

CASE NO: A-20-815838-W  
Department 8

**WRIT**  
DAVID S. LEE, ESQ.  
Nevada Bar No.: 6033  
CHARLENE N. RENWICK, ESQ.  
Nevada Bar No.: 10165  
LEE, LANDRUM & CARLSON, APC  
7575 Vegas Drive, Suite 150  
Las Vegas, Nevada 89128  
Phone: (702) 880-9750  
Fax: (702) 314-1210  
[dlee@lee-lawfirm.com](mailto:dlee@lee-lawfirm.com)  
[crenwick@lee-lawfirm.com](mailto:crenwick@lee-lawfirm.com)

Attorneys for Petitioners  
NEVADA REPUBLICAN CENTRAL COMMITTEE  
d/b/a NEVADA REPUBLICAN PARTY AND  
REPUBLICAN NATIONAL COMMITTEE

**DISTRICT COURT**

**CLARK COUNTY OF NEVADA**

NEVADA REPUBLICAN CENTRAL  
COMMITTEE d/b/a NEVADA  
REPUBLICAN PARTY and  
REPUBLICAN NATIONAL COMMITTEE

Petitioners,

vs.

CLARK COUNTY, a governmental entity;  
JUSTIN JONES, in his capacity as a member  
of the Clark County Board of Commissioners;  
MICHAEL NAFT, in his capacity as a  
member of the Clark County Board of  
Commissioners; MARILYN  
KIRKPATRICK, in her capacity as a member  
of the Clark County Board of Commissioners;  
LARRY BROWN, in his capacity as a  
member of the Clark County Board of  
Commissioners; LAWRENCE WEEKLY, in  
his capacity as a member of the Clark County  
Board of Commissioners; TICK  
SEGERBLOM, in his capacity as a member  
of the Clark County Board of Commissioners;  
JAMES B. GIBSON, in his capacity as a  
member of the Clark County Board of  
Commissioners; JOSEPH GLORIA, in his  
capacity as a Registrar of Voters for Clark  
County,

Respondents.

CASE NO.:  
DEPT. NO.:

**APPLICATION FOR ORDER  
COMPELLING DISCLOSURE OF  
PUBLIC RECORDS PURSUANT TO  
NRS 239.011/PETITION FOR WRIT OF  
MANDAMUS**

(Request for matter to be expedited pursuant  
to NRS 239.011 (2))

LEE, LANDRUM & CARLSON, APC  
7575 VEGAS DRIVE, SUITE 150  
LAS VEGAS, NV 89128  
(702) 880-9750

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7575 VEGAS DRIVE, SUITE 150  
LAS VEGAS, NV 89128  
(702) 880-9750

1 COME NOW Petitioners, NEVADA REPUBLICAN CENTRAL COMMITTEE d/b/a  
2 NEVADA REPUBLICAN PARTY and REPUBLICAN NATIONAL COMMITTEE  
3 (“Petitioners”) by and through their attorneys, David S. Lee, Esq. and Charlene N. Renwick, Esq.,  
4 of the law firm LEE, LANDRUM, CARLSON, APC, and hereby submit their Nevada Public  
5 Records Act Application and Petition for Writ of Mandamus for declaratory and injunctive relief  
6 (“Application”), ordering Respondents to provide Petitioners access to public records requested by  
7 Petitioners. Petitioners also request an award for all fees and costs associated with their efforts to  
8 obtain withheld public records, and that this matter be expedited, as provided for by NRS  
9 239.011(2).

10 Petitioners hereby allege as follows:

11 **I.**

12 **NATURE OF ACTION**

13 1. Petitioners bring this Application for relief pursuant to NRS 239.011. *See also Reno*  
14 *Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 884, 266 P.3d 623, 630, n.4 (2011).

15 2. Petitioners’ Application to this court is the proper means to secure Respondents’  
16 compliance with the Nevada Public Records Act (“NPRA”). *Id.*; *see also DR Partners v. Bd. of*  
17 *Cty. Comm’rs of Clark Cty.*, 116 Nev. 616, 621, 6 P.3d 465, 468 (2000) (*citing Donrey of Nevada*  
18 *v. Bradshaw*, 106 Nev. 630, 798 P.2d 144 (1990)) (a writ of mandamus is the appropriate procedural  
19 remedy to compel compliance with the NPRA).

20 3. Petitioners are entitled to an expedited hearing on this matter pursuant to NRS  
21 239.011(2), which mandates that “the court shall give this matter priority over other civil matters  
22 to which priority is not given by other statutes.”

23 **II.**

24 **PARTIES**

25 4. Petitioner Nevada Republican Central Committee d/b/a Nevada Republican Party  
26 is the official state party committee for the Republican Party for the State of Nevada, and it brings  
27 this petition on behalf of itself, and on behalf of the candidates, voters, and elected officials with  
28 whom it associates.

1           5.       Petitioner Republican National Committee is the official national committee for  
2 the Republican Party of the United States, and it brings this petition on behalf of itself, and on  
3 behalf of the candidates, voters, and elected officials with whom it associates.

4           6.       Respondent Clark County is a Nevada governmental entity, which is subject to the  
5 NPRA.

6           7.       Respondent JUSTIN JONES is a resident of Clark County, Nevada and is, and was at all times  
7 relevant herein, a member of the Clark County Board of Commissioners, and by way of the same  
8 is subject to the NPRA.

9           8.       Respondent MICHAEL NAFT is a resident of Clark County, Nevada and is, and  
10 was at all times relevant herein, a member of the Clark County Board of Commissioners, and by  
11 way of the same is subject to the NPRA.

12          9.       Respondent MARILYN KIRKPATRICK is a resident of Clark County, Nevada and  
13 is, and was at all times relevant herein, a member of the Clark County Board of Commissioners,  
14 and by way of the same is subject to the NPRA.

15          10.      Respondent LARRY BROWN is a resident of Clark County, Nevada and is, and  
16 was at all times relevant herein, a member of the Clark County Board of Commissioners, and by  
17 way of the same is subject to the NPRA.

18          11.      Respondent LAWRENCE WEEKLY is a resident of Clark County, Nevada and is,  
19 and was at all times relevant herein, a member of the Clark County Board of Commissioners, and  
20 by way of the same is subject to the NPRA.

21          12.      Respondent TICK SEGERBLOM is a resident of Clark County, Nevada and is, and  
22 was at all times relevant herein, a member of the Clark County Board of Commissioners, and by  
23 way of the same is subject to the NPRA.

24          13.      Respondent JAMES B. GIBSON is a resident of Clark County, Nevada and is, and  
25 was at all times relevant herein, a member of the Clark County Board of Commissioners, and by  
26 way of the same is subject to the NPRA.

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1 14. Respondent JOSEPH GLORIA is a resident of Clark County, Nevada and is, and  
2 was at all times relevant herein, the Registrar of Voters for Clark County, Nevada, and by way of  
3 the same is subject to the NPRA.

4 15. Respondents Clark County, Justin Jones, Michael Naft, Marilyn Kirkpatrick, Larry  
5 Brown, Lawrence Weekly, Tick Segerblom, James B. Gibson and Joseph Gloria are collectively  
6 referred to herein as the “Respondents”.

7 **III.**

8 **JURISDICTION AND VENUE**

9 16. This Court has jurisdiction under NRS 239.011, as the court of Clark County is  
10 where all relevant public records sought are held.

11 17. This Court has jurisdiction to issue writs of mandamus under Article 6, Section 6 of  
12 the Nevada Constitution and NRS 34.160.

13 18. Venue is proper in the Eighth Judicial District Court of Nevada under NRS 239.011.  
14 All relevant actions asserted herein were conducted in Clark County, Nevada.

15 **IV.**

16 **STANDING**

17 19. Petitioners have standing to pursue this expedited action pursuant to NRS 239.011  
18 (1), because the public records they requested from Respondents, by way of their counsel, have  
19 been unjustifiably withheld and Respondents failed to meaningfully respond to their request, which  
20 is not permitted by law.

21 **V.**

22 **FACTS**

23 20. In the First Judicial District Court in Carson City, Nevada, there is currently pending an action  
24 entitled Daniel Corona et al. v. Barbara Cegavske, et al., Case No. CV 20-OC-00064-1B (the  
25 “Corona Action”).

26 21. At issue in the Corona Action is the modified voting procedures that the Nevada  
27 Secretary of State and the Registrar of Voters for Clark County adopted in response to the COVID-  
28 19 crisis and Governor Sisolak’s emergency executive orders responding to the same.

1           22.     On May 4, 2020, the Clark County Registrar of Voters filed a Joinder in the Corona  
2 Action which states that, “[a]t the direction of local county officials, the Clark County Registrar of  
3 Voters is setting up two additional election day voting sites and will mail absent ballots to all  
4 registered voters, including inactive voters, at additional expense.” (Emphasis added.)<sup>1</sup>

5           23.     Attached to the Joinder was the Affidavit of Lorena Portillo,<sup>2</sup> who affirmed that the  
6 cost for additional printers to be delivered and programed will be \$138,997.50; the cost for mailing  
7 the additional ballots will be \$184,738.01; and that “[b]ased on past experience, at least 90% of  
8 those” additional ballots “will come back as undeliverable.” As such, the additional costs to be  
9 incurred by Clark County based upon the direction from county officials is in excess of \$300,000,  
10 with more than \$166,000 to be spent on mailings that even county officials expect will not reach  
11 their intended recipients.

12           24.     In an effort to ascertain when those officials met and whether the public was able to  
13 provide input on this increased taxpayer expense, a review was conducted of possible Clark County  
14 Commission meetings where these items would have been discussed. However, between when the  
15 complaint was filed on April 16, 2020 in the Corona Action and when the Joinder was filed on May  
16 4, 2020, the only Clark County Commission meeting where such action could have been discussed  
17 was held on Tuesday, April 21, 2020.<sup>3</sup>

18           25.     The agenda for the April 21, 2020 meeting provides no evidence that the issues of  
19 additional in-person voting places or mail-in ballots—or the cost for either—were addressed during  
20 this meeting.<sup>4</sup>

21           26.     Under NRS 241.020 the agenda for the April 21, 2020 meeting was required to have  
22 been posted three working days before the meeting—or by April 16, 2020, the same day the Corona  
23 Action was filed.

24 \_\_\_\_\_  
25 <sup>1</sup> Exhibit 1, *Joinder in the Opposition to Plaintiff’s Motion for Preliminary Injunction Filed by*  
26 *Defendants Cegavske, Ford, Spikula, and Jakeman*, page 2, lines 2-4 (May 4, 2020)

27 <sup>2</sup> Exhibit 1, *Affidavit of Lorena Portillo* (April 30, 2020) (attached to Joinder).

28 <sup>3</sup> See *Affidavit of Tyler R. Green, Esq.* (June 1, 2020).

<sup>4</sup> Exhibit 2, *Agenda, Joint Meeting of the Clark County Board of Commissioners, Clark County*  
*Water Reclamation District Board of Trustees and University Medical Center of Southern Nevada*  
*Board of Trustees* (April 21, 2020).

1           27.    Upon information and belief, the Clark County Commissioners failed to properly  
2 notice and hold a public meeting to discuss and receive public input before deciding to spend more  
3 than \$300,000.00 in additional taxpayer funds on the June 9, 2020, primary election.

4           28.    Based on the representations made in the Clark County Registrar of Voters' Joinder  
5 and in the Affidavit of Lorena Portillo, serious questions were raised in the Corona Action about  
6 whether the directives made by the Clark County Commissioners were undertaken and/or provided  
7 contrary to Nevada Open Meeting Laws.

8           29.    In order to determine whether the Clark County Commissioners complied with  
9 Nevada's Open Meeting Laws, pursuant to NRS 241, Petitioners, by way of their counsel, Tyler  
10 Green, Esq. of the law firm Consovoy McCarthy PLLC, made an Expedited Public Record Request  
11 to the Clark County Manager's Office, County Commission Division, and the Clark County  
12 Registrar of Voters on May 7, 2020, and pursuant to NRS 239.105(2)(b) and his supporting  
13 affidavit, requested the following public records:<sup>5</sup>

14 Expedited Request to Clark County Manager's Office, County Commission Division:

15                   1.    All records, including but not limited to correspondence such as  
16 emails, text messages, memoranda, letters, and facsimiles, in the custody or  
17 control of any County Commissioner (or his or her staff) and dated  
18 between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss,  
or mention the decision to set up two additional voting sites for the June  
2020 primary election.

19                   2.    All records, including but not limited to correspondence such as  
20 emails, text messages, memoranda, letters, and facsimiles, in the custody or  
21 control of any County Commissioner (or his or her staff) and dated  
22 between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss,  
or mention the decision to mail absent ballots to "all registered voters,  
including inactive voters" for the June 2020 primary election.

23                   3.    All records in the custody or control of any County Commissioner  
24 or his or her staff—including but not limited to correspondence such as  
25 emails, text messages, memoranda, letters, and facsimiles—dated between  
26 March 1, 2020, to and including May 4, 2020, that relate to, refer to,  
27 discuss, or mention the June 2020 primary election, and were sent to or  
received from any member, representative, or agent of the Nevada State  
Democratic Party, DNC Service Corporation/Democratic National

28 <sup>5</sup> See *Affidavit of Tyler R. Green, Esq.* (June 1, 2020).

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Committee, DCCC, DSCC, Priorities USA, or current or former Nevada elected official who has run as a Democratic candidate. This should include, but not be limited to, all emails between any County Commissioner or county commission staff member and anyone with one of the following email domains: @democrats.org, @dnc.org, @dccc.org, @dsc.org, @nevadadems.com, or @nevadadems.org.

4. Records that list, identify, or otherwise indicate the names or positions of “local county officials” who provided “direction” on the updated procedures for the June 2020 primary election announced in the Registrar’s May 4 joinder.

5. Records that list, identify, or otherwise indicate the names or positions of any of other persons who were involved in the process by which “local county officials” provided “direction” on the updated procedures for the June 2020 primary election announced in the Registrar’s May 4 joinder.

6 Any notices by which the “local county officials” informed the public of the modified “direction” and costs incumbent in the updated process for the June 2020 election announced in the Registrar’s May 4 joinder.

7. Any minutes from any meetings or hearings during which “local county officials” discussed the updated ballot mailings and set up of new voting sites.<sup>6</sup>

Expedited Public Record Request to Clark County Registrar of Voters:

1. All records, including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles, in the custody or control of Joseph P. Gloria or Lorena Portillo and dated between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss, or mention the decision to set up two additional voting sites for the June 2020 primary election.

2. All records, including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles, in the custody or control of Joseph P. Gloria or Lorena Portillo and dated between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss, or mention the decision to mail absent ballots to “all registered voters, including inactive voters” for the June 2020 primary election.

3. All records in the custody or control of Joseph P. Gloria or Lorena Portillo—including but not limited to correspondence such as emails, text

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<sup>6</sup> Exhibit 3, *Expedited Public Records Request to Clark County Manager’s Office, County Commission Division* (May 7, 2020).

1 messages, memoranda, letters, and facsimiles—dated between March 1,  
2 2020, to and including May 4, 2020, that relate to, refer to, discuss, or  
3 mention the June 2020 primary election, and were sent to or received from  
4 any member, representative, or agent of the Nevada State Democratic  
5 Party, DNC Service Corporation/Democratic National Committee, DCCC,  
6 DSCC, Priorities USA, or current or former Nevada elected official who  
7 has run as a Democratic candidate. This should include, but not be limited  
8 to, all emails between Joseph P. Gloria or Lorena Portillo and anyone with  
9 one of the following email domains: @democrats.org, @dnc.org,  
10 @dccc.org, @dsc.org, @nevadadems.com, or @nevadadems.org.

11 4. Records that list, identify, or otherwise indicate the names or  
12 positions of “local county officials” who provided “direction” on the  
13 updated procedures for the June 2020 primary election announced in the  
14 Registrar’s May 4 joinder.

15 5. Records that list, identify, or otherwise indicate the names or  
16 positions of any of other persons who were involved in the process by  
17 which “local county officials” provided “direction” on the updated  
18 procedures for the June 2020 primary election announced in the Registrar’s  
19 May 4 joinder.

20 6 Any notices by which the “local county officials” informed the  
21 public of the modified “direction” and costs incumbent in the updated  
22 process for the June 2020 election announced in the Registrar’s May 4  
23 joinder.

24 7. Any minutes from any meetings or hearings during which “local  
25 county officials” discussed the updated ballot mailings and set up of new  
26 voting sites.<sup>7</sup>

27 30. On May 12, 2020, Mary-Anne Miller, County Counsel of the Office of the District  
28 Attorney, Civil Division, responded to Petitioners’ Expedited Public Record Request to the Clark  
County Registrar of Voters as follows:

Dear Mr. Green,

In response to your May 7, 2020 request for public records, please be  
advised:

The documents (emails) responsive to requests 1 and 2 are covered by the  
attorney-client privileged and will not be disclosed.

<sup>7</sup> Exhibit 4, *Expedited Public Records Request to Expedited Public Record Request to Clark County Registrar of Voters* (May 7, 2020).



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There are no documents responsive to requests 3, 4, or 5. Relative to item 6, please see information on the County’s Election Department website: <https://www.clarkcountynv.gov/election/Documents/2020/Mailer-Notice-20P-EXPANDED.pdf>

In response to Item 7, minutes of meetings between a governing board and its attorney are protected by the attorney-client privilege, and will not be produced. Further, such a meeting does not fall within the Open Meeting Law. See NRS 241.015(3)(b)(2).

As the Election Department had no documents to produce, your check will be returned to you under separate cover.

Thank you.<sup>8</sup>

31. On May 14, 2020, Mr. Green sent a follow-up email to Mary-Anne Miller seeking to clarify when the Clark County Commissioners would respond to his Expedited Public Records Request. Ms. Miller responded to that request for clarification by email, stating:

Hello Gentlemen,

I'm sorry for the oversight in properly answering your email requests about COMMISSIONER emails. The only way that our response would be different would be for the first three questions. There were no emails between Commissioners and the Manager's Office or Election Department that would not be covered by the attorney client privilege, but it is possible that a commissioner may have had email communications or other documents from third parties that would be responsive to your requests.

I do not believe your requests were forwarded to the Commissioners but I will do that tomorrow on my return to the office. I will ask the Commissioners's (*sic*) assistants and liaisons to expedite their searches.

32. By May 20, 2020—nearly one week later—the County Commissioner Respondents still had failed to respond to the Expedited Public Records Request. So on that day, Petitioners, by way of their counsel, Mr. Green, again emailed Ms. Miller asking when a response from the Clark County Commissioners could be expected.

33. Ms. Miller responded by email that same day, stating:

Hello,

To date, the attached are the only documents that I have received which are responsive and not subject to the attorney client privilege (communication

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<sup>8</sup> Exhibit 5, *Email from Mary-Anne Miller to Tyler Green, Esq.* (May 12, 2020).

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between me and the commissioners). I have not heard by from all of the commissioners yet, who have to search their individual phones.<sup>9</sup>

34. The “attached documents” mentioned in Ms. Miller’s May 20 email were records provided by Commissioner Gibson via Susan Gersh on the morning of May 18, 2020. They consist principally of blast emails from the Democratic Party or media articles. None of them provides information relevant to the County Commission’s decision to mail ballots to all inactive registered voters.

35. Petitioners waited one more week after May 20 to receive a supplemental response from the County Commissioner Respondents after they searched their phones as Ms. Miller said. When no additional response had arrived by May 27, 2020, Mr. Green sent a third follow-up email to Ms. Miller, stating:

Dear Ms. Miller,

I’m writing to follow up again on the status of the Commissioners’ responses to my May 7 public records request.

Under NRS 239.0107, the Commissioners’ responses were due no later than five business days after that request, or by May 14. To date, the only responses they have provided are in your May 20 email (attached here). And in that email, you said that as of May 20, you still had not heard back from all of the Commissioners, who still had to search their phones. Since then, another week has passed, and the Commissioners have yet to provide any other responses.

Because the Commissioners’ responses are now nearly two weeks overdue, I ask you under NRS 239.0107(1)(c)(1) to please provide a written “explanation of the reason the public . . . record is not available and a date and time . . . after which a copy of the public . . . record will be available.”

Thank you,  
Tyler Green

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<sup>9</sup> Exhibit 6, *Email from Mary-Anne Miller to Tyler Green, Esq.* (May 20, 2020) and *Email from Susan Gersh to Mary-Anne Miller and Jim Gibson* (May 18, 2020).

1           36.     On May 27, 2020, Ms. Miller responded to Mr. Green as follows:

2                     Hello gentlemen,

3                     I have checked with the Commissioners' staff, and we have no more  
4                     documents responsive to your request.

5                     Thank you,  
6                     Mary Miller

7           37.     In responding to Petitioners' first two requests to the Registrar of Voters,  
8 Respondents allege that responsive public records exist but they are confidential. Yet  
9 Respondents fail to cite any factual or legal authority to support their allegation that those public  
10 records are confidential, as required by NRS 239.0107(1)(d).

11           38.     In responding to Petitioners' seventh request to the Registrar for Voters for public  
12 records, Respondents claim that records exist but are confidential under NRS 241.015(3)(b)(2).  
13 But that statute on its face applies to meetings by members of a public body to receive  
14 information from a public body's attorney regarding potential or existing litigation, and a plain  
15 reading of Petitioners' request demonstrates that request number 7 does not make any request for  
16 information related to litigation or attorney-client communications.

17           39.     Respondents failed to provide the requested public records under Petitioners' first,  
18 second and seventh requests to the Registrar of Voters, under the guise of confidentiality. But  
19 Respondents failed to cite any applicable authority supporting that assertion as required by NRS  
20 239.0107(1)(d), have no justification for withholding public records in their legal custody and  
21 control, and failed to reasonably respond to Petitioners' request. As such, Respondents failed to  
22 comply with the NPRA in its response to Petitioners' public record requests to the Registrar of  
23 Voters.

24           40.     Respondents also failed to timely respond to Petitioners' public records requests to  
25 the Clark County Commissioners, as a response was due on May 14, 2020, and only a partial  
26 response was provided on May 20, 2020.

27           41.     In responding to Petitioners' seven requests to the Clark County Commissioners,  
28 Respondents provided only four emails from Jim Gibson, which were either unresponsive to  
Petitioners' requests, or contained nothing more than Democratic Party email blasts, or media

1 articles. Further, Respondents allege that other responsive public records are subject to attorney-  
2 client privilege, but fail to cite any authority to support that allegation.

3 42. Respondents failed to provide the requested public records under Petitioners'  
4 seven requests to the Clark County Commissioners, under the guise of attorney-client privilege.

5 43. Respondents' claim that it does not have any non-confidential/privileged  
6 documents is untenable because the Commission is a multi-member body, wherein no single  
7 Commissioner has sole authority to direct the Registrar of Voters to take any particular action. In  
8 light of this restriction, in order to take any particular action, the multiple members of the  
9 Commission must communicate with each other in order to coordinate any action, and such  
10 communication is likely conducted by text message or email.

11 44. As such, based on the above understanding that no single Commissioner may alone  
12 take action, Petitioners believe and hereon allege that the Commissioners communicated with  
13 each other before the unnamed county officials referred to in the Joinder instructed the Registrar  
14 of Voters to add more polling places and mail ballots to all inactive registered voters.

15 45. Further, Petitioners believe and hereon allege that some of those communications  
16 occurred solely amongst the Commissioners, with no involvement by counsel from the District  
17 Attorney's office, and resultantly, such communications, which include text and email messages,  
18 are not subject to any attorney-client privilege.

19 46. Petitioners further believe, and hereon allege, that the Clark County  
20 Commissioners communicated about the Corona lawsuit and/or the decision it prompted via text  
21 or email with persons or groups who are not other Commissioners or representatives from the  
22 District Attorney's office, and as such, any such communications with those third parties are not  
23 subject to the attorney-client privilege.

24 47. Despite Petitioners' request that Respondents produce all communications  
25 amongst the Commissioners and communications between the Commissioners and other third  
26 parties, as required under the NPRA, each and every Commissioner has failed or refused to  
27 produce the same.

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1 48. To the extent that any attorney-client privilege is applicable to a responsive  
2 communication, Respondents failed to cite any applicable authority supporting that assertion as  
3 required by NRS 239.0107(1)(d), have no justification for withholding public records in their  
4 legal custody and control, and have failed to reasonably respond to Petitioners' request. As such,  
5 Respondents failed to comply with the NPRA in its response to Petitioners' public record requests  
6 to the Clark County Commissioners.

7 **VI.**

8 **LEGAL AUTHORITY**

9 49. NRS 239.010 mandates that, unless a record is confidential, "all public books and  
10 public records of a governmental entity must be open at all times during office hours to inspection  
11 by any person, and may be fully copied..." NRS 239.010(1). The NPRA reflects specific legislative  
12 findings and declarations that "[i]ts purpose is to foster democratic principles by providing  
13 members of the public with access to inspect and copy public books and records to the extent  
14 permitted by law" and that its provisions "must be construed liberally to carry out this important  
15 purpose." NRS 239.001(1) and (2).

16 50. NRS 239.010 further provides that:

17 A governmental entity that has legal custody or control of a public book or  
18 record shall not deny a request made pursuant to subsection 1 to inspect or  
19 copy or receive a copy of a public book or record on the basis that the  
20 requested public book or record contains information that is confidential if  
21 the governmental entity can redact, delete, conceal or separate, including,  
without limitation, electronically, the confidential information from the  
information included in the public book or record that is not otherwise  
confidential.

22 NRS. 239.010(3).

23 51. The NPRA provides that a governmental entity must provide timely and specific  
24 notice if it is denying a request because the entity determines the documents sought are confidential.  
25 NRS 239.0107(1)(d) states that, within five (5) business days of receiving a request,

26 [i]f the governmental entity must deny the person's request because the  
27 public book or record, or part thereof, is confidential, provide to the person,  
in writing:

28 (1) Notice of that fact; and

1 (2) A citation to the specific state or other legal authority that  
2 make the public book or record, or a part thereof, confidential.

3 NRS 239.0107(1)(d).

4 52. The NPRA dictates that a meaningful response be provided within five (5) days of  
5 a request. NRS 239.0107(1).

6 53. Per NRS 239.0113(2),

7 The governmental entity that has legal custody or control of the public book  
8 or record asserts that the public book or record, or a part thereof, is  
9 confidential, the governmental entity has the burden of proving by a  
preponderance of the evidence that the public book or record, or a part  
thereof, is confidential.

10 **VII.**

11 **CLAIM FOR RELIEF**

12 54. Petitioners re-allege and incorporate by reference each and every allegation  
13 contained in paragraphs 1-53 above, as though fully set forth herein.

14 55. Petitioners should be provided with the public records they requested, but were  
15 denied by Respondents.

16 56. The requested public records are subject to disclosure. Respondents failed to meet  
17 their burden of establishing otherwise, and indeed have failed to provide any basis for withholding  
18 records as required by the NPRA. NRS 239.0107(1)(d). Further, Respondents failed to justify the  
19 reasonableness of their searches for records responsive to the requests before denying them.

20 57. Respondents failed to cite any applicable authority for their claim of confidentiality  
21 or attorney-client privilege as to: (1) Petitioners' first and second requests to the Registrar of Voters;  
22 (2) Petitioners' seventh request to the Registrar of Voters; and (3) all seven of Petitioners' requests  
23 to the Clark County Commissioners.

24 58. Respondents failed to make any effort to redact, delete, conceal, or separate any  
25 alleged confidential information from non-confidential information, with respect to the public  
26 records requested, as mandated by NRS 239.010(3).

27 59. A writ of mandamus is necessary to compel Respondents' compliance with the  
28 NPRA, and response to Petitioners' Requests for Public Records.

LEE, LANDRUM & CARLSON, APC  
7575 VEGAS DRIVE, SUITE 150  
LAS VEGAS, NV 89128  
(702) 880-9750

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60. Respondents have violated the provisions and intent of NRS 239.010 by: (1) refusing to comply with Petitioners' requests 1, 2 and 7 for public records made to the Registrar of Voters; (2) refusing to comply with Petitioners' requests 1 through 7 for public records made to the Clark County Commissioners; and (3) failing to provide Petitioners the same under the NPRA.

WHEREFORE, the Petitioners pray for the following relief:

1. That the court hear and adjudicate this matter on an expedited basis as mandated by NRS 239.011;
2. Injunctive relief ordering Respondents to justify the reasonableness of their search for responsive records, and immediately make available complete copies of all records requested, which are admittedly in their legal custody and control;
3. Reasonable costs and attorney's fees pursuant to NRS 239.011(2); and
4. Any further relief the Court deems appropriate.

**DATED** this 1<sup>st</sup> day of June, 2020.

**LEE, LANDRUM & CARLSON, APC**

By: 

DAVID S. LEE, ESQ.  
Nevada Bar No. 6033  
CHARLENE N. RENWICK, ESQ.  
Nevada Bar No.: 10165  
7575 Vegas Drive, Suite 150  
Las Vegas, Nevada 89128

Attorneys for Petitioners  
NEVADA REPUBLICAN CENTRAL  
COMMITTEE d/b/a NEVADA  
REPUBLICAN PARTY and  
REPUBLICAN NATIONAL COMMITTEE

1                                   **DECLARATION OF TYLER GREEN, ESQ. IN SUPPORT OF**  
2                                   **APPLICATION FOR ORDER COMPELLING DISCLOSURE OF PUBLIC RECORDS**  
3                                   **PURSUANT TO NRS 239.011/PETITION FOR WRIT OF MANDAMUS**

4                                   TYLER R. GREEN, ESQ., hereby declares and states as follows:

5                                   1.       I am over the age of eighteen years and have personal knowledge of the facts stated  
6 herein, except for those stated upon information and belief, and as to those, I believe them to be  
7 true. I am competent to testify as to the facts stated herein, and will so testify as to the same if called  
8 upon to do so.

9                                   2.       I am an attorney at law licensed in the state of Utah and have been admitted *pro hac*  
10 *vice* as counsel of record in the matter of Daniel Corona et al. v. Barbara Cegavske, et al. (Case  
11 No. CV 20-OC-00064-1B). The Corona case is currently pending before the First Judicial  
12 District Court in Carson City, Nevada.

13                                  3.       In the Corona case, Plaintiffs challenge the modified voting procedures that the  
14 Nevada Secretary of State and the Registrar of Voters for Clark County adopted in response to the  
15 COVID-19 crisis and Governor Sisolak's emergency executive order(s).

16                                  4.       A joinder dated May 4, 2020, and filed in the Corona case on behalf of the Clark  
17 County Registrar of Voters, Joseph P. Gloria (a defendant in the Corona case), states, "At the  
18 direction of local county officials, the Clark County Registrar of Voters is setting up two  
19 additional election day voting sites and will mail absent ballots to all registered voters, including  
20 inactive voters, at additional expense."<sup>10</sup>

21                                  5.       Attached to the joinder is the Affidavit of Lorena Portillo, who affirms that the cost  
22 for additional printers to be delivered and programed will be an additional \$138,997.50 and the cost  
23 for mailing the additional ballots will be an additional \$184,738.01. As such, the additional costs  
24 to be incurred by Clark County based upon the direction that Mr. Gloria received from unnamed  
25 county officials exceeds \$300,000.<sup>11</sup>

26 \_\_\_\_\_  
27 <sup>10</sup> See Exhibit 1 to *Application for Order Compelling Disclosure of Public Records Pursuant to*  
28 *NRS 239.011/Petition For Writ Of Mandamus* (June 2, 2020).

<sup>11</sup> *Id.*



1           6.       In an effort to ascertain when those unnamed officials met and whether the public  
2 was able to provide input on this increased taxpayer expense, I reviewed agendas of the Clark  
3 County Commission meetings where these items could have been discussed.

4           7.       Between April 16, 2020—when the Corona Complaint was filed—and May 4,  
5 2020—when Clark County filed its joinder—only one Clark County Commission public meeting  
6 was held. That occurred on Tuesday, April 21, 2020.

7           8.       The agenda for the April 21 meeting provides no evidence that the issues of  
8 additional in-person voting places or mail-in ballots—or the cost for either—were addressed.<sup>12</sup>

9           9.       Under NRS 241.020 the agenda for the April 21 meeting was required to have been  
10 posted three working days before the meeting—or by April 16, 2020, the same day the Corona  
11 Action was filed.

12           10.      Upon information and belief, the Clark County Commissioners failed to properly  
13 notice and hold a public meeting to discuss and receive public input before deciding to spend more  
14 than \$300,000.00 additional taxpayer funds on the June 9, 2020, primary election.

15           11.      Based on the representations made in the Clark County Registrar of Voters Joinder,  
16 the Affidavit of Lorena Portillo, and the Agenda for the April 21, 2020 meeting, there does not  
17 appear to be any evidence showing that the directives made by the Clark County Commissioners  
18 were undertaken and/or provided in compliance with Nevada Open Meeting Laws.

19           12.      To determine whether the Clark County Commissioners complied with Nevada’s  
20 Open Meeting Laws, on behalf of the Petitioners I made an Expedited Public Record Request to  
21 the Clark County Manager’s Office, County Commission Division, and the Clark County Registrar  
22 of Voters on May 7, 2020. In accordance with NRS 239.105(2)(b) and my supporting affidavit, I  
23 requested the public records identified in Exhibits 4 and 5 to the underlying Application/Petition.

24           13.      On May 12, 2020, Mary-Anne Miller, County Counsel of the Office of the District  
25 Attorney, Civil Division, responded to my Public Record Request to the Clark County Registrar of  
26 Voters via email, asserting that documents responsive to requests 1, 2 and 7 would not be produced  
27

28 <sup>12</sup> See Exhibit 2 to *Application for Order Compelling Disclosure of Public Records Pursuant to NRS 239.011/Petition For Writ Of Mandamus* (June 2, 2020).

1 based on attorney-client privilege, and that items responsive to request number 7 do not fall within  
2 the Open Meeting Law, pursuant to NRS 241.015(3)(b)(2). She further said that the Registrar of  
3 Voters does not have any documents responsive to requests 3 through 5, and cited the following  
4 website as being the only responsive record to request number 6:  
5 <https://www.clarkcountynv.gov/election/Documents/2020/Mailer-Notice-20P-EXPANDED.pdf>.  
6 Ms. Miller did not cite any authority supporting the contention that the responsive but unproduced  
7 documents were protected by confidentiality or the attorney-client privilege.

8 14. On May 14, 2020, I emailed Ms. Miller and asked when I could expect a response  
9 to the Expedited Public Record Request made to the Clark County Commissioners' on May 7,  
10 2020. She responded that there were no communications responsive to those requests that are not  
11 subject to the attorney-client privilege, but that the commissioners may have responsive  
12 documents, so she would forward the requests to them. Again, Ms. Miller did not cite any  
13 authority to support her claim of attorney-client privilege.

14 15. After nearly one week of no response, I sent Ms. Miller another email on May 20,  
15 2020, asking when a response from the Clark County Commissioners could be expected.

16 16. She responded to me on May 20, 2020 by forwarding a May 18, 2020 email from  
17 Susan Gersh, which included 4 emails from Commissioner Jim Gibson. Those emails were either  
18 generic email blasts from the Democratic Party or media articles.

19 17. In Ms. Miller's May 20, 2020 email to me, she again asserted that responsive  
20 documents were subject to attorney-client privilege. But she did not cite any authority for that  
21 proposition. She also said that she had not yet heard back from all of the Commissioners with  
22 respect to information on their individual phones.

23 18. After another week of no response, I again followed up with Ms. Miller by sending  
24 her an email on May 27, 2020, asking about the status of the other Commissioners' responses to  
25 the public records request. She responded the same day and said that the Commissioners had no  
26 other responsive documents.

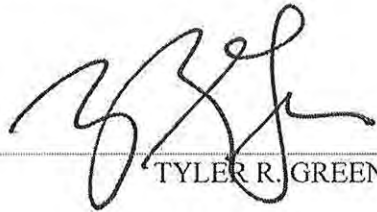
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19. Under NRS 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 1<sup>st</sup> day of June, 2020

  
\_\_\_\_\_  
TYLER R. GREEN, ESQ.

LEE, LANDRUM & CARLSON, APC  
7575 VEGAS DRIVE, SUITE 150  
LAS VEGAS, NV 89128  
(702) 880-9750

**EXHIBIT "1"**

**Exhibit "1"**

1 STEVEN B. WOLFSON  
Clark County District Attorney  
2 MARY-ANNE MILLER  
County Counsel  
3 NSB #001419  
4 500 S. Grand Central Parkway  
Las Vegas, NV 89106  
5 702.455.2164  
6 Mary-Anne.Miller@ClarkCountyDA.com  
*Attorneys for Defendant Joseph P. Gloria,*  
7 *Clark County Registrar of Voters*

8 **FIRST JUDICIAL DISTRICT COURT**  
**IN AND FOR CARSON CITY, STATE OF NEVADA**

9  
10 DANIEL CORONA, DARIN MAINS, BRIAN  
MELENDEZ, TERESA MELENDEZ,  
11 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
12 CORPORATION/DEMOCRATIC  
NATIONAL COMMITTEE, DCCC, and  
PRIORITIES USA,

13 Plaintiffs,

14 vs.

15 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State; JOSEPH  
16 P. GLORIA, in his official capacity as  
Registrar of Voters for Clark County, Nevada;  
17 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
18 Nevada; KRISTINE JAKEMAN, in her official  
capacity as the Elko County Clerk; and  
19 AARON FORD, in his official capacity as the  
Attorney General of the State of Nevada,

20 Defendants.

Case No.: 20 OC 00064 1B

Dept. No.: II

21  
22 **JOINDER IN THE OPPOSITIONS TO**  
23 **PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**  
24 **FILED BY DEFENDANTS CEGAVSKE, FORD, SPIKULA AND JAKEMAN**

25 Comes now Defendant Joseph P. Gloria, by and through his counsel, Steven B. Wolfman,  
26 District Attorney, by Mary-Anne Miller, County Counsel and files this Joinder to the Oppositions filed  
27 by the other Defendants in this action to the Plaintiffs' Motion for Preliminary Injunction. The  
28 Registrar fully supports the arguments made therein.

1 In addition to this Joinder, this Defendant attaches the affidavit of the Assistant Registrar of  
2 Voters, Lorena Portillo. At the direction of local county officials, the Clark County Registrar of Voters  
3 is setting up two additional election day voting sites and will mail absent ballots to all registered voters,  
4 including inactive voters, at additional expense.

5 The additional election day voting sites were not thought to be needed because of the ease and  
6 safety of voting by mail ballot and because of the extremely low turnout for primary elections in Clark  
7 County in the recent past. (See attached affidavit). The mailing of ballots to inactive voters will likely  
8 be similarly unnecessary because their addresses are outdated and the ballots will be returned as  
9 undeliverable. (See attached affidavit).


10 This Defendant would also like to point out the relative low signature mismatch on mail ballots  
11 experienced in Clark County. See Affidavit of Assistant Registrar. This low rate is likely attributable  
12 to the fact that voters mark their mail ballots in the comfort of their home, at their kitchen table or  
13 desk, unlike those signatures obtained by petition circulators who utilize clipboards or catch their  
14 voters in a rush coming in or out of businesses.

15 In the event there is an issue with a voter signature, Clark County will contact the voter by  
16 phone or email first and has been advertising this fact on the notice sent to voters and on its website.  
17 See Exhibit A, Notice sent to all registered voters about mail ballot. *Also accessible at:*  
18 <https://www.clarkcountynv.gov/election/pages/default.aspx>.

19 For the reasons set forth above and in the Defendants' Oppositions, Defendant Gloria asks this  
20 Court to deny the relief requested by Plaintiffs.

21 DATED this 17<sup>th</sup> day of May, 2020.

22 STEVEN B. WOLFSON  
23 DISTRICT ATTORNEY

24 By:   
25 MARY-ANNE MILLER  
26 County Counsel  
27 State Bar No. 001419  
28 500 South Grand Central Pkwy, 5<sup>th</sup> Flr.  
Las Vegas, Nevada 89155-2215  
*Attorneys for Defendant Joseph P. Gloria,  
Clark County Registrar of Voters*

1 **CERTIFICATE OF MAILING**

2 I hereby certify that on the 4th day of May, 2020, I served a copy of the document by  
3 emailing a copy of the above and foregoing **JOINDER IN THE OPPOSITIONS TO PLAINTIFFS'**  
4 **MOTION FOR PRELIMINARY INJUNCTION FILED BY DEFENDANTS CEGAVSKE,**  
5 **FORD, SPIKULA AND JAKEMAN** addressed as follows:

6 David Omara, Esq.  
7 311 E. Liberty St.  
8 Reno, NV 89501  
9 david@omaralaw.net

Rand Greenberg, Esq.  
540 Court Street, 2<sup>nd</sup> Fl.  
Elko, NV 89801  
rgreenburg@elkocountynv.net

10 Bradley Schrage, Esq.  
11 3556 East Russell Road, 2<sup>nd</sup> Fl.  
12 Las Vegas, NV 89120  
13 bschrager@wrslawyers.com


Herbert Kaplan, Esq.  
Washoe District Attorney's  
Office  
1 South Sierra Street  
Reno, NV 89501  
hkaplan@da.washoecounty.us

14 Brian Hardy, Esq.  
15 10001 W. Park Run Dr.  
16 Las Vegas, NV 89145  
17 bhardy@maclaw.com

Marc E. Elias, Esq.  
700 Thirteenth Street, NW. Ste. 800  
Washington, DC 20005-3960  
melias@perkinscoie.com

18 Districtcourtclerk@carson.org  
19 emeibert@carson.org  
20 sgreenberg@carson.org  
21 bshadron@carson.org

Gregory Zunino, Esq.  
Office of the Attorney General  
555 E. Washington Ave., Ste #3900  
Las Vegas, NV 89101  
gzunino@ag.nv.gov

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An Employee of the Clark County District Attorney's  
Office – Civil Division

**AFFIDAVIT OF  
LORENA  
PORTILLO**



1 STEVEN B. WOLFSON  
Clark County District Attorney  
2 MARY-ANNE MILLER  
County Counsel  
3 NSB #001419  
4 500 S. Grand Central Parkway  
Las Vegas, NV 89106  
5 702.455.2164  
[Mary-anne.miller@clarkcountyda.com](mailto:Mary-anne.miller@clarkcountyda.com)  
6 *Attorneys for Defendant Joseph P. Gloria,*  
*Clark County Registrar of Voters*  
7  
8  
9

10 **FIRST JUDICIAL DISTRICT COURT**  
**IN AND FOR CARSON CITY, STATE OF NEVADA**

11  
12 DANIEL CORONA, DARIN MAINS, BRIAN  
MELENDEZ, TERESA MELENDEZ,  
13 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
14 CORPORATION/DEMOCRATIC  
NATIONAL COMMITTEE, DCCC, and  
15 PRIORITIES USA,  
Plaintiffs,

Case No.: 20 OC 00064 1B

Dept. No.: II

16 vs.

17 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State; JOSEPH  
18 P. GLORIA, in his official capacity as  
Registrar of Voters for Clark County, Nevada;  
19 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
20 Nevada; KRISTINE JAKEMAN, in her official  
capacity as the Elko County Clerk; and  
21 AARON FORD, in his official capacity as the  
Attorney General of the State of Nevada,  
22

Defendants.

23  
24 **AFFIDAVIT OF LORENA PORTILLO**

25 STATE OF NEVADA )  
26 ) ss:  
27 COUNTY OF CLARK )

28 COMES NOW, Lorena Portillo, being duly sworn, states:

1           1. I am the Assistant Registrar of Voters of Clark County, and have worked for the Clark  
2 County Election Department since August 3, 1998.

3           2. That the Clark County Registrar of Voters supported the adoption of an all-mail ballot  
4 election for the June 9, 2020 Primary Election and the temporary provisions that the Nevada  
5 Secretary of State enacted to implement that. The plan is a necessary and an appropriate way to  
6 address voter and staff safety while safeguarding the right to vote in a fair and secure election  
7 setting. The Clark County Election Department immediately undertook the complicated process and  
8 expense necessary to conduct an election in this manner, including the acquisition of mail ballot and  
9 signature verification hardware and software at an expense of \$331,750. Mail ballots will go out to  
10 active registered votes on May 6, 2020.

11           3. I have read the affidavit of Deanna Spikula, Washoe County Registrar of Voters,  
12 submitted in this action and agree with the representation of the problems that a revision to or  
13 expansion of same day registration/in person voting would present in the upcoming primary election.

14           4. To expand the provision of same-day registration and in-person voting on election day,  
15 Clark County will have to acquire the use of additional printers that are capable of printing the  
16 individualized ballot for each prospective voter with the accuracy required to have it counted with  
17 the County's automated ballot counting machines. There are only 60 printers available from the  
18 County's vendor that can be delivered and programmed by Primary Election Day. The cost of  
19 leasing the available printers for one year will be \$138,997.50.

20           5. Clark County will have to locate available sites which have both sufficient wiring and  
21 electrical facilities for the computers and printers, as well as the necessary space to adequately  
22 separate staff and voters from each other. Many sites traditionally used are not available because  
23 they do not wish to undertake the risk of exposures at this time.

24           6. If County sites are used, and the additional available printers are divided into two sites,  
25 the County could staff two additional vote centers with 25-30 additional personnel assigned to each  
26 site, who could assist the prospective voter, research voter issues, and ensure that proper distancing  
27 is maintained between 15 prospective voter registration/vote stations and waiting voters. An order  
28 that would impose more than two additional sites in Clark County would require that these existing

1 printers be spread out among the additional sites, resulting in the potential for longer lines and wait  
2 times at those sites. In turn, that expands the potential for infection spread and danger to the public.  
3 Further, each new site will require additional ADA desktops, as well as hardware and software for  
4 onsite audio voting, and additional PPE for each site, all at the unbudgeted expense of the County.

5 7. In addition, each new vote center will require additional staff to monitor voter and staff  
6 safety measures, including site disinfectant and distance spacing. Clark County will experience the  
7 same troubles outlined in Ms. Spikula's affidavit in recruiting and training staff willing to work with  
8 a constant flow of strangers during the pandemic.

9 8. It will cost Clark County \$184,738.01 (\$30,385.00 in postage; \$154,353.01 in mail ballot  
10 packet-bulk pricing) to mail ballots to inactive voters in Clark County. It will take seven days to  
11 print and assemble the ballot packets, and they will be mailed out over a period of a few days to  
12 comply with postal service bulk mail rules. Based on past experience, at least 90% of those will  
13 come back undeliverable.

14 9. The past voter turnout for primary election in even numbered years has been low. In  
15 2018, with a highly contested gubernatorial primary and two U.S. Senate nominations on the  
16 primary ballot, the turnout was only 20.41% of registered voters. In 2016, the primary election  
17 turnout was 16.16%. In 2014, it was 15.80% in the County. In 2012, the turnout was 16.23%. This  
18 year, with no hotly contested state-wide races at the top of the ballot, there is nothing special to draw  
19 voters in greater numbers than before for in-person voting.

20 10. Signature verification has not been a significant issue on absent ballots in the recent past.  
21 For example, in the 2018 Primary Election, there were only 9 mismatched signatures out of 14,708  
22 ballots returned, and in the 2018 General Election, only 59 signatures were determined to be  
23 mismatched out of a ballot return of 49,072.

24 11. Given the low voter turnout expected, the increased risk of harm to voter and staff safety  
25 alike, and in light of the new expenses already incurred, there is little justification for such increased  
26 risk and expense that any change to the plan would cause.

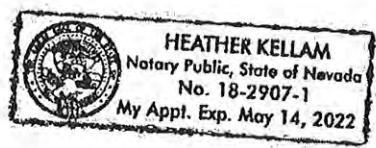
27 Dated this 7<sup>th</sup> day of April, 2020.

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*Lorena S. Portillo*  
LORENA PORTILLO

SUBSCRIBED and SWORN to before me  
this 30<sup>th</sup> day of April, 2020.

*Heather Kellam*  
NOTARY PUBLIC in and for  
said County and State.



# **EXHIBIT A**



## JUNE 9, 2020, PRIMARY ELECTION NOTICE OF ALL-MAIL BALLOT ELECTION

Clark County Election Department, 965 Trade Dr., North Las Vegas, NV 89030

### OVERVIEW

To help keep you, your family, and our community safer by limiting interactions that could spread the coronavirus, the June 9, 2020, Primary Election is being conducted entirely by mail ballot. On or before May 18, 2020, Clark County registered voters will receive a mail ballot packet from the Clark County Election Department which will include:

- A ballot and instructions for voting a mail ballot;
- A pre-addressed, postage-paid envelope that must be used for returning voted mail ballots; and
- A list of mail ballot drop-off sites for voters to drop off their own voted mail ballot in-person, if they are unable to put their ballot in the mail.

Registered Voters who do not receive their packet by May 18, 2020, should contact us at (702) 455-VOTE (8683). We **STRONGLY ENCOURAGE VOTERS TO MAIL THEIR BALLOT** rather than drop it off in-person. Please read this entire notice for important details.

### CONTACT INFORMATION WILL HELP US ASSIST VOTERS

We strongly encourage all voters who do not have their current e-mail or phone number listed in their registration records to contact us as soon as possible and no later than **MAY 12, 2020**, to provide that information. This is important because if a mail ballot has no signature on the envelope, or if the signature does not match the one the Election Department has on file, we will need to contact the voter as soon as possible to resolve this issue. To check if your phone number or e-mail is in your voter registration records or to add it if it is not:

- Log-in on the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov); or
- Send an e-mail to [elinfo@ClarkCountyNV.gov](mailto:elinfo@ClarkCountyNV.gov); or
- Call us at (702) 455-VOTE (8683).

Please note that NRS 293.558 requires the Clark County Election Department to keep your e-mail address **CONFIDENTIAL**. Meaning, it may not be given to third parties.

## CLOSE OF STANDARD REGISTRATION

The deadlines to register to vote or update existing voter registration by mail or online in time for the June 9, 2020, Primary Election and still receive a regular mail ballot are below. After those dates pass, voters who wish to register to vote or make changes to their existing voter registration will have to do so through the same-day registration or same-day updates process, either online or in-person. Those voters may only vote a paper provisional mail ballot in-person on the spot at the Clark County Election Department and will need to show current, valid identification, and, if needed, proof of residency. See "Same Day Registration and Same-Day Updates of Existing Registration" starting on page 5 for more information. We strongly urge voters to register to vote or to make any necessary updates as soon as possible so they may avoid having to go to the Election Department offices.

- **May 12, 2020**, is the last day to register to vote or update your existing voter registration by mail for the June 9, 2020, Primary Election.
- **May 21, 2020**, is the last day to register to vote or update your existing registration on the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov).

## RETURNING YOUR VOTED MAIL BALLOT

The Clark County Election Department will process and count voted mail ballots that are returned in the envelope provided, **but only if the outside of the envelope is signed by the voter**. This is required for verification purposes.

The ballots must be submitted and received in one of the following ways:

- **Mailed Through the U.S. Post Office:** We ***STRONGLY ENCOURAGE VOTERS TO RETURN THEIR VOTED MAIL BALLOT THROUGH THE U.S. POST OFFICE*** rather than drop it off in-person. To send it by postal mail, voters must:
  - Seal their voted mail ballot in the pre-addressed, postage-paid, return envelope included in the packet they will receive.
  - **Sign the outside of the envelope in the space provided for their signature.**
  - Make sure their signed envelope is postmarked by June 9, 2020. Note that we must receive properly postmarked ballots by 5:00 p.m. on June 16, 2020, (7 days after the Election Day) for them to be counted.
- **Dropped-Off In-Person:** Voters may also drop off their own voted mail ballot, but only at one of the locations in the schedules on pages 3-5 during the listed dates and hours. To do this, voters must:
  - Seal their voted mail ballot in the return envelope included in the packet they will receive.
  - **Sign the outside of the envelope in the space provided for their signature.**
  - Drop off their voted mail ballot no later than 7:00 p.m. on Election Day.

**DROP-OFF LOCATIONS THROUGH JUNE 5, 2020, (FRIDAY)**

These locations, dates, and hours for dropping off mail ballots will be available as soon as voters begin receiving their mail ballots and will continue through June 5.

<b>DROP-OFF LOCATIONS</b>	<b>DATES AND HOURS</b>
CLARK COUNTY ELECTION DEPARTMENT 965 Trade Dr., North Las Vegas <i>Only the Clark County Election Dept. will be available on May 25, 2020, Memorial Day.</i>	UP TO MAY 22: • MON.-FRI.: 8am-5pm • SAT. AND SUN: CLOSED MAY 23-JUNE 3, EVERY DAY (including Sat., Sun., and Memorial Day): 8am-6pm JUNE 4-5, THURS.-FRI.: 8am-8pm
CLARK COUNTY GOVERNMENT CENTER 1 <sup>st</sup> Floor, Rotunda 500 S. Grand Central Pkwy., Las Vegas	MONDAY-FRIDAY: 8am-5pm CLOSED: All Saturdays, Sundays, and May 25, Memorial Day Holiday
BOULDER CITY, CITY CLERK City Hall, Upstairs, 401 California Ave. Boulder City	MONDAY-THURSDAY: 7am-6pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day
HENDERSON CITY CLERK City Hall, Front of Bldg., 240 S. Water St. Henderson	MONDAY-THURSDAY: 7:30am-5:30pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day
LAS VEGAS CITY CLERK City Hall, 2 <sup>nd</sup> Floor, 495 S. Main St. Las Vegas	MONDAY-THURSDAY: 7am-5:30pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day
MESQUITE CITY CLERK City Hall, 10 E. Mesquite Blvd. Mesquite	MONDAY-THURSDAY: 8am-5pm FRIDAY: 8am-3:30pm CLOSED: All Saturdays, Sundays, and May 25, Memorial Day
NORTH LAS VEGAS CITY CLERK City Hall, 8 <sup>th</sup> Floor 2250 Las Vegas Blvd. North, North Las Vegas	MONDAY-THURSDAY: 8am-5:45pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day

**DROP-OFF LOCATION ON JUNE 8, 2020, (MONDAY)**

On this date, voters may drop-off their own voted mail ballot in-person, from 8:00 a.m. to 5:00 p.m. at the Clark County Election Department, 965 Trade Dr., North Las Vegas.



**DROP-OFF LOCATIONS ON JUNE 9, 2020, PRIMARY ELECTION DAY (TUESDAY)**

On Primary Election Day, voters may drop-off their own voted mail ballot in-person at the locations and during the times listed below.

<b>DROP-OFF LOCATIONS ON JUNE 9 PRIMARY ELECTION DAY, OPEN 7:00 A.M. TO 7:00 P.M.</b>
CLARK COUNTY ELECTION DEPARTMENT, 965 Trade Dr., North Las Vegas
BOB PRICE RECREATION CENTER, 2050 Bonnie Ln., Las Vegas
BUNKERVILLE COMMUNITY CENTER, 200 W. Virgin St., Bunkerville
CLARK COUNTY FAIRGROUNDS - LOGANDALE, 1301 Whipple Ave., Logandale
DESERT BREEZE COMMUNITY CENTER, 8275 Spring Mountain Rd., Las Vegas
DR. WILLIAM U. PEARSON COMMUNITY CENTER, 1625 W. Carey Ave., North Las Vegas
ENTERPRISE LIBRARY, 25 E. Shelbourne Ave., Las Vegas
HOLLYWOOD RECREATION CENTER, 1650 S. Hollywood Blvd., Las Vegas
INDIAN SPRINGS COMMUNITY CENTER, 715 W. Gretta Lane, Indian Springs
LAUGHLIN LIBRARY, 2840 S. Needles Highway, Laughlin
MOAPA COMMUNITY CENTER, 1340 E. Highway 168, Moapa
MOAPA TRIBAL ADMINISTRATION BUILDING, 1 Lincoln St., Moapa
MOAPA VALLEY COMMUNITY CENTER - OVERTON, 300 N. Moapa Blvd., Overton
MOUNTAIN CREST COMMUNITY CENTER, 4701 N. Durango Dr., Las Vegas
PARADISE RECREATION CENTER, 4775 S. McLeod Dr., Las Vegas
PASEO VERDE LIBRARY, 280 S. Green Valley Pkwy., Henderson
SAHARA WEST LIBRARY, 9600 W. Sahara Ave., Las Vegas
SANDY VALLEY COMMUNITY CENTER, 650 W. Quartz Ave., Sandy Valley
SEARCHLIGHT COMMUNITY CENTER, 200 Michael Wendell Way, Searchlight
SILVER MESA RECREATION CENTER, 4025 Allen Ln., North Las Vegas
VETERANS MEMORIAL LEISURE CENTER, 101 N. Pavilion Center Dr., Las Vegas
WALNUT COMMUNITY CENTER, 3075 N. Walnut Rd., Las Vegas
WHITNEY RECREATION CENTER, 5712 E. Missouri Ave., Las Vegas
WINDMILL LIBRARY, 7060 W. Windmill Ln., Las Vegas

**ADDITIONAL DROP-OFF LOCATIONS ON JUNE 9  
PRIMARY ELECTION DAY, VARYING HOURS**

BOULDER CITY, CITY CLERK, City Hall, Upstairs, 401 California Ave., Boulder City  
7:00 a.m. to 6:00 p.m.

CLARK COUNTY GOVERNMENT CENTER, 1<sup>st</sup> Floor, Rotunda  
500 S. Grand Central Pkwy., Las Vegas  
8:00 a.m. to 5:00 p.m.

HENDERSON CITY CLERK, City Hall, Front of Building, 240 S. Water St., Henderson  
7:30 a.m. to 5:30 p.m.

LAS VEGAS CITY CLERK, City Hall, 2<sup>nd</sup> Floor, 495 S. Main St., Las Vegas  
7:00 a.m. to 5:30 p.m.

MESQUITE CITY CLERK, City Hall, 10 E. Mesquite Blvd., Mesquite  
8:00 a.m. to 5:00 p.m.

NORTH LAS VEGAS CITY CLERK, City Hall, 8<sup>th</sup> Floor, 2250 Las Vegas BL North, N. Las Vegas  
8:00 a.m. to 5:45 p.m.

**SAME-DAY REGISTRATION AND  
SAME-DAY UPDATES OF EXISTING REGISTRATION**

**Online Registration and Updates:** If you could not register to vote or update your existing voter registration by mail by May 12, 2020, you still may do so through the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov) through June 4, 2020 (Thursday).

- **May 13 to May 21:** If you register to vote or update your existing registration online between May 13 (Wednesday) and May 21, 2020, (Thursday), within about a week you will receive a regular mail ballot with your updated name, precinct, party, etc., as applicable.
- **May 22 to June 4 (Online Same-Day Registration and Same-Day Updates):** If you register to vote or update your existing registration online between May 22 (Friday) and June 4, 2020 (Thursday), you may only vote a paper **PROVISIONAL MAIL BALLOT IN-PERSON AT THE CLARK COUNTY ELECTION DEPARTMENT, WHICH YOU MUST IMMEDIATELY TURN IN.** You may not take your ballot out of the building. You must also show acceptable identification and, if needed, proof of residency. See page 6 for details on identification and provisional ballot voting. The address is **965 Trade Dr., Suite F, North Las Vegas, NV.** The dates for in-person voting are May 23 (Saturday) to June 5 (Friday) and also on June 9 (Tuesday). See page 7 for the "In-Person Voting Location and Schedule," including hours and a map.

**Identification and Proof of Residency:** If you register to vote or update your existing voter registration online from May 22 to June 4, or in-person from May 23 to June 5 or on June 9, you must provide identification and, if needed, proof of residency, to vote a paper provisional mail ballot in-person on the spot at the Clark County Election Department. The identification requirements are:

- Your unexpired Nevada (NV) Department of Motor Vehicles (DMV) Driver's License with your current residential address which must match the address in your registration; or
- Your unexpired NV State Identification Card with your current residential address, which must match the address in your registration; or
- Your NV DMV temporary "Interim Document" with your current residential address, which must match the address in your voter registration.
- **IF** the address on your identification is not your current residential address, meaning it does not match your voter registration residential address and/or if it is not where you currently live, then you must also provide proof of current residency, such as:
  - A military identification card; or
  - A utility bill (electric, gas, oil, water, sewer, septic, phone, cable); or
  - A bank or credit union statement; or
  - A paycheck; or
  - An income tax return; or
  - A mortgage statement, or residential rental or lease agreement; or
  - A motor vehicle registration; or
  - A property tax statement; or
  - Any other document issued by a governmental agency.

**Paper Provisional Mail Ballot Overview and Verification Process:** If you register to vote or update your voter registration either online from May 22 to June 4, or in-person from May 23 to June 5 or on June 9, you may only vote a paper provisional mail ballot by appearing in-person at the Clark County Election Department and voting on the spot. You must also provide the identification indicated above. Your paper provisional mail ballot will have all of the contests and candidates that are on a regular ballot. It will differ from a regular ballot in that it will be counted only after verification that:

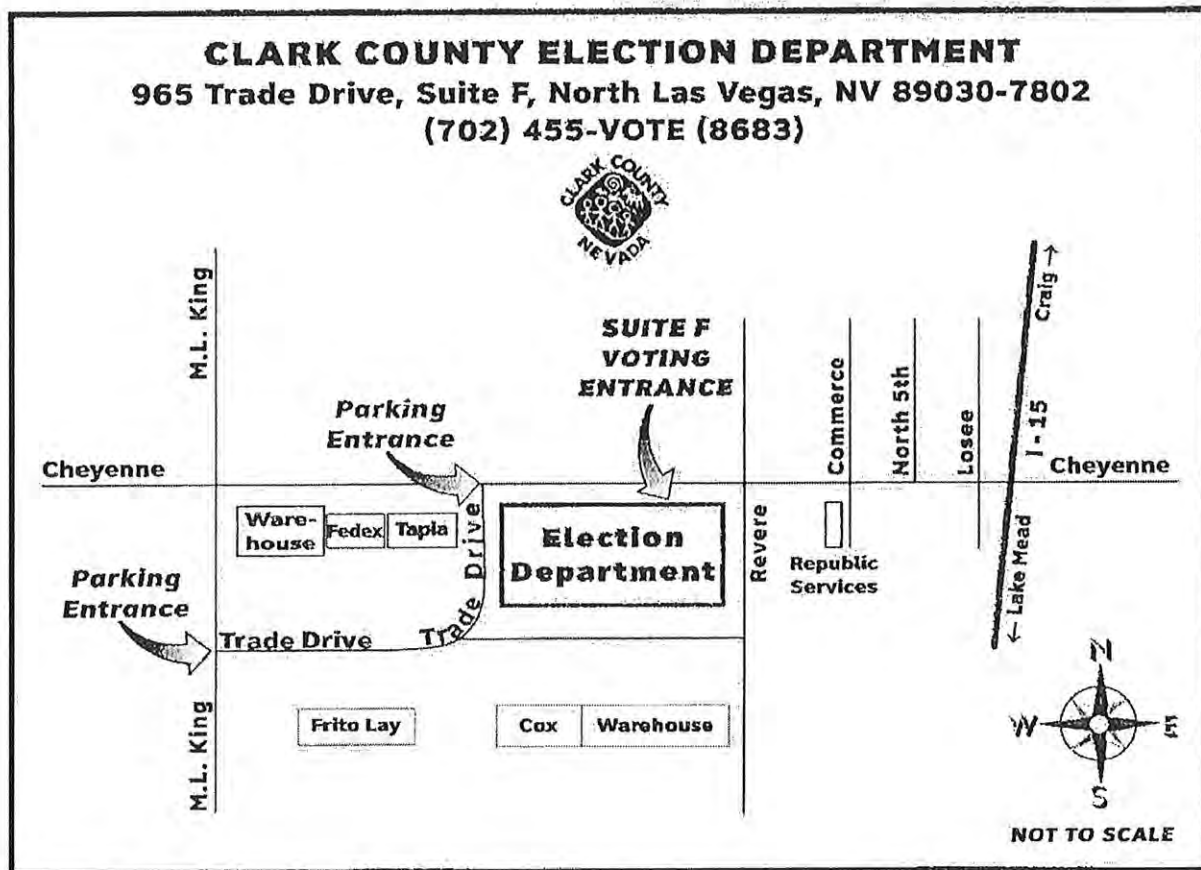
- You were qualified to cast a ballot in the current election;
- You did not cast multiple ballots in the same election;
- You showed acceptable identification when you voted (see above); and
- **IF** needed, you provided acceptable proof of residency (see above).

**In-Person Same-Day Registration and Updates, May 23-June 5 and on June 9:** If you could not register to vote or update your existing voter registration by mail by May 12, 2020, or online by May 21, you may do so in-person and vote a paper provisional mail ballot on the spot at the Clark County Election Department from **May 23 (Saturday) to June 5, 2020 (Friday)**, or on **June 9, 2020 (Tuesday, Primary Election Day)**. You may not take your ballot out of the building and you must turn it in immediately. You must show acceptable identification and, if needed, proof of residency. See page 6 for details on identification and provisional ballot voting. The address is **965 Trade Dr., Suite F, North Las Vegas, NV**. See below for the "In-Person Voting Location and Schedule," including hours and a map.

### **IN-PERSON VOTING LOCATION AND SCHEDULE**

**May 23 (Sat.)-June 5 (Fri.) and June 9, 2020 (Tues., Primary Election Day)**

- May 23-June 3, every day (including Saturday, Sunday, and Memorial Day on May 25): 8:00 a.m.-6:00 p.m.
- June 4-5, Thursday-Friday: 8:00 a.m.-8:00 p.m.
- June 9, Tuesday, Primary Election Day: 7:00 a.m.-7:00 p.m.



## VOTERS WITH DISABILITIES

Several options are available for voters with disabilities:

- Electronic registration and electronic voting will be offered through Nevada's Effective Absentee System for Elections (EASE). This option may be accessed on the Nevada Secretary of State's website at [www.NVEASE.gov](http://www.NVEASE.gov).
- Voters who register to vote by mail by May 12, 2020, or online by May 21, 2020, may call the County Election Department at (702) 455-VOTE (8683) to request an electronic ballot.
- Unassisted and private in-person voting will be available at the Election Department. The location, dates, and times will be the same as for "In-Person Voting" (see page 7).

## VOTING IN THE NOVEMBER 3 GENERAL ELECTION

At this time, we expect to return to in-person voting for the November 3, 2020, General Election. If that occurs, voters who had not previously requested to receive mail ballots for every election, which is most voters, will be expected to vote at regular polling places. For more information about the General Election see the Election Department's webpage at [www.ClarkCountyNV.gov/vote](http://www.ClarkCountyNV.gov/vote).

## QUESTIONS

More information about the all mail-in Primary Election and other resources for voters are available on the Election Department's website at [www.ClarkCountyNV.gov/vote](http://www.ClarkCountyNV.gov/vote). You may also e-mail questions to the Department at [EInfo@ClarkCountyNV.gov](mailto:EInfo@ClarkCountyNV.gov), or call (702) 455-VOTE (8683) or 711 for TTY/TDD devices.

**VOTING OR ATTEMPTING TO VOTE MORE  
THAN ONCE IN THE SAME ELECTION  
IS A FELONY. (NRS 293.780)**

**EXHIBIT "2"**

**Exhibit "2"**

AGENDA

JOINT MEETING OF THE  
CLARK COUNTY BOARD OF COMMISSIONERS  
CLARK COUNTY WATER RECLAMATION DISTRICT BOARD OF TRUSTEES AND  
UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA BOARD OF TRUSTEES  
9:00 AM TUESDAY, APRIL 21, 2020  
CLARK COUNTY COMMISSION CHAMBERS, GOVERNMENT CENTER  
500 SOUTH GRAND CENTRAL PARKWAY, LAS VEGAS, NEVADA

Pursuant to the Governor's Emergency Directive on Public Meetings, this meeting will not be open to the public.

This meeting will be broadcast live in the Las Vegas area. Clark County Television is available in the Las Vegas area on Channel 4/1004 on Cox cable and on CenturyLink on Channels 4 and 1004 as well as in Laughlin on Channel 14 via Suddenlink. Live streaming of CCTV programming is available at [www.ClarkCountyNV.gov](http://www.ClarkCountyNV.gov) and [www.YouTube.com/ClarkCountyNV](http://www.YouTube.com/ClarkCountyNV). CCTV is also available in Boulder City on Channel 4 and in Moapa Valley on Digital Channel 50.3. For more information about the program schedule, please refer to <https://www.clarkcountynv.gov/public-communications/Pages/CCTV4.aspx> or contact CCTV Channel 4 at (702) 455-6890.

If you wish to comment on an item marked "For Possible Action" appearing on this agenda, you may send an e-mail to [comment@clarkcountynv.gov](mailto:comment@clarkcountynv.gov). Please identify on which agenda item you are commenting. Any comments not so identified will be read at the end of the meeting.

- Items on the agenda may be taken out of order.
- The Board of County Commissioners, Board of Trustees, and Licensing Board may combine two or more agenda items for consideration.
- The Board of County Commissioners, Board of Trustees, and Licensing Board may remove an item from the agenda or delay discussion relating to an item at any time.

Contracts, zoning matters, or ordinances that do not comply with the County's disclosure requirement as outlined in Section 10(2) of the County Ethics Policy are subject to being voided.

The main agenda is available on Clark County's website, [ClarkCountyNV.gov](http://ClarkCountyNV.gov). For copies of agenda items and supporting backup materials, please contact Cyndi Baroni, Agenda Coordinator, at (702) 455-3530.

This meeting has been properly noticed and posted online at [ClarkCountyNV.gov](http://ClarkCountyNV.gov) and Nevada Public Notice at <https://notice.nv.gov/>, and at the Clark County Government Center, 500 S. Grand Central Parkway, Las Vegas, NV.

**SEC. 1. OPENING CEREMONIES**

**CALL TO ORDER**

**INVOCATION**

**PLEDGE OF ALLEGIANCE**

**1. Public Comment**

2. Approval of Minutes of the Emergency Meeting on March 20, 2020. (For possible action) *(Available in the County Clerk's Office, Commission Division)*
3. Approval of Agenda with the Inclusion of Any Emergency Items and Deletion of Any Items. (For possible action)

## SEC. 2. CONSENT AGENDA: Items No. 4 through No. 52

### NOTE:

- The Board of County Commissioners, Board of Trustees, and Licensing Board may remove an item from the agenda or delay discussion relating to an item at any time.
- Consent Agenda - All matters in this sub-category are considered by the Board of County Commissioners, Board of Trustees, and Licensing Board to be routine and may be acted upon in one motion. Most agenda items are phrased for a positive action. However, the Board/Trustees may take other actions such as hold, table, amend, etc.
- Consent Agenda items are routine and can be taken in one motion unless a Commissioner/Trustee/Licensing member requests that an item be taken separately. The Chair will call for public comment on these items before a vote. For all items left on the Consent Agenda, the action taken will be staff's recommendation as indicated on the item.
- Items taken separately from the Consent Agenda by Commission/Trustees/Licensing members at the meeting will be heard following the Commissioners'/County Manager's Recognition Section.

### Purchasing & Contracts

4. Approve the selection of, and the contract award with Technical Resource Management, LLC dba Cordant Health Solutions, for RFP No. 605354-19, to provide Forensic Drug Testing, and authorize the Chief Financial Officer or her designee to sign the contract; or take other action as appropriate. (For possible action)
5. Authorize the Chair to sign the Interlocal Agreement with the National Oceanic and Atmospheric Administration / Earth System Research Laboratory / Chemical Sciences Division, U.S. Department of Commerce, for RFP No. 605440-19, for Ozone Formation and Its Sensitivity to NOx and VOCs Study; or take other action as appropriate. (For possible action)
6. Approve the award of Bid No. 605579-20, Contract for Electrical Services Countywide, to the low responsive and responsible bidder, contingent upon submission of the required bonds and insurance. Staff recommends award to Sturgeon Electric Company Inc.; or take other action as appropriate. (For possible action)

### Environment and Sustainability

7. Approve and authorize the Director to submit the 2020 Readiness and Environmental Protection Integration Challenge Program grant application to the Department of Defense for \$15,000,000 from October 2020 to September 2025 for acquisition of real property in the Coyote Springs area; authorize acceptance of funds, if awarded; and authorize the Director or her designee to execute any necessary documents related thereto. (For possible action)

### Aviation

8. Approve, adopt, and authorize the Chair to sign a resolution authorizing the Director of Aviation (Director), or her designee, to execute deferral agreements to temporarily defer payments for Joint Use Space, for a period of three (3) months effective April 1, 2020, ending on June 30, 2020 (Relief Period) for any eligible airlines operating at McCarran International Airport (Airport), which were not in default as of March 15, 2020. (For possible action)



9. Approve, adopt, and authorize the Chair to sign a resolution authorizing the Director of Aviation (Director), or her designee, to execute letters of agreement to temporarily amend all Concessions Agreements which contain Minimum Annual Guarantee (MAG) obligations and which were not in default as of March 15, 2020, to waive MAG payments, effective April 1, 2020 for an initial period of three (3) months ending on June 30, 2020 (Initial Relief Period); or as otherwise extended as authorized herein. (For possible action)

### **Public Works**

10. Approve and authorize the Chair to sign Supplemental No. 1 to the interlocal contract between Clark County and the Regional Flood Control District to increase total funds for the Wagon Trail Channel between Sunset Road and Teco Avenue project. (For possible action)
11. Approve and authorize the Chair to sign an interlocal contract between Clark County and the Regional Flood Control District for design engineering for the Duck Creek Haven Street Storm Drain project. (For possible action)
12. Approve and authorize the Chair to sign an interlocal contract between Clark County and the Regional Flood Control District for the Silverado Ranch Detention Basin, Collection & Outfall project. (For possible action)
13. Approve and authorize the Chair to sign Supplemental No 1 to Interlocal Contract No. 1089a between Clark County and the Regional Transportation Commission of Southern Nevada to increase total funds for the Cactus Avenue between Verona Wood Street and Polaris Avenue project. (For possible action)
14. Approve and authorize the Chair to sign Supplemental No. 1 to Interlocal Contract No. 1152a between Clark County and the Regional Transportation Commission of Southern Nevada for the Rainbow Boulevard between Erie Avenue and Blue Diamond Road project. (For possible action)
15. Approve and authorize the Chair to sign Supplemental No. 5 to Interlocal Contract No. 730e between Clark County and the Regional Transportation Commission of Southern Nevada to increase total funds for the Hollywood Boulevard between Charleston Boulevard and Lake Mead Boulevard project. (For possible action)
16. Approve and authorize the Chair to sign Interlocal Contract No. 1169 between Clark County and the Regional Transportation Commission of Southern Nevada for construction of the Arterial Reconstruction: 2019 Clark County Russell Road and Eastern Avenue Construction project. (For possible action)
17. Approve and authorize the Chair to sign Interlocal Agreement No. 1175 among Clark County, City of Las Vegas, City of North Las Vegas, City of Henderson, Regional Transportation Commission of Southern Nevada for engineering for the Adaptive Signal Pilot project. (For possible action)
18. Approve and authorize the respective Chairs to sign an interlocal agreement between Clark County and the Clark County Water Reclamation District for the construction and funding of sewer facilities as part of the Jones Boulevard between the Clark County 215 Beltway and Tropicana Avenue project. (Also sitting as the Clark County Water Reclamation District Board of Trustees) (For possible action)
19. Approve and authorize the respective Chairs to sign an interlocal agreement between Clark County and the Clark County Water Reclamation District for the construction and funding of sewer facilities as part of the Jones Boulevard between Blue Diamond Road and Windmill Lane project. (Also sitting as the Clark County Water Reclamation District Board of Trustees) (For possible action)

20. Approve and authorize the respective Chairs to sign an interlocal agreement between Clark County and the Clark County Water Reclamation District for the construction and funding of sewer facilities as part of the Rainbow Boulevard between Erie Avenue and Blue Diamond Road project. (Also sitting as the Clark County Water Reclamation District Board of Trustees) (For possible action)
21. Approve the fourth and final of one-year renewal options to the interlocal contract between Clark County and the Bullhead City Pest Abatement District for continued pest abatement and aquatic insect suppression services along the Colorado River. (For possible action)
22. Approve and authorize the County Manager or her designee to sign Amendment No. 1 to Cooperative (Local Public Agency) Agreement No. PR329-18-063 between Clark County and the Nevada Department of Transportation for a time extension to the agreement for the Erie Avenue Pedestrian Bridge project. (For possible action)
23. Approve and authorize the County Manager or her designee to sign Interlocal Agreement No. P066-20-015 between Clark County and Nevada Department of Transportation (NDOT) defining the cooperation and maintenance responsibilities during and after construction and for the transfer of County-owned right-of-way to NDOT for NDOT's construction of the US-95 and Bruce Woodbury Beltway Clark County 215 System-to-System Interchange Northwest. (For possible action)
24. Approve and authorize the County Manager or her designee to sign a public highway at-grade crossing improvement agreement between Clark County and the Union Pacific Railroad Company (UPRR) for the widening of Rainbow Boulevard and installation of new signal equipment at the UPRR crossing of Rainbow Boulevard between Landberg Avenue and Gary Avenue. (For possible action)
25. Approve, adopt, and authorize the Chair to sign a resolution directing the Director of Public Works to prepare the assessment roll; and approve, adopt, and authorize the Chair to sign a resolution calling for a public hearing on the assessment roll for Tuesday, May 19, 2020, at 10:00 a.m., for Special Improvement District No. 97B - Las Vegas Boulevard Beautification Maintenance between Sahara Avenue and Mandalay Bay Road. (For possible action)
26. Approve, adopt, and authorize the Chair to sign a resolution directing the Director of Public Works to prepare the assessment roll; and approve, adopt, and authorize the Chair to sign a resolution calling for a public hearing on the assessment roll for Tuesday, May 19, 2020, at 10:00 a.m., for Special Improvement District No. 114B - Las Vegas Boulevard South Strip Maintenance between Mandalay Bay Road and Russell Road. (For possible action)
27. Approve, adopt, and authorize the Chair to sign a resolution directing the Director of Public Works to prepare the assessment roll; and approve, adopt, and authorize the Chair to sign a resolution calling for a public hearing on the assessment roll for Tuesday, May 19, 2020, at 10:00 a.m., for Special Improvement District No. 126B - Boulder Highway Strip Maintenance, along Boulder Highway from Interstate 515 to the intersection of Desert Inn Road and Lamb Boulevard, and along Boulder Highway from Flamingo Road to approximately 900 feet south of East Sun Valley Drive. (For possible action)
28. Approve, adopt, and authorize the Chair to sign a resolution directing the Director of Public Works to prepare the assessment roll; and approve, adopt, and authorize the Chair to sign a resolution calling for a public hearing on the assessment roll for Tuesday, May 19, 2020, at 10:00 a.m., for Special Improvement District No. 162B - for maintenance of the dredging work in the Laughlin Lagoon Waterfront located along and adjacent to the Colorado River in the unincorporated township of Laughlin, Nevada. (For possible action)

29. Approve and authorize the Chair to sign a resolution and enter into an exchange agreement between Clark County and United States of America, acting by and through the Secretary of the Air Force, to exchange a County-owned property identified as Assessor's Parcel No. 140-10-801-001 for portions of United States of America's properties identified as Assessor's Parcel Nos. 140-16-401-007 and 140-16-801-001 needed for the construction of Carey Avenue between Nellis Boulevard and Toiyabe Street; and authorize the County Manager or her designee to sign escrow documents to complete the transaction. (For possible action)
30. Approve, adopt, authorize, and ratify the Chair's signature on the resolution to recognize the Rock 'n' Roll Las Vegas Marathon and Half Marathon as an annual event beneficial to Clark County; pursuant to Title 16, Section 16.06.150, of the Clark County Code, waive the 120-day time limitation for filing applications; and grant a waiver of Title 16, Section 16.06.060 - Restriction on streets and times for events on Las Vegas Boulevard South for a Special Event for the Rock 'n' Roll Las Vegas Marathon and Half Marathon on the third Sunday in November in the years 2020 through 2029. (For possible action)

### **Real Property Management**

31. Approve and authorize the liquor uses proposed by E.S. Bash and Design, LLC, as subtenant, on Clark County-owned land leased to EJM Arroyo Buffalo & Sunset Property, LLC, at 6520 South Buffalo Drive, Suites 145 and 150, located at the southeast corner of Buffalo Drive and Sunset Road (portion of Assessor's Parcel Number 176-03-101-001). (For possible action)
32. Approve & authorize the Director of Real Property Management or her designee to sign a License Agreement with the City of North Las Vegas (CNLV) for a Clark County Department of Juvenile Justice Services Harbor North Las Vegas site located at 3001 North Martin Luther King Boulevard, North Las Vegas, NV 89032 (Assessor's Parcel Number 139-16-101-003) for licensed use of a portion of the former Fire Station 53 building to operate the Harbor Program which is located on a portion of CNLV owned property; and sign any other necessary documents to complete and manage the License Agreement. (For possible action)
33. Approve and authorize the Chair to sign an Interlocal Agreement (Agreement) between Clark County (County) and the Las Vegas Metropolitan Police Department (Metro) to allow Metro's consultant Shot Spotter Inc. to install, operate and maintain acoustic sensors on County-owned property known as the Walnut Community Center located at 3085 N Walnut Road, Las Vegas, NV (Assessor's Parcel Number 140-18-102-024) and the Parkdale Recreation & Senior Center located at 3200 Ferndale Street, Las Vegas, NV (Assessor's Parcel Number 161-08-401-001), which are necessary for public safety; and authorize the Chair to sign any other documents necessary to facilitate the Agreement. (For possible action)
34. Approve and authorize the Director of Real Property Management (Director) or her designee to sign the Right of Entry and Grant of Easement between Clark County and Cox Communications LLC for ±1,742 square feet at the Clark County Detention Center located at 330 S Casino Center Blvd Las Vegas, NV on a portion of Assessor's Parcel Number 139-34-210-033; and authorize the Director or her designee to sign any other necessary documents related to the Right of Entry and Grant of Easement. (For possible action)
35. Approve and authorize the Director of Real Property Management or designee to amend the Purchase and Sale Agreements for two surplus land auctions that were conducted November 5 - 7, 2019 and March 3 - 5, 2020. The Resolutions of Acceptance and Sale of Real Property for the applicable sale units were approved by the Board of County Commissioners on November 19, 2019 and April 7, 2020, respectively. (For possible action)

### **Budget & Finance**

36. In accordance with NRS 244.210 and 354.220 through 354.250, approve, adopt, and authorize the Chair to sign a resolution to authorize refunds as shown on Exhibit "A. " (For possible action)
37. Approve, adopt, and authorize the Chair to sign a resolution ratifying the establishment of the Covid-19 Response Fund (2980). (For possible action)

**Clark County Water Reclamation District (*Board of County Commissioners sitting as the CCWRD Board of Trustees*)**

38. Approve and authorize the General Manager to sign an Agreement for Engineering Services with HDR Engineers, Inc. to provide design, and engineering services during construction for the FWRC Preliminary and Primary Treatment Expansion, Project No. 19005; or take other action as appropriate. (For possible action)

**University Medical Center of Southern Nevada (*Board of County Commissioners sitting as the UMC Hospital Board of Trustees*)**

39. Approve the March 2020 Physician Credentialing Activities for University Medical Center of Southern Nevada (UMC) as authorized by the Medical Executive Committee (MEC) on March 24, 2020. (For possible action)

**General Administration**

40. Pursuant to the Nevada Revised Statutes, note for the record that the Official Reports and Documents received from various County offices are on file in the County Clerk's Office, Commission Division.
41. Approve the Settlement Agreement and Mutual Release in the case Clark County v. Hanover Insurance Co., Case No. A-12-671287-C; authorize the Chair to sign the Agreement; and consider other matters properly related thereto. (For possible action)
42. Approve and authorize the Chair to sign an interlocal agreement between Clark County and the Las Vegas Metropolitan Police Department for their participation in the FY21 State Emergency Response Commission Operations, Planning, Training, and Equipment (SERCOPTE) grant program; authorize the Chair to sign federal assurances; or take other action as appropriate. (For possible action)
43. On behalf of the Local Emergency Planning Committee (LEPC), ratify the submission of the FFY20 State of Nevada Emergency Response Commission (SERC) Hazardous Materials Emergency Preparedness (HMEP) Mid Cycle grant application in the amount of \$8,595 for the Hazardous Materials training system; authorize the Chair to sign application and certified assurances; authorize the LEPC Chair to sign the award documents; and accept any funds awarded. (For possible action)
44. Approve and authorize the Chair to sign an interlocal agreement between Clark County and the City of Henderson for their participation in the FFY20 State Emergency Response Commission (SERC) Hazardous Material Emergency Preparedness (HMEP) Mid Cycle grant program; authorize the Chair to sign federal assurances; or take other action as appropriate. (For possible action)
45. On behalf of the Local Emergency Planning Committee (LEPC), ratify the submission of the FFY20 State of Nevada Emergency Response Commission (SERC) Hazardous Materials Emergency Preparedness (HMEP) Mid Cycle grant application in the amount of \$3,166 for training; authorize the Chair to sign application and certified assurances; authorize the LEPC Chair to sign the award documents; and accept any funds awarded. (For possible action)

46. Approve and authorize the Chair to sign an interlocal agreement between Clark County and the Las Vegas Metropolitan Police Department for their participation in the FFY20 State Emergency Response Commission (SERC) Hazardous Material Emergency Preparedness (HMEP) Mid Cycle grant program; authorize the Chair to sign federal assurances; or take other action as appropriate. (For possible action)
47. On behalf of the Local Emergency Planning Committee (LEPC), approve and authorize the submission of the FY21 State of Nevada Emergency Response Commission Operations, Planning, Training, and Equipment (SERCOPTE) grant application in the amount of \$29,000 for equipment; authorize the Chair to sign application and certified assurances; authorize the LEPC Chair to sign award documents; and accept any funds awarded. (For possible action)
48. Approve and authorize the Chair to sign an interlocal agreement between Clark County and University Medical Center of Southern Nevada for their participation in the FY21 State Emergency Response Commission Operations, Planning, Training, and Equipment (SERCOPTE) grant program; authorize the Chair to sign federal assurances; or take other action as appropriate. (For possible action)
49. Approve and authorize the Chair to amend and accept the submission of a grant from the Board of Regents, Nevada System of Higher Education for \$109,884.98. (For possible action)
50. Approve and authorize the Chair to amend and accept the grant from the State of Nevada Department of Health and Human Services Division of Public & Behavioral Health and the Board of Regents, Nevada System of Higher Education for \$517,467. (For possible action)
51. Accept and amend the Behavioral Health, Prevention and Treatment Program grant award from the State of Nevada Division of Public and Behavioral Health to provide residential treatment in the amount of \$324,159. (For possible action)
52. Receive a report of the donations accepted by the Clark County Asian-American Pacific Islanders Community Commission (AAPICC) from January 1, 2020 through March 31, 2020, for the use and benefit of the AAPICC. (For possible action)

### **END CONSENT AGENDA**

#### **SEC. 3. ITEMS TAKEN SEPARATELY FROM CONSENT AGENDA**

#### **SEC. 4. PUBLIC HEARINGS - 10 AM**

53. Pursuant to NRS 288.153, conduct a public hearing; and in accordance with Clark County Ordinance 3.74.030(12), ratify the University Medical Center of Southern Nevada's ("UMC") Governing Board's approval of the Fiscal Year 2020 salary plan cost of living adjustment ("COLA"), effective July 1, 2019, to the current Collective Bargaining Agreement between UMC and the International Union of Operating Engineers, Local 501 AFL-CIO ("Local 501"). (Also sitting as the Clark County Board of Hospital Trustees) (For possible action)
54. Conduct a public hearing and approve, adopt and authorize the Chair to sign a resolution approving a Public Finance Authority (Wisconsin) tax exempt 501(c)(3) refunding revenue bond issue in an amount not to exceed \$25,000,000 in order to refinance the Clark County, Nevada, Variable Rate Demand Economic Development Refunding Revenue Bonds (Bishop Gorman High School Project) Series 2011, for the financing and/or refinancing of educational facilities for use by Bishop Gorman High School. (For possible action)

55. Conduct a public hearing and approve, adopt and authorize the Chair to sign a resolution approving a Public Finance Authority (Wisconsin) tax exempt 501(c)(3) revenue bond issue in an amount not to exceed \$21,000,000 in order to finance and/or refinance the acquisition, construction, improvement, equipping and furnishing of charter school educational facilities for use by Founders Academy of Las Vegas. (For possible action)
56. Conduct a public hearing to approve, adopt, and authorize the Chair to sign an ordinance amending sections of Chapter 2.38 of the Clark County Code setting forth the rights of county officers and employees who disclose improper governmental action; and providing for other matters properly relating thereto; or take other action as appropriate. (For possible action)
57. Adopt an ordinance by emergency, amending Chapter 3.04 of the Clark County Code, authorizing the enforcement of emergency directives, orders and regulations enacted during a declared state of emergency; providing for immediate effectiveness and for other provisions related thereto. (For possible action)

### END PUBLIC HEARINGS

#### SEC. 5. BUSINESS ITEMS

58. Identify emerging issues to be addressed by staff or by the Board at future meetings; receive updates on the activities of the various regional boards and commissions; and direct staff accordingly.
59. Receive a report regarding the Clark County Fiscal Year 2021 General Fund budget; and direct staff accordingly. (For possible action)
60. Go into closed session, pursuant to NRS 241.015(3)(b)(2), to receive information from the District Attorney regarding potential or existing litigation involving a matter over which the Board has supervision, control, jurisdiction or advisory power, and to deliberate toward a decision on the matter, and pursuant to NRS Chapter 288.220, to receive a report on the status of ongoing labor negotiations; and direct staff accordingly. (For possible action)

### PUBLIC COMMENTS WITHIN THE GENERAL JURISDICTION OF THE BOARD/TRUSTEES

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ZONING AND SUBDIVISIONS

Tuesday, April 21, 2020, 10:00 a.m.

Separate Agenda

THE REGULAR JOINT MEETINGS OF THE CLARK COUNTY BOARD OF COMMISSIONERS, THE CLARK COUNTY WATER RECLAMATION BOARD OF TRUSTEES, THE UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA BOARD OF TRUSTEES, AND THE CLARK COUNTY LIQUOR AND GAMING LICENSING BOARD HELD ON THE FIRST AND THIRD TUESDAYS OF EACH MONTH, ARE VIDEO-TAPED BY CLARK COUNTY TELEVISION (CCTV). THIS MEETING WILL BE BROADCAST LIVE IN THE LAS VEGAS AREA. CLARK COUNTY TELEVISION IS AVAILABLE IN THE LAS VEGAS AREA ON CHANNEL 4/1004 ON COX CABLE AND ON CENTURYLINK ON CHANNELS 4 AND 1004 AS WELL AS IN LAUGHLIN ON CHANNEL 14 VIA SUDENLINK. LIVE STREAMING OF CCTV PROGRAMMING IS AVAILABLE AT [WWW.CLARKCOUNTYNV.GOV](http://WWW.CLARKCOUNTYNV.GOV) AND [WWW.YOUTUBE.COM/CLARKCOUNTYNV](http://WWW.YOUTUBE.COM/CLARKCOUNTYNV). CCTV IS ALSO AVAILABLE IN BOULDER CITY ON CHANNEL 4 AND IN MOAPA VALLEY ON DIGITAL CHANNEL 50.3. FOR MORE INFORMATION ABOUT THE PROGRAM SCHEDULE, PLEASE REFER TO [HTTPS://WWW.CLARKCOUNTYNV.GOV/PUBLIC-COMMUNICATIONS/PAGES/CCTV4.ASPX](https://www.clarkcountynv.gov/public-communications/pages/cctv4.aspx) OR CONTACT CCTV CHANNEL 4 AT (702) 455-6890.

**THE COUNTY CLERK KEEPS THE OFFICIAL RECORD OF ALL PROCEEDINGS OF THE COUNTY COMMISSION, THE CCWRD BOARD OF TRUSTEES, THE UMC HOSPITAL BOARD OF TRUSTEES, AND THE CLARK COUNTY LIQUOR AND GAMING LICENSING BOARD. IN ORDER TO MAINTAIN A COMPLETE AND ACCURATE RECORD OF ALL PROCEEDINGS, ANY PHOTOGRAPH, MAP, CHART, OR ANY OTHER DOCUMENT USED IN ANY PRESENTATION TO THE BOARD/TRUSTEES SHOULD BE SUBMITTED TO THE COUNTY CLERK . IF MATERIALS ARE TO BE DISTRIBUTED TO COMMISSIONERS/TRUSTEES, PLEASE PROVIDE SUFFICIENT COPIES FOR DISTRIBUTION TO THE COUNTY MANAGER, COUNTY COUNSEL, AND COUNTY CLERK.**

**EXHIBIT "3"**

**Exhibit "3"**





1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
703.243.9423  
www.consovoymccarthy.com

May 7, 2020

**Via email to ccmgr@ClarkCountyNV.gov and hand delivery**

Clark County Manager's Office  
County Commission Division  
Clark County Government Center, 6<sup>th</sup> Floor  
500 S. Grand Central Parkway  
Las Vegas, NV 89155-1601

**Re: Expedited Public Record Request**

Dear Sir or Madam:

Please allow this letter to serve as a request under the Nevada Public Records Act, NRS Chapter 239. The purpose of the request is to investigate information relevant to the ongoing litigation in *Daniel Corona et al. v. Barbara Cegavske, et al.*, First Judicial District Court Case No. CV 20-OC-00064-1B. In accordance with NRS 239.0105(2)(b), please find attached as **Exhibit 1** my declaration, which attests that the requested documents are necessary to the *Corona* litigation.

In that case, Plaintiffs challenge the modified voting procedures that the Nevada Secretary of State and the Registrar of Voters for Clark County adopted in response to the COVID-19 crisis and Governor Sisolak's emergency executive orders. A joinder filed in the *Corona* case on May 4, 2020, on behalf of the Clark County Registrar of Voters stated, "At the direction of local county officials, the Clark County Registrar of Voters is setting up two additional election day voting sites and will mail absent ballots to all registered voters, including inactive voters, at additional expense." A copy of the joinder is attached hereto as **Exhibit 1-A** for your reference. Attached to the joinder was the Affidavit of Lorena Portillo, who affirmed that the cost for additional printers to be delivered and programmed will be \$138,997.50; the cost for mailing the additional ballots will be \$184,738.01; and that "[b]ased on past experience, at least 90% of those" additional ballots "will come back as undeliverable." As such, the additional costs to be incurred by Clark County based upon the direction that Mr. Gloria received from county officials is in excess of \$300,000, with more than \$166,000 to be spent on mailings that even county officials expect will not reach their intended recipients.

In an effort to ascertain when those officials met and whether the public was able to provide input on this increased taxpayer expense, a review was conducted of possible Clark County Commission meetings where these items would have been discussed. Yet, between when the *Corona* complaint was filed on April 16, 2020 and when the joinder was filed on May 4, the only County Commission meeting where such action could have been discussed was held on Tuesday, April 21, 2020. The agenda for that meeting provides no evidence that the issues of additional in-person voting places

or mail-in ballots—or the cost for either—were addressed during this meeting.<sup>1</sup> Even if they were, under NRS 241.020 the agenda for the April 21 meeting was required to have been posted three working days before the meeting—or by April 16, 2020, the same day the *Corona* action was filed against Clark County.

The statements in the Registrar’s litigation filings raise serious questions about whether the direction he received from local Clark County officials was undertaken or provided contrary to Nevada Open Meeting Laws. *See also* Rory Appleton, *New Clark County election plan decision shrouded in mystery*, Las Vegas Review-Journal (May 6, 2020), <https://www.reviewjournal.com/news/politics-and-government/clark-county/new-clark-county-election-plan-decision-shrouded-in-mystery-2022735/>. If so, the remedy for those violations is the one set forth in NRS 241.036: “[t]he action of any public body taken in violation of any provision of this chapter is **void**.” (Emphasis added.) The court and the parties in the *Corona* action have relied upon those representations; if they are determined to have violated Nevada Open Meeting Laws and thus are void, the impact is significant and irreversible given the date of next month’s primary election. As such, we respectfully ask that your office *expedite* the instant request.

In order to investigate the representations in the Registrar’s joinder and the issues in the *Corona* case, I am requesting full, complete, non-redacted copies of the following documents:

1. All records, including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles, in the custody or control of any County Commissioner (or his or her staff) and dated between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss, or mention the decision to set up two additional voting sites for the June 2020 primary election.
2. All records, including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles, in the custody or control of any County Commissioner (or his or her staff) and dated between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss, or mention the decision to mail absent ballots to “all registered voters, including inactive voters” for the June 2020 primary election.
3. All records in the custody or control of any County Commissioner or his or her staff—including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles—dated between March 1, 2020, to and including May 4, 2020, that relate to, refer to, discuss, or mention the June 2020 primary election, and were sent to or received from any member, representative, or agent of the Nevada State Democratic Party, DNC Services Corporation/Democratic National Committee, DCCC, DSCC, Priorities USA, or current or former Nevada

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<sup>1</sup> <https://agenda.co.clark.nv.us/sirepub/mtgviewer.aspx?meetid=2091&doctype=agenda>

elected official who has run as a Democratic candidate. This should include, but not be limited to, all emails between any County Commissioner or county commission staff member and anyone with one of the following email domains: @democrats.org, @dnc.org, @dccc.org, @dsc.org, @nevadadems.com, or @nevadadems.org.

4. Records that list, identify, or otherwise indicate the names or positions of "local county officials" who provided "direction" on the updated procedures for the June 2020 primary election announced in the Registrar's May 4 joinder.

5. Records that list, identify, or otherwise indicate the names or positions of any of other persons who were involved in the process by which "local county officials" provided "direction" on the updated procedures for the June 2020 primary election announced in the Registrar's May 4 joinder.

6. Any notices by which the "local county officials" informed the public of the modified "direction" and costs incumbent in the updated process for the June 2020 election announced in the Registrar's May 4 joinder.

7. Any minutes from any meetings or hearings during which "local county officials" discussed the updated ballot mailings and set up of new voting sites.

Because the purpose of Nevada's Public Records Act is to promote government transparency and accountability, this request should be "liberally construed to maximize the public's right to access." *Reno Newspapers v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 626 (2011); see NRS 239.001(1)-(3). A check in the amount of \$50.00 is enclosed with the in-person delivery of this letter. If the cost of processing this request exceeds that amount, I will remit additional payment upon receipt of a billing.

Please do not hesitate to call or email me if you need any additional information or any clarification. I appreciate your prompt attention to this matter and look forward to hearing from you soon.

Sincerely,

CONSOVOY MCCARTHY PLLC

/s/ Tyler R. Green  
Tyler R. Green, Esq.

Enclosures: Declaration of Tyler R. Green  
Joinder in the Oppositions to Plaintiffs' Motion for Preliminary  
Injunction filed by Defendants Cegavske, Ford, Spikula, and Jakeman



1 Commission meeting where such action could have been discussed was held on Tuesday, April  
2 21, 2020.

3 7. The agenda for the April 21 meeting evidences that the issue was not addressed  
4 during this meeting. Even if it were, under NRS 241.020, the Agenda for the April 21 meeting was  
5 required to have been posted three working days before the meeting, or by April 16, 2020—the  
6 same day the complaint in the *Corona* action was filed.

7 8. The statements made in Mr. Gloria’s May 4 joinder raise serious questions about  
8 whether the direction he received from Clark County officials was arrived at or given contrary to  
9 Nevada Open Meeting Laws.

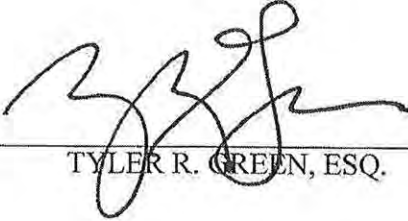
10 9. The serious questions about whether the actions undertaken by Clark County were  
11 done in violation of NRS 241 et seq, also raise serious questions about whether the remedy set  
12 forth in NRS 241.036 should apply: “[t]he action of any public body taken in violation of any  
13 provision of this chapter is **void**.” (Emphasis added.) The court and the parties in the *Corona* action  
14 have relied upon Clark County’s representations and—if they are determined to have violated  
15 Nevada Open Meeting Laws and are, in fact, void—the impact is significant and irreversible given  
16 the date of the upcoming primary election. As such, we respectfully ask that your office *expedite*  
17 the instant request.

18 10. This public records request is relevant to an investigation in anticipation of  
19 litigation. *See* NRS 239.0105(2)(b).

20 11. Given the exigent circumstances, an expedited response to the public records  
21 request is necessary.

22 12. Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the  
23 State of Nevada that the foregoing is true and correct.

24 Dated this 7<sup>th</sup> day of May, 2020.

25  
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27   
28 TYLER R. GREEN, ESQ.

1 STEVEN B. WOLFSON  
Clark County District Attorney  
2 MARY-ANNE MILLER  
County Counsel  
3 NSB #001419  
4 500 S. Grand Central Parkway  
Las Vegas, NV 89106  
5 702.455.2164  
Mary-Anne.Miller@ClarkCountyDA.com  
6 *Attorneys for Defendant Joseph P. Gloria,*  
*Clark County Registrar of Voters*

7  
8 **FIRST JUDICIAL DISTRICT COURT**  
**IN AND FOR CARSON CITY, STATE OF NEVADA**

9  
10 DANIEL CORONA, DARIN MAINS, BRIAN  
MELENDEZ, TERESA MELENDEZ,  
11 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
12 CORPORATION/DEMOCRATIC  
NATIONAL COMMITTEE, DCCC, and  
PRIORITIES USA,

13 Plaintiffs,

14 vs.

15 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State; JOSEPH  
16 P. GLORIA, in his official capacity as  
Registrar of Voters for Clark County, Nevada;  
17 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
18 Nevada; KRISTINE JAKEMAN, in her official  
capacity as the Elko County Clerk; and  
19 AARON FORD, in his official capacity as the  
Attorney General of the State of Nevada,

20 Defendants.

Case No.: 20 OC 00064 1B

Dept. No.: II

21  
22 **JOINDER IN THE OPPOSITIONS TO**  
**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**  
23 **FILED BY DEFENDANTS CEGAVSKE, FORD, SPIKULA AND JAKEMAN**

24  
25 Comes now Defendant Joseph P. Gloria, by and through his counsel, Steven B. Wolfman,  
26 District Attorney, by Mary-Anne Miller, County Counsel and files this Joinder to the Oppositions filed  
27 by the other Defendants in this action to the Plaintiffs' Motion for Preliminary Injunction. The  
28 Registrar fully supports the arguments made therein.

1 In addition to this Joinder, this Defendant attaches the affidavit of the Assistant Registrar of  
2 Voters, Lorena Portillo. At the direction of local county officials, the Clark County Registrar of Voters  
3 is setting up two additional election day voting sites and will mail absent ballots to all registered voters,  
4 including inactive voters, at additional expense.

5 The additional election day voting sites were not thought to be needed because of the ease and  
6 safety of voting by mail ballot and because of the extremely low turnout for primary elections in Clark  
7 County in the recent past. (See attached affidavit). The mailing of ballots to inactive voters will likely  
8 be similarly unnecessary because their addresses are outdated and the ballots will be returned as  
9 undeliverable. (See attached affidavit).

10 This Defendant would also like to point out the relative low signature mismatch on mail ballots  
11 experienced in Clark County. See Affidavit of Assistant Registrar. This low rate is likely attributable  
12 to the fact that voters mark their mail ballots in the comfort of their home, at their kitchen table or  
13 desk, unlike those signatures obtained by petition circulators who utilize clipboards or catch their  
14 voters in a rush coming in or out of businesses.

15 In the event there is an issue with a voter signature, Clark County will contact the voter by  
16 phone or email first and has been advertising this fact on the notice sent to voters and on its website.  
17 See Exhibit A, Notice sent to all registered voters about mail ballot. *Also accessible at:*  
18 <https://www.clarkcountynv.gov/election/pages/default.aspx>.

19 For the reasons set forth above and in the Defendants' Oppositions, Defendant Gloria asks this  
20 Court to deny the relief requested by Plaintiffs.

21 DATED this 17<sup>th</sup> day of May, 2020.

22 STEVEN B. WOLFSON  
23 DISTRICT ATTORNEY

24 By: 

25 MARY-ANNE MILLER

26 County Counsel

27 State Bar No. 001419

28 500 South Grand Central Pkwy. 5<sup>th</sup> Flr.

Las Vegas, Nevada 89155-2215

Attorneys for Defendant Joseph P. Gloria,  
Clark County Registrar of Voters

1 CERTIFICATE OF MAILING

2 I hereby certify that on the 4th day of May, 2020, I served a copy of the document by  
3 emailing a copy of the above and foregoing **JOINDER IN THE OPPOSITIONS TO PLAINTIFFS'**  
4 **MOTION FOR PRELIMINARY INJUNCTION FILED BY DEFENDANTS CEGAVSKE,**  
5 **FORD, SPIKULA AND JAKEMAN** addressed as follows:

6 David Omara, Esq.  
7 311 E. Liberty St.  
8 Reno, NV 89501  
9 david@omaraalaw.net

Rand Greenberg, Esq.  
540 Court Street, 2<sup>nd</sup> Fl.  
Elko, NV 89801  
rgreenburg@elkocountynv.net

10 Bradley Schrager, Esq.  
11 3556 East Russell Road, 2<sup>nd</sup> Fl.  
12 Las Vegas, NV 89120  
13 bschrager@wrslawyers.com


Herbert Kaplan, Esq.  
Washoe District Attorney's  
Office  
1 South Sierra Street  
Reno, NV 89501  
hkaplan@da.washoecounty.us

14 Brian Hardy, Esq.  
15 10001 W. Park Run Dr.  
16 Las Vegas, NV 89145  
17 bhardy@maclaw.com

Marc E. Elias, Esq.  
700 Thirteenth Street, NW. Ste. 800  
Washington, DC 20005-3960  
melias@perkinscoie.com

18 Districtcourtclerk@carson.org  
19 emeibert@carson.org  
20 sgreenberg@carson.org  
21 bshadron@carson.org

Gregory Zunino, Esq.  
Office of the Attorney General  
555 E. Washington Ave., Ste #3900  
Las Vegas, NV 89101  
gzunino@ag.nv.gov

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23  
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An Employee of the Clark County District Attorney's  
Office – Civil Division



**AFFIDAVIT OF  
LORENA  
PORTILLO**

1 STEVEN B. WOLFSON  
Clark County District Attorney  
2 MARY-ANNE MILLER  
County Counsel  
3 NSB #001419  
4 500 S. Grand Central Parkway  
Las Vegas, NV 89106  
5 702.455.2164  
Mary-anne.miller@clarkcountyda.com  
6 *Attorneys for Defendant Joseph P. Gloria,*  
*Clark County Registrar of Voters*  
7  
8  
9

10 **FIRST JUDICIAL DISTRICT COURT**  
**IN AND FOR CARSON CITY, STATE OF NEVADA**

11  
12 DANIEL CORONA, DARIN MAINS, BRIAN  
MELENDEZ, TERESA MELENDEZ,  
13 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
14 CORPORATION/DEMOCRATIC  
NATIONAL COMMITTEE, DCCC, and  
15 PRIORITIES USA,  
Plaintiffs,

Case No.: 20 OC 00064 1B

Dept. No.: II

16 vs.

17 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State; JOSEPH  
18 P. GLORIA, in his official capacity as  
Registrar of Voters for Clark County, Nevada;  
19 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
20 Nevada; KRISTINE JAKEMAN, in her official  
capacity as the Elko County Clerk; and  
21 AARON FORD, in his official capacity as the  
Attorney General of the State of Nevada,

22 Defendants.  
23

24 **AFFIDAVIT OF LORENA PORTILLO**

25 STATE OF NEVADA )  
26 ) ss:  
27 COUNTY OF CLARK )

28 COMES NOW, Lorena Portillo, being duly sworn, states:

1           1. I am the Assistant Registrar of Voters of Clark County, and have worked for the Clark  
2 County Election Department since August 3, 1998.

3           2. That the Clark County Registrar of Voters supported the adoption of an all-mail ballot  
4 election for the June 9, 2020 Primary Election and the temporary provisions that the Nevada  
5 Secretary of State enacted to implement that. The plan is a necessary and an appropriate way to  
6 address voter and staff safety while safeguarding the right to vote in a fair and secure election  
7 setting. The Clark County Election Department immediately undertook the complicated process and  
8 expense necessary to conduct an election in this manner, including the acquisition of mail ballot and  
9 signature verification hardware and software at an expense of \$331,750. Mail ballots will go out to  
10 active registered votes on May 6, 2020.

11           3. I have read the affidavit of Deanna Spikula, Washoe County Registrar of Voters,  
12 submitted in this action and agree with the representation of the problems that a revision to or  
13 expansion of same day registration/in person voting would present in the upcoming primary election.

14           4. To expand the provision of same-day registration and in-person voting on election day,  
15 Clark County will have to acquire the use of additional printers that are capable of printing the  
16 individualized ballot for each prospective voter with the accuracy required to have it counted with  
17 the County's automated ballot counting machines. There are only 60 printers available from the  
18 County's vendor that can be delivered and programmed by Primary Election Day. The cost of  
19 leasing the available printers for one year will be \$138,997.50.

20           5. Clark County will have to locate available sites which have both sufficient wiring and  
21 electrical facilities for the computers and printers, as well as the necessary space to adequately  
22 separate staff and voters from each other. Many sites traditionally used are not available because  
23 they do not wish to undertake the risk of exposures at this time.

24           6. If County sites are used, and the additional available printers are divided into two sites,  
25 the County could staff two additional vote centers with 25-30 additional personnel assigned to each  
26 site, who could assist the prospective voter, research voter issues, and ensure that proper distancing  
27 is maintained between 15 prospective voter registration/vote stations and waiting voters. An order  
28 that would impose more than two additional sites in Clark County would require that these existing

1 printers be spread out among the additional sites, resulting in the potential for longer lines and wait  
2 times at those sites. In turn, that expands the potential for infection spread and danger to the public.  
3 Further, each new site will require additional ADA desktops, as well as hardware and software for  
4 onsite audio voting, and additional PPE for each site, all at the unbudgeted expense of the County.

5 7. In addition, each new vote center will require additional staff to monitor voter and staff  
6 safety measures, including site disinfectant and distance spacing. Clark County will experience the  
7 same troubles outlined in Ms. Spikula's affidavit in recruiting and training staff willing to work with  
8 a constant flow of strangers during the pandemic.

9 8. It will cost Clark County \$184,738.01 (\$30,385.00 in postage; \$154,353.01 in mail ballot  
10 packet-bulk pricing) to mail ballots to inactive voters in Clark County. It will take seven days to  
11 print and assemble the ballot packets, and they will be mailed out over a period of a few days to  
12 comply with postal service bulk mail rules. Based on past experience, at least 90% of those will  
13 come back undeliverable.

14 9. The past voter turnout for primary election in even numbered years has been low. In  
15 2018, with a highly contested gubernatorial primary and two U.S. Senate nominations on the  
16 primary ballot, the turnout was only 20.41% of registered voters. In 2016, the primary election  
17 turnout was 16.16%. In 2014, it was 15.80% in the County. In 2012, the turnout was 16.23%. This  
18 year, with no hotly contested state-wide races at the top of the ballot, there is nothing special to draw  
19 voters in greater numbers than before for in-person voting.

20 10. Signature verification has not been a significant issue on absent ballots in the recent past.  
21 For example, in the 2018 Primary Election, there were only 9 mismatched signatures out of 14,708  
22 ballots returned, and in the 2018 General Election, only 59 signatures were determined to be  
23 mismatched out of a ballot return of 49,072.

24 11. Given the low voter turnout expected, the increased risk of harm to voter and staff safety  
25 alike, and in light of the new expenses already incurred, there is little justification for such increased  
26 risk and expense that any change to the plan would cause.

27 Dated this 7<sup>th</sup> day of April, 2020.

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*Lorena Portillo*  
LORENA PORTILLO

SUBSCRIBED and SWORN to before me  
this 30<sup>TH</sup> day of April, 2020.

*Heather Kellam*  
NOTARY PUBLIC in and for  
said County and State.



# EXHIBIT A



## JUNE 9, 2020, PRIMARY ELECTION NOTICE OF ALL-MAIL BALLOT ELECTION

*Clark County Election Department, 965 Trade Dr., North Las Vegas, NV 89030*

### OVERVIEW

To help keep you, your family, and our community safer by limiting interactions that could spread the coronavirus, the June 9, 2020, Primary Election is being conducted entirely by mail ballot. On or before May 18, 2020, Clark County registered voters will receive a mail ballot packet from the Clark County Election Department which will include:

- A ballot and instructions for voting a mail ballot;
- A pre-addressed, postage-paid envelope that must be used for returning voted mail ballots; and
- A list of mail ballot drop-off sites for voters to drop off their own voted mail ballot in-person, if they are unable to put their ballot in the mail.

Registered Voters who do not receive their packet by May 18, 2020, should contact us at (702) 455-VOTE (8683). We **STRONGLY ENCOURAGE VOTERS TO MAIL THEIR BALLOT** rather than drop it off in-person. Please read this entire notice for important details.

### CONTACT INFORMATION WILL HELP US ASSIST VOTERS

We strongly encourage all voters who do not have their current e-mail or phone number listed in their registration records to contact us as soon as possible and no later than **MAY 12, 2020**, to provide that information. This is important because if a mail ballot has no signature on the envelope, or if the signature does not match the one the Election Department has on file, we will need to contact the voter as soon as possible to resolve this issue. To check if your phone number or e-mail is in your voter registration records or to add it if it is not:

- Log-in on the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov); or
- Send an e-mail to [elinfo@ClarkCountyNV.gov](mailto:elinfo@ClarkCountyNV.gov); or
- Call us at (702) 455-VOTE (8683).

Please note that NRS 293.558 requires the Clark County Election Department to keep your e-mail address **CONFIDENTIAL**. Meaning, it may not be given to third parties.

## CLOSE OF STANDARD REGISTRATION

The deadlines to register to vote or update existing voter registration by mail or online in time for the June 9, 2020, Primary Election and still receive a regular mail ballot are below. After those dates pass, voters who wish to register to vote or make changes to their existing voter registration will have to do so through the same-day registration or same-day updates process, either online or in-person. Those voters may only vote a paper provisional mail ballot in-person on the spot at the Clark County Election Department and will need to show current, valid identification, and, if needed, proof of residency. See "Same Day Registration and Same-Day Updates of Existing Registration" starting on page 5 for more information. We strongly urge voters to register to vote or to make any necessary updates as soon as possible so they may avoid having to go to the Election Department offices.

- **May 12, 2020**, is the last day to register to vote or update your existing voter registration by mail for the June 9, 2020, Primary Election.
- **May 21, 2020**, is the last day to register to vote or update your existing registration on the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov).

## RETURNING YOUR VOTED MAIL BALLOT

The Clark County Election Department will process and count voted mail ballots that are returned in the envelope provided, **but only if the outside of the envelope is signed by the voter**. This is required for verification purposes.

The ballots must be submitted and received in one of the following ways:

- **Mailed Through the U.S. Post Office:** We ***STRONGLY ENCOURAGE VOTERS TO RETURN THEIR VOTED MAIL BALLOT THROUGH THE U.S. POST OFFICE*** rather than drop it off in-person. To send it by postal mail, voters must:
  - Seal their voted mail ballot in the pre-addressed, postage-paid, return envelope included in the packet they will receive.
  - **Sign the outside of the envelope in the space provided for their signature.**
  - Make sure their signed envelope is postmarked by June 9, 2020. Note that we must receive properly postmarked ballots by 5:00 p.m. on June 16, 2020, (7 days after the Election Day) for them to be counted.
- **Dropped-Off In-Person:** Voters may also drop off their own voted mail ballot, but only at one of the locations in the schedules on pages 3-5 during the listed dates and hours. To do this, voters must:
  - Seal their voted mail ballot in the return envelope included in the packet they will receive.
  - **Sign the outside of the envelope in the space provided for their signature.**
  - Drop off their voted mail ballot no later than 7:00 p.m. on Election Day.



### DROP-OFF LOCATIONS THROUGH JUNE 5, 2020, (FRIDAY)

These locations, dates, and hours for dropping off mail ballots will be available as soon as voters begin receiving their mail ballots and will continue through June 5.

DROP-OFF LOCATIONS	DATES AND HOURS
<b>CLARK COUNTY ELECTION DEPARTMENT</b> 965 Trade Dr., North Las Vegas <i>Only the Clark County Election Dept. will be available on May 25, 2020, Memorial Day.</i>	UP TO MAY 22: • MON.-FRI.: 8am-5pm • SAT. AND SUN: CLOSED
	MAY 23-JUNE 3, EVERY DAY (including Sat., Sun., and Memorial Day): 8am-6pm
	JUNE 4-5, THURS.-FRI.: 8am-8pm
<b>CLARK COUNTY GOVERNMENT CENTER</b> 1 <sup>st</sup> Floor, Rotunda 500 S. Grand Central Pkwy., Las Vegas	MONDAY-FRIDAY: 8am-5pm
	CLOSED: All Saturdays, Sundays, and May 25, Memorial Day Holiday
<b>BOULDER CITY, CITY CLERK</b> City Hall, Upstairs, 401 California Ave. Boulder City	MONDAY-THURSDAY: 7am-6pm
	CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day
<b>HENDERSON CITY CLERK</b> City Hall, Front of Bldg., 240 S. Water St. Henderson	MONDAY-THURSDAY: 7:30am-5:30pm
	CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day
<b>LAS VEGAS CITY CLERK</b> City Hall, 2 <sup>nd</sup> Floor, 495 S. Main St. Las Vegas	MONDAY-THURSDAY: 7am-5:30pm
	CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day
<b>MESQUITE CITY CLERK</b> City Hall, 10 E. Mesquite Blvd. Mesquite	MONDAY-THURSDAY: 8am-5pm
	FRIDAY: 8am-3:30pm
	CLOSED: All Saturdays, Sundays, and May 25, Memorial Day
<b>NORTH LAS VEGAS CITY CLERK</b> City Hall, 8 <sup>th</sup> Floor 2250 Las Vegas Blvd. North, North Las Vegas	MONDAY-THURSDAY: 8am-5:45pm
	CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day

### DROP-OFF LOCATION ON JUNE 8, 2020, (MONDAY)

On this date, voters may drop-off their own voted mail ballot in-person, from 8:00 a.m. to 5:00 p.m. at the Clark County Election Department, 965 Trade Dr., North Las Vegas.

**DROP-OFF LOCATIONS ON JUNE 9, 2020, PRIMARY ELECTION DAY (TUESDAY)**

On Primary Election Day, voters may drop-off their own voted mail ballot in-person at the locations and during the times listed below.

<b>DROP-OFF LOCATIONS ON JUNE 9 PRIMARY ELECTION DAY, OPEN 7:00 A.M. TO 7:00 P.M.</b>
CLARK COUNTY ELECTION DEPARTMENT, 965 Trade Dr., North Las Vegas
BOB PRICE RECREATION CENTER, 2050 Bonnie Ln., Las Vegas
BUNKERVILLE COMMUNITY CENTER, 200 W. Virgin St., Bunkerville
CLARK COUNTY FAIRGROUNDS - LOGANDALE, 1301 Whipple Ave., Logandale
DESERT BREEZE COMMUNITY CENTER, 8275 Spring Mountain Rd., Las Vegas
DR. WILLIAM U. PEARSON COMMUNITY CENTER, 1625 W. Carey Ave., North Las Vegas
ENTERPRISE LIBRARY, 25 E. Shelbourne Ave., Las Vegas
HOLLYWOOD RECREATION CENTER, 1650 S. Hollywood Blvd., Las Vegas
INDIAN SPRINGS COMMUNITY CENTER, 715 W. Gretta Lane, Indian Springs
LAUGHLIN LIBRARY, 2840 S. Needles Highway, Laughlin
MOAPA COMMUNITY CENTER, 1340 E. Highway 168, Moapa
MOAPA TRIBAL ADMINISTRATION BUILDING, 1 Lincoln St., Moapa
MOAPA VALLEY COMMUNITY CENTER - OVERTON, 300 N. Moapa Blvd., Overton
MOUNTAIN CREST COMMUNITY CENTER, 4701 N. Durango Dr., Las Vegas
PARADISE RECREATION CENTER, 4775 S. McLeod Dr., Las Vegas
PASEO VERDE LIBRARY, 280 S. Green Valley Pkwy., Henderson
SAHARA WEST LIBRARY, 9600 W. Sahara Ave., Las Vegas
SANDY VALLEY COMMUNITY CENTER, 650 W. Quartz Ave., Sandy Valley
SEARCHLIGHT COMMUNITY CENTER, 200 Michael Wendell Way, Searchlight
SILVER MESA RECREATION CENTER, 4025 Allen Ln., North Las Vegas
VETERANS MEMORIAL LEISURE CENTER, 101 N. Pavilion Center Dr., Las Vegas
WALNUT COMMUNITY CENTER, 3075 N. Walnut Rd., Las Vegas
WHITNEY RECREATION CENTER, 5712 E. Missouri Ave., Las Vegas
WINDMILL LIBRARY, 7060 W. Windmill Ln., Las Vegas

**ADDITIONAL DROP-OFF LOCATIONS ON JUNE 9  
PRIMARY ELECTION DAY, VARYING HOURS**

BOULDER CITY, CITY CLERK, City Hall, Upstairs, 401 California Ave., Boulder City  
7:00 a.m. to 6:00 p.m.

CLARK COUNTY GOVERNMENT CENTER, 1<sup>st</sup> Floor, Rotunda  
500 S. Grand Central Pkwy., Las Vegas  
8:00 a.m. to 5:00 p.m.

HENDERSON CITY CLERK, City Hall, Front of Building, 240 S. Water St., Henderson  
7:30 a.m. to 5:30 p.m.

LAS VEGAS CITY CLERK, City Hall, 2<sup>nd</sup> Floor, 495 S. Main St., Las Vegas  
7:00 a.m. to 5:30 p.m.

MESQUITE CITY CLERK, City Hall, 10 E. Mesquite Blvd., Mesquite  
8:00 a.m. to 5:00 p.m.

NORTH LAS VEGAS CITY CLERK, City Hall, 8<sup>th</sup> Floor, 2250 Las Vegas Bl. North, N. Las Vegas  
8:00 a.m. to 5:45 p.m.

**SAME-DAY REGISTRATION AND  
SAME-DAY UPDATES OF EXISTING REGISTRATION**

**Online Registration and Updates:** If you could not register to vote or update your existing voter registration by mail by May 12, 2020, you still may do so through the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov) through June 4, 2020 (Thursday).

- **May 13 to May 21:** If you register to vote or update your existing registration online between May 13 (Wednesday) and May 21, 2020, (Thursday), within about a week you will receive a regular mail ballot with your updated name, precinct, party, etc., as applicable.
- **May 22 to June 4 (Online Same-Day Registration and Same-Day Updates):** If you register to vote or update your existing registration online between May 22 (Friday) and June 4, 2020 (Thursday), you may only vote a paper **PROVISIONAL MAIL BALLOT IN-PERSON AT THE CLARK COUNTY ELECTION DEPARTMENT, WHICH YOU MUST IMMEDIATELY TURN IN.** You may not take your ballot out of the building. You must also show acceptable identification and, if needed, proof of residency. See page 6 for details on identification and provisional ballot voting. The address is **965 Trade Dr., Suite F, North Las Vegas, NV.** The dates for in-person voting are May 23 (Saturday) to June 5 (Friday) and also on June 9 (Tuesday). See page 7 for the "In-Person Voting Location and Schedule," including hours and a map.

**Identification and Proof of Residency:** If you register to vote or update your existing voter registration online from May 22 to June 4, or in-person from May 23 to June 5 or on June 9, you must provide identification and, if needed, proof of residency, to vote a paper provisional mail ballot in-person on the spot at the Clark County Election Department. The identification requirements are:

- Your unexpired Nevada (NV) Department of Motor Vehicles (DMV) Driver's License with your current residential address which must match the address in your registration; or
- Your unexpired NV State Identification Card with your current residential address, which must match the address in your registration; or
- Your NV DMV temporary "Interim Document" with your current residential address, which must match the address in your voter registration.
- **IF** the address on your identification is not your current residential address, meaning it does not match your voter registration residential address and/or if it is not where you currently live, then you must also provide proof of current residency, such as:
  - A military identification card; or
  - A utility bill (electric, gas, oil, water, sewer, septic, phone, cable); or
  - A bank or credit union statement; or
  - A paycheck; or
  - An income tax return; or
  - A mortgage statement, or residential rental or lease agreement; or
  - A motor vehicle registration; or
  - A property tax statement; or
  - Any other document issued by a governmental agency.

**Paper Provisional Mail Ballot Overview and Verification Process:** If you register to vote or update your voter registration either online from May 22 to June 4, or in-person from May 23 to June 5 or on June 9, you may only vote a paper provisional mail ballot by appearing in-person at the Clark County Election Department and voting on the spot. You must also provide the identification indicated above. Your paper provisional mail ballot will have all of the contests and candidates that are on a regular ballot. It will differ from a regular ballot in that it will be counted only after verification that:

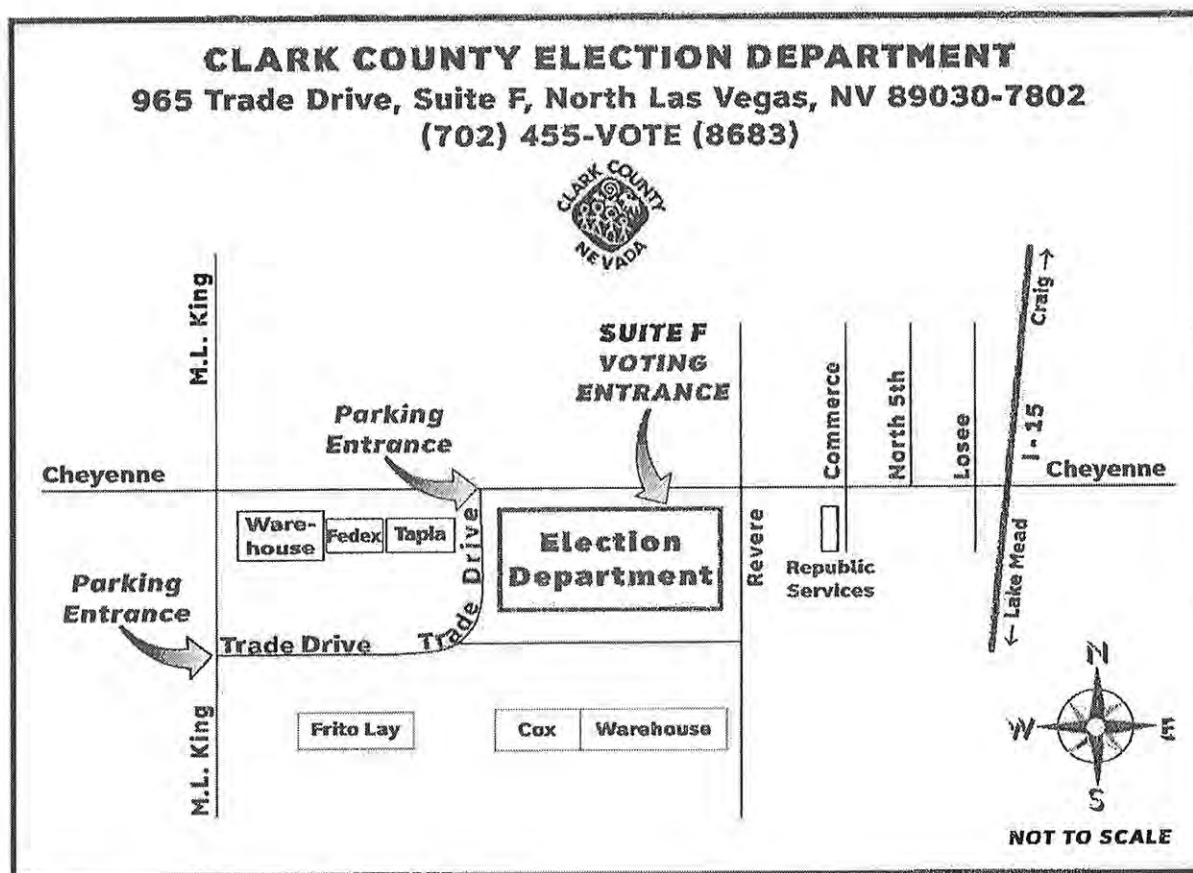
- You were qualified to cast a ballot in the current election;
- You did not cast multiple ballots in the same election;
- You showed acceptable identification when you voted (see above); and
- **IF** needed, you provided acceptable proof of residency (see above).

**In-Person Same-Day Registration and Updates, May 23-June 5 and on June 9:** If you could not register to vote or update your existing voter registration by mail by May 12, 2020, or online by May 21, you may do so in-person and vote a paper provisional mail ballot on the spot at the Clark County Election Department from **May 23 (Saturday) to June 5, 2020 (Friday)**, or on **June 9, 2020 (Tuesday, Primary Election Day)**. You may not take your ballot out of the building and you must turn it in immediately. You must show acceptable identification and, if needed, proof of residency. See page 6 for details on identification and provisional ballot voting. The address is 965 Trade Dr., Suite F, North Las Vegas, NV. See below for the "In-Person Voting Location and Schedule," including hours and a map.

### **IN-PERSON VOTING LOCATION AND SCHEDULE**

**May 23 (Sat.)-June 5 (Fri.) and June 9, 2020 (Tues., Primary Election Day)**

- May 23-June 3, every day (including Saturday, Sunday, and Memorial Day on May 25): 8:00 a.m.-6:00 p.m.
- June 4-5, Thursday-Friday: 8:00 a.m.-8:00 p.m.
- June 9, Tuesday, Primary Election Day: 7:00 a.m.-7:00 p.m.



## VOTERS WITH DISABILITIES

Several options are available for voters with disabilities:

- Electronic registration and electronic voting will be offered through Nevada's Effective Absentee System for Elections (EASE). This option may be accessed on the Nevada Secretary of State's website at [www.NVEASE.gov](http://www.NVEASE.gov).
- Voters who register to vote by mail by May 12, 2020, or online by May 21, 2020, may call the County Election Department at (702) 455-VOTE (8683) to request an electronic ballot.
- Unassisted and private in-person voting will be available at the Election Department. The location, dates, and times will be the same as for "In-Person Voting" (see page 7).

## VOTING IN THE NOVEMBER 3 GENERAL ELECTION

At this time, we expect to return to in-person voting for the November 3, 2020, General Election. If that occurs, voters who had not previously requested to receive mail ballots for every election, which is most voters, will be expected to vote at regular polling places. For more information about the General Election see the Election Department's webpage at [www.ClarkCountyNV.gov/vote](http://www.ClarkCountyNV.gov/vote).

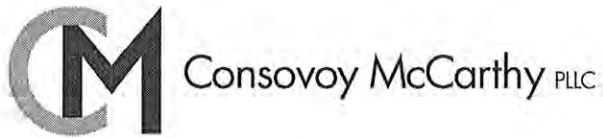
## QUESTIONS

More information about the all mail-in Primary Election and other resources for voters are available on the Election Department's website at [www.ClarkCountyNV.gov/vote](http://www.ClarkCountyNV.gov/vote). You may also e-mail questions to the Department at [Elinfo@ClarkCountyNV.gov](mailto:Elinfo@ClarkCountyNV.gov), or call (702) 455-VOTE (8683) or 711 for TTY/TDD devices.

**VOTING OR ATTEMPTING TO VOTE MORE  
THAN ONCE IN THE SAME ELECTION  
IS A FELONY. (NRS 293.780)**

EXHIBIT "4"

Exhibit "4"



Consvoy McCarthy PLLC

1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
703.243.9423  
www.consvoymccarthy.com

May 7, 2020

Via email to [jpg@ClarkCountyNV.gov](mailto:jpg@ClarkCountyNV.gov) and hand delivery

Clark County Registrar of Voters  
Attn: Joe P. Gloria  
Clark County Election Department  
965 Trade Drive, Suite A  
North Las Vegas, NV 89030-7802

**Re: Expedited Public Record Request**

Dear Sir or Madam:

Please allow this letter to serve as a request under the Nevada Public Records Act, NRS Chapter 239. The purpose of the request is to investigate information relevant to the ongoing litigation in *Daniel Corona et al. v. Barbara Cegavske, et al.*, First Judicial District Court Case No. CV 20-OC-00064-1B. In accordance with NRS 239.0105(2)(b), please find attached as **Exhibit 1** my declaration, which attests that the requested documents are necessary to the *Corona* litigation.

In that case, Plaintiffs challenge the modified voting procedures that the Nevada Secretary of State and the Registrar of Voters for Clark County adopted in response to the COVID-19 crisis and Governor Sisolak's emergency executive orders. A joinder filed in the *Corona* case on May 4, 2020, on behalf of the Clark County Registrar of Voters stated, "At the direction of local county officials, the Clark County Registrar of Voters is setting up two additional election day voting sites and will mail absent ballots to all registered voters, including inactive voters, at additional expense." A copy of the joinder is attached hereto as **Exhibit 1-A** for your reference. Attached to the joinder was the Affidavit of Lorena Portillo, who affirmed that the cost for additional printers to be delivered and programmed will be \$138,997.50; the cost for mailing the additional ballots will be \$184,738.01; and that "[b]ased on past experience, at least 90% of those" additional ballots "will come back as undeliverable." As such, the additional costs to be incurred by Clark County based upon the direction that Mr. Gloria received from county officials is in excess of \$300,000, with more than \$166,000 to be spent on mailings that even county officials expect will not reach their intended recipient.

In an effort to ascertain when those officials met and whether the public was able to provide input on this increased taxpayer expense, a review was conducted of possible Clark County Commission meetings where these items would have been discussed. Yet, between when the *Corona* complaint was filed on April 16, 2020 and when the joinder was filed on May 4, the only County Commission meeting where such action could have been discussed was held on Tuesday, April 21, 2020. The agenda for that meeting provides no evidence that the issues of additional in-person voting places



or mail-in ballots—or the cost for either—were addressed during this meeting.<sup>1</sup> Even if they were, under NRS 241.020 the agenda for the April 21 meeting was required to have been posted three working days before the meeting—or by April 16, 2020, the same day the *Corona* action was filed against Clark County.

The statements in the Registrar’s litigation filings raise serious questions about whether the direction he received from local Clark County officials was undertaken or provided contrary to Nevada Open Meeting Laws. *See also* Rory Appleton, *New Clark County election plan decision shrouded in mystery*, Las Vegas Review-Journal (May 6, 2020), <https://www.reviewjournal.com/news/politics-and-government/clark-county/new-clark-county-election-plan-decision-shrouded-in-mystery-2022735/>. If so, the remedy for those violations is the one set forth in NRS 241.036: “[t]he action of any public body taken in violation of any provision of this chapter is **void**.” (Emphasis added.) The court and the parties in the *Corona* action have relied upon those representations; if they are determined to have violated Nevada Open Meeting Laws and thus are void, the impact is significant and irreversible given the date of next month’s primary election. As such, we respectfully ask that your office *expedite* the instant request.

In order to investigate the representations in the Registrar’s *Corona* joinder and the issues in the *Corona* case, I am requesting full, complete, non-redacted copies of the following documents:

1. All records, including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles, in the custody or control of Joseph P. Gloria or Lorena Portillo and dated between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss, or mention the decision to set up two additional voting sites for the June 2020 primary election.
2. All records, including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles, in the custody or control of Joseph P. Gloria or Lorena Portillo and dated between March 23, 2020 and May 5, 2020, that relate to, refer to, discuss, or mention the decision to mail absent ballots to “all registered voters, including inactive voters” for the June 2020 primary election.
3. All records in the custody or control of Joseph P. Gloria or Lorena Portillo—including but not limited to correspondence such as emails, text messages, memoranda, letters, and facsimiles—dated between March 1, 2020, to and including May 4, 2020, that relate to, refer to, discuss, or mention the June 2020 primary election, and were sent to or received from any member, representative, or agent of the Nevada State Democratic Party, DNC Services Corporation/Democratic National Committee, DCCC, DSCC, Priorities USA, or current or former Nevada

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<sup>1</sup> <https://agenda.co.clark.nv.us/sirepub/mtgviewer.aspx?meetid=2091&doctype=agenda>

elected official who has run as a Democratic candidate. This should include, but not be limited to, all emails between Joseph P. Gloria or Lorena Portillo and anyone with one of the following email domains: @democrats.org, @dnc.org, @dccc.org, @dsc.org, @nevadadems.com, or @nevadadems.org.

4. Records that list, identify, or otherwise indicate the names or positions of "local county officials" who provided "direction" on the updated procedures for the June 2020 primary election announced in the Registrar's May 4 joinder.

5. Records that list, identify, or otherwise indicate the names or positions of any of other persons who were involved in the process by which "local county officials" provided "direction" on the updated procedures for the June 2020 primary election announced in the Registrar's May 4 joinder.

6. Any notices by which the "local county officials" informed the public of the modified "direction" and costs incumbent in the updated process for the June 2020 election announced in the Registrar's May 4 joinder.

7. Any minutes from any meetings or hearings during which "local county officials" discussed the updated ballot mailings and set up of new voting sites.

Because the purpose of Nevada's Public Records Act is to promote government transparency and accountability, this request should be "liberally construed to maximize the public's right to access." *Reno Newspapers v. Gibbons*, 127 Nev. 873, 878, 266 P.3d 623, 626 (2011); see NRS 239.001(1)-(3). A check in the amount of \$50.00 is enclosed with the in-person delivery of this letter. If the cost of processing this request exceeds that amount, I will remit additional payment upon receipt of a billing.

Please do not hesitate to call or email me if you need any additional information or any clarification. I appreciate your prompt attention to this matter and look forward to hearing from you soon.

Sincerely,

CONSOVOY MCCARTHY PLLC

/s/ Tyler R. Green  
Tyler R. Green, Esq.

cc: Mary-Anne Miller – via email at mary-anne.miller@clarkcountyda.com

Enclosures: Declaration of Tyler R. Green

Joinder in the Oppositions to Plaintiffs' Motion for Preliminary Injunction filed by Defendants Cegavske, Ford, Spikula, and Jakeman



1 Commission meeting where such action could have been discussed was held on Tuesday, April  
2 21, 2020.

3 7. The agenda for the April 21 meeting evidences that the issue was not addressed  
4 during this meeting. Even if it were, under NRS 241.020, the Agenda for the April 21 meeting was  
5 required to have been posted three working days before the meeting, or by April 16, 2020—the  
6 same day the complaint in the *Corona* action was filed.

7 8. The statements made in Mr. Gloria's May 4 joinder raise serious questions about  
8 whether the direction he received from Clark County officials was arrived at or given contrary to  
9 Nevada Open Meeting Laws.

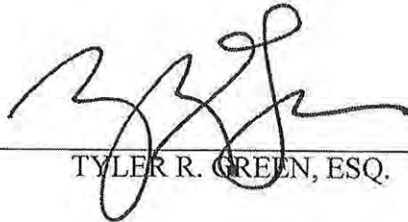
10 9. The serious questions about whether the actions undertaken by Clark County were  
11 done in violation of NRS 241 et seq. also raise serious questions about whether the remedy set  
12 forth in NRS 241.036 should apply: "[t]he action of any public body taken in violation of any  
13 provision of this chapter is **void**." (Emphasis added.) The court and the parties in the *Corona* action  
14 have relied upon Clark County's representations and—if they are determined to have violated  
15 Nevada Open Meeting Laws and are, in fact, void—the impact is significant and irreversible given  
16 the date of the upcoming primary election. As such, we respectfully ask that your office *expedite*  
17 the instant request.

18 10. This public records request is relevant to an investigation in anticipation of  
19 litigation. *See* NRS 239.0105(2)(b).

20 11. Given the exigent circumstances, an expedited response to the public records  
21 request is necessary.

22 12. Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the  
23 State of Nevada that the foregoing is true and correct.

24 Dated this 7<sup>th</sup> day of May, 2020.

25  
26  
27   
28 TYLER R. GREEN, ESQ.

1 STEVEN B. WOLFSON  
Clark County District Attorney  
2 MARY-ANNE MILLER  
County Counsel  
3 NSB #001419  
4 500 S. Grand Central Parkway  
Las Vegas, NV 89106  
5 702.455.2164  
[Mary-Anne.Miller@ClarkCountyDA.com](mailto:Mary-Anne.Miller@ClarkCountyDA.com)  
6 *Attorneys for Defendant Joseph P. Gloria,*  
*Clark County Registrar of Voters*  
7

8 **FIRST JUDICIAL DISTRICT COURT**  
**IN AND FOR CARSON CITY, STATE OF NEVADA**

9  
10 DANIEL CORONA, DARIN MAINS, BRIAN  
MELENDEZ, TERESA MELENDEZ,  
11 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
CORPORATION/DEMOCRATIC  
12 NATIONAL COMMITTEE, DCCC, and  
PRIORITIES USA,

Case No.: 20 OC 00064 1B

Dept. No.: II

13 Plaintiffs,

14 vs.

15 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State; JOSEPH  
16 P. GLORIA, in his official capacity as  
Registrar of Voters for Clark County, Nevada;  
17 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
18 Nevada; KRISTINE JAKEMAN, in her official  
capacity as the Elko County Clerk; and  
19 AARON FORD, in his official capacity as the  
Attorney General of the State of Nevada,

20 Defendants.

21  
22 **JOINDER IN THE OPPOSITIONS TO**  
**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**  
23 **FILED BY DEFENDANTS CEGAVSKE, FORD, SPIKULA AND JAKEMAN**  
24

25 Comes now Defendant Joseph P. Gloria, by and through his counsel, Steven B. Wolfman,  
26 District Attorney, by Mary-Anne Miller, County Counsel and files this Joinder to the Oppositions filed  
27 by the other Defendants in this action to the Plaintiffs' Motion for Preliminary Injunction. The  
28 Registrar fully supports the arguments made therein.

1 In addition to this Joinder, this Defendant attaches the affidavit of the Assistant Registrar of  
2 Voters, Lorena Portillo. At the direction of local county officials, the Clark County Registrar of Voters  
3 is setting up two additional election day voting sites and will mail absent ballots to all registered voters,  
4 including inactive voters, at additional expense.

5 The additional election day voting sites were not thought to be needed because of the ease and  
6 safety of voting by mail ballot and because of the extremely low turnout for primary elections in Clark  
7 County in the recent past. (See attached affidavit). The mailing of ballots to inactive voters will likely  
8 be similarly unnecessary because their addresses are outdated and the ballots will be returned as  
9 undeliverable. (See attached affidavit).

10 This Defendant would also like to point out the relative low signature mismatch on mail ballots  
11 experienced in Clark County. See Affidavit of Assistant Registrar. This low rate is likely attributable  
12 to the fact that voters mark their mail ballots in the comfort of their home, at their kitchen table or  
13 desk, unlike those signatures obtained by petition circulators who utilize clipboards or catch their  
14 voters in a rush coming in or out of businesses.

15 In the event there is an issue with a voter signature, Clark County will contact the voter by  
16 phone or email first and has been advertising this fact on the notice sent to voters and on its website.  
17 See Exhibit A, Notice sent to all registered voters about mail ballot. *Also accessible at:*  
18 <https://www.clarkcountynv.gov/election/pages/default.aspx>.

19 For the reasons set forth above and in the Defendants' Oppositions, Defendant Gloria asks this  
20 Court to deny the relief requested by Plaintiffs.

21 DATED this 17 day of May, 2020.

22 STEVEN B. WOLFSON  
23 DISTRICT ATTORNEY

24 By: 

25 MARY-ANNE MILLER

26 County Counsel

27 State Bar No. 001419

28 500 South Grand Central Pkwy. 5<sup>th</sup> Flr.

Las Vegas, Nevada 89155-2215

Attorneys for Defendant Joseph P. Gloria,

Clark County Registrar of Voters

1 CERTIFICATE OF MAILING

2 I hereby certify that on the 4th day of May, 2020, I served a copy of the document by  
3 emailing a copy of the above and foregoing **JOINDER IN THE OPPOSITIONS TO PLAINTIFFS'**  
4 **MOTION FOR PRELIMINARY INJUNCTION FILED BY DEFENDANTS CEGAVSKE,**  
5 **FORD, SPIKULA AND JAKEMAN** addressed as follows:

6 David Omara, Esq.  
7 311 E. Liberty St.  
8 Reno, NV 89501  
9 david@omaralaw.net

Rand Greenberg, Esq.  
540 Court Street, 2<sup>nd</sup> Fl.  
Elko, NV 89801  
rgreenburg@elkocountynv.net

9 Bradley Schrager, Esq.  
10 3556 East Russell Road, 2<sup>nd</sup> Fl.  
11 Las Vegas, NV 89120  
12 bschrager@wrslawyers.com


Herbert Kaplan, Esq.  
Washoe District Attorney's  
Office  
1 South Sierra Street  
Reno, NV 89501  
hkaplan@da.washoecounty.us

13 Brian Hardy, Esq.  
14 10001 W. Park Run Dr.  
Las Vegas, NV 89145  
bhardy@maclaw.com

Marc E. Elias, Esq.  
700 Thirteenth Street, NW. Ste. 800  
Washington, DC 20005-3960  
melias@perkinscoie.com

15 [Districtcourtclerk@carson.org](mailto:Districtcourtclerk@carson.org)  
16 [emeibert@carson.org](mailto:emeibert@carson.org)  
17 [sgreenberg@carson.org](mailto:sgreenberg@carson.org)  
18 [bshadron@carson.org](mailto:bshadron@carson.org)

Gregory Zunino, Esq.  
Office of the Attorney General  
555 E. Washington Ave., Ste #3900  
Las Vegas, NV 89101  
gzunino@ag.nv.gov

19   
20 An Employee of the Clark County District Attorney's  
21 Office – Civil Division  
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**AFFIDAVIT OF  
LORENA  
PORTILLO**



1 STEVEN B. WOLFSON  
Clark County District Attorney  
2 MARY-ANNE MILLER  
County Counsel  
3 NSB #001419  
4 500 S. Grand Central Parkway  
Las Vegas, NV 89106  
5 702.455.2164  
[Mary-anne.miller@clarkcountyda.com](mailto:Mary-anne.miller@clarkcountyda.com)  
6 *Attorneys for Defendant Joseph P. Gloria,*  
*Clark County Registrar of Voters*  
7  
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9

10 **FIRST JUDICIAL DISTRICT COURT**  
**IN AND FOR CARSON CITY, STATE OF NEVADA**

11  
12 DANIEL CORONA, DARIN MAINS, BRIAN  
MELENDEZ, TERESA MELENDEZ,  
13 NEVADA STATE DEMOCRATIC PARTY,  
DNC SERVICES  
14 CORPORATION/DEMOCRATIC  
NATIONAL COMMITTEE, DCCC, and  
15 PRIORITIES USA,  
Plaintiffs,

Case No.: 20 OC 00064 1B

Dept. No.: II

16 vs.

17 BARBARA CEGAVSKE, in her official  
capacity as Nevada Secretary of State; JOSEPH  
18 P. GLORIA, in his official capacity as  
Registrar of Voters for Clark County, Nevada;  
19 DEANNA SPIKULA, in her official capacity  
as Registrar of Voters for Washoe County,  
20 Nevada; KRISTINE JAKEMAN, in her official  
capacity as the Elko County Clerk; and  
21 AARON FORD, in his official capacity as the  
Attorney General of the State of Nevada,  
22  
23 Defendants.

24 **AFFIDAVIT OF LORENA PORTILLO**

25 STATE OF NEVADA )  
26 ) ss:  
27 COUNTY OF CLARK )

28 COMES NOW, Lorena Portillo, being duly sworn, states:

1           1. I am the Assistant Registrar of Voters of Clark County, and have worked for the Clark  
2 County Election Department since August 3, 1998.

3           2. That the Clark County Registrar of Voters supported the adoption of an all-mail ballot  
4 election for the June 9, 2020 Primary Election and the temporary provisions that the Nevada  
5 Secretary of State enacted to implement that. The plan is a necessary and an appropriate way to  
6 address voter and staff safety while safeguarding the right to vote in a fair and secure election  
7 setting. The Clark County Election Department immediately undertook the complicated process and  
8 expense necessary to conduct an election in this manner, including the acquisition of mail ballot and  
9 signature verification hardware and software at an expense of \$331,750. Mail ballots will go out to  
10 active registered votes on May 6, 2020.

11           3. I have read the affidavit of Deanna Spikula, Washoe County Registrar of Voters,  
12 submitted in this action and agree with the representation of the problems that a revision to or  
13 expansion of same day registration/in person voting would present in the upcoming primary election.

14           4. To expand the provision of same-day registration and in-person voting on election day,  
15 Clark County will have to acquire the use of additional printers that are capable of printing the  
16 individualized ballot for each prospective voter with the accuracy required to have it counted with  
17 the County's automated ballot counting machines. There are only 60 printers available from the  
18 County's vendor that can be delivered and programmed by Primary Election Day. The cost of  
19 leasing the available printers for one year will be \$138,997.50.

20           5. Clark County will have to locate available sites which have both sufficient wiring and  
21 electrical facilities for the computers and printers, as well as the necessary space to adequately  
22 separate staff and voters from each other. Many sites traditionally used are not available because  
23 they do not wish to undertake the risk of exposures at this time.

24           6. If County sites are used, and the additional available printers are divided into two sites,  
25 the County could staff two additional vote centers with 25-30 additional personnel assigned to each  
26 site, who could assist the prospective voter, research voter issues, and ensure that proper distancing  
27 is maintained between 15 prospective voter registration/vote stations and waiting voters. An order  
28 that would impose more than two additional sites in Clark County would require that these existing

1 printers be spread out among the additional sites, resulting in the potential for longer lines and wait  
2 times at those sites. In turn, that expands the potential for infection spread and danger to the public.  
3 Further, each new site will require additional ADA desktops, as well as hardware and software for  
4 onsite audio voting, and additional PPE for each site, all at the unbudgeted expense of the County.

5 7. In addition, each new vote center will require additional staff to monitor voter and staff  
6 safety measures, including site disinfectant and distance spacing. Clark County will experience the  
7 same troubles outlined in Ms. Spikula's affidavit in recruiting and training staff willing to work with  
8 a constant flow of strangers during the pandemic.

9 8. It will cost Clark County \$184,738.01 (\$30,385.00 in postage; \$154,353.01 in mail ballot  
10 packet-bulk pricing) to mail ballots to inactive voters in Clark County. It will take seven days to  
11 print and assemble the ballot packets, and they will be mailed out over a period of a few days to  
12 comply with postal service bulk mail rules. Based on past experience, at least 90% of those will  
13 come back undeliverable.

14 9. The past voter turnout for primary election in even numbered years has been low. In  
15 2018, with a highly contested gubernatorial primary and two U.S. Senate nominations on the  
16 primary ballot, the turnout was only 20.41% of registered voters. In 2016, the primary election  
17 turnout was 16.16%. In 2014, it was 15.80% in the County. In 2012, the turnout was 16.23%. This  
18 year, with no hotly contested state-wide races at the top of the ballot, there is nothing special to draw  
19 voters in greater numbers than before for in-person voting.

20 10. Signature verification has not been a significant issue on absent ballots in the recent past.  
21 For example, in the 2018 Primary Election, there were only 9 mismatched signatures out of 14,708  
22 ballots returned, and in the 2018 General Election, only 59 signatures were determined to be  
23 mismatched out of a ballot return of 49,072.

24 11. Given the low voter turnout expected, the increased risk of harm to voter and staff safety  
25 alike, and in light of the new expenses already incurred, there is little justification for such increased  
26 risk and expense that any change to the plan would cause.

27 Dated this 7<sup>th</sup> day of April, 2020.

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*Lorena Portillo*  
LORENA PORTILLO

SUBSCRIBED and SWORN to before me  
this 30<sup>TH</sup> day of April, 2020.

*Heather Kellam*  
NOTARY PUBLIC in and for  
said County and State.



# EXHIBIT A



## JUNE 9, 2020, PRIMARY ELECTION NOTICE OF ALL-MAIL BALLOT ELECTION

*Clark County Election Department, 965 Trade Dr., North Las Vegas, NV 89030*

### OVERVIEW

To help keep you, your family, and our community safer by limiting interactions that could spread the coronavirus, the June 9, 2020, Primary Election is being conducted entirely by mail ballot. On or before May 18, 2020, Clark County registered voters will receive a mail ballot packet from the Clark County Election Department which will include:

- A ballot and instructions for voting a mail ballot;
- A pre-addressed, postage-paid envelope that must be used for returning voted mail ballots; and
- A list of mail ballot drop-off sites for voters to drop off their own voted mail ballot in-person, if they are unable to put their ballot in the mail.

Registered Voters who do not receive their packet by May 18, 2020, should contact us at (702) 455-VOTE (8683). We **STRONGLY ENCOURAGE VOTERS TO MAIL THEIR BALLOT** rather than drop it off in-person. Please read this entire notice for important details.

### CONTACT INFORMATION WILL HELP US ASSIST VOTERS

We strongly encourage all voters who do not have their current e-mail or phone number listed in their registration records to contact us as soon as possible and no later than **MAY 12, 2020**, to provide that information. This is important because if a mail ballot has no signature on the envelope, or if the signature does not match the one the Election Department has on file, we will need to contact the voter as soon as possible to resolve this issue. To check if your phone number or e-mail is in your voter registration records or to add it if it is not:

- Log-in on the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov); or
- Send an e-mail to [elinfo@ClarkCountyNV.gov](mailto:elinfo@ClarkCountyNV.gov); or
- Call us at (702) 455-VOTE (8683).

Please note that NRS 293.558 requires the Clark County Election Department to keep your e-mail address **CONFIDENTIAL**. Meaning, it may not be given to third parties.

## CLOSE OF STANDARD REGISTRATION

The deadlines to register to vote or update existing voter registration by mail or online in time for the June 9, 2020, Primary Election and still receive a regular mail ballot are below. After those dates pass, voters who wish to register to vote or make changes to their existing voter registration will have to do so through the same-day registration or same-day updates process, either online or in-person. Those voters may only vote a paper provisional mail ballot in-person on the spot at the Clark County Election Department and will need to show current, valid identification, and, if needed, proof of residency. See "Same Day Registration and Same-Day Updates of Existing Registration" starting on page 5 for more information. We strongly urge voters to register to vote or to make any necessary updates as soon as possible so they may avoid having to go to the Election Department offices.

- **May 12, 2020**, is the last day to register to vote or update your existing voter registration by mail for the June 9, 2020, Primary Election.
- **May 21, 2020**, is the last day to register to vote or update your existing registration on the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov).

## RETURNING YOUR VOTED MAIL BALLOT

The Clark County Election Department will process and count voted mail ballots that are returned in the envelope provided, **but only if the outside of the envelope is signed by the voter**. This is required for verification purposes.

The ballots must be submitted and received in one of the following ways:

- **Mailed Through the U.S. Post Office:** We ***STRONGLY ENCOURAGE VOTERS TO RETURN THEIR VOTED MAIL BALLOT THROUGH THE U.S. POST OFFICE*** rather than drop it off in-person. To send it by postal mail, voters must:
  - Seal their voted mail ballot in the pre-addressed, postage-paid, return envelope included in the packet they will receive.
  - **Sign the outside of the envelope in the space provided for their signature.**
  - Make sure their signed envelope is postmarked by June 9, 2020. Note that we must receive properly postmarked ballots by 5:00 p.m. on June 16, 2020, (7 days after the Election Day) for them to be counted.
- **Dropped-Off In-Person:** Voters may also drop off their own voted mail ballot, but only at one of the locations in the schedules on pages 3-5 during the listed dates and hours. To do this, voters must:
  - Seal their voted mail ballot in the return envelope included in the packet they will receive.
  - **Sign the outside of the envelope in the space provided for their signature.**
  - Drop off their voted mail ballot no later than 7:00 p.m. on Election Day.

**DROP-OFF LOCATIONS THROUGH JUNE 5, 2020, (FRIDAY)**

These locations, dates, and hours for dropping off mail ballots will be available as soon as voters begin receiving their mail ballots and will continue through June 5.

DROP-OFF LOCATIONS	DATES AND HOURS
<p>CLARK COUNTY ELECTION DEPARTMENT 965 Trade Dr., North Las Vegas <i>Only the Clark County Election Dept. will be available on May 25, 2020, Memorial Day.</i></p>	<p>UP TO MAY 22: • MON.-FRI.: 8am-5pm • SAT. AND SUN: CLOSED MAY 23-JUNE 3, EVERY DAY (including Sat., Sun., and Memorial Day): 8am-6pm JUNE 4-5, THURS.-FRI.: 8am-8pm</p>
<p>CLARK COUNTY GOVERNMENT CENTER 1<sup>st</sup> Floor, Rotunda 500 S. Grand Central Pkwy., Las Vegas</p>	<p>MONDAY-FRIDAY: 8am-5pm CLOSED: All Saturdays, Sundays, and May 25, Memorial Day Holiday</p>
<p>BOULDER CITY, CITY CLERK City Hall, Upstairs, 401 California Ave. Boulder City</p>	<p>MONDAY-THURSDAY: 7am-6pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day</p>
<p>HENDERSON CITY CLERK City Hall, Front of Bldg., 240 S. Water St. Henderson</p>	<p>MONDAY-THURSDAY: 7:30am-5:30pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day</p>
<p>LAS VEGAS CITY CLERK City Hall, 2<sup>nd</sup> Floor, 495 S. Main St. Las Vegas</p>	<p>MONDAY-THURSDAY: 7am-5:30pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day</p>
<p>MESQUITE CITY CLERK City Hall, 10 E. Mesquite Blvd. Mesquite</p>	<p>MONDAY-THURSDAY: 8am-5pm FRIDAY: 8am-3:30pm CLOSED: All Saturdays, Sundays, and May 25, Memorial Day</p>
<p>NORTH LAS VEGAS CITY CLERK City Hall, 8<sup>th</sup> Floor 2250 Las Vegas Blvd. North, North Las Vegas</p>	<p>MONDAY-THURSDAY: 8am-5:45pm CLOSED: All Fridays, Saturdays, Sundays, and May 25, Memorial Day</p>

**DROP-OFF LOCATION ON JUNE 8, 2020, (MONDAY)**

On this date, voters may drop-off their own voted mail ballot in-person, from 8:00 a.m. to 5:00 p.m. at the Clark County Election Department, 965 Trade Dr., North Las Vegas.



**DROP-OFF LOCATIONS ON JUNE 9, 2020, PRIMARY ELECTION DAY (TUESDAY)**

On Primary Election Day, voters may drop-off their own voted mail ballot in-person at the locations and during the times listed below.

<b>DROP-OFF LOCATIONS ON JUNE 9 PRIMARY ELECTION DAY, OPEN 7:00 A.M. TO 7:00 P.M.</b>
CLARK COUNTY ELECTION DEPARTMENT, 965 Trade Dr., North Las Vegas
BOB PRICE RECREATION CENTER, 2050 Bonnie Ln., Las Vegas
BUNKERVILLE COMMUNITY CENTER, 200 W. Virgin St., Bunkerville
CLARK COUNTY FAIRGROUNDS - LOGANDALE, 1301 Whipple Ave., Logandale
DESERT BREEZE COMMUNITY CENTER, 8275 Spring Mountain Rd., Las Vegas
DR. WILLIAM U. PEARSON COMMUNITY CENTER, 1625 W. Carey Ave., North Las Vegas
ENTERPRISE LIBRARY, 25 E. Shelbourne Ave., Las Vegas
HOLLYWOOD RECREATION CENTER, 1650 S. Hollywood Blvd., Las Vegas
INDIAN SPRINGS COMMUNITY CENTER, 715 W. Gretta Lane, Indian Springs
LAUGHLIN LIBRARY, 2840 S. Needles Highway, Laughlin
MOAPA COMMUNITY CENTER, 1340 E. Highway 168, Moapa
MOAPA TRIBAL ADMINISTRATION BUILDING, 1 Lincoln St., Moapa
MOAPA VALLEY COMMUNITY CENTER - OVERTON, 300 N. Moapa Blvd., Overton
MOUNTAIN CREST COMMUNITY CENTER, 4701 N. Durango Dr., Las Vegas
PARADISE RECREATION CENTER, 4775 S. McLeod Dr., Las Vegas
PASEO VERDE LIBRARY, 280 S. Green Valley Pkwy., Henderson
SAHARA WEST LIBRARY, 9600 W. Sahara Ave., Las Vegas
SANDY VALLEY COMMUNITY CENTER, 650 W. Quartz Ave., Sandy Valley
SEARCHLIGHT COMMUNITY CENTER, 200 Michael Wendell Way, Searchlight
SILVER MESA RECREATION CENTER, 4025 Allen Ln., North Las Vegas
VETERANS MEMORIAL LEISURE CENTER, 101 N. Pavilion Center Dr., Las Vegas
WALNUT COMMUNITY CENTER, 3075 N. Walnut Rd., Las Vegas
WHITNEY RECREATION CENTER, 5712 E. Missouri Ave., Las Vegas
WINDMILL LIBRARY, 7060 W. Windmill Ln., Las Vegas

**ADDITIONAL DROP-OFF LOCATIONS ON JUNE 9  
PRIMARY ELECTION DAY, VARYING HOURS**

BOULDER CITY, CITY CLERK, City Hall, Upstairs, 401 California Ave., Boulder City  
7:00 a.m. to 6:00 p.m.

CLARK COUNTY GOVERNMENT CENTER, 1<sup>st</sup> Floor, Rotunda  
500 S. Grand Central Pkwy., Las Vegas  
8:00 a.m. to 5:00 p.m.

HENDERSON CITY CLERK, City Hall, Front of Building, 240 S. Water St., Henderson  
7:30 a.m. to 5:30 p.m.

LAS VEGAS CITY CLERK, City Hall, 2<sup>nd</sup> Floor, 495 S. Main St., Las Vegas  
7:00 a.m. to 5:30 p.m.

MESQUITE CITY CLERK, City Hall, 10 E. Mesquite Blvd., Mesquite  
8:00 a.m. to 5:00 p.m.

NORTH LAS VEGAS CITY CLERK, City Hall, 8<sup>th</sup> Floor, 2250 Las Vegas BL North, N. Las Vegas  
8:00 a.m. to 5:45 p.m.

**SAME-DAY REGISTRATION AND  
SAME-DAY UPDATES OF EXISTING REGISTRATION**

**Online Registration and Updates:** If you could not register to vote or update your existing voter registration by mail by May 12, 2020, you still may do so through the Secretary of State's website at [www.registertovotenv.gov](http://www.registertovotenv.gov) through **June 4, 2020** (Thursday).

- **May 13 to May 21:** If you register to vote or update your existing registration online between May 13 (Wednesday) and May 21, 2020, (Thursday), within about a week you will receive a regular mail ballot with your updated name, precinct, party, etc., as applicable.
- **May 22 to June 4 (Online Same-Day Registration and Same-Day Updates):** If you register to vote or update your existing registration online between May 22 (Friday) and June 4, 2020 (Thursday), you may only vote a paper **PROVISIONAL MAIL BALLOT IN-PERSON AT THE CLARK COUNTY ELECTION DEPARTMENT, WHICH YOU MUST IMMEDIATELY TURN IN.** You may not take your ballot out of the building. You must also show acceptable identification and, if needed, proof of residency. See page 6 for details on identification and provisional ballot voting. The address is **965 Trade Dr., Suite F, North Las Vegas, NV.** The dates for in-person voting are May 23 (Saturday) to June 5 (Friday) and also on June 9 (Tuesday). See page 7 for the "In-Person Voting Location and Schedule," including hours and a map.

**Identification and Proof of Residency:** If you register to vote or update your existing voter registration online from May 22 to June 4, or in-person from May 23 to June 5 or on June 9, you must provide identification and, if needed, proof of residency, to vote a paper provisional mail ballot in-person on the spot at the Clark County Election Department. The identification requirements are:

- Your unexpired Nevada (NV) Department of Motor Vehicles (DMV) Driver's License with your current residential address which must match the address in your registration; or
- Your unexpired NV State Identification Card with your current residential address, which must match the address in your registration; or
- Your NV DMV temporary "Interim Document" with your current residential address, which must match the address in your voter registration.
- **IF** the address on your identification is not your current residential address, meaning it does not match your voter registration residential address and/or if it is not where you currently live, then you must also provide proof of current residency, such as:
  - A military identification card; or
  - A utility bill (electric, gas, oil, water, sewer, septic, phone, cable); or
  - A bank or credit union statement; or
  - A paycheck; or
  - An income tax return; or
  - A mortgage statement, or residential rental or lease agreement; or
  - A motor vehicle registration; or
  - A property tax statement; or
  - Any other document issued by a governmental agency.

**Paper Provisional Mail Ballot Overview and Verification Process:** If you register to vote or update your voter registration either online from May 22 to June 4, or in-person from May 23 to June 5 or on June 9, you may only vote a paper provisional mail ballot by appearing in-person at the Clark County Election Department and voting on the spot. You must also provide the identification indicated above. Your paper provisional mail ballot will have all of the contests and candidates that are on a regular ballot. It will differ from a regular ballot in that it will be counted only after verification that:

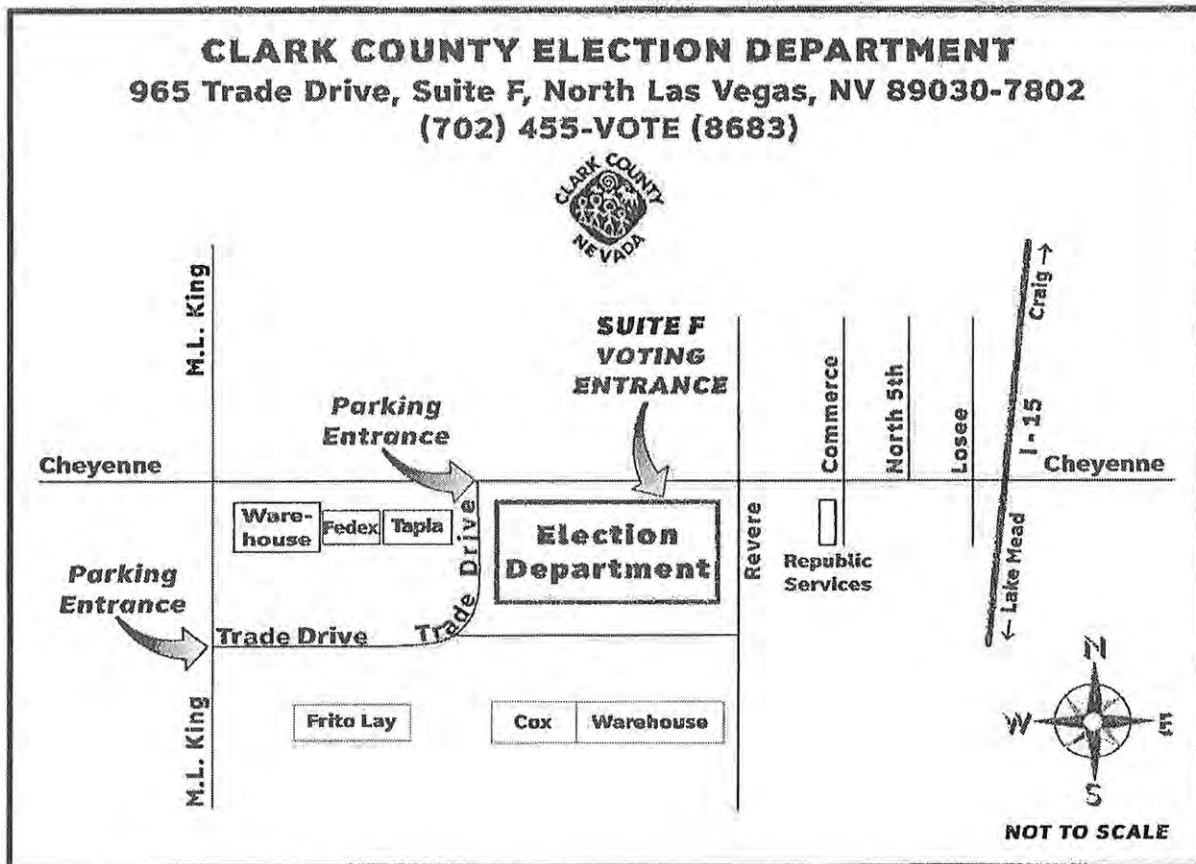
- You were qualified to cast a ballot in the current election;
- You did not cast multiple ballots in the same election;
- You showed acceptable identification when you voted (see above); and
- **IF** needed, you provided acceptable proof of residency (see above).

**In-Person Same-Day Registration and Updates, May 23-June 5 and on June 9:** If you could not register to vote or update your existing voter registration by mail by May 12, 2020, or online by May 21, you may do so in-person and vote a paper provisional mail ballot on the spot at the Clark County Election Department from May 23 (Saturday) to June 5, 2020 (Friday), or on June 9, 2020 (Tuesday, Primary Election Day). You may not take your ballot out of the building and you must turn it in immediately. You must show acceptable identification and, if needed, proof of residency. See page 6 for details on identification and provisional ballot voting. The address is 965 Trade Dr., Suite F, North Las Vegas, NV. See below for the "In-Person Voting Location and Schedule," including hours and a map.

### **IN-PERSON VOTING LOCATION AND SCHEDULE**

**May 23 (Sat.)-June 5 (Fri.) and June 9, 2020 (Tues., Primary Election Day)**

- May 23-June 3, every day (including Saturday, Sunday, and Memorial Day on May 25): 8:00 a.m.-6:00 p.m.
- June 4-5, Thursday-Friday: 8:00 a.m.-8:00 p.m.
- June 9, Tuesday, Primary Election Day: 7:00 a.m.-7:00 p.m.



## VOTERS WITH DISABILITIES

Several options are available for voters with disabilities:

- Electronic registration and electronic voting will be offered through Nevada's Effective Absentee System for Elections (EASE). This option may be accessed on the Nevada Secretary of State's website at [www.NVEASE.gov](http://www.NVEASE.gov).
- Voters who register to vote by mail by May 12, 2020, or online by May 21, 2020, may call the County Election Department at (702) 455-VOTE (8683) to request an electronic ballot.
- Unassisted and private in-person voting will be available at the Election Department. The location, dates, and times will be the same as for "In-Person Voting" (see page 7).

## VOTING IN THE NOVEMBER 3 GENERAL ELECTION

At this time, we expect to return to in-person voting for the November 3, 2020, General Election. If that occurs, voters who had not previously requested to receive mail ballots for every election, which is most voters, will be expected to vote at regular polling places. For more information about the General Election see the Election Department's webpage at [www.ClarkCountyNV.gov/vote](http://www.ClarkCountyNV.gov/vote).

## QUESTIONS

More information about the all mail-in Primary Election and other resources for voters are available on the Election Department's website at [www.ClarkCountyNV.gov/vote](http://www.ClarkCountyNV.gov/vote). You may also e-mail questions to the Department at [Elinfo@ClarkCountyNV.gov](mailto:Elinfo@ClarkCountyNV.gov), or call (702) 455-VOTE (8683) or 711 for TTY/TDD devices.

**VOTING OR ATTEMPTING TO VOTE MORE  
THAN ONCE IN THE SAME ELECTION  
IS A FELONY. (NRS 293.780)**

EXHIBIT "5"

Exhibit "5"

## Charlene Renwick

---

**From:** David Lee  
**Sent:** Thursday, May 14, 2020 3:30 PM  
**To:** Charlene Renwick  
**Subject:** FW: Public Records Request

---

**From:** Tyler Green <tyler@consovoymccarthy.com>  
**Sent:** Thursday, May 14, 2020 3:17 PM  
**To:** David Lee <Dlee@lee-lawfirm.com>  
**Subject:** FW: Public Records Request

\*\*\* This is an external email \*\*\*

---

---

**From:** Mary-Anne Miller <Mary-Anne.Miller@clarkcountyda.com>  
**Date:** Tuesday, May 12, 2020 at 10:06 AM  
**To:** 'Tyler Green' <tyler@consovoymccarthy.com>  
**Subject:** Public Records Request

Dear Mr. Green,

In response to your May 7, 2020 request for public records, please be advised:

The documents (emails) responsive to requests 1 and 2 are covered by the attorney-client privilege and will not be disclosed.

There are no documents responsive to requests 3, 4, or 5.

Relative to item 6, please see information on the County's Election Department website: <https://www.clarkcountynv.gov/election/Documents/2020/Mailer-Notice-20P-EXPANDED.pdf>

In response to Item 7, minutes of meetings between a governing board and its attorney are protected by the attorney-client privilege, and will not be produced. Further, such a meeting does not fall within the Open Meeting Law. See NRS 241.015(3)(b)(2).

As the Election Department had no documents to produce, your check will be returned to you under separate cover.

Thank you.

MARY-ANNE MILLER  
COUNTY COUNSEL  
OFFICE OF THE DISTRICT ATTORNEY | CIVIL DIVISION  
702 455 4761 | [MARY-ANNE.MILLER@CLARKCOUNTYDA.COM](mailto:MARY-ANNE.MILLER@CLARKCOUNTYDA.COM)

**EXHIBIT "6"**

**Exhibit "6"**



**From:** David Lee  
**To:** Charlene Renwick  
**Subject:** FW: Public records request re primary election  
**Date:** Wednesday, May 20, 2020 10:09:00 AM  
**Attachments:** Commissioner Gibson Records Request 05182020.pdf

---

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Mary-Anne Miller <Mary-Anne.Miller@clarkcountyda.com>  
**Date:** Wednesday, May 20, 2020 at 10:39 AM  
**To:** 'Tyler Green' <tyler@consvoymccarthy.com>, "David O'Mara, Esq." <david@omaralaw.net>  
**Subject:** FW: Public records request re primary election

Hello,

To date, the attached are the only documents that I have received which are responsive and not subject to the attorney client privilege (communication between me and the commissioners). I have not heard by from all of the commissioners yet, who have to search their individual phones.

MARY-ANNE MILLER  
COUNTY COUNSEL  
OFFICE OF THE DISTRICT ATTORNEY | CIVIL DIVISION  
702 455 4761 | [MARY-ANNE.MILLER@CLARKCOUNTYDA.COM](mailto:MARY-ANNE.MILLER@CLARKCOUNTYDA.COM)

---

**From:** Susan Gersh <Susan.Gersh@ClarkCountyNV.gov>  
**Sent:** Monday, May 18, 2020 10:11 AM  
**To:** Mary-Anne Miller <Mary-Anne.Miller@clarkcountyda.com>  
**Cc:** Jim Gibson <Jim.Gibson@ClarkCountyNV.gov>; Susan Gersh <Susan.Gersh@ClarkCountyNV.gov>  
**Subject:** FW: Public records request re primary election

Hi Mary-Anne,

Attached is Commissioner Gibson's correspondence as requested.

Thank you.

-Susan

**Diane Starr Lewis**

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**From:** Jim Gibson <jimgibsonlegal@gmail.com>  
**Sent:** Monday, May 18, 2020 8:06 AM  
**To:** Diane Starr Lewis  
**Subject:** Fwd: Clark County Democratic Party Executive Board Acts to Protect Integrity of Platform

----- Forwarded message -----

**From:** **CCDP Executive Board** <[eboard@clarkdems.co](mailto:eboard@clarkdems.co)>  
**Date:** Fri, May 8, 2020 at 10:44 AM  
**Subject:** Clark County Democratic Party Executive Board Acts to Protect Integrity of Platform  
**To:** <[JIMGIBSONLEGAL@gmail.com](mailto:JIMGIBSONLEGAL@gmail.com)>

[View this email in your browser](#)

**FOR IMMEDIATE RELEASE – May 8<sup>th</sup>, 2020**

## **Clark County Democratic Party Executive Board Acts to Protect Integrity of Platform**

*Emergency meeting held to restore three planks which were undemocratically removed*

**Las Vegas** – Today the Clark County Democratic Party Executive Board calls on CCDP Chair Donna West to respect the will of the party membership and restore three planks which were removed from the platform under mysterious and undemocratic circumstances.

Clark County delegates have been working for months through open hearings to create an inclusive and representative platform that Democrats can be proud of. That platform was approved by the Chair of the Platform Committee, Steve Horner, and published on April 27 by CCDP Chair West. But just a few hours later, a revised platform was

published by Chair West. Three planks on human rights had been mysteriously removed without proper democratic process.

In response, the Executive Board held an emergency meeting on April 30 to investigate the situation. This meeting was legal, proper, and quorate per the party parliamentary in attendance. Sadly, Party Chair West and Platform Committee Chair Horner chose not to attend despite repeated invitations to provide a satisfactory explanation for the last-minute unilateral platform change.

Therefore, the Executive Board was forced to use its oversight authority under the by-laws to protect the will and intent of the rank and file party members by unanimously voting to restore the original approved and authorized platform.

Two major Clark County clubs, the Red Rock Democratic Club and the Left Caucus, have since issued public statements backing the Executive Board's defense of the democratic process. We thank them for their support in ensuring the voices of the party members are heard.

Unfortunately, Chair West has so far denied the will of the party members she was elected to serve and has refused to restore the original platform. The Executive Board therefore urges all convention delegates to vote "no" on the party platform until the situation can be resolved.

**Clark County Executive Board Members Present and Voting at the meeting:**

**Gabrielle d'Ayr, 1st Vice Chair**

**Judith Whitmer, 2nd Vice Chair**

**Asbury Edens, Recording Secretary**

**Sakina Turner, Corresponding Secretary**

**Janet Carter, Commission District D Rep**

**Marco Henry, Commission District E Rep**

**Joe Throneberry, Commission District F Rep**

**Carolyn Murray, Commission District G Rep**

## **Diane Starr Lewis**

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**From:** Jim Gibson <jimgibsonlegal@gmail.com>  
**Sent:** Saturday, May 16, 2020 10:51 AM  
**To:** Diane Starr Lewis  
**Subject:** Fwd: DIGITAL SLATE CARD FOR NON-PARTISAN RACES  
**Attachments:** CCDP 2020 Primay Candidates - Nonpartisan Races Final1.jpg; CCDP 2020 Primay Candidates - Nonpartisan Races updated.pdf

----- Forwarded message -----

**From:** **Boulder\_City Democratic\_Club** <bouldercitydemocraticclub@gmail.com>  
**Date:** Sat, May 9, 2020 at 2:40 PM  
**Subject:** Fwd: DIGITAL SLATE CARD FOR NON-PARTISAN RACES  
**To:**

Dear Members,

Please find attached information concerning which candidates for non-partisan office in the upcoming primary election are registered Democrats.

If you have not received your mail-in ballot, you should soon.

The last day to register to vote/update your registration for mail-in voting is May 12. The last day to do so online and vote on June 9 is June 4.

----- Forwarded message -----

**From:** **Donna West** <donna4dems@gmail.com>  
**Date:** Sat, May 9, 2020 at 9:43 AM  
**Subject:** DIGITAL SLATE CARD FOR NON-PARTISAN RACES

Hi

Our members have started to receive their ballots for the mail-in primary election. Many have reached out for information on the registered Democrats running for non-partisan offices. We are posting this digital slate card on our social media pages. Please feel free to share copies with your network. I'm including several versions of the card to make it easier to share.

Wishing you well,

Donna West, Chairwoman  
Clark County Democratic Party



# Clark County Democratic Party



**THE 2020 PRIMARY ELECTION IS JUNE 9th**

The 2020 Primary election will be conducted by mail, you should receive your ballot along with return information by May 18th, 2020.

If you do not receive your ballot, please contact the Clark County Election Department at 702-455-VOTE (8683)

For more information, visit [www.clarkcountynv.gov/VOTE](http://www.clarkcountynv.gov/VOTE)

## Non- Judicial Races

**State Board of Education Dist. 1**  
Angelo Casino  
Tim Hughes

**State Board of Education Dist. 3**  
Felicia Ortiz

**State Board of Education Dist. 4**  
Rene Cantu  
Mark Newburn  
Vincent Richardson

**University Regent Dist. 2**  
Lois Tarkanian

**University Regent Dist. 5**  
Nick "Doc" Spirtos

**Trustee, Clark Co. School Dist. A**  
Anand K. Nair  
Lisa Guzman

**Trustee, Clark Co. School Dist. B**  
Ksina Boone  
Jeff Proffitt  
Ebony Sherman

**Trustee, Clark Co. School Dist. C**  
Antonio Bowen  
Barbara A. Dreyer  
Carol Ferranti  
Evelyn Garcia Morales  
Tameka Henry

**Trustee, Clark Co. School Dist. E**  
Elysa Arroyo  
Lola Brooks  
Tracey Lewis  
Alexis Salt

**Virgin Valley Water Dist. Logandale**  
Stanley Glen Hardy

**Virgin Valley Water Dist. Mesquite**  
Michael McGreer

**Overton Power Dist 5 Mesquite**  
Jake Noll, Jr.

**Laughlin Town Advisory Board**  
Kathleen Hoss  
James "Jim" Maniaci

**Moapa Valley Town Advisory Board**  
Shana Munn

**Mesquite City Council Seat 2**  
Karen Dutkowski  
Ronnie Skutov

## Judicial Races

**Nevada Supreme Court Seat B**  
Esther Rodriguez

**Nevada Supreme Court Seat D**  
Ozzie Funo

**Nevada Court of Appeals**  
Bonnie Bulla  
Susan Bush

**District Court**

**Judge Dept. 1**  
Bila "Mario" Yeager

**Judge Dept. 2**  
Carli Lynn Kierny  
Dustin R. Marcello

**Judge Dept. 3**  
Adam Ganz  
Michael J. Miceli  
Monica Trujillo

**Judge Dept. 4**  
Phil Aurbach  
Nadia Krall

**Judge Dept. 5**  
Terry Coffing  
Blair C. Parker

**Judge Dept. 6**  
Jacqueline Bluth

**Judge Dept. 7**  
Linda Marie Bell

**Judge Dept. 8**  
Trevor Atkin

**Judge Dept. 9**  
Cristina D. Silva

**Judge Dept. 10**  
Tierra D. Jones

**Judge Dept. 13**  
Mark Denton

**Judge Dept. 15**  
Adam Breeden  
Tegan Christine MacHnich

**Judge Dept. 16**  
Timothy Williams

**Judge Dept. 17**  
Anna Albertson

**Judge Dept. 18**  
John A. Hunt

**Judge Dept. 19**  
Crystal Eller  
Fikisha Miller

**Judge Dept. 20**  
Dawn Allysa Hooker

**Judge Dept. 21**  
Caesar Almaso  
Tara Clark Newberry  
Bruce L. Gale

**Judge Dept. 22**  
Ben Nadig

**Judge Dept. 23**  
Karl W. Armstrong  
Craig Friedberg  
Jasmin Lily-Spells

**Judge Dept. 24**  
Erika D. Ballou  
Mickey Bohn  
Dan Gilliam  
Dena Rinetti  
Joe Vadalà

**Judge Dept. 25**  
Kathleen E. Delaney

**Judge Dept. 26**  
Gloria J. Sturman

**Judge Dept. 27**  
Nancy L. Allif

**Judge Dept. 28**  
James E. Cavanaugh "Jim"  
Ron Israel  
Alexandra Beth McLeod

**Judge Dept. 29**  
David M. Jones  
David Lopez-Negrete

**Judge Dept. 30**  
Jorry A. Wieso

**Judge Dept. 31**  
Gary W. Call  
Joanna S. Kishner

**Judge Dept. 32**  
Rob Baro  
Christy Craig

## District Court Family Division

**Judge Dept. A**  
Nathan Gayle

**Judge Dept. B**  
Linda Marquis

**Judge Dept. I**  
Soonhee "Sunny" Bailey  
Michelle O. Tobler

**Judge Dept. J**  
Dedree Butler  
J. Scott MacDonald

**Judge Dept. K**  
Cynthia N Giuliani

**Judge Dept. L**  
David Gibson Jr.

**Judge Dept. M**  
Amy M. Mastin

**Judge Dept. O**  
Frank P. Sullivan

**Judge Dept. P**  
Sara Dayani

**Judge Dept. R**  
Bill Henderson

**Judge Dept. S**  
Vincent Ochoa  
Lisa M. Szyz

**Judge Dept. T**  
Nadin Cutler  
Gemma "Gem" Nazareno Edquilang

**Judge Dept. U**  
Dawn Thome  
Bill Gonzales

**Judge Dept. V**  
Jack Fleeman  
Margret E. Pickard

**Judge Dept. W**  
Stacy Michelle Rocheleau  
Adriana Rincon White

**Judge Dept. X**  
Heidi Almase  
Jim Davis

**Judge Dept. Y**  
Maricar "Rica" Andrade  
Stephanie Charter

**Judge Dept. Z**  
Randall Foreman  
Romeo Perez  
Kevin Speed

## Justice of the Peace

**Henderson Twnsh. Dept. 3**  
David S. Gibson, Sr.

**Las Vegas Twnsh. Dept. 11**  
Eric A. Goodman

**Las Vegas Twnsh. Dept. 12**  
Shannon Clowers-Sarborn  
Diana L. Sullivan

**N. Las Vegas Twnsh. Dept 3**  
Belinda T. Harris "BTH"  
Chris Leo

Paid For by the Clark County Democratic Party

**Diane Starr Lewis**

---

**From:** Jim Gibson <jimgibsonlegal@gmail.com>  
**Sent:** Saturday, May 16, 2020 10:50 AM  
**To:** Diane Starr Lewis  
**Subject:** Fwd: NEVADA'S ALL MAIL IN PRIMARY & SLATE CARD FOR NON-PARTISAN SEATS

----- Forwarded message -----

**From:** Donna West <clarkdems@gmail.com>  
**Date:** Mon, May 4, 2020 at 10:31 PM  
**Subject:** NEVADA'S ALL MAIL IN PRIMARY & SLATE CARD FOR NON-PARTISAN SEATS  
**To:** <JIMGIBSONLEGAL@gmail.com>

Hello Clark County Democrats!

As you have heard, the 2020 Primary Election scheduled for June 9, 2020 will be conducted entirely by mail. Hopefully you have received information about this process from the Clark County Election Department, if not please see the link at the end of this email for more information

The Nevada Secretary of State announced that ballots are being mailed this week. The Clark County Election Department advised that active registered county voters will receive their ballots in the next 2 weeks. You should receive your ballot, instructions, and prepaid return envelope no later than **May 18, 2020**. If you do not receive these materials by May 18th, please contact the Clark County Election Department at (702) 455-8683.

We strongly encourage you to make sure your current email or phone number is listed in your voter registration records as it will enable the Election Department to contact you if there are issues with your ballot. Please ensure that you provide this information no later than May 12, 2020. You can update your registration information on the Nevada Secretary of State's

website: [registertovotenv.gov](http://registertovotenv.gov) or by emailing the Clark County Election Department: [elinfo@clarkcountynv.com](mailto:elinfo@clarkcountynv.com) or calling the Clark County Election Department at (702) 455-8683

### **Voter Registration**

If you need to register to vote, or update your voter information, you must do so by May 21st by using the Nevada Secretary of State's website [registertovotenv.gov](http://registertovotenv.gov)

### **Democrats Running for Non-Partisan Offices**

You will receive the Democratic primary ballot that also includes non-partisan seats. To assist you in voting for Democrats in every seat all the way down ballot we have created and are distributing that attached slate card. All the Democrats running for non-partisan offices are listed. [For a copy of the slate card, please click this link](#)

### **Returning your Mail Ballot**

We strongly encourage you to return your voted ballot via the prepaid return envelope that you received with your other ballot materials. Ballots must be signed on the provided space and, must be postmarked by June 9, 2020. Ballots must be received by the Election Department by 5pm on June 16, 2020 for them to be counted.

There are options for dropping off a voted mail ballot and those are listed in this informational notice from the Clark County Election Department: <https://www.clarkcountynv.gov/election/Documents/2020/Mailer-Notice-20P-EXPANDED.pdf>

Wishing you well,



**Diane Starr Lewis**

---

**From:** Jim Gibson <jimgibsonlegal@gmail.com>  
**Sent:** Saturday, May 16, 2020 10:51 AM  
**To:** Diane Starr Lewis  
**Subject:** Fwd: BREAKING: Lawsuit Being Prepared to Block Nevada's Mail-In Primary Election

----- Forwarded message -----

**From:** Chuck Muth <chuck@chuckmuth.com>  
**Date:** Thu, Apr 16, 2020 at 1:33 PM  
**Subject:** BREAKING: Lawsuit Being Prepared to Block Nevada's Mail-In Primary Election  
**To:** <jimgibsonlegal@gmail.com>

[View this email in your browser](#)

## **BREAKING: Lawsuit Being Prepped to Block Nevada's Mail-In Primary Election**

**April 16, 2020**

*(Chuck Muth)* - Democrats all across the nation are trying to use the Wuhan Virus crisis to change in-person elections to all-mail balloting – including here in Nevada.

This ain't good for a lot of reasons, not the least of which is this from Timothy Sandefur, Vice President for Litigation at the Goldwater Institute...

*"If the history of democracy teaches us anything, it is that suddenly changing the rules of an election in the midst of a crisis - especially by the decree of a single official - is a terrible idea.*

*"Emergencies are times when people are least likely to dispassionately weigh the long-term costs of benefits of their actions, and the whole purpose of*

*constitutional rules is to keep people from making bad decisions in the heat of the moment. Breaking those rules can inflict permanent damage on democratic government.”*

In addition, the potential for fraud and voter disenfranchisement due to mailed ballots not reaching their destination is huge.

“Absentee ballots remain the largest source of potential voter fraud,” concluded the bipartisan 2005 report of the Commission on Federal Election Reform, chaired by former President Jimmy Carter.

Jimmy. Carter. Democrat.

Republican Gov. Doug Ducey, of next-door-neighbor Arizona, this week slammed the door on moving his August primary to an all-mail election, declaring: “We’re not going to disenfranchise anyone from voting (in person) on Election Day.”

Ducey noted that voters have the OPTION of requesting a mail-in ballot if they so choose for whatever reason, including worries about the Wu-Flu.

But perhaps the greatest threat of this is the Democrats’ effort to allow “ballot harvesting.”

Ballot harvesting is where someone goes around – say, to a seniors center or union hall – and collects all the mail-in ballots they can get their hands on and then delivers them to the election department.

They did this in California in 2018 and it definitely cost some Republicans their races. An Orange County election official noted that ballot harvesters were

showing up with batches of 100 and 200 ballots at a time.

The problem with this is at least two-fold...

1.) There's no "chain of custody" control. What's to stop the ballot harvester from tossing any ballots they think might be for a candidate other than their preferred candidate?

2.) There's huge potential for coercion and intimidation by ballot harvesters trying to get people to vote for certain candidates...or else!

By law, ballot harvesting is illegal in Nevada. No one other than an immediate family member is allowed to submit another person's ballot.

But the Nevada Democrat Party has threatened to sue the Secretary of State unless she agrees not to prosecute anyone for ballot harvesting.

They're also demanding, among other things, additional in-person voting sites, even though the whole stated purpose of switching to an all-mail election was to mitigate the chance of someone getting the Wu-Flu while voting.

Oh, and they want ballots mailed to inactive voters (voters who no longer live at the address where they registered), and don't want election officials verifying that the signatures on ballots match the voter registration signatures on file.

What could go wrong, right?

While I disagree with the Secretary of State's decision to switch Nevada to an all-mail primary election, I'm happy to report they told the D's to pound sand over these demands.

Meanwhile, the Democrats "Vote By Mail" (VBM) effort in New Mexico was

stopped cold Tuesday night when the state's Supreme Court ruled that the Secretary of State could NOT order an all-mail election for its June primary; that such a re-writing of election law had to be done by the Legislature, not the courts or the SoS.

*[Click here to read all about it](#)*

This was a tremendous victory for election integrity, spearheaded by a grassroots organization called True the Vote.

Longtime supporters of Citizen Outreach may recall when TTV's Anita Moncrief came to Vegas and spoke at our First Friday Happy Hour back in 2011. So TTV is no stranger to us.

And now they want to come to here and file a similar class action lawsuit to block Nevada's planned all-mail primary election which was ordered without approval of the Legislature.

"If you are facing this in your state and are fighting back, True The Vote will have your back," TTV's Catherine Engelbrecht told Breitbart News. "We're headed to Nevada next, where a similar situation is in play, and we're going to stop it there too."

Yesterday I helped them line up a dozen potential plaintiffs from across the state. Lawyers are prepping the case.

With any luck, Nevada voters will enjoy the same success New Mexico did Tuesday night.

Keep your fingers crossed!

**FAMOUS LAST WORDS**

"While the (Wuhan virus) crisis is far from over in the U.S. ... the doomsday scenarios that were predicted just two weeks ago have not come to pass." – **Associated Press, 4/15/20**

*(Mr. Muth is president of CitizenOutreach.org and publisher of NevadaNewsandViews.com. He blogs at MuthsTruths.com. His views are his own.)*

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**Our mailing address is:**

5841 E. Charleston Blvd., Ste. 230-226

Mt. Reagan, NV 89142

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Jim Gibson &lt;jimgibsonlegal@gmail.com&gt;

**AN UPDATE FROM CLARK DEMS**

1 message

Donna West <clarkdems@gmail.com>  
Reply-To: clarkdems@gmail.com  
To: JIMGIBSONLEGAL@gmail.com

Tue, Mar 31, 2020 at 1:32 PM

**Hello Clark County Democrats,**

It's been a while since we have been in touch. We have gotten all of the data from our caucus updated and will be reaching out to you more often. I hope this email finds you and your loved ones healthy and safe. Today I want to update you on 4 issues: the Clark County Democratic Convention, the corona virus pandemic, the 2020 Census and the mail in Nevada primary election.

**CLARK COUNTY DEMOCRATIC CONVENTION**

First, our Clark County Democratic Convention scheduled for April 18 at the Rio Hotel convention center has been **cancelled**. It is not safe to bring our thousands of delegates together and our first priority is to keep everyone safe and healthy. We are working with the Nevada State Democratic Party on an alternative way to complete our convention business. The state convention is scheduled for May 30. The state party will keep us apprised if this convention is able to be held in person or if we will also conduct state party business via alternative means. The Clark County Central Committee meeting that usually follows the county convention is likewise cancelled. Our next central committee

meeting is scheduled for August 25. As plans come together for our alternative county convention, we will keep all of the delegates and alternates up to date. We will also update our website and social media with information about conducting our county convention business.

### **CORONA VIRUS IN NEVADA**

Our nation, our state and our county are facing a crisis unlike any we have seen in our lifetime. During this challenging time, we want to make sure that you have the facts you need to keep yourselves and your loved ones safe and healthy. We are grateful to Governor Steve Sisolak and our state's leaders for taking the necessary steps to protect Nevadans' health and safety. The following are resources to keep you up to date, safe and healthy.

### **World Health Organization**

Advice to the public: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-foi-public>

### **Center for Disease Control**

How to protect yourself: <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>

If you think you are sick: <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

**COVID-19 Resource Guide courtesy of Senator Catherine Cortez Masto:**  
<https://www.cortezmasto.senate.gov/imo/media/doc/03>.

Gmail - AN UPDATE FROM CLARK DEMS  
[22.20%20COVID%2019%20Resource%20Guide%20FINAL.pdf](https://nvhealthresponse.nv.gov/2020/09/22/2020COVID%2019%20Resource%20Guide%20FINAL.pdf)

**Corona Virus Updates from Governor Steve Sisolak and the State of Nevada:** <https://nvhealthresponse.nv.gov/>

**Nevada Census 2020 – Nevada Matters. Be Counted.**

Clark County Democrats want to ensure that Nevada gets our fair share of federal resources and appropriate Congressional representation by encouraging everyone to participate in Census 2020.

It's easy. And it's quick! To fill out your census questionnaire just click here:  
<https://my2020census.gov/>

For more information about Census 2020 visit: <https://census.nv.gov/>

### **NEVADA PRIMARY 2020 - MAIL IN ELECTION**

Nevada plans to conduct an **all-mail** election for the **June 9, 2020** primary election. All active registered voters in Nevada will be mailed an absentee ballot for the primary election. No action or steps, such as submitting an absentee ballot request application, will be required by individual voters in order to receive a ballot in the mail.

Voters will be able to mark their ballot at home and then return it by mail using a postage-prepaid envelope or by dropping it off in person at a designated county location. This announcement applies only to the June 9, 2020 primary election.



**What you need to do:**

1. Verify that you are still currently registered to vote in Nevada here:  
<https://www.nvsos.gov/votersearch/index.aspx> If you don't find your voter registration, please register again while on the Secretary of State's website. Please note that you must have a Nevada state drivers' license or state issued identification card to register to vote online
2. Make sure that your address is up-to-date. Mail in ballots will automatically be sent to you are the current address on your voter registration. You can update your voter registration here:  
<https://www.nvsos.gov/SOSVoterServices/registration/step0.aspx>

When you receive your ballot, you will also receive a postage-paid envelope to return it. You will have to sign your ballot. If you submit an unsigned ballot you will be notified by the Election Department how to correct this so that your vote is counted.

There will be limited in person voting sites where you can a) register to vote the same day, b) change your party affiliation to vote for partisan offices, c) drop off your mail in ballot and d) vote in person

More details will be forthcoming from the Secretary of State's Office and we will keep you informed.

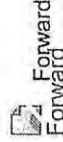
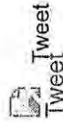
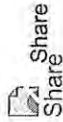
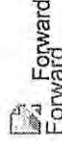
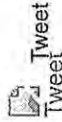
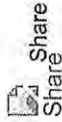
What we are experiencing is unprecedented. If you need any information or

assistance, please feel free to reach out to us. We will get through this difficult time together because we are Battle Born, Battle Tested and Nevada Strong.

**Wishing you well,**

**Donna West, Chairwoman  
Clark County Democratic Party**

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*Copyright © 2020 Clark County Democratic Party, All rights reserved.*  
You are receiving this email because you are a current member of the Clark County Democratic Party Central Committee.

**Our mailing address is:**  
Clark County Democratic Party  
2320 Paseo del Prado Ste B107  
Las Vegas, NV 89102-4394

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