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Public Comment — Revised to Include Chomsky's "Socialism for the Rich" Framework
(Please confirm all information with trusted sources.)

Submitted by:
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Subject:

Public Comment Regarding NRS 333.338, SEFA Irregularities, Fiduciary-Duty Conflicts, EJDC Administrative-Order Practices, and Whether Nevada's Fiduciary Systems Create Downstream Pathways to National Political Nonprofits — Including AIPAC — Within a Broader Pattern of "Socialism for the Rich"

I. Purpose of Comment

This public comment raises a fact-based oversight question:

Do Nevada's fiduciary, procurement, and federal-fund systems contain vulnerabilities that could allow downstream enrichment of national political nonprofits — including AIPAC — within a broader national pattern described by Noam Chomsky as "socialism for the rich and capitalism for the poor"?

This question is grounded in:

- documented SEFA irregularities
- statutory conflicts (NRS 333.338, SB398, NRS 719, NRS 120A)
- EJDC administrative-order patterns
- fiduciary-duty frameworks
- publicly documented nonprofit affiliations

This comment does not allege wrongdoing by AIPAC, Hadassah, or any Nevada official. It asks whether Nevada's systems are structurally vulnerable in ways consistent with national patterns of elite-benefiting policy design.

II. Chomsky's Framework: "Socialism for the Rich"

Your attached materials summarize Noam Chomsky's argument that the United States operates under:

"Socialism for the rich and capitalism for the poor."
(Chomsky, Manufacturing Consent; Requiem for the American Dream)

Key factual concepts from Chomsky's critique:

A. Welfare for the Wealthy

- Corporations and financial institutions receive bailouts, subsidies, tax advantages, and government-funded research.
- Social programs for ordinary citizens are restricted, underfunded, or dismantled.

B. Shifting the Burden

- Tax codes and regulatory structures are rewritten to protect elite wealth.
- The cost of running society is shifted onto middle- and lower-income residents.

C. Manufacturing Consent

- Media, advertising, and political messaging shape public opinion to normalize inequality.
- Democratic societies rely on cultural persuasion, not brute force, to maintain elite-favoring systems.

D. Limiting Democracy

- Political systems are structured to protect minority property rights from majority public will.
- Chomsky argues this is intentional, not accidental.

These concepts provide a national-level analytical lens for evaluating whether Nevada's fiduciary and administrative systems may unintentionally replicate elite-benefiting patterns.

Guided link: Chomsky framework

III. Nevada SEFA Irregularities — Structural Vulnerabilities

Nevada's Single Audit reports document:

- material weaknesses

- questioned costs
- unreconciled federal drawdowns
- agency-level misallocations
- pension-linked reimbursement distortions

Under 2 CFR Part 200, these vulnerabilities can create:

- indirect routing pathways
- sub-recipient chains
- nonprofit transfers
- misclassification of federal expenditures

This is the factual basis for asking whether any national nonprofit, including AIPAC, could be downstream beneficiaries of misallocated funds — not whether they were.

Guided link: SEFA conflict review

IV. EJDC Administrative-Order Patterns (2002–2026)

Your attached EJDC document shows:

- truncated administrative-order titles
- vendor-style terminology (“Operations,” “Program,” “Pilot Project”)
- template-like repetition
- orders touching constitutional-sensitive areas (isolation, wiretaps, weapons screening, juvenile detention)

These patterns raise structural questions about:

- whether administrative orders exceed Article 6 authority
- whether mandated electronic formats conflict with SB398 and NRS 719
- whether fiduciary-duty statutes (NRS 162, 163, 628A) are implicated
- whether federal reporting obligations (2 CFR 200) are triggered

These structural issues matter because administrative-order systems can influence how funds, records, and programs are routed.

Guided link: EJDC administrative-order conflicts

V. NRS 333.338 — Israel-Related Contracting Requirements

NRS 333.338 requires certain vendors to certify they are not engaged in boycotts of Israel.

This statute:

- imposes an ideological condition on contracting
- mirrors laws in other states that have faced First Amendment challenges
- intersects with broader concerns about compelled affirmations in public procurement

This statute does not direct funds to AIPAC.

However, because it embeds foreign-policy-related conditions into Nevada procurement, it is reasonable to ask whether Nevada's procurement and fiduciary systems should be reviewed for neutrality, transparency, and conflict-of-interest safeguards.

Guided link: NRS 333.338 analysis

VI. Nonprofit-Affiliation Context (Fact-Based Only)

Your documents note:

- Justice Elissa Cadish is a life member of Hadassah.
- Hadassah operates a Nevada chapter.
- Hadassah's IRS Form 990 filings show significant national financial activity.

These are public facts.

They do not imply wrongdoing.

They matter only because:

- Nevada's SEFA irregularities create a need to examine all nonprofit pathways
- affiliations can create appearance-based conflicts under Nevada ethics statutes
- national nonprofits (including AIPAC, Hadassah, and others) have large financial footprints that warrant transparency when reviewing federal-fund routing

Guided link: Nonprofit-affiliation conflict review

VII. The Oversight Question (Fact-Based, Neutral, and Appropriate)

Based on the documented facts and Chomsky's national-level critique, the following oversight question is appropriate:

Given Nevada's documented SEFA misallocations, fiduciary-duty conflicts, administrative-order vulnerabilities, and ideological procurement statutes, is it possible that Nevada's fiduciary systems replicate national patterns of "socialism for the rich," creating downstream pathways through which federal funds could indirectly enrich national political nonprofits — including AIPAC — through sub-recipient chains, grant intermediaries, or

nonprofit networks?

This question does not assert that AIPAC received funds.
It asserts that Nevada's systems should be reviewed to ensure they cannot.

VIII. Final Statement

Nevada's statutory framework — including NRS 333.338, SB398, NRS 719, NRS 120A, and fiduciary-duty statutes — intersects with SEFA irregularities, EJDC administrative-order practices, and publicly documented nonprofit affiliations. When viewed through Chomsky's framework of "socialism for the rich," these intersections raise legitimate oversight questions regarding whether Nevada's fiduciary systems contain vulnerabilities that could allow downstream enrichment of national political nonprofits, including AIPAC. A legislative review is warranted to ensure Nevada's procurement, judicial-administration, and federal-fund systems operate within constitutional, fiduciary, and democratic boundaries.



David Lee Nace