

September 14, 2026

Christopher S. Delzotto
Special Agent in Charge
Federal Bureau of Investigation, Las Vegas Field Office
1787 West Lake Mead Boulevard
Las Vegas, Nevada 89106-2135

Re: Request for Investigation into Teresa Benitez-Thompson

Dear Special Agent in Charge Delzotto:

I write to request that the Federal Bureau of Investigation review a series of documented financial, political, employment, and governmental overlaps involving Teresa Benitez-Thompson, a candidate for the United States House of Representatives in Nevada's Second Congressional District. Public records do not, standing alone, establish that Ms. Benitez-Thompson committed a federal crime. They do, however, present several fact patterns that warrant independent review, preservation of records, and, where appropriate, referral to other federal or state authorities.

This request is intentionally framed as a request for investigation rather than an accusation of criminal guilt. The matters described below involve public records, campaign finance filings, official government documents, and contemporaneous reporting. Some may ultimately have innocent explanations. The purpose of this submission is to ask federal law enforcement to determine whether those explanations are supported by the underlying records and whether any conduct falls within federal public-corruption, campaign-finance, fraud, misuse-of-government-resources, or related jurisdiction.

Ms. Benitez-Thompson filed a federal statement of candidacy for Nevada's Second Congressional District on February 17, 2026, and her principal campaign committee, Elect Teresa, reported substantial federal receipts and expenditures during the 2026 cycle.[1] On the same date her candidacy became public, contemporaneous reporting identified her as Chief of Staff to Nevada Attorney General Aaron Ford.[2]

I. FACTUAL BACKGROUND

A. Appointment by Attorney General Aaron Ford and Subsequent \$3,000 Political Contribution

On December 1, 2022, Attorney General Aaron Ford publicly announced that Ms. Benitez-Thompson would serve as his Chief of Staff.[3] Public campaign-finance data then reflects that, on December 30, 2022, the Campaign to Elect Teresa Benitez-Thompson made a \$3,000 monetary contribution to Aaron Ford, following an earlier \$506 in-kind contribution on October 25, 2022.[4]

A political contribution by an appointee's campaign committee to the appointing official's campaign is not inherently unlawful. The sequence nevertheless warrants verification of the surrounding facts, including when the employment discussions began, when compensation and duties were agreed upon, why the December 30 contribution was made after the appointment had already been announced, whether the transfer was requested or discussed by either side, and whether any donor or third party directed or expected the transfer.

B. Mater Academy Board Service and the Attorney General's Representation of Mater's Regulator

Ms. Benitez-Thompson was involved in the creation and governance of Mater Academy of Northern Nevada. Mater's charter application identified her as an intended board member and expressly cited her legislative experience, including service on Ways and Means and education budgeting, as qualifications for the board.[5] Mater records continued to identify her as a board member through the period immediately preceding and overlapping her service in the Attorney General's Office, and the Mater board formally acknowledged her resignation in July 2023.[6]

Mater Academy of Northern Nevada is sponsored and regulated by the Nevada State Public Charter School Authority. The Nevada Attorney General's 2022-2024 Biennial Report states that attorneys in the Attorney General's Office assisted the State Public Charter School Authority when its general counsel position was vacant, including advising on oversight, school-opening processes, enforcement options, litigation, and meetings with school leaders.[7]

The overlap raises a straightforward records question: while Ms. Benitez-Thompson was Chief of Staff and simultaneously remained a Mater board member, what conflict screens, recusals, or internal safeguards existed concerning Mater, Academica, the State Public Charter School Authority, or related charter-school matters? The Bureau should determine whether she participated in, influenced, received information concerning, or was screened from any matter affecting Mater or entities connected to it.

C. UNR Employment While Exercising Legislative Authority Over NSHE Budgets

Public payroll records show that the University of Nevada, Reno paid Ms. Benitez-Thompson \$6,000 in 2019 as temporary teaching faculty.[8] During that same legislative session she served as Vice Chair of the Assembly Committee on Ways and Means and on the K-12/Higher Education/CIP budget subcommittee. Official minutes show her actively questioning Nevada System of Higher Education officials and participating in NSHE budget matters, including proceedings involving UNR and system-wide higher-education funding.[9]

The 2019 Assembly ethics rules required a legislator who knew she had a conflict arising from a private economic interest to make a general disclosure on the committee record or Assembly floor, subject to the rule's limitations and class-of-persons presumption.[10] I have not located, in the principal NSHE budget records reviewed to date, a disclosure of the UNR employment. That does not establish that no disclosure exists elsewhere, nor does it establish that the rule was violated. It does justify obtaining the underlying employment contract, appointment date, semester, payroll dates, communications, and any ethics advice or disclosures.

This dual-employment issue was serious enough to become the subject of civil litigation. In 2020, the Nevada Policy Research Institute named Ms. Benitez-Thompson in litigation challenging legislators who simultaneously held paid public employment, specifically describing her as simultaneously serving in the Nevada Assembly and working for the University of Nevada, Reno. The Legislature disputed that legal theory, and Ms. Benitez-Thompson was later voluntarily dismissed after the plaintiff was informed that she was no longer engaged in the dual employment.[11] The existence of that civil dispute is not evidence of a crime, but it confirms that the overlap was real and contemporaneously contested.

D. Federal Campaign Launch While Serving as Chief of Staff

Ms. Benitez-Thompson's federal campaign formally began on February 17, 2026. On that same day, The Nevada Independent reported that she was then Chief of Staff to Attorney General Ford and quoted her discussing a transition out of the Attorney General's Office in connection with the congressional race.[2] Later reporting states that she left the Attorney General's Office to run for Congress.[12]

This creates a discrete period in which a federal candidacy and a senior state-government position overlapped. The Bureau should determine whether any campaign activity occurred using

state time, state email, state phones, state offices, state vehicles, state personnel, state-funded travel, state information systems, or other public resources. Relevant records include calendars, leave records, email and messaging metadata, device logs, VPN access, badge records, telephone logs, travel records, and campaign invoices covering the period before and immediately after the federal filing.

E. Federal Campaign Vendors with Ford and Nevada Political-Network Connections

Elect Teresa's federal filings show substantial payments to Changing Dynamics, Tissot Solutions LLC, MB3 Political LLC, and Blue Wave Political Partners LLC, among other vendors.[13] Public materials establish that Tissot Solutions has performed continuing fundraising work for Attorney General Aaron Ford and has an established partnership with Changing Dynamics in Northern Nevada. Tissot also states that its services include call-time staffing, donor meetings, donor data, digital fundraising, fundraising CRM technology, and campaign compliance.[14]

Blue Wave Political Partners' public biography for Samantha Peterson states that she has raised money online for attorneys general including Aaron Ford.[15] These relationships may be entirely ordinary political consulting arrangements. They nevertheless create records capable of answering whether Ms. Benitez-Thompson's federal campaign was being planned, staffed, solicited, or operationalized while she remained in the Attorney General's Office, whether the same consultants or personnel were simultaneously working for Ford and Benitez-Thompson, and whether any donor data, state-office information, or government resources crossed between the governmental office and either campaign.

F. State Campaign Committee Transfers to Other Political Committees

Public campaign-finance records show that Ms. Benitez-Thompson's state campaign committee made repeated contributions to other candidates and political organizations, including party committees and individual candidates. One public compilation reflects at least \$24,000 in such political contributions over several years, separate from the December 30, 2022 contribution to Aaron Ford.[16] Such transfers are not inherently improper. The relevant question is whether any contribution to Ms. Benitez-Thompson's committee was earmarked, donor-directed, reimbursed, or followed by an agreed transfer to another political recipient.

G. Data-Center Legislation and Industry-Interest Timeline

In 2015, Ms. Benitez-Thompson voted in favor of Senate Bill 170, legislation authorizing significant partial tax abatements for qualifying data centers, including abatements of personal-property taxes and local sales and use taxes.[17] Public campaign-finance records should be examined alongside the legislative record to determine the complete chronology of contributions from data-center companies, utilities, telecommunications interests, lobbyists, executives, law firms, and related entities before and after relevant votes or official actions.

A contribution followed by a favorable vote does not establish bribery or corruption. The appropriate investigative question is whether any contribution or fundraising assistance was solicited, made, routed, or understood in exchange for an official act, or whether there were undisclosed communications tying financial support to governmental action.

H. Outside Employment, Boards, Grants, and Financial Disclosures

Ms. Benitez-Thompson's public record includes outside employment in health care and social work, service on nonprofit and charter-school boards, legislative service on committees with jurisdiction over health care and public spending, and later senior employment in the Attorney General's Office. These overlapping roles warrant a systematic comparison against the financial-disclosure and conflict-disclosure requirements applicable in each period.

The Bureau should obtain or preserve annual financial disclosures, legislative conflict disclosures, employment agreements, board rosters, nonprofit filings, grant and contract records, and relevant communications. The purpose is not to presume that an omission occurred, but to determine whether all reportable interests were disclosed and whether any undisclosed economic or fiduciary interest intersected with official action.

I. Pharmaceutical Contributions and Biosimilar Legislation

Public contribution records show recurring Pfizer contributions to Ms. Benitez-Thompson's state political committee, including contributions in 2014, 2016, 2017, 2018, and 2019. In 2017 she was the principal Assembly sponsor of AB 245, legislation governing substitution of interchangeable biological products. Pfizer was commercially active in biosimilars during the same period.[19] These facts do not establish that any contribution was tied to legislation. They warrant a chronology of contributions, lobbying contacts, bill drafting, amendments, and communications to determine whether any financial support was connected to a requested official act.

J. Credit Union Contributions and Financial-Services Matters

Public reporting shows the Nevada Credit Union League was a significant contributor to Ms. Benitez-Thompson during her legislative career, including unusually large support compared with most legislators during the period reviewed.[20] The Bureau or an appropriate state authority should compare that financial support with legislation, budget matters, tax policy, and regulatory issues affecting credit unions or affiliated financial interests. Large lawful contributions are not themselves evidence of wrongdoing; the relevant question is whether there was any agreement, solicitation, or undisclosed communication connecting support to official action.

K. Private Activity Bond Council and Real-Estate Interests

Official legislative records identify Ms. Benitez-Thompson as the Assembly member of Nevada's Private Activity Bond Council during the 2021-2022 interim. The Council advises on allocation of Nevada's ceiling for tax-exempt private activity bonds and considers housing-related matters.[21] Because her campaign also received substantial support from real-estate interests during her legislative career, the complete list of bond applicants, beneficiaries, developers, lenders, law firms, and related contributors should be compared with her campaign-finance records and any communications concerning Council matters. Again, contribution overlap alone does not establish misconduct.

L. Sierra Nevada Transportation Coalition, CitiCare, and Publicly Funded Programs

IRS-derived nonprofit records identify Teresa Benitez Thompson as an unpaid director of the Sierra Nevada Transportation Coalition during several years of her legislative service.[22] Her official legislative biography also listed service with CitiCare. These organizations operated in fields that can involve public transportation, health, disability, senior, and human-services funding. The appropriate review is whether any grants, appropriations, agency actions, letters of support, or legislative work affecting those organizations overlapped with undisclosed fiduciary obligations or other reportable interests.

M. Health-Care Employment and Legislative Jurisdiction

Mater Academy application materials identified Ms. Benitez-Thompson as a social worker employed by Gentiva Hospice while also serving in the Assembly.[5] During her legislative career she served on committees with jurisdiction over health and human services and public spending. Employment in an industry while legislating on that industry is not inherently improper. A targeted conflict audit should compare Gentiva, Kindred, hospice, home-health, Medicaid, palliative-care, and related lobbying or reimbursement matters against her employment dates, disclosures, committee work, and votes.[23]

II. SPECIFIC MATTERS WARRANTING INVESTIGATION

- (1) **State-resource use for a federal campaign.** Determine whether Ms. Benitez-Thompson, while Chief of Staff, used or directed the use of state employees, devices, email systems, office space, vehicles, calendars, travel, databases, or work time for her congressional campaign or for campaign vendors.
- (2) **Ford appointment and post-announcement contribution.** Determine the full chronology and communications surrounding Ms. Benitez-Thompson's appointment and the December 30, 2022 \$3,000 contribution from her state campaign committee to Aaron Ford.
- (3) **Mater Academy and SPCSA conflicts.** Determine whether Ms. Benitez-Thompson was screened from Attorney General matters involving Mater, Academica, SPCSA, or related entities while she remained a Mater board member, and whether any official action affecting those entities was influenced by her.
- (4) **UNR employment and NSHE appropriations.** Obtain the 2019 UNR employment contract, appointment date, payroll dates, course assignment, funding source, correspondence, conflict advice, and legislative disclosures; compare those records to NSHE and UNR budget actions in which she participated.
- (5) **Campaign-vendor overlap.** Determine when Changing Dynamics, Tissot Solutions, MB3 Political, and Blue Wave Political Partners first performed work for the congressional effort; identify the personnel assigned to TBT and Ford; and determine whether any campaign planning occurred while she remained a state employee.
- (6) **Donor data and information transfer.** Determine whether donor lists, donor-contact histories, proprietary fundraising data, governmental contact information, state-office data, or other nonpublic information was shared between Ford's political operation, the Attorney General's Office, and Elect Teresa.
- (7) **Campaign-fund routing or earmarking.** Review incoming and outgoing transactions from Ms. Benitez-Thompson's state political committee for donor-directed transfers, reimbursements, matching dollar amounts, or communications showing an agreement to pass funds to another candidate or committee.
- (8) **Donor-to-official-action chronology.** Review data-center, utility, health-care, pharmaceutical, credit-union, financial-services, real-estate, bond-finance, and other major donor interests against bills, appropriations, amendments, budget closings, regulatory contacts, and other official actions in which Ms. Benitez-Thompson participated. Timing alone should not be treated as proof of wrongdoing.
- (9) **Financial and conflict disclosures.** Compare known employment, compensation, board service, fiduciary roles, liabilities, and other reportable interests against all state legislative and federal candidate disclosures and any internal Attorney General conflict or recusal records.
- (10) **Preservation of electronic records.** Preserve relevant state email, text messages, encrypted-messaging records to the extent legally obtainable, calendars, device records, campaign communications, consultant communications, donor CRM records, invoices, contracts, and payment records before routine retention periods cause records to be lost.

III. FEDERAL INTEREST AND REQUEST FOR COORDINATION

Several of the matters above may ultimately fall principally within state ethics, state campaign-finance, or state public-integrity jurisdiction. Others involve a federal candidate committee, interstate campaign vendors and fundraising activity, federal electronic communications, and potentially federally funded state programs. I respectfully request that the FBI determine whether a federal predicate exists and, where the matter is outside federal jurisdiction, coordinate or refer the relevant evidence to the appropriate authority.

I further request that the Bureau coordinate, as appropriate, with the U.S. Department of Justice Public Integrity Section, the U.S. Attorney's Office for the District of Nevada, the Federal Election Commission, and relevant Nevada authorities. The Public Integrity Section lists its contact address at 1301 New York Avenue, 10th Floor, Washington, D.C. 20005.[18]

IV. REQUEST FOR ACTION

The public record establishes multiple unusual intersections among Ms. Benitez-Thompson's public employment, political committees, campaign vendors, outside board service, private economic relationships, and official governmental authority. No single intersection should be treated as proof of criminal conduct. Taken together, however, they justify an independent review of records that are not available to the public and that can conclusively determine whether the conduct was lawful.

I respectfully request that the Federal Bureau of Investigation open an appropriate preliminary inquiry or assessment, preserve the relevant records, obtain the nonpublic communications and financial records necessary to resolve these questions, and take or recommend whatever further action the evidence supports.

I understand that 18 U.S.C. § 1001 applies to materially false statements made knowingly and willfully in matters within the jurisdiction of the federal government. To the best of my knowledge and belief, the factual assertions in this submission are based on the cited public records and sources. Where this letter identifies an investigative theory or unanswered question, it is presented as such and not as an assertion that criminal conduct has been proven.

Thank you for your prompt attention to this matter.

Sincerely,



Bruce Parks

cc: Chief, Public Integrity Section, U.S. Department of Justice
U.S. Attorney's Office for the District of Nevada

SOURCE NOTES

The following are public-record and public-source references supporting the factual predicates described above. Investigative questions and requests for records are identified as such in the body of the letter.

- [1] Federal Election Commission, Candidate Overview, BENITEZ-THOMPSON, TERESA, Candidate ID H6NV02362; Elect Teresa, C00939488. <https://www.fec.gov/data/candidate/H6NV02362/>
- [2] The Nevada Independent, "Former Dem Assembly leader Teresa Benitez-Thompson to run for Congress," Feb. 17, 2026. The article identified her as Aaron Ford's chief of staff at the time of the announcement. <https://thenevadaindependent.com/article/former-dem-assembly-leader-teresa-benitez-thompson-to-run-for-congress>
- [3] KOLO, "Reelected AG Ford announces new staff," Dec. 1, 2022. <https://www.kolotv.com/2022/12/01/reelected-ag-ford-announces-new-staff/>
- [4] Nevada Campaign Contributions, contributor records for Campaign to Elect Teresa Benitez-Thompson showing contributions to Aaron Ford. <https://nevadacampaigncontributions.com/contributors/391242-campaign-to-elect-teresa-benitez-thompson.html>
- [5] Nevada State Public Charter School Authority, Mater Academy of Northern Nevada 2016 Summer Application, including Teresa Benitez-Thompson biographical and applicant-team materials. <https://charterschools.nv.gov/uploadedFiles/CharterSchoolsnv.gov/content/PublicationsRpts/Mater-Academy-2016-Summer-Applicaton-2.pdf>
- [6] Mater Academy of Northern Nevada, July 13, 2023 Board Meeting Support Materials, including acknowledgment of Teresa Benitez-Thompson's resignation from the board. https://www.maternorthernnevada.org/ourpages/auto/2022/8/4/30512797/MANN_REVISED%20Final%20Support%20Materials_7-13-23_.pdf
- [7] Nevada Office of the Attorney General, 2022-2024 Biennial Report, General Counsel Assistance section concerning the State Public Charter School Authority. <https://ag.nv.gov/uploadedFiles/agnv.gov/Content/Issues/Attorney%20General%20Biennial%20Report%202022-2024.pdf>
- [8] Transparent Nevada, 2019 University of Nevada, Reno salary data for Teresa Benitez-Thompson, reporting \$6,000 in regular pay as Temporary Faculty - Teaching. <https://transparentnevada.com/salaries/2019/university-nevada-reno/teresa-benitez-thompson/>
- [9] Nevada Legislature, 80th Session (2019), Assembly Ways and Means records concerning NSHE budget hearings and closings, including March 20 and May 14 proceedings. <https://archive.leg.state.nv.us/Session/80th2019/Minutes/Assembly/WM/Final/618.pdf> ; <https://www.leg.state.nv.us/Session/80th2019/Minutes/Assembly/WM/Final/1193.pdf>
- [10] Nevada Legislature, 80th Session (2019), Assembly Standing Rules, including Rule 23 concerning conflicts of interest and disclosure. <https://www.leg.state.nv.us/Statutes/80th2019/Stats2019R01.html>
- [11] Nevada Policy Research Institute litigation materials concerning legislative dual employment, including amended complaint and subsequent filing discussing Benitez-Thompson's dismissal after the dual employment ended. <https://nevadapolicy.org/wp-content/uploads/2020/11/NPRI-Amended-Complaint-for-Declaratory-and-Injunctive-Relief-C2.pdf> ; https://nevadapolicy.org/wp-content/uploads/2020/10/Plaintiff_s-Opposition-to-NV-Legislature_s-Motion-to-Intervene-2020-10-14-C3.pdf
- [12] KOLO, "Congressional candidate Teresa Benitez-Thompson kicks off the start of early voting with supporters," May 23, 2026, reporting that she left the Nevada Office of the Attorney General to run for Congress. <https://www.kolotv.com/2026/05/23/congressional-candidate-teresa-benitez-thompson-kicks-off-start-early-voting-with-supporters-bartley-ranch/>
- [13] Capitol Hill Access, Elect Teresa vendor/disbursement compilation based on federal campaign reports, 2026 cycle. https://capitolhillaccess.com/tr/tr_ef_vendor?sCycle=2026&sFECID=C00939488&sRptNum=
- [14] Tissot Solutions, "2024 Year in Review" and services description, discussing work for Aaron Ford, partnership with Changing Dynamics, and fundraising/data services. <https://www.tissotsolutions.com/post/2024-year-in-review> ; <https://www.tissotsolutions.com/solutions>
- [15] Blue Wave Political Partners, team biography for Samantha Peterson, describing fundraising work for attorneys general including Aaron Ford. <https://www.bluewavecompliance.com/team>
- [16] Nevada Campaign Contributions, Campaign to Elect Teresa Benitez-Thompson recipient/contribution records reflecting transfers or contributions to political recipients. <https://nevadacampaigncontributions.com/companies/12219-campaign-to-elect-teresa-benitez-thompson.html>
- [17] Nevada Legislature, Senate Bill 170 (2015) and Assembly Journal vote records concerning data-center tax abatements. <https://www.leg.state.nv.us/Session/78th2015/Bills/SB/SB170.pdf> ; <https://archive.leg.state.nv.us/Session/78th2015/Journal/Assembly/Final/aj1116.pdf>
- [18] U.S. Department of Justice, Criminal Division, Public Integrity Section contact information. <https://www.justice.gov/criminal/criminal-pin/contact>
- [19] Nevada Legislature, AB 245 (2017) enacted text; Nevada Campaign Contributions, Pfizer Inc. contribution records for Teresa Benitez-Thompson; Pfizer 2017 Annual Review describing its biosimilar portfolio. <https://www.leg.state.nv.us/Statutes/79th2017/Stats201705.html> ; <https://nevadacampaigncontributions.com/companies/3877-pfizer-inc.html> ; https://pfe-pfizercom-prod.s3.amazonaws.com/investors/financial_reports/annual_reports/2017/assets/pdf/pfizer-2017-annual-review.pdf

- [20] The Nevada Independent, analysis of major industry legislative campaign giving, including Nevada Credit Union League support; Transparency USA, Nevada Credit Union League PAC records. <https://thenevadaindependent.com/article/follow-the-money-breaking-down-2-8-million-in-combined-legislative-campaign-spending-from-major-industries> ; <https://www.transparencyusa.org/nv/committee/nevada-credit-union-league-pac-pac-636?cycle=2020-election-cycle&filer=teresa-benitez-thompson-3925>
- [21] Nevada Legislature, Private Activity Bond Council summary for the 2021-2022 interim, identifying Assemblywoman Teresa Benitez-Thompson as a member and describing the Council's duties; Transparency USA candidate contribution summary for the 2020 election cycle. <https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/26895> ; <https://www.transparencyusa.org/nv/candidate/teresa-benitez-thompson?cycle=2020-election-cycle&filer=teresa-benitez-thompson-3925>
- [22] ProPublica Nonprofit Explorer, Sierra Nevada Transportation Coalition, IRS-derived filings identifying Teresa Benitez Thompson as an unpaid director in multiple years; Washoe County advisory-board materials describing Sierra Nevada Transportation Coalition transportation programs. <https://projects.propublica.org/nonprofits/organizations/880473296> ; https://www.washoecounty.gov/seniorsrv/senior_services_advisory_board/2017/files/04-06-17%20Sierra%20NV%20Transportation%20Coalition.pdf
- [23] Nevada Legislature, legislator biography/committee records for Teresa Benitez-Thompson; Mater Academy application materials identifying Gentiva Hospice employment. <https://www.leg.state.nv.us/App/Legislator/A/Assembly/78th2015/27> ; <https://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/PublicationsRpts/Mater-Academy-2016-Summer-Applicaton-2.pdf>

Submission address verification: FBI Las Vegas Field Office, 1787 West Lake Mead Boulevard, Las Vegas, NV 89106-2135; Special Agent in Charge Christopher S. Delzotto. Source: <https://www.fbi.gov/contact-us/field-offices/lasvegas>