researched intimate-partner sexual assault and trauma responses. I have written what is intended as a handbook for prosecutors about these cases

because I could not understand how something that appeared so obvious to me could disappear inside governmental institutions.

This is the postscript where I actually talk about my case. I would appreciate you reading it.

Collateral Damage

***Email to the Clark County, Nevada District Attorney
July, 2024***

I write today to discuss a case that has been brought to you recently involving

redacted. I am the victim in the video.

It is my understanding that context seems to be the issue in the decision not to move forward with this case. I do find that interesting from an academic standpoint. If sexual assault is defined simply as “forced sexual penetration against another person’s will.” The video clearly shows that. Any reasonable person would see that and hear the word “no” and see me grabbing at his wrist trying to pull his hand out of me, while screaming and they would say the fits the legal definition of sexual assault in Nevada law.

However, in this case it is a question. Was I doing this voluntarily? Did I give consent? What is on film is fact. You can see it, it is real. It would appear that I said no. It would appear I begged him to stop.

The real question in this case is one of substantial circumstance for women

all over this country. When does no actually mean no? What rights to legal protection do women forfeit by being in a relationship with their attacker? At what point or state of mind does a woman have to be in to finally take action against their assailant and at what point is that too late. In Nevada it is twenty years. This happened within the current calendar year.

These are definitions that we need as women. Honestly, how do we navigate not knowing? It's a contract you enter into with someone giving sexual consent. If I can't say "no, stop, you're hurting me" and have it stop, there must be a caveat in the contract somewhere stating that there are exclusions of when no doesn't mean someone has to stop. Without a legal definition of what constitutes forfeiture of protection by law from sexual assault, how am I actually supposed to navigate?

There are a lot of women not currently protected from sexual assault under the law. We put ourselves in situations that are dangerous and it's our fault. But Jesus, I should have been able to say no. Just because I walk into a bad part of town doesn't mean I deserve to be shot. Just because I know my attacker and had a relationship with him, doesn't give him the right to penetrate me against my will as I told him to stop.

I know it is easier to prosecute the men in the shadows who violate virgins. But that is not the only definition and victim profile that exists. Women deserve better protection and we can't protect ourselves unless we have legal definitions.

If that was your wife, your daughter, your sister, or your friend in that video, would that be sexual assault? I'm certain you would say so. I certainly would.

It's not a matter of proving that, it is clearly defined as sexual assault. It's a matter of does no actually mean no and at what point that is. That is the crux of his defense. It's not sexual assault because she stayed and dated the guy. So, is that not still sexual assault? Legal definition. Black and white. If sexual assault is forced sexual penetration against another person's will, if those are the words that define what sexual assault is, then that not being sexual assault isn't possible.

It's a tough case and a tough question and frankly I want an answer. This is important. I didn't handle it well and I should have taken it to the police. But again, I was questioning if I was being sexual assaulted. Yes, that's what it looks like. Yes that's how it felt. Yes that is what I would call that looking at it. But, he was a man I had been engaged in a sexual relationship with for six years. I didn't think anyone would believe me, because of this murky water

with known persons and ongoing relationships.

This was a tangled. incident. There is a lot to it. But so few cases are cut and dry. You have video recordings. Moment by moment what happened. What was said. Who did what. If that's not enough to prove it there needs to be some sort of legal precedent clearly defining this.

When I taught, I taught that law had letter and intent. This is sexual assault, letter of the law. Is it sexual assault intent of the law? It's truly fascinating and I hope you will at least review it again and see if you see my point.

Please contact me if you have any questions or just even thoughts about this.

*Regards,
Kathleen Light*

I wrote that email because I wanted an answer.

Not comfort. Not sympathy. Not a civics lesson on prosecutorial discretion. I wanted an answer to a very simple question: when does no actually mean no?

Because I had video. On that video I said no repeatedly. I begged him to stop. I grabbed at his wrist trying to pull his hand out of me while I screamed. It was not subtle. It was not poetic. It was not open to some great philosophical debate about human intention and ambiguity. It was plain. It was clearly stated. And still the answer from the Clark County District Attorney's Office was no charges. The issue, somehow, was "context."

Because what context meant in my case was not that the conduct on the video

was unclear. It meant I knew him. It meant I had slept with him before. It meant I stayed. It meant I did not behave like the kind of victim the system prefers. It meant I was not a stranger sexual assault case gift-wrapped for easy prosecution and public approval. It meant I was a woman in the murky water of intimate partner sexual assault, and our institutions still do not know how to look at women like me without blaming us for drowning in those murky waters.

For the last two years I have been screaming. Internally. Externally. Just screaming. Screaming in pain. Screaming for help. Screaming so it will just end. The end, in my case, is justice.

The screaming began at a hotel by the airport. There were three men in that room. I had known one ten years, one, the main assailant, six years, and one

about a month. There was alcohol. There was cocaine. There was video.

Four separate videos actually.

In that room I was sexually assaulted by two of my friends. The main assailant told me he loved me for the first time while I screamed and begged him to stop. Then the men shook hands over me in an agreement I was not party to, but instead subject of. "I'm taking her home and I'm keeping her," he said.

I would then spend five months with a man who routinely pinned me down and forced himself on me at night, so blackout drunk he did not remember it in the morning, and who on other nights threatened me with murder-suicide and went for his father's service revolver to blow my head off. He said he wanted to see my brain splattered on the wall.

Mine was intimate partner sexual assault, the most common and one of the least prosecuted forms of sexual assault. It does not look like the movies. It looks like women staying. It looks like women freezing. It looks like women doubting themselves. It looks like trauma bonding, shame, confusion, and trying to survive inside a relationship that has already turned into a crime scene.

When I finally reported, five months later, it was because I had watched the videos for the first time. The police were actually the ones who convinced me it was sexual assault. I asked more than once if they were sure. It could not be, could it? He loved me. He told me he loved me while it was happening. But love is not consent. A relationship is not consent. A history is not consent. The law already knows that.

My case went first through the Clark County District Attorney's Office. I was told at one point that my assailant was being arrested "at that moment." At the same time the assailant was texting me that he had been escorted out of his office by Capitol Police and that his car was being searched. I believed an arrest was happening. The weekend came and went. I broke and felt guilty and told my assailant Sunday to be prepared. The police told me he was to be arrested and it was going to happen at any moment. Then a day later I was told it was a jurisdictional issue and the arrest would still happen. Then, the day after that, I was told the District Attorney had declined charges and the case was no longer being investigated.

That kind of whiplash does something to your nervous system. It takes you from terror to relief to confusion to collapse in a matter of hours. One moment the state is telling you that what happened to you was real enough to

justify arrest. The next, it is telling you the same conduct is not prosecutable. I had been so relieved he was going to be arrested and unable to contact me as we continued texting for months after I reported. I knew I needed to walk away, I just couldn't. He would need to be in jail to break that contact. That was the trauma bonding.

It took months and dozens of emails to get a meeting with the District Attorney. If you do not have an active case, you cannot call the Clark County District Attorney's Office. You email. And email. And email. Eventually I got tired of being ignored and showed up in person and refused to leave until someone talked to me and told me why. That is how the meeting got scheduled. That is how I ended up across from the District Attorney.

When I got there, District Attorney himself came out to get me from the

waiting room. He introduced himself as “Steve.” I told him to call me “Katie.” We went into a conference room where the Deputy District Attorney in charge of my case as well as the Chief Deputy for criminal were waiting. The Chief Deputy immediately announced that nothing could be recorded in that room. The message was clear: they were in control of the record. I was not.

Then “Steve” began explaining that prosecutors could not try cases they could not win. I answered him with the same fact I kept coming back to because it was the fact that made everything else so obscene.

“It’s on video.”

That should have ended the argument. Instead it began one. The Deputy mentioned something about me asking whether we should close the window in

*the third of the four videos, as if that somehow retroactively converted the previous half hour of screaming into consent. I tried to explain that the video showed exactly what sexual assault looks like. I said no. I said stop. I said you're hurting me. My assailant told me to shut up. When I asked him to pull his hand out of my body, he said "no, I'm not going to pull it out, I'm going to f** you with it." He was, in effect and in plain language, acknowledging my revocation of consent and telling me he intended to continue and escalate anyway.**

I asked the District Attorney somewhat sarcastically if he had even watched the video. Then I learned he had never watched the video.

The actual elected District Attorney for Clark County, Nevada which is major metropolitan area containing Las Vegas had declined charges on my sexual

assault case personally—now for the third time, as I understood it—without ever viewing the evidence.

That was the moment I stopped being calm.

I pulled out my phone and pulled up the video. He told me that if I played it, he would terminate the meeting. I looked him in the eye and pressed play. He jumped up out of his chair and scurried down the hallway. I followed him with the volume all the way up and said, “What’s the matter, Steve? You don’t want to hear me scream?” I muttered an insult under my breath. The Chief Deputy informed me that I was being removed from the building for “forcing” the District Attorney to hear the video. That word — forcing — landed on me like another assault. Then I said, “Go ahead. Do I appear to be someone who has never been in cuffs before?” The District Attorney snorted in some

amusement.

Then I broke down sobbing because by that point the entire spectacle had become too grotesque to process upright.

The District Attorney then agreed he would watch the video and meet with me again the following week. The chief deputy objected — “Boss, no!” — which remains one of the strangest details of the whole story. Why was everyone so worried about the elected District Attorney actually seeing the evidence in a sexual assault case? What exactly were they trying to protect? Him? The office? The declination? Themselves?

At the second meeting, held over Teams, I hoped he had watched it. I had sent it to him directly via email every single day that week.

The District Attorney opened with a question: had I had sexual intercourse with my assailant after that video was made? I answered plainly. Of course I had. We were in a relationship. That was not some shocking revelation. That was the whole point. Mine was intimate-partner sexual assault , not a stranger in an alley.

He had his line ready. You could feel it. He started, stopped, and restarted the way people do when they have rehearsed and want to get it exactly right.

He said his office “could prosecute men who raped prostitutes, but you stayed with him”.

There it was. That was the answer to my email. That was the answer to “when does no actually mean no?” Apparently not when the woman stayed. Apparently not when she loved him.

The statement was not just cruel. It was legally false. A relationship does not nullify sexual assault. Continued contact does not nullify sexual assault. Subsequent sex does not travel backward in time and manufacture consent where there was none. He knew that. I knew that. So what he gave me in that moment was not legal reasoning.

I believe he wanted a reaction from me. Something explosive. Something hysterical. Something he could point to and say, see? That is what we are dealing with here. Instead I smiled and told him I would be back, that I would go through Las Vegas Metro Police because I believed Nevada State Police had mishandled the case, and then I ended the call.

What he did that day did not end with the meeting. That is the part people do not understand when they talk about prosecutorial decisions as if they are

clinical, bureaucratic, almost bloodless things. A declination is not just a memo. It is not just a line in a file. It enters the victim. It attaches itself to every doubt she already has and gives those doubts institutional authority.

Maybe it was your fault. Maybe staying meant consent. Maybe if you really had been sexual assaulted you would have left. Maybe if you really had been sexual assaulted you would have gone to police immediately. Maybe you were too messy, too sexual, too damaged, too complicated to count. Maybe women like you are not the women the law was written for.

But, my situation is exactly why the laws are written the way they are. That is why relationships are specifically excluded in Nevada law as being indicative of consent. I am why Rape Shield exists. My case is why the consent based model is now the standard. I am the person the modern laws were written for.

Me. My case. Those laws exist specifically to prevent what happened to me both in the assault and in the institutional response.

That is collateral damage.

Not because the prosecutor caused the original assault. He did not. But because he took the raw material of trauma and fed it the oldest lie in the book: that the victim's behavior after sexual assault is the real issue, not the assailant's behavior during it.

By the end of that month I was in intensive trauma therapy and had to quit my job to do it. The District Attorney's comment had a hand in that. Not because it was the first wound, but because it was the state stepping directly into the wound and grinding it deeper.

People like to imagine prosecutorial decisions as detached exercises in evidence and judgment. But, malinformed prosecutorial decisions do damage. They can reinforce every trauma distortion already in a victim's mind. They can make her question reality, question law, question whether the word no has any meaning at all once it is spoken inside a relationship. They can teach her that what happened to her may satisfy the legal definition of sexual assault in theory, but not in practice, not for her, not with her facts, not with her body, not with her life.

And then people wonder why women become angry. Why they document everything. Why they read case law at three in the morning. Why they build websites. Why they write books. Why they refuse to shut up.

This is why.

Because when the people entrusted to apply the law cannot or will not do it, the victim is left to carry the truth herself. She has to build the record. She has to preserve the sequence. She has to learn the law well enough to defend herself not just from the rapist, but from the prosecutor's lack of knowledge on the subject. She has to become archivist, advocate, witness, expert, historian, and alarm bell, all because some man in a pastel dress shirt decided that "you stayed" was a sufficient substitute for legal analysis.

This book is a trauma response. That is not an apology. It is a fact. It exists because I cannot let another woman go through what I went through and call that justice. It exists because uninformed prosecutorial decisions do not stop at "no charges." They keep happening inside the victim long after the meeting ends. They become secondary injuries. They reshape the way she sees herself, her assault, her worth, and the law that was supposed to protect her.

You never know what a trauma response might look like. Sometimes it looks like collapse. Sometimes it looks like silence. Sometimes it looks like this book.

Attorney General Ford, I am not asking you for sympathy. I am asking you to do your goddamn job that I voted to elect you to. At this point I am not willing to accept another explanation that some unnamed person somewhere within government handled this and therefore no one in a position of authority actually knew.

Unless your entire staff is cognitively impaired, you clearly have had full knowledge of this. If not, fire some people. You could have at least used the part about Cassetty sleeping with Lombardo's ex-wife in your

campaign. There have been public-records requests, communications with your office, records involving multiple Nevada agencies, formal complaints to your office, my public testimony, and litigation—including litigation concerning the records themselves. I am sending this directly to you because I want to eliminate the possibility of anyone later saying that **Aaron Ford personally did not know.**

Please watch the attached video of my rape. When you watch it, I want you to remember what David Cassetty himself has said in the current civil case. David Cassetty acknowledges that I revoked consent. He stated: **“In a later encounter the same evening, Plaintiff requested that Plaintiff remove his hand and Plaintiff [sic] did so promptly.”** His own statement recognizes that I had specifically revoked consent. Yet, in perhaps the dumbest argument I have personally ever seen from someone who actually attended an

accredited law school—though, it is of note, Mr. Cassetty is merely a lawyer and no longer an attorney—he apparently believes it helps him that when he did it **again after I revoked consent**, he complied “promptly.”

More importantly, in response to the Request for Admission, “**Admit no safeword or non-consent agreement existed,**” David Cassetty responded: “**Admit.**” There was therefore no safeword, no agreement that “no” meant something other than no, no agreement that “stop” meant something other than stop, and no agreement that “pull it out” meant anything other than remove your hand from my body.

Then, after you watch the video, remember the defense he has actually offered for why he continued. His explanation is: “**I understood her to be requesting I stop progressing with the act, to give her time to adjust**

before continuing, and not to end the act entirely.” Read that carefully. His explanation is that I protested **and he personally decided what I meant by it.**

I said, **“Pull it out.”** He responded, **“I’m not going to pull it out. I am going to fuck you with it.”** Twice. His defense now is essentially that although I communicated that I wanted him to stop, **he interpreted my words as permission to resume when he decided I had been given enough time to “adjust.”** Watch the video and tell me at what point I was allowed to “adjust.” There was no safeword agreement and there was no non-consent agreement, by his own admission. That is the case the State of Nevada allowed to disappear without even being put in handcuffs.

What has happened since that assault has caused trauma far beyond the

original crime. This matter has demolished my life. I have lost time, work, stability, relationships, and pieces of myself trying to force institutions that were supposed to function. Every refusal to look, every unanswered complaint, every unexplained decision, every withheld record, every law your office broke, and every institutional effort directed at me instead of the conduct I reported has compounded that harm.

At some point institutional responsibility becomes personal responsibility. You are the elected Attorney General. These decisions and failures have occurred within an office carrying your name and exercising authority entrusted to you by the people of Nevada. I am telling you directly what those failures have done to a human being. **Morally, Aaron Ford, you bear responsibility for what your office has done and for the damage that continued while you had the power to intervene and did nothing.**

Do not ever tell anyone that you care about women while refusing to look directly at what happened to this one. I hope this follows you beyond your failure in November. I hope that as the campaigns, titles, offices, and political ambitions disappear into the past, you remember that there was an actual human being on the other side of these decisions. I hope that as you grow old, the weight of the knowledge of what happened here—and what you chose to do or rather not do once you knew—bears down on your conscience and your soul.

Attorney General Ford, that is why I am writing to you personally. I want **you** to watch the video, read his words, look at the complaints, and look at the records.

Most importantly, I want this in writing. Whatever anyone claims later, **you**

have now been personally informed. Please finally take some action to rectify the situation by charging him before you leave office.

You are a religious man, so I leave you with this:

Then shall he say also unto them on the left hand, Depart from me, ye cursed, into everlasting fire, prepared for the devil and his angels:

For I was an hungred, and ye gave me no meat: I was thirsty, and ye gave me no drink:

I was a stranger, and ye took me not in: naked, and ye clothed me not: sick, and in prison, and ye visited me not.

Then shall they also answer him, saying, Lord, when saw we thee an hungred, or athirst, or a stranger, or naked, or sick, or in prison, and did not minister

unto thee?

Then shall he answer them, saying, Verily I say unto you, Inasmuch as ye did it not to one of the least of these, ye did it not to me.

And these shall go away into everlasting punishment: but the righteous into life eternal.

— *Matthew 25:41–46 (KJV)*

Best of luck in November.

Kathleen Light

[702-469-7523](tel:702-469-7523)

P.S. Because I have already been subjected to a counterterrorism

investigation over alleged “indirect threats,” I want to make this explicit: nothing in this email is intended as a threat of any kind, direct or indirect. My statements concerning your conscience, your soul, God, and Scripture are moral and religious statements only. I am not threatening you with any action whatsoever. What happens between you and God is between you and God, sir and best of luck with that. I ain’t throwing stones.

Sent from my iPhone

6:43

100%



+1 (802) 917-5990 >

new positioning too. It's boring.

You should look up the revenge porn law. Multiple counts of a class D felony. Not sure if it's possible to recall those.

And I went on one date, never fucked her

That was rape. I was begging you to stop and you, sir told me to shut up.

Also, the fuck do I care about felonies or going to prison



iMessage

