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**DISTRICT COURT
CLARK COUNTY, NEVADA**

CITIZEN OUTREACH FOUNDATION,
CHARLES MUTH,

Petitioners,

vs.

LORENA S. PORTILLO, in her official
capacity as Clark County Registrar of
Voters,

Respondent.

Case No. A-24-902351-W

Dept. No. 28

HEARING NOT REQUESTED

**NEVADA SECRETARY OF STATE'S
MOTION TO INTERVENE AS RESPONDENT**

Proposed Intervenor-Respondent Francisco V. Aguilar, in his official capacity as Nevada Secretary of State ("Secretary" or "Secretary Aguilar"), by and through counsel, moves to intervene as a respondent in this above-titled action under Nevada Rule of Civil Procedure 24 ("Motion").

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1 This Motion is based on the Memorandum of Points and Authorities below, the
2 exhibits attached hereto, all papers and pleadings on file, and any oral argument this Court
3 allows at a hearing on this matter.

4 MEMORANDUM OF POINTS AND AUTHORITIES

5 I. INTRODUCTION

6 This petition for a writ of mandamus (the “Petition”) centers around Respondent
7 Portillo’s alleged actions *in direct relation to guidance issued by Secretary Aguilar* on
8 written challenges to a voter’s eligibility under NRS 293.535. *See* Pet. ¶¶ 3–12. What’s
9 more, Petitioners seek relief that (i) fundamentally contradicts the Secretary’s guidance on
10 the “personal knowledge” requirement for such third-party challenges and (ii) risks
11 violating state and federal election laws by improperly purging voters. *See id.* ¶¶ 34–35,
12 38–40, 42, 45–46; *id.* Prayer for Relief. Yet despite targeting guidance by the Secretary,
13 Nevada’s “Chief Officer of Elections,” NRS 293.124, 293.675, Petitioners do not name the
14 Secretary as a respondent. It is the Secretary, after all, who is ultimately “responsible for
15 maintaining Nevada’s voter rolls and to ensure [sic] the integrity of Nevada’s elections,”
16 Pet. ¶ 15, not just Respondent. Given the Petition’s palpable threats to the Secretary’s
17 interests in consistently administering Nevada’s elections—interests the Secretary himself
18 is best positioned to protect—intervention is necessary as a matter of right under
19 NRCP 24(a)(2). Alternatively, permissive intervention is warranted under NRCP 24(b)(2)
20 because the Petition turns on election laws the Secretary must administer.¹

21 II. BACKGROUND

22 A. The Secretary’s Executive Role as Nevada’s Chief Elections Officer

23 The Secretary of State serves as “Chief Officer of Elections for this State” and “is
24 responsible for the execution and enforcement of the provisions of title 24 of NRS and all
25 other provisions of state and federal law relating to elections in this State.” NRS 293.124.

26
27 ¹ If the Court grants the Secretary’s Motion, the Secretary intends to file a response consistent with
28 any order to respond issued by the Court. Because NRCP 24(c) requires a proposed intervenor to attach a
proposed “pleading” to a motion to intervene, the Secretary has attached a proposed answer as **Exhibit 1** to
this Motion.

1 He is therefore “mandated to, among other things, uphold Nevada’s Constitution, execute
2 and enforce Nevada’s election statutes, and administer Nevada’s election process.”
3 *Miller v. Burk*, 124 Nev. 579, 588, 188 P.3d 1112, 1118 (2008) (citing Nev. Const., art. XV,
4 § 2; NRS 293.124; *Heller v. Legis. of State of Nev.*, 120 Nev. 456, 461, 93 P.3d 746, 750
5 (2004) (per curiam)). The Secretary “must obtain and maintain consistency in the
6 application, operation and interpretation of election laws.” *Heller*, 120 Nev. at 461, 93 P.3d
7 at 750 (citing NRS 293.247). Under Nevada law, the Secretary must faithfully and
8 consistently enforce election laws across all Nevada counties. *See id.*

9 Relevant here, voter roll procedures squarely fall within the Secretary’s executive
10 duties; they also require the Secretary’s oversight of county clerks across the State. The
11 Secretary is responsible for coordination of the State’s responsibilities under the National
12 Voter Registration Act of 1993 (“NVRA”), 52 U.S.C. § 20509, which include voter roll
13 maintenance, *id.* § 20507. Further, NRS 293.675 requires that the Secretary “establish
14 and maintain a centralized, top-down database that collects and stores information related
15 to . . . the registration of electors from all the counties in [Nevada],” among other
16 requirements. NRS 293.675(1). County and city clerks must electronically enter voter
17 registration information into the Secretary’s central database and “[p]rovide [him] with
18 information concerning the voter registration of the county . . . and other reasonable
19 information requested by [him] in the form required by [him] to establish or maintain the
20 statewide voter registration list.” NRS 293.675(4); *see also* NAC 293.412. Then, the
21 Secretary uses voter registration information collected from each county or city “to create
22 the official statewide voter registration list . . . in consultation with each county and city
23 clerk.” NRS 293.675(2).

24 **B. Voter Roll Maintenance and Third-Party Challenges to Voter**
25 **Eligibility under NRS 293.535.**

26 The Secretary administers overlapping state and federal statutes that govern how
27 county clerks handle external challenges to a voter’s registration and, more broadly,

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maintain their voter registration lists. Together, these statutes require procedural coordination and authorization among various local and state officials.

Under NRS 293.535, an individual may file a “written challenge” with a county clerk, alleging that a registered voter is ineligible to vote. Relevant here, the challenger may file an affidavit stating that the challenged registrant has moved outside the county where he or she is registered and has established a new residence elsewhere with the intentions of remaining there indefinitely and abandoning their previous residence. NRS 293.535(1). However, the challenger must declare they have “personal knowledge” of the facts alleged in their affidavit. *Id.* It is Secretary Aguilar’s interpretation of “personal knowledge” under NRS 293.535 that anchors Petitioners’ claims.²

If such a written challenge alleges a registrant’s change of residence, the county clerk must notify the challenged registrant “in the manner set forth in NRS 293.530,” enclose a copy of the challenger’s affidavit, and wait for that registrant to either respond or fail to respond or appear to vote during the required time. NRS 293.535(2).

But, pertinent here, a county clerk’s duty to notify a challenged registrant (or otherwise act on Petitioners’ written challenges) is conditioned on at least (1) the contents of the challenge satisfying the requirements of NRS 293.535 and (2) the challenger’s possession of “personal knowledge” of the alleged facts.

C. Petitioners’ Attempts to Remove Voters from Voter Rolls

Petitioners allege having sent written challenges pursuant to NRS 293.535 “to almost every Nevada County Registrar/Clerk, including Clark County,” on July 29, 2024. Pet. ¶ 1. Petitioners further allege having sent 19,740 affidavits to Respondent Portillo.

² While “personal knowledge” is not explicitly defined under NRS 293.535, the Secretary stated in his August 2024 Memo to county clerks that he interprets the term to mean the same as under NRS 293.547. See Pet. Ex. 1 at 1–2; see also NAC 293.416(3) (defining “personal knowledge” as used in NRS 293.547 to mean “firsthand knowledge through experience or observation of the facts upon each ground that the challenge is based”); Personal Knowledge, Black’s Law Dictionary (12th ed. 2024) (defined as “[k]nowledge gained through firsthand observation or experience,” whereas secondhand knowledge is “based on what someone else has said”). As such, in the Secretary’s opinion, individuals who have submitted challenges based on knowledge “obtained from their review of data from databases or compilations of information” (e.g., USPS National Change of Address database) “do not meet the requirement of ‘personal knowledge’ of facts supporting the challenge required by NRS 293.535 and 293.547.” Pet. Ex. 1 at 3.

1 *Id.* ¶ 29. The Secretary disagrees that the voter registration challenges at issue here
2 comply with the strictures of NRS 293.535, and accordingly agrees with Respondent’s
3 decision not to process the challenges. The Secretary has provided guidance to county
4 clerks in an August 27, 2024 memorandum (the “August 2024 Memo”) regarding the
5 “personal knowledge” requirement for voter registration challenges pursuant to
6 NRS 293.535 and 293.547. Pet. Ex. 1. The guidance was a government document to local
7 election officials concerning their statutory duties. *See id.* It was in no way “secret” or
8 “private,” *see* Pet. ¶¶ 3–6, 8, as it is subject to public records requests, *see* NRS 239.0107,
9 but there was also no obligation to provide it to Petitioners, who obtained a copy in any
10 event.

11 Dissatisfied with Respondent’s response to the challenges, Petitioners filed this
12 action. Although fashioned on its face as a petition for a writ of mandamus, Petitioners
13 bring three counts (mandamus, declaratory, and injunctive relief) based on Respondent’s
14 alleged failure to “perform their duties” by “processing” the challenges and “mailing the
15 notice [pursuant to NRS 293.535(1)] to the challenged registrar at least thirty-three (33)
16 days before the [2024 general] election.” *Id.* ¶¶ 15, 27, 34–35, 39, 42–43, 46; *id.* Prayer for
17 Relief.

18 **III. STANDARD OF LAW**

19 NRCP 24 governs intervention in state-court actions, including in mandamus
20 proceedings.³ A movant may intervene either as of right under NRCP 24(a) or permissively
21 under NRCP 24(b). Textually, NRCP 24 and Federal Rule of Civil Procedure 24 are
22 virtually identical and thus “equivalent.”⁴ “[B]ecause the Nevada Rules of Civil Procedure
23 are based in large part upon their federal counterparts,” this Court may draw upon federal
24 cases interpreting the equivalent federal rule as “strong persuasive authority” in applying
25

26 ³ NRCP 24 intervention has long been available to applicants in state-court mandamus proceedings.
See, e.g., Azbill v. Fisher, 84 Nev. 414, 417, 442 P.2d 916, 917 (1968).

27 ⁴ *Lawler v. Ginochio*, 94 Nev. 623, 626, 584 P.2d 667, 668–69 (1978) (per curiam) (recognizing that
28 Nevada courts may look to the federal courts’ interpretations of parallel federal rules for guidance); *accord*
Am. Home Assurance Co. v. Eighth Jud. Dist. Ct., 122 Nev. 1229, 1238, 147 P.3d 1120, 1126 (2006); *see also*
NRCP 24, advisory committee’s note to 2019 amendment (“The amendments conform Rule 24 to FRCP 24[.]”).

NRCP 24. *Exec. Mgmt., Ltd. v. Ticor Title Ins. Co.*, 118 Nev. 46, 53, 38 P.3d 872, 876 (2002) (per curiam) (quoting *Las Vegas Novelty v. Fernandez*, 106 Nev. 113, 119, 787 P.2d 772, 776 (1990)); see *Lawler v. Ginocchio*, 94 Nev. 623, 626, 584 P.2d 667, 668–69 (1978) (per curiam).

NRCP 24(a)(2) governs intervention as a matter of right. To intervene as of right, “an applicant must meet four requirements: (1) that it has a sufficient interest in the litigation’s subject matter, (2) that it could suffer an impairment of its ability to protect that interest if it does not intervene, (3) that its interest is not adequately represented by existing parties, and (4) that its application is timely.” *Am. Home Assurance Co. v. Eighth Jud. Dist. Ct.*, 122 Nev. 1229, 1238, 147 P.3d 1120, 1126 (2006).

Although “[d]etermining whether an applicant has met these four requirements is within the district court’s discretion,” *id.*, courts “construe the Rule ‘broadly in favor of proposed intervenors’ . . . because ‘a liberal policy in favor of intervention serves both efficient resolution of issues and broadened access to the courts,’” *Wilderness Soc’y v. U.S. Forest Serv.*, 630 F.3d 1173, 1179 (9th Cir. 2011) (brackets and citation omitted).

Additionally, NRCP 24(b)(2) allows government officers or agencies to intervene if an existing party’s claim or defense is based on either “a statute or executive order administered by the officer or agency” or “any regulation, order, requirement, or agreement issued or made under the statute or executive order.” NRCP 24(b)(2).⁵ “In exercising its discretion, the court must consider whether the intervention will unduly delay or prejudice the adjudication of the original parties’ rights.” NRCP 24(b)(3).

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⁵ See NRCP 24(b)(2), advisory committee’s note to 2019 amendment (“The [2019] amendments conform [NRCP] 24 to FRCP 24, including the addition of [NRCP] 24(b)(2), which was not in the former Nevada rule. Intervention by government agencies under the specified conditions should enable the relevant issues to be resolved in a single action.”); *cf.* Fed. R. Civ. P. 24(b)(2).

1 **IV. ARGUMENT**

2 **A. The Secretary Satisfies All of NRCP 24(a)'s Requirements.**

3 **1. The Motion is Timely.**

4 First, the Secretary's Motion is timely under NRCP 24(a). Petitioners filed their
5 Petition on September 23, 2024. This Motion follows just one week later, before any
6 substantive activity has occurred in the case. This Motion's timing thus presents no delay
7 or risk of prejudice to the existing parties, especially when compared to prejudice the
8 Secretary would face if denied intervention.⁶

9 **2. Secretary Aguilar Has Significantly Protectable Interests That**
10 **May Be Impaired by This Action.**

11 The Secretary also satisfies the next two requirements warranting rightful
12 intervention under NRCP 24(a)(2) because he (1) has significantly protectable interests in
13 this action (2) that may be impaired by this action. In Nevada, a "significantly protectable
14 interest" is "one that is protected under law and bears a relationship to the plaintiff's
15 claims." *Am. Home Assurance Co.*, 122 Nev. at 1239, 147 P.3d at 1127 (quoting *S. Cal.*
16 *Edison Co. v. Lynch*, 307 F.3d 794, 803 (9th Cir. 2002)). If a proposed intervenor "would be
17 substantially affected in a practical sense by the determination made in an action, he
18 should, as a general rule, be entitled to intervene." *Sw. Ctr. Biological Diversity v. Berg*,
19 268 F.3d 810, 822 (9th Cir. 2001) (citation and quotation marks omitted). "Once an
20 applicant has established a significantly protectable interest in an action, courts regularly
21 find that disposition of the case may, as a practical matter, impair an applicant's ability to
22 protect that interest." *Venetian Casino Resort, LLC v. Enwave Las Vegas, LLC*, Case No.
23 2:19-cv-1197-JCM-DJA, 2020 WL 1539691, at *3 (D. Nev. Jan. 7, 2020) (citing *California*
24 *ex rel. Lockyer v. United States*, 450 F.3d 436, 442 (9th Cir. 2006)).

25 Secretary Aguilar has significantly protectable interests in this lawsuit's subject
26 matter through his clear duty to "uphold Nevada's Constitution, execute and enforce

27 ⁶ See *Am. Home Assurance Co.*, 122 Nev. at 1244, 147 P.3d at 1130; *Lawler*, 94 Nev. at 626, 584 P.2d
28 at 669; see also *W. Expl. LLC v. U.S. Dep't of Interior*, Case No. 3:15-cv-00491-MMD-VPC, 2016 WL 355122,
at *2 (D. Nev. Jan. 28, 2016).

1 Nevada’s election statutes, and administer Nevada’s election process.” *Miller*, 124 Nev. at
2 588, 188 P.3d at 1118 (citations omitted); *see also generally* Nev. Const. art. II, §1A (voters’
3 bill of rights). Relevant here, the Secretary “must obtain and maintain *consistency* in the
4 application, operation, and interpretation of election laws.” *Heller*, 120 Nev. at 461, 93 P.3d
5 at 750 (citing NRS 293.247) (emphasis added). In practical terms, Petitioners are deploying
6 an uneven litigation strategy targeting voter rolls in several Nevada counties, across three
7 district courts, with the potential for inconsistent decisions.⁷

8 The Secretary has at least three compelling interests in voter registration list
9 procedures that Petitioners threaten to impair with this action. First, the Secretary must
10 ensure that, for purposes of maintaining voter rolls, all county clerks handle third-party
11 written challenges consistently and in accordance with NRS 293.530, NRS 293.535, and
12 the NVRA. Petitioners will practically impair this interest—*i.e.*, lawful and consistent
13 voter roll maintenance *statewide*—by compelling individual county officials to “notify each
14 registrant subject to the challenges . . . pursuant to NRS 293.530.” Pet. ¶ 34. Petitioners
15 ask the Court to force Respondent to misinterpret and violate NRS 293.535 by “processing”
16 Petitioners’ written challenges and potentially purging voters based on inadequate
17 challenges.

18 Second, the Secretary has a significantly protectable interest in ensuring uniform
19 compliance with the statutory written-challenge process set forth in NRS 293.535. This
20 lawsuit could torpedo any hope of orderly, objective, and nondiscriminatory resolution of
21 written challenges to voter registrations. Instead of following these procedures, Petitioners
22 aim to short-circuit these statutes and sow distrust toward Nevada’s elections. Moreover,
23 if Petitioners prevail, a dangerous precedent may emerge in which county clerks are
24 pressured to entertain challenges to active registered voters based on insufficient
25 information.

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27 ⁷ *See, e.g., Citizen Outreach Found. et al. v. Hoen et al.*, Case No. 24 EW 00020 1B (First Jud. Dist.
28 Ct. Nev., filed Sept. 20, 2024) (virtually identical lawsuit), *Citizen Outreach Found. et al. v. Burgess*, Case
No. CV24-02182 (Second Jud. Dist. Ct. Nev., filed Sept. 23, 2024) (same).

1 Third, the Secretary oversees Nevada’s statewide voter registration database, *see*
2 NRS 293.675, and compliance with federal election laws, *see, e.g.*, 52 U.S.C. §§ 20507,
3 20509. The Secretary must ensure state and local compliance with the federal requirements
4 of the NVRA, which sharply limits a state’s ability to remove voters from its rolls—
5 especially now, with just under 40 days before an election.⁸ This action may practically
6 impair this interest in at least two ways. First, if Petitioners prevail, Nevada’s voter roll
7 maintenance program may violate the NVRA by either (i) removing voters from voter rolls
8 during the statutory 90-day “blackout” period preceding federal elections,⁹ or (ii) removing
9 voters in discriminatory or otherwise non-uniform ways.¹⁰ This action also may disrupt
10 the productive working relationships fostered between the Secretary and county clerks to
11 lawfully administer Nevada’s elections, as outlined in NRS 293.675.

12 Notably, Second Judicial District Court Judge Connie Steinheimer recently found
13 that the Secretary has significantly protectable interests warranting intervention as of
14 right in a case challenging the maintenance of voter registration lists. Ex. 2, Order
15 Granting Mot. to Intervene at 5–6, *Kraus v. Burgess*, Case No. CV24-01051 (Second Jud.
16 Dist. Ct. Nev. June 25, 2024). This case is no different.

17 **3. Respondent Does Not Adequately Represent the Secretary’s**
18 **Interests.**

19 Lastly, the Secretary’s rightful intervention is warranted because he cannot rely on
20 the existing parties to adequately represent his interests. “[T]he burden on proposed
21 intervenors in showing inadequate representation is minimal, and would be satisfied if
22 they could demonstrate that representation of their interests ‘may be’ inadequate.” *Hairr*
23 *v. First Jud. Dist. Ct.*, 132 Nev. 180, 185, 368 P.3d 1198, 1201 (2016) (citation omitted);
24 *accord Am. Home. Assurance Co.*, 122 Nev. at 1241, 147 P.3d at 1128. The Secretary meets
25 this “minimal” burden, thus warranting intervention under NRCP 24(a)(2).

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27 ⁸ *See, e.g.*, 52 U.S.C. §§ 20507(a)(3)-(4), (b)(1)-(2), (c)(2)(A).

28 ⁹ *See id.* § 20507(c)(2)(A).

¹⁰ *See id.* §§ 20507(b)(1)-(2).

1 Secretary Aguilar and Respondent do not have the same ultimate objective in this
2 litigation. “Adequate representation” does not simply exist when two government entities
3 share overlapping administrative duties or even the same goals in a case. *See Hairr*,
4 132 Nev. at 185–86, 368 P.3d at 1201–02.¹¹ The Secretary’s interests are far broader in
5 regulatory and geographic scope, and not “subsumed” within Respondent’s objectives. *Id.*
6 The Secretary administers Nevada’s election processes, “execut[es] and enforc[es]”
7 Nevada’s election statutes “and all other provisions of state and federal law relating to
8 elections in this State,” and “adopt[s] regulations” giving effect to these laws. NRS 293.124.
9 These duties include, for example, ensuring compliance with the NVRA, wherein each state
10 must ensure that its general program to remove voters who have changed residence is
11 “uniform, nondiscriminatory, and in compliance with the Voting Rights Act of 1965,” among
12 other requirements. 52 U.S.C. §§ 20507(b)(1)-(2). Also, the Secretary must ensure
13 “uniform, nondiscriminatory” application of NRS 293.535 and 293.530—Nevada’s statutory
14 means of achieving NVRA compliance statewide—an objective that Respondent need not
15 consider to the same extent. And as explained above, the Secretary must ensure consistent
16 interpretation and application of Nevada’s election laws, including NRS 293.530, 293.535,
17 and 293.547. Because Respondent need only maintain voter rolls for one county—a practice
18 that, if Petitioners prevail, would differ from other counties—Respondent’s representation
19 of the Secretary’s statewide executive interests would be inadequate. *See Ex. 2, Order*
20 *Granting Mot. to Intervene* at 6–7, *Kraus* (finding that Registrar of Voters could not
21 adequately represent the Secretary’s interests in case challenging voter roll maintenance).

22 **B. Alternatively, the Secretary Satisfies NRCP 24(b)’s Requirements**

23 Courts also permit intervention by a governmental officer or agency in actions that
24 involve statutes and regulations administered by that officer or agency. NRCP 24(b)(2).
25 A government officer “administers” a statute or regulation when he “manages, directs, or
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27 ¹¹ *See also Driftless Area Land Conservancy v. Huebsch*, 969 F.3d 742, 748 (7th Cir. 2020) (stating
28 that if seeking the same outcome in a case is “all it takes to defeat intervention, then intervention as of right
will almost always fail” because a party must necessarily intervene “on one side of the ‘v.’ or the other”).

supervises” the application of the law at issue.¹² As Nevada’s “Chief Officer of Elections,” NRS 293.124, the Secretary is a state executive official who may intervene as a governmental officer under NRCP 24(b)(2).¹³ Here, Petitioners squarely ground their claims in Nevada election laws the Secretary must execute and enforce under NRS 293.124. Petitioners seek a declaratory judgment that “Respondent are [sic] not in compliance with NRS 293.530 and 293.675, and that they have no authority not to act pursuant to NRS 293.530 once an affidavit is filed,” and “a writ of mandamus requiring Respondent to notify each registrant subject to the challenges that have been filed . . . pursuant to NRS 293.530” and 293.535. Pet. ¶¶ 34–35, 40, 45; *id.* Prayer for Relief. Put simply, Petitioners’ lawsuit solely focuses on the application of election laws that the Secretary administers for NRCP 24(b)(2) purposes.¹⁴ Thus, permissive intervention is alternatively warranted.

V. CONCLUSION

For the above reasons, this Court should allow the Secretary to intervene as a matter of right under NRCP 24(a)(2) or permissively under NRCP 24(b)(2). If the Court grants neither, the Secretary then requests leave “to submit briefs on determinative issues as amici curiae.” *Hairr*, 132 Nev. at 188, 368 P.3d at 1203.

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¹² *McHenry v. Comm’r Internal Revenue*, 677 F.3d 214, 220–21 (4th Cir. 2012); *see also Lopez v. Monterey Cnty.*, 525 U.S. 266, 278 (1999) (defining the verb “administer”).

¹³ *See generally* NRS chapter 255; *see also* Nev. Const., art. V, §§ 19, 20, 22.

¹⁴ *See Miller*, 124 Nev. at 588, 188 P.3d at 1118; *Heller*, 120 Nev. at 461, 93 P.3d at 750.

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DATED this 30th day of September 2024.

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