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14 *Attorneys for Plaintiffs*

15 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
16 **IN AND FOR CARSON CITY**

17 EMMANUEL D. ALFARO and ROSA )  
18 MENDOZA, individuals. )  
19 Plaintiffs. )  
20 vs. )  
21 OUR VOTE NEVADA PAC, a registered )  
22 Nevada political action committee; ROBERT )  
23 FEE, in his capacity as officer of OUR VOTE )  
24 NEVADA PAC; and ROSS MILLER, in his )  
25 official capacity as Secretary of State of )  
26 Nevada, )  
27 Defendants. )

Case No.: 14-0000029-18  
Dept. No. #

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2014 FEB 19 PM 3:39  
ALAN GLOVER  
BY \_\_\_\_\_ CLERK  
DEPUTY

28 **COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

**(Arbitration Exemption: Declaratory and Injunctive Relief Sought)**

29 COME NOW, Plaintiffs Emmanuel D. Alfaro and Rosa Mendoza ("Plaintiffs"),  
30 individuals registered to vote in Nevada, by and through their attorneys of record, Matthew M.  
31 Griffin, Esq., of the law firm of Griffin Rowe LLP, and Marc E. Elias, of the law firm of

1 Perkins Coie LLP, and pursuant to NRS 30.030, 33.010 and 295.061, and hereby complain  
2 against Defendants as follows:

3 **GENERAL ALLEGATIONS**

4 **Parties and Venue**

5 1. Plaintiff, Emmanuel D. Alfaro, is a resident of and registered voter in Clark  
6 County, Nevada. *See* Exhibit 1 attached hereto.

7 2. Plaintiff, Rosa Mendoza, is a resident of and registered voter in Clark County,  
8 Nevada. *See* Exhibit 1 attached hereto.

9 3. Defendant, Our Vote Nevada PAC, is named herein as a proponent of the  
10 initiative petition titled the "Voter ID Initiative" (the "Petition") filed with the Secretary of  
11 State on January 29, 2014, which proposes to amend Article 2 of the Nevada Constitution to  
12 add a new section to require registered voters to present "proof of identity" in order to cast an  
13 in-person ballot. *See* Exhibit 2 attached hereto. Upon information and belief, Our Vote  
14 Nevada PAC is a Nevada political action committee organized and existing pursuant to  
15 Chapter 294A of the Nevada Revised Statutes and was organized for the purpose of advocating  
16 for the Petition.

17 4. Defendant, Robert Fee, is named herein as a proponent of the Petition. Upon  
18 information and belief, Robert Fee is an individual and, at all times relevant herein, was and is  
19 a resident of the State of Nevada. Upon information and belief, Robert Fee is the Secretary and  
20 Treasurer of Our Vote Nevada PAC. *See* Exhibit 3 attached hereto.

21 5. Defendant, Ross Miller, is named herein in his official capacity as the Nevada  
22 Secretary of State. As the Secretary of State, Ross Miller is the Chief Officer of Elections for  
23 Nevada and is responsible for the execution, administration, and enforcement of Nevada's  
24 election laws. As a duty of the constitutional office of Secretary of State, Ross Miller is also  
25 responsible for qualifying initiatives for submission to the Nevada Legislature and/or the  
26 Nevada electorate and for disqualifying initiatives that are determined to be invalid.

27 6. Venue and jurisdiction in the First Judicial District Court in Carson City,  
28 Nevada, is proper pursuant to NRS 295.061.

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**General Allegations Common to All Claims for Relief**

7. Plaintiffs repeat and incorporate by reference each and every allegation contained in Paragraphs 1 through 7 above as fully set forth herein.

8. The Petition states, in its entirety:

**Section 1.**

Article 2 of the Nevada Constitution is hereby amended by adding thereto a new section to be designated Section 11, to read as follows:

**Sec. 11.**

1. A registered voter who wishes to vote in person must present his or her proof of identity to the applicable election board officer.
2. The Legislature shall direct by law one or more governmental entities to issue at no charge a voter identification card to a person who:
  - (a) Is registered to vote in this State; and
  - (b) Does not possess proof of identity as described in subparagraph (1) of paragraph (b) of subsection 4.
3. A voter identification card issued pursuant to subsection 2:
  - (a) Must include, without limitation, the name, address, date of birth, photograph and signature of the person; and
  - (b) Is valid as long as the person is registered to vote and resides at the address stated on the voter identification card.
4. As used in this section:
  - (a) "Governmental entity" means:
    - (1) An elected or appointed officer of this State or of a political subdivision of this State; or
    - (2) An institution, board, commission, bureau, council, department, division, authority or other unit of government of this State, including, without limitation, an agency of the Executive Department of the State Government, or of a political subdivision of this State.
  - (b) "Proof of identity" means:
    - (1) A document or identity card that:
      - (I) Is issued by a governmental entity, the United States or a federally recognized Indian tribe;
      - (II) Shows a recognizable photograph of the person to whom the document or identity card is issued;
      - (III) Shows the name and signature of the person to whom the document or identity card is issued; and
      - (IV) Bears an expiration date that is not earlier than 4 years before the date of the election for which the document or identity card is offered as proof of identity;

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- (2) A voter identification card issued pursuant to subsection 2; or
- (3) A document provided by the administrator of a licensed medical facility or licensed facility for the dependent, as those terms are defined by statute, to a resident of the facility attesting to the person's identity and that he or she is a resident of the facility.

9. The Petition also contains a Description of Effect that states:

If enacted, this measure will add a new section to Article 2 of the Nevada Constitution doing the following:

- The measure requires a registered voter who wishes to vote in person to present his or her proof of identity to the applicable election board officer. Acceptable forms of proof of identity are: (1) certain government-issued documents or identity cards that show a recognizable photograph of the person to whom the document or card was issued; (2) a voter identification card; or (3) certain documentation from an administrator of certain licensed health care facilities.
- The measure requires the Legislature to direct by law one or more governmental entities to issue, at no cost, voter identification cards to registered voters who do not possess other types of proof of identity.
- The measure provides that a voter identification card is valid as long as the person is registered to vote and resides at the address stated on the voter identification card.
- The measure requires that a voter identification card include the name, address, date of birth, photograph and signature of the person to whom the card is issued.
- The measure defines the terms "governmental entity" and "proof of identity."

**FIRST CLAIM FOR RELIEF**

**Declaratory and Injunctive Relief –**

**Violates the "Policy Only" Rule**

10. Plaintiffs hereby repeat, reallege and incorporate Paragraphs 1 through 9 as though fully set forth herein.

11. Whether an initiative proposes a new statute, constitutional provision, or amendment of either, it may only propose policy: if an initiative petition attempts to dictate

1 administrative details, it is void as a matter of law. *See, e.g., Nevadans for the Protection of*  
2 *Prop. Rights, Inc. v. Heller*, 122 Nev. 894, 898, 141 P.3d 1235, 1238 (2006); *Citizens for*  
3 *Public Train Trench Vote v. City of Reno*, 118 Nev. 574, 585, 53 P.3d 387, 393-94 (2002).

4 12. The Petition impermissibly proposes to dictate the execution of the proposed  
5 voter identification policy, including administrative details that should be left to the regulatory  
6 authority of Nevada's Chief Election Officer, the Secretary of State.

7 13. As a result, the Petition is invalid and must be stricken.

8 **SECOND CLAIM FOR RELIEF**

9 **Declaratory and Injunctive Relief –**

10 **Exceeds Initiative Power, Nev. Const. Art. 19, § 2**

11 14. Plaintiffs hereby repeat, reallege and incorporate Paragraphs 1 through 13 as  
12 though fully set forth herein.

13 15. Article 19, Section 2 of the Nevada Constitution reserves to the people the  
14 power to enact statutes or constitutional amendments; it does not authorize the people to use  
15 the initiative process to commandeer the Legislature to enact legislation for them.

16 16. Rather than propose to enact a free voter identification program directly by a  
17 statutory initiative, the Petition impermissibly attempts to direct the Legislature to, in turn,  
18 “direct by law one or more governmental entities” to administer such a program. Ex. 2 (§ 11, ¶  
19 2).

20 17. Because the Petition goes beyond the initiative power reserved to the people,  
21 it is without constitutional authority and necessarily invalid.

22 **THIRD CLAIM FOR RELIEF**

23 **Declaratory and Injunctive Relief –**

24 **Intrudes on Powers Reserved to the Legislature, Nev. Const. Art. 3, § 1(1), Art. 4, §**

25 **1, Art. 19, § 2**

26 18. Plaintiffs hereby repeat, reallege and incorporate Paragraphs 1 through 17 as  
27 though fully set forth herein.

28 ////

1           19.       The Nevada Constitution divides the power of the government of the State  
2 into separate departments and provides that “no persons charged with the exercise of powers  
3 properly belonging to one . . . shall exercise any functions, appertaining to either of the others,  
4 except in the cases expressly directed or permitted in this constitution.” Nev. Const. Art. 3, §  
5 1(1). In addition, the people of Nevada “reserve to themselves the power to propose, by  
6 initiative petition, statutes and amendments to statutes and amendments to this constitution,  
7 and to enact or reject them at the polls.” Nev. Const. Art. 19, § 2.

8           20.       The legislative authority of the state, however, is expressly “vested in a Senate  
9 and Assembly which shall be designated ‘The Legislature of the State of Nevada’ and the  
10 sessions of such Legislature shall be held at the seat of the government in the State.” Nev.  
11 Const. Art. 4, § 1.

12           21.       By commanding the Nevada Legislature to “direct by law one or more  
13 governmental entities” to establish and administer a free voter identification program, Ex. 2 (§  
14 11, ¶ 2), the Petition attempts to usurp the deliberative power of the Legislature,  
15 unconstitutionally intruding upon the powers of that body as defined in the Constitution.

16           22.       As a result, the Petition is invalid and must be stricken.

17                               **FOURTH CLAIM FOR RELIEF**

18                               **Declaratory and Injunctive Relief –**

19                               **Violates Unfunded Mandate Prohibition, Nev. Const. Art. 19, § 6**

20           23.       Plaintiffs hereby repeat, reallege and incorporate Paragraphs 1 through 22 as  
21 though fully set forth herein.

22           24.       Article 19, Section 6 of the Nevada Constitution requires that any initiative  
23 that makes an appropriation or requires the expenditure of money must also provide for a tax or  
24 other means of funding the appropriation or expenditure. The Nevada Supreme Court has held  
25 that this prohibition on unfunded mandates applies to “all proposed initiatives, without  
26 exception.” *Rogers v. Heller*, 117 Nev. 169, 173, 18 P.3d 1034, 1036 (2001).

27           ////

28           ////

1           25.       Although the free voter identification program mandated by the Petition  
2 would unquestionably require the expenditure of money, the Petition contains no tax or other  
3 provision for its funding.

4           26.       As a result, the Petition is invalid and must be stricken.

5                                   **FIFTH CLAIM FOR RELIEF**

6                                   **Declaratory and Injunctive Relief –**

7                                   **Violation of Description of Effect Requirement, NRS § 295.009(1)(b)**

8           27.       Plaintiffs hereby repeat, reallege and incorporate Paragraphs 1 through 26 as  
9 though fully set forth herein.

10          28.       NRS 295.009(1)(b) requires that an initiative petition set forth, in not more  
11 than 200 words, a “description of the effect of the initiative . . . if the initiative . . . is approved  
12 by the voters.” The purpose of the description of effect is to help prevent voter confusion and  
13 promote informed decisions. The description of effect cannot be materially misleading or fail  
14 to identify the consequences of an initiative’s passage, and it must be straightforward, succinct,  
15 and nonargumentative.

16          29.       The description of effect filed together with the Petition is fundamentally  
17 deficient in that it fails to accurately describe the actual effects of the Petition on two classes of  
18 voters: (a) those who currently lack “proof of identity” as defined by the Petition and will  
19 therefore be subject to the Petition’s free voter identification card program; and (b) non-  
20 residents who are currently permitted to vote for President and Vice President in Nevada.

21          30.       For those voters that will be subject to the Petition’s rules related to the free  
22 voter identification program, the Petition will require them to obtain a new identification card  
23 every time they move. As a result, the Petition strips from these voters their rights under NRS  
24 293.490 and 293.525, which currently permit all of Nevada’s registered voters who move  
25 between counties or precincts in Nevada after the close of registration for an election to retain  
26 their residence for the purpose of that election and permit voters who move within a Nevada  
27 county to vote in the precinct where they previously resided. The description of effect,  
28 however, makes no mention of this infringement on these voters’ enfranchisement rights.

1 31. The description of effect also contains no indication that the Petition will  
2 impose a new burden on nonresident voters who are currently permitted to vote for the offices  
3 of President or Vice President in Nevada upon filing a sworn statement and submitting other  
4 evidence to the county clerk or field registrar of voters. *See also* Nev. Const. Art. 2, § 1; NRS  
5 293.5057. However, because out-of-state identification documents would not suffice as proof  
6 of identity under the Petition's definition of "governmental entity," these voters will likely not  
7 be permitted to vote unless they possess a U.S. Passport or tribal identification card. The  
8 description of effect obscures this material effect on this class of voters.

9 32. In addition, the description of effect is deficient in that it fails to advise  
10 potential signatories that the free voter identification program mandated by the Petition will  
11 require a legislative appropriation of funds.

12 33. Each of these failures renders the description of effect invalid under NRS  
13 295.009(1)(b).

14 **PRAYER FOR RELIEF**

15 **WHEREFORE**, Plaintiffs pray that this Court:

- 16 1. Declare that the Petition is invalid because:
- 17 a. It violates the "policy only" rule, which renders invalid petitions that  
18 include administrative details;
- 19 b. It exceeds the initiative power reserved to the people under Article 19 of  
20 the Nevada Constitution;
- 21 c. It intrudes on powers reserved to the Legislature under Articles 3 and 4  
22 of the Nevada Constitution; and
- 23 d. It violates the prohibition under Article 19, Section 6 of the Nevada  
24 Constitution on unfunded mandates in initiative petitions;
- 25 2. Declare that the description of effect is invalid, because it is inaccurate,  
26 misleading, and does not adequately inform voters of the Petition's effects, in  
27 violation of NRS 295.009(1)(b);
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3. Enjoin Defendant Our Vote Nevada PAC and its proponents, officers, or agents from circulating the signatures for verification pursuant to NRS 293.1276 to 293.1279, inclusive;
4. In the circumstance that Defendants have obtained any signatures of Nevada voters, invalidate those signatures until such time as the petition complies with Nevada law;
5. Enjoin Defendant Ross Miller from placing the Petition on the 2014 general election ballot;
6. Award Plaintiffs their reasonable costs and attorneys' fees; and
7. Grant such other relief as the Court deems appropriate.

DATED this 19<sup>th</sup> day of February, 2014.

  
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*Rule 42 Applications for Association  
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8 *Attorneys for Plaintiffs*

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10 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
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14 EMMANUEL D. ALFARO and ROSA )  
MENDOZA, ) Case No.:  
15 individuals, )  
 ) Dept No.  
16 Plaintiffs, )  
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17 vs. )  
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18 OUR VOTE NEVADA PAC, a Political )  
19 Action Committee; ROBERT FEE, in his )  
20 capacity as officer of OUR VOTE NEVADA )  
PAC; and ROSS MILLER, in his official )  
21 capacity as Secretary of State of Nevada, )  
 )  
22 Defendants. )

23 **INITIAL AFFIRMATION**  
24 Pursuant to NRS 239B.030/603A.040  
25 (Initial Appearance)

26 The undersigned does hereby affirm that upon the filing of additional documents in the above  
27 matter, an Affirmation will be provided **ONLY** if the document contains a social security  
28 number (NRS 239B.030) or "personal information" (NRS 603A.040), which means a natural  
person's first name or first initial and last name in combination with any one or more of the  
following data elements:

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1. Social Security number.
2. Driver's license number or identification card number.
3. Account number, credit card number or debit card number, in combination with any required security code, access code or password that would permit access to the person's financial account.

The term does not include publicly available information that is lawfully made available to the general public.

The purpose of this initial affirmation is to ensure that each person who initiates a case, or upon first appearing in a case, acknowledges their understanding that no further affirmations are necessary unless a pleading which is filed contains personal information.

  
\_\_\_\_\_  
Matthew M. Griffin, Esq.

Date: 2/19/14

INDEX OF EXHIBITS

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Exhibit Number:	Title of Exhibit	No. of Pages
1	Affidavits of Alfaro and Mendoza	4
2	Initiative Petition	6
3	Committee for Political Action Registration Form	2

401 S. Curry Street  
Carson City, NV 89703

**EXHIBIT 1**

**EXHIBIT 1**

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20 capacity as officer of OUR VOTE NEVADA )  
PAC; and ROSS MILLER, in his official )  
21 capacity as Secretary of State of Nevada. )  
22 Defendants. )

23 **AFFIDAVIT OF EMMANUEL D. ALFARO**

24 Emmanuel D. Alfaro, being duly sworn under oath and under penalty of perjury,  
25 deposes and says:

26 That I have personal knowledge of the matters set forth herein and know them to  
27 be true.

28 1. I am a resident of Clark County, Nevada.

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2. I am a registered voter in Nevada.  
Further Affiant Sayeth Naught.

*Emmanuel D. Alfaro*  
EMMANUEL D. ALFARO

STATE OF NEVADA )  
                              ) ss  
COUNTY OF CLARK )

Subscribed and Sworn to before me by Emmanuel D. Alfaro on this 10<sup>th</sup> day of  
February, 2014.



*Michelle A. Wooldridge*  
NOTARY PUBLIC (SEAL)

1 MATTHEW M. GRIFFIN, ESQ.  
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27 PAC; and ROSS MILLER, in his official )  
28 capacity as Secretary of State of Nevada, )  
29 Defendants. )

30 **AFFIDAVIT OF ALMA ROSA MENDOZA**

31 Rosa Mendoza, being duly sworn under oath and under penalty of perjury,  
32 deposes and says:

33 That I have personal knowledge of the matters set forth herein and know them to  
34 be true.

- 35 1. I am a resident of Clark County, Nevada.



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2. I am a registered voter in Nevada.  
Further Affiant Sayeth Naught.

*Alma Rosa Mendoza*  
ROSAMENDOZA

STATE OF NEVADA )  
                                : SS  
COUNTY OF CLARK )

Subscribed and Sworn to before me by Rosa Mendoza on this 12<sup>th</sup> day of  
February, 2014.



*Michelle A. Wooldridge*  
NOTARY PUBLIC (SEAL)

**EXHIBIT 2**

**EXHIBIT 2**

EXPLANATION - Matter in *bolded italics* is new

**THE VOTER ID INITIATIVE**

The People of the State of Nevada do enact as follows:

RECEIVED  
JUN 23 2011  
LAS VEGAS  
AF

Section 1. Article 2 of the Nevada Constitution is hereby amended by adding thereto a new section to be designated as Section 11, to read as follows:

*Sec. 11. 1. A registered voter who wishes to vote in person must present his or her proof of identity to the applicable election board officer.*

*2. The Legislature shall direct by law one or more governmental entities to issue at no charge a voter identification card to a person who:*

- (a) Is registered to vote in this State; and*
- (b) Does not possess proof of identity as described in subparagraph (1) of paragraph (b) of subsection 4.*

*3. A voter identification card issued to a person pursuant to subsection 2:*

- (a) Must include, without limitation, the name, address, date of birth, photograph and signature of the person; and*
- (b) Is valid as long as the person is registered to vote and resides at the address stated on the voter identification card.*

*4. As used in this section:*

*(a) "Governmental entity" means:*

- (1) An elected or appointed officer of this State or of a political subdivision of this State; or*
- (2) An institution, board, commission, bureau, council, department, division, authority or other unit of government of this State, including, without limitation, an agency of the Executive Department of the State Government, or of a political subdivision of this State.*

*(b) "Proof of identity" means:*

- (1) A document or identity card that:*
  - (I) Is issued by a governmental entity, the United States or a federally recognized Indian tribe;*
  - (II) Shows a recognizable photograph of the person to whom the document or identity card is issued;*
  - (III) Shows the name and signature of the person to whom the document or identity card is issued;*
- and*
- (IV) Bears an expiration date that is not earlier than 4 years before the date of the election for which the document or identity card is offered as proof of identity;*
- (2) A voter identification card issued pursuant to subsection 2; or*
- (3) A document provided by the administrator of a licensed medical facility or licensed facility for the dependent, as those terms are defined by statute, to a resident of the facility attesting to the person's identity and that he or she is a resident of the facility.*



**DESCRIPTION OF EFFECT**

AF

If enacted, this measure will add a new section to Article 2 of the Nevada Constitution doing the following:

- The measure requires a registered voter who wishes to vote in person to present his or her proof of identity to the applicable election board officer. Acceptable forms of proof of identity are: (1) certain government-issued documents or identity cards that show a recognizable photograph of the person to whom the document or card was issued; (2) a voter identification card; or (3) certain documentation from an administrator of certain licensed health care facilities.
- The measure requires the Legislature to direct by law one or more governmental entities to issue, at no cost, voter identification cards to registered voters who do not possess other types of proof of identity.
- The measure provides that a voter identification card is valid as long as the person is registered to vote and resides at the address stated on the voter identification card.
- The measure requires that a voter identification card include the name, address, date of birth, photograph and signature of the person to whom the card is issued.
- The measure defines the terms "governmental entity" and "proof of identity."

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

**DESCRIPTION OF EFFECT**

If enacted, this measure will add a new section to Article 2 of the Nevada Constitution doing the following:

- The measure requires a registered voter who wishes to vote in person to present his or her proof of identity to the applicable election board officer. Acceptable forms of proof of identity are: (1) certain government-issued documents or identity cards that show a recognizable photograph of the person to whom the document or card was issued; (2) a voter identification card; or (3) certain documentation from an administrator of certain licensed health care facilities.
- The measure requires the Legislature to direct by law one or more governmental entities to issue, at no cost, voter identification cards to registered voters who do not possess other types of proof of identity.
- The measure provides that a voter identification card is valid as long as the person is registered to vote and resides at the address stated on the voter identification card.
- The measure requires that a voter identification card include the name, address, date of birth, photograph and signature of the person to whom the card is issued.
- The measure defines the terms “governmental entity” and “proof of identity.”

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

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	

**DESCRIPTION OF EFFECT**

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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		
<b>11</b>	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE _____ DATE ____/____/____	CITY _____	COUNTY _____	PETITION DISTRICT _____
<b>12</b>	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE _____ DATE ____/____/____	CITY _____	COUNTY _____	PETITION DISTRICT _____
<b>13</b>	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE _____ DATE ____/____/____	CITY _____	COUNTY _____	PETITION DISTRICT _____
<b>14</b>	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE _____ DATE ____/____/____	CITY _____	COUNTY _____	PETITION DISTRICT _____
<b>15</b>	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE _____ DATE ____/____/____	CITY _____	COUNTY _____	PETITION DISTRICT _____

**DESCRIPTION OF EFFECT**

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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

16	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE	DATE	CITY	COUNTY	
17	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE	DATE	CITY	COUNTY	
18	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE	DATE	CITY	COUNTY	
19	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE	DATE	CITY	COUNTY	
20	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY			
	YOUR SIGNATURE	DATE	CITY	COUNTY	

**DESCRIPTION OF EFFECT**

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County of \_\_\_\_\_ (Only registered voters of this county may sign below)  
 Petition District: \_\_\_\_\_ (Only registered voters of this petition district may sign below)

21	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY			This Space For Office Use Only
	YOUR SIGNATURE	DATE	CITY	COUNTY	

**AFFIDAVIT OF CIRCULATOR**

(To be signed by 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 is demanded.

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

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

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



**EXHIBIT 3**

**EXHIBIT 3**



ROSS MILLER  
 Secretary of State  
 Elections Division  
 101 North Carson Street, Suite 3  
 Carson City, Nevada 89701-4768  
 Phone: (775) 684-5705  
 Fax: (775) 684-5718  
 Website: www.nvsos.gov

KRut  
 02/03/2014

Office of the  
 Secretary of State  
  
 Ross Miller  
 Elections Division

**State of Nevada**  
**Committee for Political Action**  
**(PAC)**  
**Registration Form**  
 Page 1

ABOVE SPACE IS FOR OFFICE USE ONLY

New Registration       PAC (Advocating Passage or Defeat of a Ballot Question)

Annual (Due on or before January 15th of each year; NRS 294A.230(3)(b))

Amended Registration:       Change Officers       Change Registered Agent       Change Address  
 check all that apply

Change Name: \_\_\_\_\_  
Previous Name of PAC

Other: \_\_\_\_\_

Name of Committee: Our Vote Nevada PAC      Telephone: 775 787 6017

Mailing Address:  
P.O. Box 8262 - 1802 Rainbow Ridge Rd.      Reno      NV      89507  
Street Name, Number      City      State      Zip Code

**PURPOSE:** Briefly state the purpose for which the PAC was organized.

To advocate for the Voter ID initiative petition Constitutional amendment.

**REGISTERED AGENT:** pursuant to NRS 294A.240, each PAC must appoint and keep in the State a registered agent, as provided in NRS 14.020, who must be a natural person who resides in the State of Nevada.

Name of Registered Agent: Sharron Angle      Telephone: 775 787 6017

Physical Address:  
1802 Rainbow Ridge Rd.      Reno      NV      89503  
Street Name, Number      City      State      Zip Code

**REGISTERED AGENT ACCEPTANCE:** I hereby accept appointment as Registered Agent for the above-named Committee for Political Action.

X Sharron Angle      Date: \_\_\_\_\_  
 Signature of Registered Agent



ROSS MILLER  
Secretary of State  
Elections Division  
101 North Carson Street, Suite 3  
Carson City, Nevada 89701-4768  
Phone: (775) 684-5705  
Fax: (775) 684-5718  
Website: www.nvsos.gov

**State of Nevada**  
**Committee for Political Action**  
**(PAC)**  
**Registration Form**  
Page 2

**OFFICERS:** List the name, title, address and telephone number of each officer (attach additional pages if necessary).

Officer Name and Title: <i>Robert Fee Sec/Treas</i>		Telephone: <i>775 787 6017</i>	
Mailing Address: <i>P.O. Box 8262</i>			
Street Name, Number <i>P.O. Box 8262</i>		City <i>Reno</i>	State Zip Code <i>NV 89507</i>
Officer Name and Title:		Telephone:	
Mailing Address:			
Street Name, Number		City	State Zip Code
Officer Name and Title:		Telephone:	
Mailing Address:			
Street Name, Number		City	State Zip Code
Officer Name and Title:		Telephone:	
Mailing Address:			
Street Name, Number		City	State Zip Code

**AFFILIATIONS:** If the PAC is affiliated with any other organizations, list the name, address and telephone number of each organization (please attach additional pages if necessary).

Name of Organization: <i>Our Voice PAC</i>		Telephone: <i>775 787 6017</i>	
Mailing Address: <i>P.O. Box 8262</i>			
Street Name, Number <i>P.O. Box 8262</i>		City <i>Reno</i>	State Zip Code <i>NV 89507</i>
Name of Organization:		Telephone:	
Mailing Address:			
Street Name, Number		City	State Zip Code
Name of Organization:		Telephone:	
Mailing Address:			
Street Name, Number		City	State Zip Code

**SUBMITTED BY:**

<i>X Sharron Angle</i>	Printed Name: <i>Sharron Angle</i>	Date:	Telephone: <i>775 787 6017</i>
Signature of Representative of Group			