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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
17 Plaintiff,

18 vs.

19 BARBARA CEGAVSKE, in her official
capacity as NEVADA SECRETARY OF
20 STATE; R.I.S.E. NEVADA – RESTORING
INTEGRITY IN STATE ELECTIONS, a
21 Nevada Committee for Political Action; and
RAJA MOUREY, in his capacity as the
22 President of R.I.S.E. NEVADA -
RESTORING INTEGRITY IN STATE
23 ELECTIONS,

24 Defendants.

Case No.:

Dept. No.:

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF
CHALLENGING INITIATIVE
PETITION S-07-2022**

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

Arbitration Exemption: Declaratory and
Injunctive Relief

25
26 Plaintiff Emily Persaud-Zamora, an individual registered to vote in Nevada, files this
27 Complaint for declaratory and injunctive relief against Defendants Barbara Cegavske, in her
28

1 official capacity as the Nevada Secretary of State, R.I.S.E. Nevada – Restoring Integrity in State
2 Elections (“R.I.S.E. Nevada”), and Raja Mourey, in his capacity as the president of R.I.S.E.
3 Nevada – Restoring Integrity in State Elections, pursuant to the Nevada Constitution and NRS
4 30.030 and 33.010. Plaintiff alleges and complains as follows:

5 **JURISDICTION AND VENUE**

6 1. This Court has jurisdiction to hear Plaintiff’s claims pursuant to the Nevada
7 Constitution and to grant declaratory and injunctive relief pursuant to NRS 30.030, 30.040, and
8 33.010.

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

11 **PARTIES**

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

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

20 5. Defendant R.I.S.E. Nevada is a Nevada committee for political action existing
21 pursuant to Chapter 294A of the Nevada Revised Statutes and is named herein as the proponent of
22 the petition at issue, Initiative Petition S-07-2022, styled as the “Initiative to Restore Integrity of
23 State Elections” (the “Petition”).

24 6. Defendant Raja Mourey is named as a proponent of the Petition. Mr. Mourey is the
25 President of R.I.S.E. Nevada. Upon information and belief, Mr. Mourey is an individual and, at all
26 times relevant herein, was and is a resident of the State of Nevada.

1 GENERAL FACTUAL ALLEGATIONS

2 7. On or about August 3, 2022, Mr. Mourey, on behalf of R.I.S.E. Nevada
3 (collectively, “Proponents”), filed the Petition with the Nevada Secretary of State. *See Exhibit 1,*
4 a true and accurate copy of the Notice of Intent to Circulate Statewide Initiative or Referendum
5 Petition associated with Initiative Petition S-07-2022.

6 8. The Petition seeks to amend Chapter 293 of the Nevada Revised Statutes to make
7 several significant changes to Nevada’s election process, including imposing a photo ID
8 requirement on in-person voters, limiting the forms of ID available to voters to match or identify
9 a signature in certain circumstances, and mandating that Nevada provide a new form of free photo
10 ID to be used for voting purposes for voters who lack a document bearing their signature and
11 picture. The Petition provides no mechanism for raising any funds to cover the cost of the required
12 special ID. *See Ex. 1 at 2, a true and accurate copy of the filed Petition.*

13 9. The Petition would require that in-person voters present “valid photographic
14 identification” to cast a ballot in all local and federal elections unless they fall under the exceptions
15 specified in NRS 293.277. Under current Nevada law, voters may present a variety of forms of ID
16 bearing their signature to vote in person, including their voter registration card or a form of
17 government-issued ID containing their signature and a physical description. *See NRS 293.277(2).*
18 The Petition seeks to amend the forms of permissible ID listed in NRS 293.277(2) to prevent voters
19 from verifying their identity using only their voter registration cards or government-issued IDs
20 that contains only a physical description of the voter, instead requiring that *all* forms of permissible
21 ID under NRS 293.277(2) contain the voter’s picture. *See Ex. 1 at 2 (proposing to amend NRS*
22 *293.277(2)(a) to require that “[t]he voter registration card issued to the voter [be] accompanied by*
23 *another form of identification bearing the voter’s picture” (emphasis in original to highlight new*
24 *matter)).*

25 10. The Petition would also require that the Secretary of State create a new “special
26 identification document” that voters who do not have a photo ID bearing their signature could
27 request that they could then use as ID at a polling place under NRS 297.277. Ex. 1 at 2 (mandating
28

1 that “[t]he Secretary of State shall furnish upon request a special identification document to any
2 person who is eligible to vote”). The Petition provides that “[t]he special identification document
3 is only valid for the purpose of identifying a voter at a polling place under NRS 293.277.” *Id.* To
4 implement this change, the Petition would require that the county clerk, with the approval of the
5 Secretary of State: “(a) Amend the voter registration card to include an option for a voter to request
6 a special identification document; and (b) Prescribe a procedure for the issuance of a special
7 identification document.” *Id.*

8 11. The Petition thus proposes significant changes to Nevada voting procedures. It
9 contains no funding mechanism for these changes.

10 12. The Petition’s description of effect reads, in full:

11 If passed, this statutory measure would require all voters voting in person
12 at a Nevada polling place to present photographic identification before
13 casting a ballot. The measure would also require the Secretary of State to
14 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.

15 Ex. 1 at 3.

16 13. This is not the first time that Proponents have proposed this particular unfunded
17 mandate. Back in May 2022, Proponents filed an almost identical petition with the Secretary of
18 State titled S-05-2022. *See* Notice of Intent to Circulate Statewide Initiative or Referendum
19 Petition associated with Initiative Petition S-05-2022 (May 4, 2022), available at
20 <https://www.nvsos.gov/sos/home/showpublisheddocument/10560/637884821714430000> (last
21 visited Aug. 19, 2022). On July 29, 2022, a district court judge held that this petition was an
22 impermissible unfunded government mandate in violation of Article 19, Section 6. The only
23 difference is that this Petition removes the following language from the prior petition: “The
24 Secretary of State shall reallocate existing funds to cover any expenditure necessary to facilitate
25 the issuance of a special identification document under subsection 1.” *Id.* The description of effect
26 is also the same for both, indicating that there is no difference in how each Petition must be
27 implemented as a substantive matter. *Id.*

1 CAUSE OF ACTION

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

3 14. The foregoing paragraphs of this Complaint are realleged and fully incorporated as
4 if set forth in full herein.

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

11 16. “Section 6 applies to *all* proposed initiatives, without exception, and *does not*
12 *permit* any initiative that fails to comply with the stated conditions.” *Rogers v. Heller*, 117 Nev.
13 169, 173, 18 P.3d 1034, 1036 (2001) (emphases in original). When an initiative violates this
14 “threshold content restriction” by mandating unfunded expenditures, it is void ab initio, and pre-
15 election intervention by Nevada courts is warranted. *Herbst Gaming, Inc. v. Heller*, 122 Nev. 877,
16 891, 141 P.3d 1224, 1233 (2006) (quoting *Rogers*, 117 Nev. at 173).

17 17. Although the Fiscal Analysis Division (the “Division”) of the Legislative Counsel
18 Bureau has not yet issued a financial impact statement for the Petition, in 2014 and 2016, the
19 Division determined that similar voter photo ID initiatives that would require a new form of photo
20 ID **would increase the expenditures** of the state and local governments. *See Financial Impact*
21 *Statement of the Voter ID Initiative* (Feb. 13, 2014), available at
22 <https://www.nvsos.gov/sos/home/showpublisheddocument/3214/636578340122570000> (last visit
23 ed Aug. 19, 2022); *Financial Impact of the Initiative to Require Voter ID* (Aug. 4, 2016),
24 available at <https://www.nvsos.gov/sos/home/showpublisheddocument/4385/6365860236453000>
25 [00](https://www.nvsos.gov/sos/home/showpublisheddocument/4385/6365860236453000) (last visited Aug. 19, 2022).

26 18. As noted in each fiscal impact statement, “Legislation requiring the issuance of
27 voter identification cards at no charge would increase the expenditures of the state and local
28

1 government entities required to issue the cards.” *Id.* Further, the Division concluded in both
2 analyses that “the provisions of the Initiative requiring a registered voter to present his or her proof
3 of identity to vote in person would require the Secretary of State to conduct an educational
4 campaign to inform voters of the identification requirements specified within the Initiative.” *Id.*
5 Neither of the initiative petitions the Division analyzed included language requiring that a
6 government agency or actor *reallocate* funds to cover these expenditures; rather, each would have
7 requires the creation of a new form of ID for voting purposes at no cost to voters, just as this
8 Petition would do. *See Initiative Petition to Require Voter ID* (July 8, 2016), available at
9 <https://www.nvsos.gov/sos/home/showpublisheddocument/4342/637080310707300000>; *The*
10 *Voter ID Initiative* (May 14, 2014), available at
11 <https://www.nvsos.gov/sos/home/showpublisheddocument/3330/636087792326570000>.

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

20 Indiana calculated its production costs alone for the 168,264 voter ID cards that it provided to
21 voters in 2010 to be over \$1.3 million. *See Nat’l Conference for State Legislatures, The Canvass*,
22 No. XVII, Feb. 2011, p. 2, available at [https://www.ncsl.org/research/elections-and-](https://www.ncsl.org/research/elections-and-campaigns/cnv-the-canvass-vol-xvii-february-2011.aspx#Cost)
23 [campaigns/cnv-the-canvass-vol-xvii-february-2011.aspx#Cost](https://www.ncsl.org/research/elections-and-campaigns/cnv-the-canvass-vol-xvii-february-2011.aspx#Cost). The North Carolina legislature’s
24 fiscal impact analysis of the then-pending bill to require the state to issue free voter ID cards to
25 eligible voters concluded that the state would incur \$3.2 million in startup costs followed by
26 \$375,000 in recurring costs to administer the system. *See H.R. 351, 2011 Sess.*
27 (N.C. 2011), available at <http://www.ncga.state.nc.us/Sessions/2011/FiscalNotes/House/PDF/HF>

28

1 [N0351v1.pdf](#). Academic researchers in Minnesota estimated the direct cost to the state of
2 providing free ID documents to half of the eligible voters who do not already have a valid photo
3 ID to be in excess of \$1.03 million in the first year. *See* Nicholas Anhut, et al., *Voter Identification:
4 The True Cost, An Analysis of Minnesota's Voter Identification Amendment*, The Hubert H.
5 Humphrey School of Public Affairs, University of Minnesota, at 2 (Apr. 20, 2012),
6 available at [https://conservancy.umn.edu/bitstream/handle/11299/123582/Anhut_Voter%20Ident
7 ification%20The%20True%20Costs%20An%20Analysis%20of%20Minnesotas%20Voter%20Id
8 entification%20Amendment.pdf?sequence=1&isAllowed=y](https://conservancy.umn.edu/bitstream/handle/11299/123582/Anhut_Voter%20Identification%20The%20True%20Costs%20An%20Analysis%20of%20Minnesotas%20Voter%20Identification%20Amendment.pdf?sequence=1&isAllowed=y).

9 20. Simply put, there is no way in which designing, printing, and administering a new
10 form of required photo ID would be cost-free.

11 21. Each of these expenditures is inherently required by the Petition, whose measures
12 cannot be achieved without them. By commanding Nevada officials to implement and maintain
13 the new ID requirements, the Petition leaves “budgeting officials no discretion in appropriating or
14 expending the money mandated by the initiative—the budgeting official must approve the
15 appropriation or expenditure” to comply with its provisions. *Herbst Gaming*, 122 Nev. at 890.

16 22. Proponents are well aware that the Petition cannot be implemented without the
17 allocation of additional funds. This is why the previous version of the same petition expressly
18 required the Secretary to “reallocate existing funds” to cover its costs. Proponents omit this
19 language from the current Petition. This omission is immaterial because the Petition still requires
20 the Secretary to create, implement, and issue an entirely new form of photo ID without including
21 any funding mechanism to offset those costs. Ex. 1 at 2. This violates Nevada Constitution.

22 23. Section 6 is not triggered only when an initiative would require a new
23 appropriation—that is, “the setting aside of funds” that the Legislature would not otherwise set
24 aside. *Rogers*, 117 Nev. at 173. It is also implicated when an initiative requires *an expenditure*—
25 that is, “the payment of funds” for a particular purpose. *Id.* There is no reasonable debate that
26 creating a new ID requires the payment of funds for that particular purpose. And the Nevada
27
28

1 Supreme Court has already held that existing funding cannot be used to offset an initiative's costs
2 and immunize it from Section 6's requirements. *See id.* at 175-76.

3 24. For this Petition to work, the Legislature and other relevant budgeting officials have
4 no choice: they must fund the creation of a new form of photo ID, among the other costs associated
5 with administering the program. These other necessary and inherent costs include an extensive
6 voter education and public outreach campaign, revised and additional election materials, and
7 expanded poll worker training and wages, which have cost hundreds of thousands of dollars in
8 states that have adopted similar laws.¹ They also include the Petition's requirement that the county
9 clerk "[a]mend the voter registration card to include an option for a voter to request a special
10 identification document," Ex. 1 at 2, yet another change that would require the expenditure of
11 funds to redesign and reprint all voter registration cards. When other states have imposed voter ID,
12 it has come with significant costs. *See Costs of Voter Identification.*

13 25. Because the Petition would take away the Legislature and budgeting officials'
14 discretion to lower current funding levels or decline to spend the funds for the purposes the Petition
15 mandates, it requires an appropriation and expenditure. And, because no portion of the Petition
16 "provides for raising the necessary revenue," as Article 19, Section 6 requires, it is void ab initio.
17 *Rogers*, 117 Nev. at 173.

18 PRAYER FOR RELIEF

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

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

22 A. Enjoining Defendant R.I.S.E. Nevada and its proponents, officers, or agents from
23 circulating the signatures for verification pursuant to NRS 293.1276 to 293.1279, inclusive;

24
25 _____
26 ¹ See Nat'l Conference of State Legislatures, *Costs of Voter Identification*, (June 2014) at
27 2-3, https://www.ncsl.org/documents/legismgt/elect/Voter_ID_Costs_June2014.pdf (hereinafter
28 "*Costs of Voter Identification*").

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

3 C. Awarding Plaintiff her reasonable costs and attorneys' fees; and

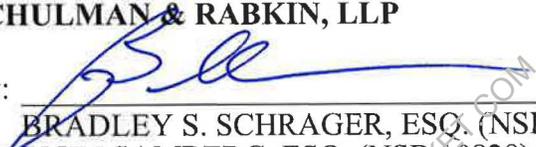
4 D. Granting such other relief as the Court deems appropriate.

5 **AFFIRMATION**

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

8 DATED this 23rd day of August, 2022.

9 **WOLF, RIFKIN, SHAPIRO,
10 SCHULMAN & RABKIN, LLP**

11 By: 

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Attorneys for Plaintiff

INDEX OF EXHIBITS

Exhibit No.	Documents	Pages
1	Notice of Intent to Circulate Statewide Initiative or Referendum Petition associated with Initiative Petition S-07-2022	6

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EXHIBIT 1

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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 Raja Mourey
Signature of Petition Filer

7-27-2022
Date

RESTORE INTEGRITY TO STATE ELECTIONS INITIATIVE

EXPLANATION: Matter in ***bolded italics*** is new; matter between brackets [~~omitted material~~] is language to be omitted.

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 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, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
2	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
3	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
4	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
5	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	

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)

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Office Use Only

6	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
7	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
8	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
9	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
10	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	

THE FOLLOWING AFFIDAVIT MUST BE COMPLETED AND SIGNED:

AFFIDAVIT OF CIRCULATOR

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

STATE OF NEVADA)
)
COUNTY OF _____)

I, _____, (print name), 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 or referendum is demanded.

Signature of Circulator

Subscribed and sworn to or affirmed before me this ____ day of _____, by _____.

Notary Public or person authorized to administer oath

EL502
Revised 8/19