

1 BRADLEY S. SCHRAGER, ESQ. (NSB 10217)  
JOHN SAMBERG, ESQ. (NSB 10828)  
2 DANIEL BRAVO, ESQ. (NSB 13078)  
**WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP**  
3 3773 Howard Hughes Parkway, Suite 590 South  
Las Vegas, NV 89169  
4 (702) 341-5200/Fax: (702) 341-5300  
bschrager@wrslawyers.com  
5 jsamberg@wrslawyers.com  
dbravo@wrslawyers.com

6  
WILLIAM STAFFORD, ESQ. (*pro hac vice forthcoming*)  
7 LINDSAY MCALEER, ESQ. (*pro hac vice forthcoming*)  
**ELIAS LAW GROUP LLP**  
8 1700 Seventh Ave, Suite 2100  
Seattle, WA 98101  
9 (206) 656-0235/Fax: (202) 968-4498  
bstafford@elias.law  
10 lmcaleer@elias.law

11 *Attorneys for Plaintiff*

12  
13 **IN THE FIRST JUDICIAL DISTRICT COURT**  
14 **OF THE STATE OF NEVADA IN AND FOR CARSON CITY**

15 EMILY PERSAUD-ZAMORA, an individual,

16 Plaintiff,

17 vs.

18  
19 BARBARA CEGAVSKE, in her official  
20 capacity as NEVADA SECRETARY OF  
STATE,

21 Defendant.

Case No.:

Dept. No.:

**COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF  
CHALLENGING INITIATIVE  
PETITION S-05-2022**

**Priority Matter, Pursuant to  
NRS 295.061(1)**

Arbitration Exemption: Declaratory and  
Injunctive Relief

22  
23  
24 Plaintiff Emily Persaud-Zamora, an individual registered to vote in Nevada, files this  
25 Complaint for declaratory and injunctive relief against Barbara Cegavske, in her official capacity  
26 as the Nevada Secretary of State, pursuant to NRS 295.061, 30.030 and 33.010. Plaintiff alleges  
27 and complains as follows:  
28

REC'D & FILED

2022 JUN -6 PM 2:53

AUBREY ROWLATT

BY

C. COOPER

DEPUTY

1  
2 **JURISDICTION AND VENUE**

3 1. This Court has jurisdiction to hear Plaintiff's claims pursuant to NRS 295.061 and  
4 to grant declaratory and injunctive relief pursuant to NRS 30.030, 30.040, and 33.010.

5 2. Venue is proper under NRS 13.020 and 13.040 because this action is against a  
6 public officer for acting in her official capacity, and also pursuant to NRS 295.061(1).

7 **PARTIES**

8 3. Plaintiff Emily Persaud-Zamora is a resident of and a registered voter in Clark  
9 County, Nevada.

10 4. Defendant Barbara Cegavske is Nevada Secretary of State and is sued in her official  
11 capacity. As the Secretary of State, Ms. Cegavske is the Chief Officer of Elections for Nevada and  
12 is responsible for the execution, administration, and enforcement of the state's election laws. *See*  
13 NRS 293.124. Ms. Cegavske's duties also include qualifying initiatives for submission to the  
14 Nevada Legislature and/or the Nevada electorate and disqualifying initiatives that are determined  
15 to be invalid.

16 **GENERAL FACTUAL ALLEGATIONS**

17 5. On or about May 13, 2022, Raj Mourey, on behalf of R.I.S.E. Nevada – Restoring  
18 Integrity in State Elections political action committee, filed Initiative Petition S-05-2022, styled as  
19 the "Initiative to Restore Integrity of State Elections" (the "Petition"), with the Nevada Secretary  
20 of State. *See Exhibit 1*, a true and accurate copy of the Notice of Intent to Circulate Statewide  
21 Initiative or Referendum Petition associated with Initiative Petition S-05-2022.

22 6. The Petition seeks to amend Chapter 293 of the Nevada Revised Statutes to make  
23 several significant changes to Nevada's election process, including imposing a photo ID  
24 requirement on in-person voters, limiting the forms of identification available to voters to match  
25 or identify a signature in certain circumstances, and mandating that Nevada provide a new form of  
26 free photo ID to be used for voting purposes for voters who lack a document bearing their signature  
27 and picture. The Petition would further mandate the Secretary of State to "reallocate existing  
28

1 funds” to cover the cost of this new photo identification document, but it provides no mechanism  
2 for raising any funds. *See* Ex. 1 at 2, a true and accurate copy of the filed Petition.

3 7. The Petition would require that in-person voters present “valid photographic  
4 identification” to cast a ballot in all local and federal elections unless they fall under the exceptions  
5 specified in NRS 293.277. Under current Nevada law, voters may present a variety of forms of ID  
6 bearing their signature to vote in person, including their voter registration card or a form of  
7 government-issued ID containing their signature and a physical description. *See* NRS 293.277(2).  
8 The Petition seeks to amend the forms of permissible ID listed in NRS 293.277(2) to prevent voters  
9 from verifying their identity using only their voter registration cards or government-issued IDs  
10 that contains only a physical description of the voter, instead requiring that *all* forms of permissible  
11 identification under NRS 293.277(2) contain the voter’s picture. *See* Ex. 1 at 2 (proposing to amend  
12 NRS 293.277(2)(a) to require that “[t]he voter registration card issued to the voter [be]  
13 **accompanied by another form of identification bearing the voter’s picture**” (emphasis in original  
14 to highlight proposed change)).

15 8. NRS 293.277(2) is referenced in several other statutes governing Nevada voting  
16 procedures, including the processes for matching and curing signatures. The Petition would  
17 therefore also limit the forms of identification that voters may use for those purposes. *See e.g.*,  
18 NRS 293.269927(8)(c) (describing the mail ballot cure process), 293.57691(2)(d) (describing the  
19 process by which county clerks review automatic voter registration applications received without  
20 an electronic signature).

21 9. The next significant change the Petition seeks to make would be to allow voters  
22 without a photo ID to request from the Secretary of State a “special identification document” with  
23 their signature and picture to use as identification at a polling place under NRS 297.277. Ex. 1 at  
24 2. To implement this change, the Petition would require that the county clerk, with the approval of  
25 the Secretary of State: “(a) Amend the voter registration card to include an option for a voter to  
26 request a special identification document; and (b) Prescribe a procedure for the issuance of a  
27 special identification document.” *Id.*



1           10. Finally, the Petition would mandate that the Secretary of State “reallocate existing  
2 funds to cover any expenditure necessary to facilitate the issuance of a special identification  
3 document.” *Id.*

4           11. The Petition’s description of effect reads, in full:

5                   If passed, this statutory measure would require all voters voting in person  
6 at a Nevada polling place to present photographic identification before  
7 casting a ballot. The measure would also require the Secretary of State to  
8 create a special photographic identification document for voting purposes.  
The new photographic identification document will be issued upon request  
to any eligible voter in Nevada.

9 Ex. 1 at 3.

#### 10                                   **FIRST CAUSE OF ACTION**

##### 11                   **Violation of Unfunded Expenditure Prohibition, Nev. Const. Art. 19, Sec. 6**

12           12. The foregoing paragraphs of this Complaint are realleged and fully incorporated as  
13 if set forth in full herein.

14           13. Nevada Constitution Article 19, Section 2(1) provides that the initiative process is  
15 “subject to the limitations of [article 19, section 6].” Article 19, Section 6, in turn, “does not permit  
16 the proposal of any statute or statutory amendment which makes an appropriation or otherwise  
17 requires the expenditure of money, unless such statute or amendment also imposes a sufficient tax,  
18 not prohibited by the constitution, or otherwise constitutionally provides for raising the necessary  
19 revenue.” Nev. Const. art. 19, § 6.

20           14. “Section 6 applies to *all* proposed initiatives, without exception, and *does not*  
21 *permit* any initiative that fails to comply with the stated conditions.” *Rogers v. Heller*, 117 Nev.  
22 169, 173, 18 P.3d 1034, 1036 (2001) (emphases in original). When an initiative violates this  
23 “threshold content restriction” by mandating unfunded expenditures, it is void ab initio, and pre-  
24 election intervention by Nevada courts is warranted. *Herbst Gaming, Inc. v. Heller*, 122 Nev. 877,  
25 891, 141 P.3d 1224, 1233 (2006) (quoting *Rogers*, 117 Nev. at 173, 18 P.3d at 1036).

26           15. The new restrictions the Petition proposes would come only with significant public  
27 expense, as has been the case elsewhere. *See* National Conference of State Legislatures, *Costs of*  
28

1 *Voter Identification*, (June 2014), [https://www.ncsl.org/documents/legismgt/elect/Voter\\_ID\\_Cost](https://www.ncsl.org/documents/legismgt/elect/Voter_ID_Cost)  
2 [s\\_June2014.pdf](#). The new in-person voter ID requirements alone would necessitate an extensive  
3 voter education and public outreach campaign, revised and additional election materials, and  
4 expanded poll worker training and wages, which have cost hundreds of thousands of dollars in  
5 states that have adopted similar laws. *See id.* at 2-3.

6 16. The creation and issuance of a new special photo identification will also come with  
7 substantial costs to the state, as confirmed by numerous studies over the last decade. In Ohio, for  
8 example, a nonpartisan analysis found that providing free identification cards to eligible voters  
9 would cost the state between \$8.50 and \$13.00 per card, taking into account increased operating  
10 costs associated with extended hours of operation at offices that issue identifications and increased  
11 costs of carrying out additional education and outreach activities. *See* Sana Haider and Amy  
12 Hanauer, *Ohio Photo Voter ID: A Picture worth \$7 Million a Year?*, POLICY MATTERS OHIO,  
13 [http://www.policymattersohio.org/wp-content/uploads/2012/04/PhotoVoterID\\_Apr2012.pdf](http://www.policymattersohio.org/wp-content/uploads/2012/04/PhotoVoterID_Apr2012.pdf).

14 Indiana calculated its production costs alone for the 168,264 voter identification cards that it  
15 provided to voters in 2010 to be over \$1.3 million. *See* National Conference for State Legislatures,  
16 *The Canvass*, No. XVII, February 2011, p. 2, available at [https://www.ncsl.org/research/elections-](https://www.ncsl.org/research/elections-and-campaigns/cnv-the-canvass-vol-xvii-february-2011.aspx#Cost)  
17 [and-campaigns/cnv-the-canvass-vol-xvii-february-2011.aspx#Cost](#). The North Carolina  
18 legislature's fiscal impact analysis of the then-pending bill to require the state to issue free voter  
19 identification cards to eligible voters concluded that the state would incur \$3.2 million in startup  
20 costs followed by \$375,000 in recurring costs to administer the system. *See* H.R. 351, 2011 Sess.  
21 (N.C. 2011), available at <http://www.ncga.state.nc.us/Sessions/2011/FiscalNotes/House/PDF/HF>  
22 [N0351v1.pdf](#). Academic researchers in Minnesota estimated the direct cost to the state of  
23 providing free identification documents to half of the eligible voters who do not already have a  
24 valid photo ID to be in excess of \$1.03 million in the first year. *See* Nicholas Anhut, et al., *Voter*  
25 *Identification: The True Cost, An Analysis of Minnesota's Voter Identification Amendment*, The  
26 Hubert H. Humphrey School of Public Affairs, University of Minnesota, at 2 (Apr. 20, 2012),  
27 available at [https://conservancy.umn.edu/bitstream/handle/11299/123582/Anhut\\_Voter%20Ident](https://conservancy.umn.edu/bitstream/handle/11299/123582/Anhut_Voter%20Ident)  
28

1 ification%20The%20True%20Costs%20An%20Analysis%20of%20Minnesotas%20Voter%20Id  
2 entification%20Amendment.pdf?sequence=1&isAllowed=y. Simply put, there is no way in which  
3 designing, printing, and administering a new form of required photo identification would be cost-  
4 free.

5 17. In addition, the Petition's requirement that the county clerk "[a]mend the voter  
6 registration card to include an option for a voter to request a special identification document"  
7 would mean that the state must redesign and reprint all voter registration cards, yet another expense  
8 that must be incurred.

9 18. Although the Fiscal Analysis Division (the "Division") of the Legislative Counsel  
10 Bureau has not yet issued a financial impact statement for the Petition, in 2014 and 2016, the  
11 Division determined that similar voter photo ID initiatives that would require a new form of photo  
12 ID would increase the expenditures of the state and local governments. *See Financial Impact*  
13 *Statement of the Voter ID Initiative* (February 13, 2014), available at  
14 <https://www.nvsos.gov/sos/home/showpublisheddocument/3214/636578340122570000> (last visit  
15 ed May 31, 2022); *Financial Impact of the Initiative to Require Voter ID* (Aug. 4, 2016),  
16 available at <https://www.nvsos.gov/sos/home/showpublisheddocument/4385/6365860236453000>  
17 00 (last visited May 31, 2022).

18 19. As noted in each fiscal impact statement, "Legislation requiring the issuance of  
19 voter identification cards at no charge would increase the expenditures of the state and local  
20 government entities required to issue the cards." *Id.* Further, the Division concluded in both  
21 analyses that "the provisions of the Initiative requiring a registered voter to present his or her proof  
22 of identity to vote in person would require the Secretary of State to conduct an educational  
23 campaign to inform voters of the identification requirements specified within the Initiative." *Id.*

24 20. Simply put, there is no way in which designing, printing, and administering a new  
25 form of required photo identification would be cost-free. Each of these expenditures is inherently  
26 required by the Petition, whose measures cannot be achieved without them. By commanding  
27 Nevada officials to implement and maintain the new identification requirements, the Petition  
28



1 leaves “budgeting officials no discretion in appropriating or expending the money mandated by  
2 the initiative—the budgeting official must approve the appropriation or expenditure” to comply  
3 with its provisions. *Herbst Gaming*, 122 Nev. at 890, 141 P.3d at 1233.

4 21. The Petition acknowledges this basic truth and would require the Secretary to  
5 “reallocate existing funds” to cover its costs. Ex. 1 at 2. But Section 6 is not triggered only when  
6 an initiative would require a new appropriation—that is, “the setting aside of funds” that the  
7 Legislature would not otherwise set aside. *Rogers*, 117 Nev. at 173, 18 P.3d at 1036. It is also  
8 implicated when an initiative requires *an expenditure*—that is, “the payment of funds” for a  
9 particular purpose. *Id.* And the Nevada Supreme Court has already held that existing funding  
10 cannot be used to offset an initiative’s costs and immunize it from Section 6’s requirements. *See*  
11 *id.* at 175-76, 18 P.3d at 1038. Because the Petition would take away the Legislature and budgeting  
12 officials’ discretion to lower current funding levels or decline to spend the funds for the purposes  
13 the Petition mandates, it requires an appropriation and expenditure. And, because no portion of the  
14 Petition “provides for raising the necessary revenue,” as Article 19, Section 6 requires, it is void  
15 ab initio. *Id.* at 173, 18 P.3d at 1036.

## 16 **SECOND CAUSE OF ACTION**

### 17 **Violation of Description of Effect Requirement, NRS 295.009(1)(b)**

18 22. The foregoing paragraphs of this Complaint are realleged and fully incorporated as  
19 if set forth in full herein.

20 23. NRS 295.009(1)(b) requires that initiative petitions “set forth, in not more than 200  
21 words, a description of the effect of the initiative or referendum if the initiative or referendum is  
22 approved by the voters.”

23 24. “[A] description of effect must identify what the law proposes and how it intends  
24 to achieve that proposal.” *Educ. Initiative PAC v. Comm. to Protect Nev. Jobs*, 129 Nev. 35, 42,  
25 293 P.3d 874, 879 (2013). In doing so, the description of effect “must be straightforward, succinct,  
26 and nonargumentative, and it must not be deceptive or misleading.” *Id.* at 42 (internal quotation  
27 marks and citation omitted). A description of effect must also sufficiently “explain the[]  
28

1 ramifications of the proposed amendment” to allow voters to make an informed decision. *Nev.*  
2 *Judges Ass’n v. Lau*, 112 Nev. 51, 59, 910 P.2d 898, 903 (1996).

3 25. Here, the description of effect is legally deficient because it is deceptive and  
4 misleading. Not only does the description omit key effects, but it also includes false statements  
5 about the consequences of enacting the Petition.

6 26. At the outset, the description of effect falsely claims that the measure “would  
7 require all voters voting in person at a Nevada polling place to present photographic identification  
8 before casting a ballot.” Ex. 1 at 3 (emphasis added). In fact, the proposed statutory revisions  
9 permit some in-person voters to cast a provisional ballot *without* showing photographic  
10 identification. As amended by the Petition, NRS 293.277(1) would read, “Except as otherwise  
11 provided in NRS 293.283, 293.541 and 293.5772 to 293.5887, inclusive, if a person’s name  
12 appears in the roster or if the person provides an affirmation pursuant to NRS 293.525, and he or  
13 she presents valid photographic identification, the person is entitled to vote and must sign his or  
14 her name in the roster or on a signature card when he or she applies to vote.”

15 27. As amended by the Petition, NRS 293.277(1) would read, “Except as otherwise  
16 provided in NRS 293.283, 293.541 and 293.5772 to 293.5887, inclusive, if a person’s name  
17 appears in the roster or if the person provides an affirmation pursuant to NRS 293.525, and he or  
18 she presents valid photographic identification, the person is entitled to vote and must sign his or  
19 her name in the roster or on a signature card when he or she applies to vote.” Pursuant to the listed  
20 exceptions, there are at least two instances when voters may vote in person without presenting a  
21 photo ID. First, registered voters who update their voter registration information after the close of  
22 registration for an election may be required to cast a provisional ballot if a city or county clerk  
23 needs more time to determine whether the voter is eligible to cast a ballot in the election. *See* NRS  
24 293.5832(1), (3). Second, electors who register to vote on Election Day and who do not have a  
25 driver’s license or identification card issued by the Department of Motor Vehicles (DMV) with  
26 their current residential address may cast a provisional ballot so long as they establish their  
27 residency by providing one of the following forms of identification (most of which do not  
28



commonly include a photograph): a military identification card, a utility bill, a bank or credit union statement, a paycheck, an income tax return, a mortgage statement, a residential rental or lease statement, a property tax statement, or any other document issued by a governmental agency. *See* NRS 293.5847. In both situations, provisional ballots will be counted if they are verified using the final verification procedures applicable to other provisional ballots cast in the same election, none of which require voters to present a photo ID. *See* NRS 293.5832(4); 293.5847(4); 293.5872. These examples illustrate how the assertion in the description of effect that *all* voters voting in person at a Nevada polling place will have to present photographic identification before casting a ballot is false and misleading.

28. The description of effect is also misleading because it fails to give a complete and accurate accounting of the Petition's effects. Although the description says that in-person voters will be required to "present photographic identification before casting a ballot," Ex. 1 at 3, it fails to mention that the proposed changes to NRS 293.277 would *also* alter Nevada's processes for voter registration and curing mail ballots where elections officials decide that a voter's signature on the ballot envelope does not sufficiently "match" the signature election officials have on file. The proposed amendment to NRS 293.277(2), which modifies the types of identification which may be used to confirm a voter's identification, would be incorporated by reference into these other election processes.

29. More specifically, with respect to the mail ballot cure process, if a county clerk decides that there "is a reasonable question of fact" as to whether the signature provided by the voter with their mail ballot "matches" the signature on file for the voter, they have three options for confirming the voter's identity: (1) have the voter correctly answer questions about their personal data; (2) have the voter provide other personal data; or (3) have the voter present proof of identification *as described in NRS 293.277* other than a voter registration card. NRS 293.269927(8)(c). The Petition's proposed changes would therefore prevent a county clerk from confirming a voter's identity using a government-issued identification containing the voter's signature and a physical description but no photograph, as currently listed in NRS 293.277(2)(e).

1 This significant impact of the Petition is not addressed at all in the description of effect. This  
2 omission is material and misleading.

3 30. Regarding voter registration, under Nevada's automatic voter registration system,  
4 individuals who renew their driver's licenses at the DMV will be automatically registered to vote  
5 unless they opt out. NRS 293.5752(1). County clerks are not allowed to reject these voter  
6 registration applications solely on the basis of a missing electronic signature. NRS 293.57691(1).  
7 If the signature is missing, the county clerk is required to confirm the person's identity in one of  
8 four ways: (1) send the prospective voter a mailed notice that the voter returns with a signature;  
9 (2) request and receive an electronic signature from the DMV or another agency; (3) request and  
10 receive the person's signature through any other means approved by the Secretary of State; or (4)  
11 approve the registration application when the person shows up to vote at a polling place and their  
12 signature on the roster is matched against their signature on one of the forms of ID described in  
13 NRS 293.277. NRS 293.57691(2)(d). As with matching a signature, the Petition's proposed  
14 changes would limit the forms of identification a county clerk may rely on to confirm a voter's  
15 identity to only those with a picture. The description of effect similarly fails to make any mention  
16 of this significant impact to Nevada's current voter registration procedures. This omission is  
17 similarly both material and misleading.

18 31. The description also falsely claims that "[t]he new photographic identification  
19 document will be issued upon request to any eligible voter." Ex. 1 at 3. This plainly contradicts  
20 the language of the proposed statutory amendments in the Petition, which provides that only "a  
21 person who does not possess any document bearing his or her signature and picture may request  
22 from the Secretary of State a special identification document bearing his or her signature and  
23 picture" *Id.* at 2 (emphasis added). Voters who possess student identification cards bearing their  
24 signatures and photographs, for example, could read the description of effect and believe  
25 themselves to be eligible to request a special identification document from the Secretary of State,  
26 even though the proposed statutory language would prevent such a request.

32. Finally, because the types of permissible photo ID are not listed in the description of effect, voters may (incorrectly) believe that because they have photo ID of some kind—for example, a credit card or student ID with their picture—that they will be able to use these IDs in order to vote in person. This would be particularly problematic because, while these IDs would not be usable for voting if the Petition were enacted, possession of one could disqualify a voter from obtaining the new special identification document that the Petition would create. Thus, the description is both misleading and confusing to voters in describing the circumstances in which voters would be able to request and use the new photo ID.

33. Collectively, these omissions and misstatements render the Petition's description of effect legally deficient.

## PRAYER FOR RELIEF

**WHEREFORE**, Plaintiff asks this Court to enter an order:

1. Declaring that the Petition's description of effect does not comply with NRS 295.009(1)(b) because it is confusing, deceptive, and misleading, and does not sufficiently explain the major ramifications of the Petition, and therefore invalid;

2. Declaring that the Petition does not comply with Article 19, Section 6 of the Nevada Constitution because it impermissibly mandates an unfunded expenditure;

3. Enjoining and prohibiting the Nevada Secretary of State from transmitting the Petition to the Legislature in 2023 or from taking further action upon it;

4. Awarding Plaintiff her reasonable costs and attorneys' fees; and

5. Granting such other relief as the Court deems appropriate.

///

///

///

///

///

///



1 **AFFIRMATION**

2 The undersigned hereby affirm that the foregoing document does not contain the social  
3 security number of any person.

4 DATED this 6th day of June, 2022.

5 **WOLF, RIFKIN, SHAPIRO,**  
6 **SCHULMAN & RABKIN, LLP**

7 By: 

8 BRADLEY S. SCHRAGER, ESQ. (NSB 10217)  
9 JOHN SAMBERG, ESQ. (NSB 10828)  
10 DANIEL BRAVO, ESQ. (NSB 13078)  
11 3773 Howard Hughes Parkway, Suite 590 South  
12 Las Vegas, NV 89169  
13 (702) 341-5200/Fax: (702) 341-5300  
14 bschrager@wrslawyers.com  
15 jsamberg@wrslawyers.com  
16 dbravo@wrslawyers.com

17 WILLIAM STAFFORD, ESQ. (*pro hac vice forthcoming*)  
18 LINDSAY MCALEER, ESQ. (*pro hac vice forthcoming*)  
19 **ELIAS LAW GROUP LLP**  
20 1700 Seventh Ave, Suite 2100  
21 Seattle, WA 98101  
22 (206) 656-0235/Fax: (202) 968-4498  
23 bstafford@elias.law  
24 lmcaleer@elias.law

25 *Attorneys for Plaintiff*  
26  
27  
28

# EXHIBIT 1

RETRIEVED FROM DEMOCRACYDOCKET.COM

# EXHIBIT 1

# NOTICE OF INTENT TO CIRCULATE STATEWIDE INITIATIVE OR REFERENDUM PETITION

State of Nevada



Secretary of State Barbara K. Cegavske

Pursuant to NRS 295.015, before a petition for initiative or referendum may be presented to registered voters for signatures, the person who intends to circulate the petition must provide the following information:

## NAME OF PERSON FILING THE PETITION

Raja Mourey

## NAME(S) OF PERSON(S) AUTHORIZED TO WITHDRAW OR AMEND THE PETITION (provide up to three)

1. Raja Mourey

2.

3.

## NAME OF THE POLITICAL ACTION COMMITTEE (PAC) ADVOCATING FOR THE PASSAGE OF THE INITIATIVE OR REFERENDUM (if none, leave blank)

R.I.S.E. Nevada - Restoring Integrity in State Elections

Please note, if you are creating a Political Action Committee for the purpose of advocating for the passage of the initiative or referendum, you must complete a separate PAC registration form.

Additionally, a copy of the initiative or referendum, including the description of effect, must be filed with the Secretary of State's office at the time you submit this form.

X

A handwritten signature in black ink, appearing to be "R. Mourey".

Signature of Petition Filer

5/4/2022

Date



## INITIATIVE TO RESTORE INTEGRITY TO STATE ELECTIONS

## THE PEOPLE OF THE STATE OF NEVADA DO ENACT AS FOLLOWS:

Chapter 293 of NRS is hereby amended by adding thereto as follows:

1. *A person who does not possess any document bearing his or her signature and picture may request from the Secretary of State a special identification document bearing his or her signature and picture.*
2. *The special identification document is only valid for the purpose of identifying a voter at a polling place under NRS 293.277.*
3. *The Secretary of State shall furnish upon request a special identification document to any person who is eligible to vote.*
4. *The Secretary of State shall reallocate existing funds to cover any expenditure necessary to facilitate the issuance of a special identification document under subsection 1.*
5. *The county clerk, with the approval of the Secretary of State, shall:*
  - (a) *Amend the voter registration card to include an option for a voter to request a special identification document; and*
  - (b) *Prescribe a procedure for the issuance of a special identification document under subsection 1.*

NRS 293.277 is hereby amended to read as follows:

1. Except as otherwise provided in NRS 293.283, 293.541 and 293.5772 to 293.5887, inclusive, if a person's name appears in the roster or if the person provides an affirmation pursuant to NRS 293.525, ***and he or she presents valid photographic identification***, the person is entitled to vote and must sign his or her name in the roster or on a signature card when he or she applies to vote. The signature must be compared by an election board officer with the signature or a facsimile thereof on the person's application to register to vote or one of the forms of identification listed in subsection 2.
2. Except as otherwise provided in NRS 293.2725, the forms of identification which may be used individually to identify a voter at the polling place are:
  - a. The voter registration card issued to the voter ***accompanied by another form of identification bearing the voter's picture***;
  - b. A driver's license;
  - c. An identification card issued by the Department of Motor Vehicles;
  - d. A military identification card; or
  - e. Any other form of identification issued by a governmental agency which contains the voter's signature and ~~physical description or picture~~.
3. The county clerk shall prescribe a procedure, approved by the Secretary of State, to verify that the voter has not already voted in that county in the current election.

**DESCRIPTION OF EFFECT**

If passed, this statutory measure would require all voters voting in person at a Nevada polling place to present photographic identification before casting a ballot. The measure would also require the Secretary of State to create a special photographic identification document for voting purposes. The new photographic identification document will be issued upon request to any eligible voter in Nevada.

County of: \_\_\_\_\_

**(Only registered voters of this county may sign below)**

Petition District: \_\_\_\_\_

**(Only registered voters of this petition district may sign below)**This Space For  
Office Use  
Only

1	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
2	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
3	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
4	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
5	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
6	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
7	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
8	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	

**DESCRIPTION OF EFFECT**

If passed, this statutory measure would require all voters voting in person at a Nevada polling place to present photographic identification before casting a ballot. The measure would also require the Secretary of State to create a special photographic identification document for voting purposes. The new photographic identification document will be issued upon request to any eligible voter in Nevada.

County of: \_\_\_\_\_

**(Only registered voters of this county may sign below)**

Petition District: \_\_\_\_\_

**(Only registered voters of this petition district may sign below)**This Space For  
Office Use

9	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
10	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
11	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
12	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
13	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
14	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
15	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	
16	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE                      DATE / /	CITY	COUNTY	PETITION DISTRICT	



**DESCRIPTION OF EFFECT**

If passed, this statutory measure would require all voters voting in person at a Nevada polling place to present photographic identification before casting a ballot. The measure would also require the Secretary of State to create a special photographic identification document for voting purposes. The new photographic identification document will be issued upon request to any eligible voter in Nevada.

County of: \_\_\_\_\_

**(Only registered voters of this county may sign below)**

Petition District: \_\_\_\_\_

**(Only registered voters of this petition district may sign below)**

This Space For  
Office Use  
Only

17	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
18	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
19	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	
20	PRINT YOUR NAME (First Name, Middle Name, Last Name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE DATE / /	CITY	COUNTY	PETITION DISTRICT	

**AFFIDAVIT OF CIRCULATOR**

(To be signed by circulator in the presence of a notary public)

STATE OF NEVADA )

COUNTY OF \_\_\_\_\_ )

I, \_\_\_\_\_ (print name of circulator), being first duly sworn under penalty of perjury, depose and say:

(1) that I reside at \_\_\_\_\_ (print street, city and state); (2) that I am 18 years of age or older; (3) that I personally circulated this document; (4) that all signatures were affixed in my presence; (5) that the number of signatures affixed thereon is \_\_\_\_\_; and (6) that each person who signed had an opportunity before signing to read the full text of the act or resolution on which the initiative is demanded.

\_\_\_\_\_  
Signature of Circulator

Subscribed and sworn to or affirmed before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

Petition Packet: \_\_\_\_\_