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11 Attorneys for Plaintiffs

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

14 JOHN KOENIG, an individual;  
15 GREGORY T. HAFEN, II, an individual;  
16 ELKO COUNTY, a political subdivision of  
the State of Nevada; WILDE BROUGH, an  
17 individual; BURT GURR, an individual;  
18 REX STENINGER, an individual; SAM MORI,  
an individual; TRACY MORI, an individual;  
19 PETER M. MORI, an individual; TAMMY  
MORI, an individual; JOHN ELLISON, an  
individual; and WILLIAM O'DONNELL,  
an individual,

20 Plaintiffs,

Case No: 21 OC 00166 1B

21 vs.

Dept. No: II

22 STATE OF NEVADA, *ex rel.*, THE HONORABLE  
23 STEPHEN SISOLAK, in his official capacity as  
Governor of the State of Nevada; THE  
24 HONORABLE AARON FORD, in his official  
capacity as the Attorney General of the State of  
25 Nevada; and THE HONORABLE BARBARA K.  
CEGAVSKE, in her official capacity as Secretary  
26 of State for the State of Nevada,

27 Defendants.  
28 \_\_\_\_\_/

**FIRST AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**



1 current Legislative redistricting plans, Plaintiff HAFEN resides in what would be, under SB 1,  
2 Assembly District 36. Plaintiff HAFEN has consistently voted for Republican candidates for Nevada  
3 Legislative Districts and plans to vote in 2022.

4 5. Plaintiff ELKO COUNTY is a political subdivision of the State of Nevada acting  
5 through its duly elected board of county commissioners. The Legislature found and declared in NRS  
6 244.137(6) a board of county commissioners are provided with the appropriate authority to address  
7 matters of local concern for the effective operation of county government. NRS 244.143(1) defines  
8 "matter of local concern" to mean any matter that primarily affects or impacts areas located in the  
9 county, or persons who reside, work, visit or are otherwise present in areas located in the county.

10 6. NRS 244.161 provides for the county's promotion of civil and equal rights of residents  
11 of the county and NRS 244.1615 provides the board of county commissioners may take any action  
12 designed to increase the extent and quality of participation of the residents of the county in the  
13 development of public policy and the improvement of the operation of government at all levels.  
14 Pursuant to NRS 244.146(3) a board of county commissioners shall not order or conduct an election  
15 except as expressly authorized by statute. Plaintiff ELKO COUNTY is required to conduct elections  
16 in 2022 pursuant to the Legislative Districts created by SB 1.

17 7. SB 1 provides for the establishment of Senate and Assembly Districts in Elko County  
18 which primarily affect or impact areas located in the county and primarily affect or impact persons  
19 who reside and work in Elko County. SB 1 splits Elko County into two different Assembly and two  
20 different Senate Districts. Residents who reside and work in Elko County are now included in  
21 Assembly and Senate Districts that span from western Elko County to the other end of the state in  
22 Washoe County and the northern California border and span from Elko County in northern Nevada to  
23 Clark County in southern Nevada and the southern California border.

24 8. SB 1 splits voting Precinct 28 in Elko County into two Assembly and two Senate  
25 Districts. Residents who reside and work in Precinct 28 are now included in different Assembly and  
26 Senate Districts that span from western Elko County to the other end of the state in Washoe County  
27 and the northern California border and span from Elko County in northern Nevada to Clark County in  
28 southern Nevada and the southern California border.

1           9.       SB 1 impacts and harms the operation of county government because the Elko County  
2 Clerk will now be required to print different ballots for county and precinct residents as SB 1 splits  
3 Elko County, including Precinct 28, into two different Assembly and two different Senate Districts  
4 with residents voting in Assembly and Senate Districts running from northern Elko County to Washoe  
5 County and from northern Nevada to Clark County in southern Nevada.

6           10.       Plaintiff WILDE BROUGH is a United States citizen and registered Republican voter  
7 in the State of Nevada. He resides in Wells, Nevada in Elko County. Under the current Legislative  
8 redistricting plans, Plaintiff BROUGH resides in what would be, under SB 1, Assembly District 33  
9 and Senate District 19. Plaintiff BROUGH has consistently voted for Republican candidates for  
10 Nevada Legislative Districts and plans to vote in 2022. Plaintiff BROUGH is a duly elected and  
11 sitting Elko County Commissioner representing District 1 in Elko County. SB 1 splits Elko County  
12 into 2 Assembly Districts and 2 Senate Districts. Effective January 1, 2022, Plaintiff BROUGH's  
13 Commission District 1 includes constituents who reside in 2 different Assembly Districts and 2  
14 different Senate Districts based upon the maps approved in SB 1, thereby splitting communities of  
15 interest and their issues in his Commission District between different Assembly and Senate Legislative  
16 Districts.

17           11.       Plaintiff, BERT GURR, is a United States citizen and registered Republican voter in  
18 the State of Nevada. He resides in Elko, Nevada in Elko County. Under the current Legislative  
19 redistricting plans, Plaintiff GURR resides in what would be, under SB 1, Assembly District 33 and  
20 Senate District 19. Plaintiff GURR has consistently voted for Republican candidates for Nevada  
21 Legislative Districts and plans to vote in 2022.

22           12.       Plaintiff, REX STENINGER, is a United States citizen and registered Republican voter  
23 in the State of Nevada. He resides in Lamoille, Nevada in Elko County. Under the current Legislative  
24 redistricting plans, Plaintiff STENINGER resides in what would be, under SB 1, Assembly District  
25 33 and Senate District 19. Plaintiff STENINGER has consistently voted for Republican candidates  
26 for Nevada Legislative Districts and plans to vote in 2022.

27           13.       Plaintiffs, SAM MORI and TRACY MORI are United States citizens and registered  
28 Republican voters in the State of Nevada. They reside in Tuscarora, Nevada in Elko County. Under

1 the current Legislative redistricting plans, they reside in what would be, under SB 1, Assembly District  
2 33 and Senate District 19. Plaintiffs SAM MORI and TRACY MORI have consistently voted for  
3 Republican candidates for Nevada Legislative Districts and plan to vote in 2022. Plaintiffs SAM  
4 MORI and TRACY MORI operate a family cattle ranch business with Plaintiffs PETER M. MORI  
5 and TAMMY MORI who reside across the highway – a stone’s throw away.

6 14. Plaintiffs PETER M. MORI and TAMMY MORI are United States citizens and  
7 registered Republican voters in the State of Nevada. They reside in Tuscarora, Nevada in Elko  
8 County. Plaintiffs PETER M. MORI and TAMMY MORI have consistently voted for Republican  
9 candidates for Nevada Legislative Districts and plan to vote in 2022. Plaintiffs PETER M. MORI and  
10 TAMMY MORI operate a family cattle ranch business with Plaintiffs SAM MORI and TRACY  
11 MORI who reside across the highway – a stone’s throw away. Prior to the enactment of SB 1,  
12 Plaintiffs PETER M. MORI and TAMMY MORI resided in Assembly District 33 and Senate District  
13 19 and their family and business interests were entirely located in Assembly District 33 and Senate  
14 District 19. Under the current Legislative redistricting plans, Plaintiffs PETER M. MORI and  
15 TAMMY MORI reside in what would be, under SB 1, Assembly District 32 and Senate District 14.  
16 For 64 years the MORI family and business interests have been in the same Legislative Districts and  
17 their family and business interests have never been subject to separate Legislative representation. The  
18 MORI family and business interests are split by SB 1’s redistricting for no legitimate or justifiable  
19 reason.

20 15. Plaintiff, JOHN ELLISON, is a United States citizen and registered Republican voter  
21 in the State of Nevada. He resides in Elko, Nevada in Elko County. Under the current Legislative  
22 redistricting plans, he resides in what would be, under SB 1, Assembly District 33 and Senate District  
23 19. Plaintiff ELLISON has consistently voted for Republican candidates for Nevada Legislative  
24 Districts and plans to vote in 2022.

25 16. Plaintiff, WILLIAM O’DONNELL, is a United States citizen and registered  
26 Republican voter in the State of Nevada. He resides in Reno, Nevada in Washoe County in the  
27 Somerset development. Under the current Legislative redistricting plans, Plaintiff O’DONNELL  
28 resides in what would be, under SB 1, Assembly District 25 and Senate District 15. Plaintiff

1 O'DONNELL has consistently voted for Republican candidates for Nevada Legislative Districts and  
2 plans to vote in 2022. Plaintiff O'DONNELL is the Secretary and a board member of the Somerset  
3 Owners Association, a domestic non-profit corporation, representing the homeowners of the  
4 Somerset development in Reno, Washoe County, Nevada. SB 1 splits the Somerset development  
5 and homeowners and the Somerset community of interest so portions of the development and  
6 homeowners are now in Assembly District 32 and Senate District 14 which span from western Nevada  
7 all the way to Elko, Nevada located in the eastern portion of Nevada, and portions of the development  
8 and homeowners are now in Assembly District 25 and Senate District 15 which are entirely located in  
9 Washoe County, Nevada.

10 17. By passage of SB 1 Plaintiffs have been and will continue to be denied equal protection  
11 of the laws and fair representation in the Nevada Legislature as further alleged below.

12 18. The Individual Plaintiffs, as taxpayers, citizens, residents, electors, registered and  
13 qualified voters, are appropriate parties to litigate this action and are capable of fully advocating their  
14 positions in Court. Plaintiff ELKO COUNTY, having been provided with the appropriate authority  
15 to address matters of local concern for the effective operation of county government and its other  
16 powers alleged above, is the appropriate party to litigate this action and its claims of unequal protection  
17 and discrimination and is capable of fully advocating its position in Court. Plaintiffs may have no  
18 other means of redress to raise the constitutional challenges to SB 1, said constitutional challenges  
19 may not be otherwise raised without Plaintiffs' claims for relief set forth in this First Amended  
20 Complaint, and said Plaintiffs can assist the Court in developing and reviewing all relevant legal and  
21 factual questions.

22 19. Defendant, Stephen Sisolak, is the Governor of the State of Nevada and in that role, is  
23 the State's chief law enforcement officer. The Nevada Constitution provides the Governor is  
24 responsible for the execution of laws and that "He shall see that the laws are faithfully executed."  
25 Nev. Const. Art. 5, § 7. Defendant Sisolak is responsible for enforcing SB 1. Defendant Sisolak is  
26 sued in his official capacity.

27 20. Defendant, Aaron Ford, is the Attorney General of the State of Nevada and in that role,  
28 is also responsible for enforcing SB 1. Defendant Ford is sued in his official capacity. Because this

1 action challenges the constitutionality of SB 1, NRS 33.130 provides Defendant Ford is to be served  
2 with a copy of this First Amended Complaint and shall be entitled to be heard in this action.

3 21. Defendant, Barbara Cegavske is the Secretary of State for the State of Nevada. In her  
4 official capacity, the Secretary of State is the chief elections officer for the State of Nevada and is  
5 charged with administering and enforcing Nevada election laws. The Secretary's duties include  
6 prescribing the list of all statewide offices and candidates on the ballots, accepting declarations and  
7 certificates of candidacy from candidates for certain public offices, issuing regulations and  
8 interpretations concerning Nevada election laws, receiving and canvassing election returns, and other  
9 duties necessary for the conduct of primary and general elections in the State of Nevada.

### 10 JURISDICTION AND VENUE

11 22. This Court has jurisdiction pursuant to Article 6, Section 6 of the Nevada Constitution  
12 and has authority to grant declaratory and injunctive relief pursuant to NRS 30.030 et seq. and NRS  
13 33.010, respectively.

14 23. This action involves an issue of significant public and statewide importance as it seeks  
15 to uphold and protect the constitutional requirements for redistricting. As provided in Article 1,  
16 Section 2 of the Nevada Constitution, political power is inherent in the people. Government only has  
17 power from the consent of the governed.

18 24. Venue in the First Judicial District Court in Carson City, Nevada is proper pursuant to  
19 NRS 13.020(2) and NRS 13.040, as the cause of action arose in Carson City, the offices of the  
20 Governor and Attorney General are located in Carson City, the Governor and Attorney General  
21 exercise their duties in Carson City, the Elections Division of the Office of the Secretary of State is  
22 located, and the Secretary exercises her duties as chief elections officer in Carson City, and certain  
23 Legislative Districts will go into effect, under SB 1, in contravention of the Nevada and United States  
24 Constitutions.

### 25 GENERAL ALLEGATIONS

26 25. This is an action to challenge the constitutionality of SB 1 as well as the  
27 constitutionality of the manner in which said bill was passed into law.

28

1           26.    The joint legislative rules adopted for the 33<sup>rd</sup> Special Session of the Nevada  
2 Legislature provided for “equality of representation” based upon certain population criteria for state  
3 legislative districts and that the district boundaries created by a redistricting plan must follow the  
4 census geography. These were the only redistricting requirements contained in the joint legislative  
5 rules adopted for the 33<sup>rd</sup> Special Session of the Nevada Legislature. The joint legislative rules also  
6 provided the redistricting committees shall seek and encourage: (a) public participation in all aspects  
7 of the reapportionment and redistricting activities; and (b) the widest range of public input into the  
8 deliberations relating to those activities.

9           27.    At the redistricting committee hearing held on November 13, 2021 during the 33<sup>rd</sup>  
10 Special Session of the Nevada Legislature, the SB 1 proponents could not answer questions about the  
11 Legislative Districts proposed therein, could not explain why the maps were drawn the way they were  
12 or provide a rational basis for the maps. Nor could the non-partisan staff of the Legislative Counsel  
13 Bureau (“LCB”) answer any questions about the basis or manner in which the districts had been drawn  
14 because the LCB did not create the districts contained in SB 1 for the SB 1 proponents. The  
15 redistricting committees and/or the Legislature subsequently made certain changes to the original  
16 proposed SB 1 districts at the request of certain communities of interest and political subdivisions  
17 (municipalities, townships, cities, counties) for the benefit of voters, but ignored and did not consider  
18 the requests of other political subdivisions (municipalities, townships, cities, counties) or communities  
19 of interest for changes to the SB 1 districts for the benefit of voters.

20           28.    During the 33<sup>rd</sup> Special Session of the Nevada Legislature, members of the redistricting  
21 committees and the Legislature had at times less than 24 hours to consider the redistricting proposals  
22 for which they voted. The process was criticized for leaving legislators and the public with little time  
23 to consider the redistricting maps and in the dark as to the data and process that led to the maps’  
24 drawing.

25           29.    The totality of the circumstances established that the enacted Legislative Districts  
26 through the redistricting plan approved in SB 1 has the effect of denying voters an equal opportunity  
27 to participate in the political process of electing candidates of their choice in violation of federal and  
28 state law.



1           30.     SB 1 was signed into law by Governor Sisolak on November 16, 2021, stating “These  
2 maps reflect Nevada’s diversity and reflect public feedback gathered throughout the legislative  
3 process.”

4           31.     Plaintiffs are informed and believe and on that basis allege the maps in SB 1 were  
5 included in the bill for illustrative purposes only, were not legally binding in and of themselves, the  
6 Legislative District maps were being updated from November 16, 2021 until the Legislative District  
7 maps were finalized by the LCB on or about January 7, 2022. Plaintiffs are informed and believe and  
8 on that basis allege the larger, poster size, individual District maps and the *2021 Nevada Redistricting:  
9 Overview Maps and Statistical Tables* publication produced by the LCB Research Division were not  
10 available until the week of January 10, 2022. Plaintiffs are still reviewing the Legislative District  
11 maps finalized on or about January 7, 2022 and may have additional allegations based upon their  
12 further review of the final Legislative District maps. True and correct copies of the 2011 LCB Maps  
13 and 2021 LCB Maps for Assembly Districts 25, 32, 33 and 36 and Senate Districts 14, 15 and 19 are  
14 attached hereto as **Exhibit “1”** and **Exhibit “2”** respectively. Plaintiffs can provide the Court with  
15 copies of all 2011 and 2021 Legislative District Maps for the State of Nevada if the Court so requests.

16           32.     The Nevada and federal Constitutions guarantee the opportunity for equal participation  
17 by all voters in the election of legislators.

18           33.     SB 1 appears to be an intentional extreme partisan gerrymander that unconstitutionally  
19 dilutes votes and prevents voters from electing candidates of their choice.

20           34.     SB 1 deprives citizens and voters such as the Individual Plaintiffs and all others  
21 similarly situated of the right to participate equally in the political process, to join with others to  
22 advance political beliefs, and to choose their political representatives.

23           35.     Without any compelling reason or purpose, SB 1 divides Nye County into three  
24 different Assembly Districts and divides the town of Pahrump into two Assembly Districts.

25           36.     Pahrump is a small Nye County rural community and the entirety of Nye County is  
26 rural.

27           37.     More than half of Pahrump is being moved into Assembly District 36 with an urban  
28 area of metropolitan Las Vegas and Clark County, which has the effect of lumping rural Nye County

1 voters and metropolitan Clark County voters in one district despite sharing little to anything in  
2 common.

3 38. The rural and urban voters of the new Assembly District 36 have entirely different  
4 types of local government, school districts and are contained in separate valleys with separate policy  
5 interests, issues and concerns.

6 39. SB 1 splits the Pahrump community where residents live, work, raise their families,  
7 gather, shop, attend school and worship together; dilutes their representation; diminishes their ability  
8 to be engaged in their government; and creates additional burdens on local elected officials. This split  
9 appears to be aimed at ensuring Pahrump voters do not have sufficient voting power to join together  
10 and elect a candidate of their choice.

11 40. An Assemblyperson from the new Assembly District 33 elected from Elko County or  
12 an Assemblyperson in the new Assembly District 36 elected from Clark County will have little  
13 understanding of Pahrump's and Nye County's unique and local problems and issues and as such will  
14 be unable to adequately represent the needs and interests of Pahrump's and Nye County's rural voters.

15 41. SB 1 unconstitutionally packs and cracks voters in Nye County and Pahrump and also  
16 other districts in the State of Nevada.

17 42. In addition to federal requirements of one person, one vote, and those contained in the  
18 Voting Rights Act, Article IV, Section 5 of the Nevada Constitution requires that Legislative Districts  
19 respect county boundaries. The Legislative Districts created by SB 1 fail to comply with these  
20 requirements.

21 43. Under Art. 4, Sec. 21, "In all cases enumerated in the preceding section, and in all other  
22 cases where a general law can be made applicable, all laws shall be general and of uniform operation  
23 throughout the State." SB 1 violates Art. 4, Sec. 21 of the Nevada Constitution and is therefore,  
24 unconstitutional.

25 44. SB 1 changes the boundaries of the Assembly Districts and Senate Districts. The new  
26 districts divide Elko County into two separate Assembly and Senate Districts.

27  
28

1           45.     Assembly District 32 and Senate District 14 span from Elko County to Washoe County.  
2 The boundaries of this district include all of Humboldt, Pershing and Lander Counties. Also, the  
3 districts include parts of Eureka, Elko and Washoe Counties.

4           46.     Assembly District 33 spans from Elko County to the boarder of Clark County. The  
5 boundaries include all of White Pine and Lincoln Counties. Also, the District includes most of Eureka,  
6 Elko, and part of Nye Counties.

7           47.     Senate District 19 spans from Elko County to Clark County. The boundaries include  
8 all of White Pine and Lincoln County. Also, the District includes a portion of Elko, Eureka, Nye and  
9 Clark Counties.

10          48.     Elko County is divided into two districts that when combined cover an area from  
11 Washoe County to Clark County. This causes citizens in the same County and community of interest  
12 to vote in two distinct demographics of the State. Assembly District 33 and Senate District 19 will  
13 vote in a district that includes most of Eastern Nevada and part of Southern Nevada. Elko County  
14 citizens in Assembly District 32 and Senate District 14 vote in a demographic that covers North and  
15 Northwestern Nevada.

16          49.     SB 1 preserves for the majority of Counties the communities of interest by either  
17 incorporating the entire County into a single district or by making the district small and within a single  
18 demographic region.

19          50.     However, SB 1 in a minority of Counties does not preserve communities of interest  
20 within a County, including Elko County, Nye County and Washoe County. SB 1 divides these  
21 Counties into two or more districts with very distinct demographics and communities of interest.

22          51.     Because SB 1 preserves communities of interest for some Counties and because SB1  
23 does not preserve communities of interest in other Counties, including Elko County, Nye County and  
24 Washoe County, SB1 is not uniformly applied throughout the State and violates Art. 4, Sec 21 of the  
25 Nevada Constitution causing harm to Elko County and the Individual Plaintiffs.

26          52.     SB 1 splits Elko County voting Precinct 28 designated Jacks Creek so that some voters  
27 in Jacks Creek Precinct 28 are in Assembly District 32 and Senate District 14 and some voters in Jacks  
28 Creek Precinct 28 are in Assembly District 33 and Senate District 19.

1           53.     SB 1 splits communities of interest for mine workers who live in Assembly District 33  
2 in Elko County but work in Lander and Eureka County in Assembly District 32. Elko County serves  
3 as the health board for Lander County and Eureka County (which is also split). Elko County provides  
4 the Child Advocacy Center in Elko County used by Eureka County. Elko County, Lander County and  
5 Eureka County share a library system. These local health, child advocacy services and library system  
6 communities of interest are now split by the Legislative Districts created by SB 1.

7           54.     Elko County is a small county and rural community, and Elko County is entirely rural.

8           55.     A portion of Elko County is being moved into Assembly District 32 with an urban area  
9 of metropolitan Reno and Washoe County, which has the effect of lumping rural Elko County voters  
10 and metropolitan Washoe County voters in one district despite sharing little to anything in common  
11 and being miles apart across the State of Nevada.

12           56.     A portion of Elko County is being moved into Senate District 14 which includes an  
13 urban area of metropolitan Reno and Washoe County, which has the effect of lumping rural Elko  
14 County voters and metropolitan Washoe County voters in one district despite sharing little to anything  
15 in common and being miles apart across the State of Nevada.

16           57.     The rural and urban voters of the new Assembly District 32 and new Senate Districts  
17 14 and 19 have entirely different types of local government, school districts and are contained in  
18 separate valleys with separate policy issues and concerns.

19           58.     SB 1 splits the Elko County community where residents live, work, raise their families,  
20 gather, shop, attend school and worship together; dilutes their representation; diminishes their ability  
21 to be engaged in their government; and creates additional burdens on local elected officials. This split  
22 appears to be aimed at ensuring Elko County voters do not have sufficient voting power to join  
23 together and elect a candidate of their choice.

24           59.     An Assemblyperson in the new Assembly District 32 elected from Washoe County will  
25 have little understanding of Elko County's unique and local problems and issues and as such will be  
26 unable to adequately represent the needs and interests of Elko County's rural voters. Likewise, an  
27 Assemblyperson from new Assembly District 32 in Elko County will have little understanding of  
28

1 Washoe County's unique and local urban problems and issues and as such will be unable to adequately  
2 represent the needs and interest of urban Washoe County.

3 60. A Senator representing Washoe County or Clark County will have little understanding  
4 of Elko County's unique and local problems and issues and as such will be unable to adequately  
5 represent the needs and interests of Elko County's rural voters. Likewise, a Senator from Elko County  
6 will have little understanding of Washoe County's and Clark County's unique and local problems and  
7 issues and as such will most likely be unable to adequately represent the needs and interests of urban  
8 voters in Washoe County and Clark County.

9 61. SB 1 unconstitutionally packs and cracks voters in Elko County and Washoe County  
10 and Elko County and Clark County and also other districts in the State of Nevada.

11 62. SB 1 violates compactness requirements by creating an oddly, horseshoe shaped district  
12 of the western portion of Washoe County and part of the North Valleys. This horseshoe carves the  
13 west side of the political subdivision of the City of Reno and communities of interest, namely  
14 Somersett, and Cold Springs, out of Assembly District 25 and Senate District 15 and places them in  
15 the rural Assembly District 32 or another Assembly District and/or Senate District 14 that stretches all  
16 the way to Elko. Somersett is a large development with thousands of homeowners. These citizens  
17 share open spaces, work-out centers and their children go to the same schools.

18 63. Cold Springs is part of the North Valleys. The North Valleys residents share schools,  
19 parks, stores and neighborhood pride. These communities were severed from Assembly District 25  
20 and Senate District 15.

21 64. SB 1 divides the University of Nevada Reno – students who live in the “West  
22 University” area are separated from the thousands who live south and east of the University split  
23 between Senate District 13 and Senate District 15.

24 65. Assembly District 25 and Senate District 15 are reflective of broader Washoe County  
25 where registration between the Republicans and Democrats is almost equal with a growing number of  
26 Independent, Nonpartisans and Other voters. Both Washoe County and Senate District 15 have  
27 approximately 1/3 Democrat, 1/3 Republican and 1/3 Independent, Nonpartisan and Other registered  
28 voters based upon the October 2021 Nevada Secretary of State records: Washoe County: 32.7%

1 Democrat, 32.7% Republican and 34.7% Nonpartisan and Other (25.9% Nonpartisan and 8.8% Other)  
2 and Senate District 15: 34.0% Democrat, 32.7% Republican and 33.3% Nonpartisan and Other (24.7%  
3 Nonpartisan and 8.6 Other). 2/3rds of registered voters in Washoe County are not Democrats. Again,  
4 a super majority of Washoe County voters are not registered Democrats though the SB 1 maps are  
5 drawn to ensure both senate districts wholly in Washoe County, Senate District 13 and Senate District  
6 15, are super majority Democrat districts.

7 66. Under SB 1, voters in Washoe County – a county with near equal Democrat/Republican  
8 registration and rising numbers of Independent, Nonpartisan and Other voters, will be disenfranchised  
9 because its only two senate seats, wholly in the county, will have artificial Democratic super  
10 majorities. The Legislative Districts in SB 1 were created with the clear intent to secure artificial  
11 super majorities in both legislative houses for the next decade and to draw lines to predetermine the  
12 outcome of future elections. The Legislative Districts created by SB 1 deny the rights of Independent,  
13 Nonpartisan, Republican and Other voters to participate equally in the political process, to join with  
14 others to advance political beliefs, and to choose their political representatives.

15 67. In 2011, this Court issued additional criteria for the special masters appointed to draw  
16 the Legislative Districts, ordering them to consider population, contiguity, political subdivisions  
17 (municipalities, townships, cities, counties), communities of interest, compactness, and, to the extent  
18 practical, contests between incumbents. SB 1 fails to comply with these and other redistricting  
19 principles and requirements, such as preserving the core of a prior district, resulting in unconstitutional  
20 Legislative Districts. There is no compelling justification nor legitimate purposes or reasons that  
21 justify the Legislative Districts in SB 1.

22 68. In adopting SB 1, the Legislature failed to consider increasing the number of  
23 Legislative Districts in Nevada to respect county boundaries, political subdivisions and voting  
24 precincts, or alternate maps and Legislative District boundaries to maintain compactness, respect  
25 county boundaries and to retain communities of interest. True and correct copies of Assembly District  
26 32 and Assembly District 36 2021 Maps showing certain Elko County and Nye County precincts are  
27 attached hereto as Exhibit “3”.

28

1           69. Plaintiffs are informed and believe and on that basis allege as shown and alleged herein  
2 and in statistical metrics analyzing redistricting maps, the Legislative District maps approved in SB 1  
3 tend to be less compact than more compact (overall most Legislative Districts (for example 35 out of  
4 42 Assembly Districts) have a compactness score closer to 0 than to 1, where 0 is not compact and 1  
5 is optimally compact), unnecessarily split counties, towns and other political subdivisions and  
6 communities of interest, show high locality splitting in Legislative Districts (split pair metric is 0.857  
7 for Assembly Districts and 0.802 for Senate Districts; the metric ranges from 0 to 1 and the closer to  
8 0, the better), and are excessively partisan (Democrats are outperforming (unfairly winning additional  
9 seats) by 14.3% in the Assembly Districts and Democrats are outperforming (unfairly winning  
10 additional seats) by 11.9% in Senate Districts), biased and are not competitive for the majority of  
11 Legislative Districts.

12           70. SB 1 is unconstitutional and therefore unenforceable. Plaintiffs request a declaration  
13 by this Court that SB 1 is unconstitutional and Defendants be enjoined from enforcing its provisions.

14           71. Plaintiffs' rights, status, or other legal relations are affected by SB 1 and, by the claims  
15 asserted herein, Plaintiffs seek declarations of their rights, status, or other relations. Declaratory relief  
16 pursuant to NRS Chapter 30 is appropriate because it will effectively adjudicate the rights, status or  
17 other legal relations of the parties.

18           72. Plaintiffs and Defendants have adverse interests, and an actual justiciable controversy  
19 exists between them within the jurisdiction of this Court concerning the constitutionality, legality, and  
20 enforceability of SB 1.

21           73. The Individual Plaintiffs have a legally protectable interest in this controversy as  
22 registered voters and citizens of Pahrump, Nye County, Elko, Lamoille, Wells, Tuscarora, Elko  
23 County, Reno and Washoe County and the State of Nevada.

24           74. SB 1 splits political subdivisions – dividing counties and towns. County political  
25 subdivisions are the basis for Nevada's elections, courts, school districts, taxes, infrastructure and  
26 more. SB 1 externally divides sparsely populated counties diluting their voting power. Voters are  
27 entitled to have representation in the Legislature that represents a County's interests.  
28

1           75.     SB 1 also breaks up communities of interest by splitting homeowners' associations and  
2 general improvement districts that have independent governing boards, dues, and enforcement  
3 authority but will have to advocate for representation on complex state policy between different Senate  
4 and Assembly Districts.

5           76.     SB 1 fails to preserve the cores of prior districts or to maintain districts as previously  
6 drawn, to the extent possible, for continuity of representation for voters.

7           77.     SB 1's Legislative Districts do not include competitive districts. The 2/3rds of voters  
8 who are not registered Democrats, will have no voice if districts are politically engineered to create  
9 many artificial super majority Democrat districts.

10          78.     SB 1 did not create fair districts to represent voters in a just and fair manner.

11          79.     SB 1 increases the Democratic registration advantage in 3 Senate seats and 6 Assembly  
12 seats. The most dramatic shifts can be found in Senate District 15 and Assembly District 25. These  
13 Legislative Districts will no longer be a Republican representative seat as they have been for decades  
14 but a seat with a 6.5% democrat advantage in Senate District 15 and a 2.7% advantage in Assembly  
15 District 25 (a 9% swing in a district that showed only a 1% deviation from the ideal population size).

16          80.     The controversy before this Court is ripe for judicial determination because SB 1 was  
17 passed into law by the Legislature and signed by the Governor on November 16, 2021. The  
18 controversy is also ripe for judicial determination because LCB finalized the redistricting maps and  
19 posted them online on or about January 7, 2022.

20          81.     For each claim asserted herein, Plaintiffs have been required to engage the services of  
21 counsel to pursue their rights and as a proximate and necessary result of the State's illegal and  
22 unconstitutional conduct complained of herein, Plaintiffs are entitled to reasonable attorneys' fees and  
23 costs as special and foreseeable damages, or in the alternative, as costs of suit. In addition, Plaintiffs  
24 are entitled to attorneys' fees and costs under common law theories of the substantial benefit doctrine  
25 and the private attorney general doctrine.

26          82.     If declaratory and/or injunctive relief are granted in Plaintiffs' favor, NRS 30.100  
27 allows for such further relief as is necessary and proper. Monetary damages are demanded as  
28 supplemental relief in addition to declaratory and injunctive relief demanded herein and because



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1 equitable relief is sought, an award of attorneys' fees is proper as an item of damages. Attorneys' fees  
2 are an actual injury constituting damages caused to Plaintiffs by the State's constitutional violations.

3 **FIRST CLAIM FOR RELIEF**

4 **Legislative District: Violation of the Nevada Constitution**

5 83. Plaintiffs restate and incorporate by reference all allegations of this First Amended  
6 Complaint as though fully set forth herein.

7 84. Prior to SB 1, Nevada's most recent Legislative Districts were established pursuant to  
8 an Order Adopting and Approving Special Masters' Report and Redistricting Maps as Modified by  
9 this Court on October 27, 2011 in *Guy, et al v. Miller*, Case No. 11 OC 00042 1B (the "2011  
10 Redistricting Order"), based on the results of the 2010 Census. Nevada's Senate and Assembly  
11 Districts are set forth in the 2011 Redistricting Order, which is or was codified in the Appendix to  
12 NRS Chapter 218B and NRS Chapter 293.

13 85. The results of the 2010 Census revealed that the population of Nevada was 2,700,551.  
14 The 2011 Redistricting Order drew district lines for 21 Senate districts and 42 Assembly districts.

15 86. Based on the results of the 2020 Census, the population of Nevada is 3,104,614.

16 87. On August 25, 2021, the United States Census Bureau released the redistricting  
17 population data for the State of Nevada. The 2020 redistricting population data for the State of Nevada  
18 is or will be made available at [https://www.census.gov/programs-surveys/decennial-](https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files.html)  
19 [census/about/rdo/summary-files.html](https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files.html).

20 88. Article 1, Section 13 of the Nevada Constitution provides: "Representation shall be  
21 apportioned according to population."

22 89. Article 4, Section 5 of the Nevada Constitution provides in relevant part:

23 It shall be the mandatory duty of the legislature at its first session  
24 after the taking of the decennial census of the United States in the  
25 year 1950, and after each subsequent decennial census, to fix by law  
26 the number of senators and assemblymen, and apportion them  
among the several counties of the state, or among legislative districts  
which may be established by law, according to the number of  
inhabitants in them, respectively.

27 ///

28 ///

1 90. Article 15, Section 13 of the Nevada Constitution provides in relevant part:

2 The enumeration of the inhabitants of this State shall be taken under  
3 the direction of the Legislature if deemed necessary . . . ; and these  
4 enumerations, together with the census that may be taken under the  
5 direction of the Congress of the United States . . . shall serve as the  
6 basis of representation in both houses of the Legislature.

7 91. Article 4, Section 21 of the Nevada Constitution provides that “all laws shall be general  
8 and of uniform operation throughout the State.”

9 92. Article 1, Section 1 of the Nevada Constitution provides: “All men are by Nature free  
10 and equal and have certain inalienable rights among which are those of enjoying and defending life  
11 and liberty; Acquiring, Possessing and Protecting property and pursuing and obtaining safety and  
12 happiness[.]”

13 93. Article 1, Section 8(5) of the Nevada Constitution provides: “No person shall be  
14 deprived of life, liberty, or property, without due process of law.”

15 94. Article 2, Section 1 A of the Nevada Constitution provides for Rights of Voters,  
16 including equal access to the election system without discrimination.

17 95. The above provisions of the Nevada Constitution require that Nevada’s Legislative  
18 Districts be apportioned according to the state population, as derived from the 2020 United States  
19 Census, thereby guaranteeing to Nevada residents the creation of Legislative Districts of substantially  
20 equal population and Legislative Districts respecting county boundaries so that votes for state senators  
21 and assemblymen cast in different Legislative Districts are given equal weight.

22 96. The above provisions of the Nevada Constitution further guarantee that Nevada voters  
23 have a fair and equal opportunity to cast a meaningful ballot for state senators and assemblymen,  
24 regardless of the Legislative Districts in which voters reside, and that voters in more sparsely  
25 populated Legislative Districts or Counties will not be subject to unlawful discrimination.

26 97. The Legislative redistricting plan set forth in SB 1 deprives the Individual Plaintiffs  
27 and all similarly situated individuals of such rights guaranteed by the Nevada Constitution. The  
28 Legislative redistricting plan set forth in SB 1 does not respect county boundaries, is not uniformly  
applied throughout the State and violates Art. 4, Sec 21 of the Nevada Constitution causing harm to  
ELKO COUNTY and the Individual Plaintiffs.

1           98.    As a result of the reapportionment of Nevada’s Legislative Districts, the Individual  
2 Plaintiffs’ votes for state senators and assemblymen will be unconstitutionally diluted and SB 1 is not  
3 uniformly applied throughout the State.

4           99.    It is necessary for the Court to order a redistricting plan reapportioning the Nevada  
5 Senate and Assembly in accordance with the Nevada Constitution.

6           100. On information and belief, absent enactment of a new Legislative redistricting plan by  
7 the Nevada Legislature and Governor or an injunction by this Court, the Secretary of State intends to  
8 and will conduct primary and general elections for the Nevada Legislature on the basis of the  
9 Legislative Districts set forth in SB 1 and the Governor and the Attorney General will enforce SB 1.  
10 If not enjoined, Plaintiff ELKO COUNTY will have conducted an election in violation of the Nevada  
11 Constitution.

12           101. The Individual Plaintiffs intend to and will vote in the state primary and general  
13 elections to be held in 2022 and thereafter for candidates for the Nevada Senate and Nevada Assembly.  
14 Plaintiff ELKO COUNTY will be required to conduct the election pursuant to the Legislative Districts  
15 set forth in SB 1. If those elections are conducted by the Secretary of State on the basis of the  
16 Legislative Districts set forth in SB 1 and SB 1 is enforced by the Governor and Attorney General, the  
17 individual Plaintiffs and all similarly situated Nevada voters in the illegally and unconstitutionally  
18 reapportioned Legislative Districts will be further deprived of rights guaranteed in the Nevada  
19 Constitution and Plaintiff ELKO COUNTY will be harmed by SB 1 which does not respect county  
20 boundaries and does not require the general and uniform application of law throughout the State.

21           102. The failure to draw Legislative Districts as required by the Nevada Constitution will  
22 cause the Governor, Attorney General and Secretary of State to violate Individual Plaintiffs’ rights  
23 under the Nevada Constitution and the constitutional rights of all other similarly situated Nevada  
24 residents and to violate the Nevada Constitution which requires that county boundaries be respected  
25 in the redistricting process and the general and uniform application of law throughout the State.

26 ///  
27 ///  
28 ///

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1 **SECOND CLAIM FOR RELIEF**

2 **Legislative Districts: Violation of the United States Constitution**

3 103. Plaintiffs restate and incorporate by reference all allegations of this First Amended  
4 Complaint as though fully set forth herein.

5 104. The Fourteenth Amendment of Section 1 of the United States Constitution provides in  
6 relevant part:

7 No State shall make or enforce any law which shall abridge the  
8 privileges or immunities of citizens of the United States; nor shall  
9 any State deprive any person of life, liberty, or property, without due  
process of law; nor deny to any person within its jurisdiction the  
equal protection of the laws.

10 105. The Fifth Amendment of the United States Constitution provides in relevant part: "No  
11 person shall . . . be deprived of life, liberty, or property, without due process of law" nor be denied  
12 "equal protection of the laws".

13 106. The above provisions of the United States Constitution guarantee that Nevada voters  
14 have a fair and equal opportunity to cast a meaningful ballot for state senators and assemblymen,  
15 regardless of the Legislative Districts in which voters reside, and that voters in more sparsely  
16 populated Legislative Districts will not be subject to unlawful discrimination.

17 107. As set forth herein, the Legislative Districts set forth in SB 1 are not properly drawn,  
18 and unlawfully discriminate against the Individual Plaintiffs and other similarly situated individuals.

19 108. The Legislative redistricting plan set forth in SB 1 deprives the Individual Plaintiffs  
20 and all similarly situated individuals of rights guaranteed to them under the United States Constitution.

21 109. As a result of the unconstitutionally reapportionment of Nevada's Legislative Districts,  
22 the Individual Plaintiffs' votes for state senators and assemblymen will be diluted.

23 110. It is necessary for the Court to order a redistricting plan drawing Nevada's Senate and  
24 Assembly Legislative Districts in accordance with the United States Constitution.

25 111. On information and belief, absent enactment of a new Legislative redistricting plan by  
26 the Nevada Legislature and Governor or an injunction by this Court, the Secretary of State intends to  
27 and will conduct primary and general elections for the Nevada Legislature on the basis of the  
28 Legislative Districts set forth in SB 1 and the Governor and the Attorney General will enforce SB 1.



1 their views. The State has unconstitutionally burdened speech where it renders disfavored speech *less*  
2 *effective*, even if it does not ban such speech outright.

3 119. SB 1 violates Article 1, Sections 9 and 10 and Article 2, Section 1 A of the Nevada  
4 Constitution because it severely burdens – if not outright precludes – the ability of Republican,  
5 Independent, Nonpartisan and Other voters to associate by eroding their ability to instruct and obtain  
6 redress from their members of the Nevada Legislature on issues important to them.

7 120. SB 1 violates Article 1, Sections 9 and 10 and Article 2, Section 1 A of the Nevada  
8 Constitution by retaliating against the Individual Plaintiffs and other Republican, Independent,  
9 Nonpartisan and Other voters based on their exercise of political speech. SB 1 takes adverse action  
10 against the Individual Plaintiffs and other Republican, Independent, Nonpartisan and Other voters,  
11 retaliates against their protected speech and conduct, and would not have taken the adverse action but  
12 for SB 1's intent to pack and crack Republican, Independent, Nonpartisan and Other voters because  
13 of their prior political speech and associations.

14 121. There is no legitimate state interest in discriminating and retaliating against the  
15 Individual Plaintiffs because of their political viewpoints, voting histories, and affiliations. Nor can  
16 SB 1 be explained or justified by Nevada's geography or any legitimate redistricting criteria.

17 **PRAYER FOR RELIEF**

18 Accordingly, Plaintiffs request that this Court:

- 19 1. Declare that the Legislative Districts set forth in SB 1 are invalid for failure to comply  
20 with the requirements of the Nevada and United States Constitutions;
- 21 2. Enjoin the Governor, Attorney General and Secretary of State from enforcing SB 1 and  
22 from calling, holding, supervising, or taking any action regarding Senate or Assembly elections based  
23 on the Senate or Assembly districts set forth in SB 1;
- 24 3. To order a redistricting plan drawing new Legislative Districts in accordance with the  
25 Nevada and United States Constitutions;
- 26 4. Award damages, including attorneys' fees and costs as damages, and/or for attorneys'  
27 fees as special and foreseeable damages in the amount to be proven at trial; and  
28

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1 5. Grant such other or further relief the Court deems to be appropriate, including but not  
2 limited to supplemental relief pursuant to NRS 33.100 and equitable relief under common law  
3 theories, for an award of Plaintiffs' attorneys' fees and reasonable costs.

4 **AFFIRMATION**

5 The undersigned does hereby affirm that the preceding document **DOES NOT** contain the  
6 social security number of any person.

7 DATED this 19<sup>th</sup> day of January, 2022.

8 **TYLER J. INGRAM**  
9 **ELKO COUNTY DISTRICT ATTORNEY**  
10 **RAND J. GREENBURG, ESQ.**  
11 Civil Deputy District Attorney  
12 Nevada State Bar No. 13881  
13 540 Court Street  
14 Elko, NV 89801  
15 Telephone: (775) 738-3101  
16 Email: [rgreenburg@elkocountynv.net](mailto:rgreenburg@elkocountynv.net)

17 ~ and ~

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19 402 North Division Street  
20 Carson City, NV 89703  
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22 By: 

23 **KAREN A. PETERSON, ESQ.**  
24 Nevada State Bar No. 366  
25 **JUSTIN M. TOWNSEND, ESQ.**  
26 Nevada State Bar No. 12293  
27 Email: [kpeterson@allisonmackenzie.com](mailto:kpeterson@allisonmackenzie.com)  
28 Email: [jtownsend@allisonmackenzie.com](mailto:jtownsend@allisonmackenzie.com)

Attorneys for Plaintiffs

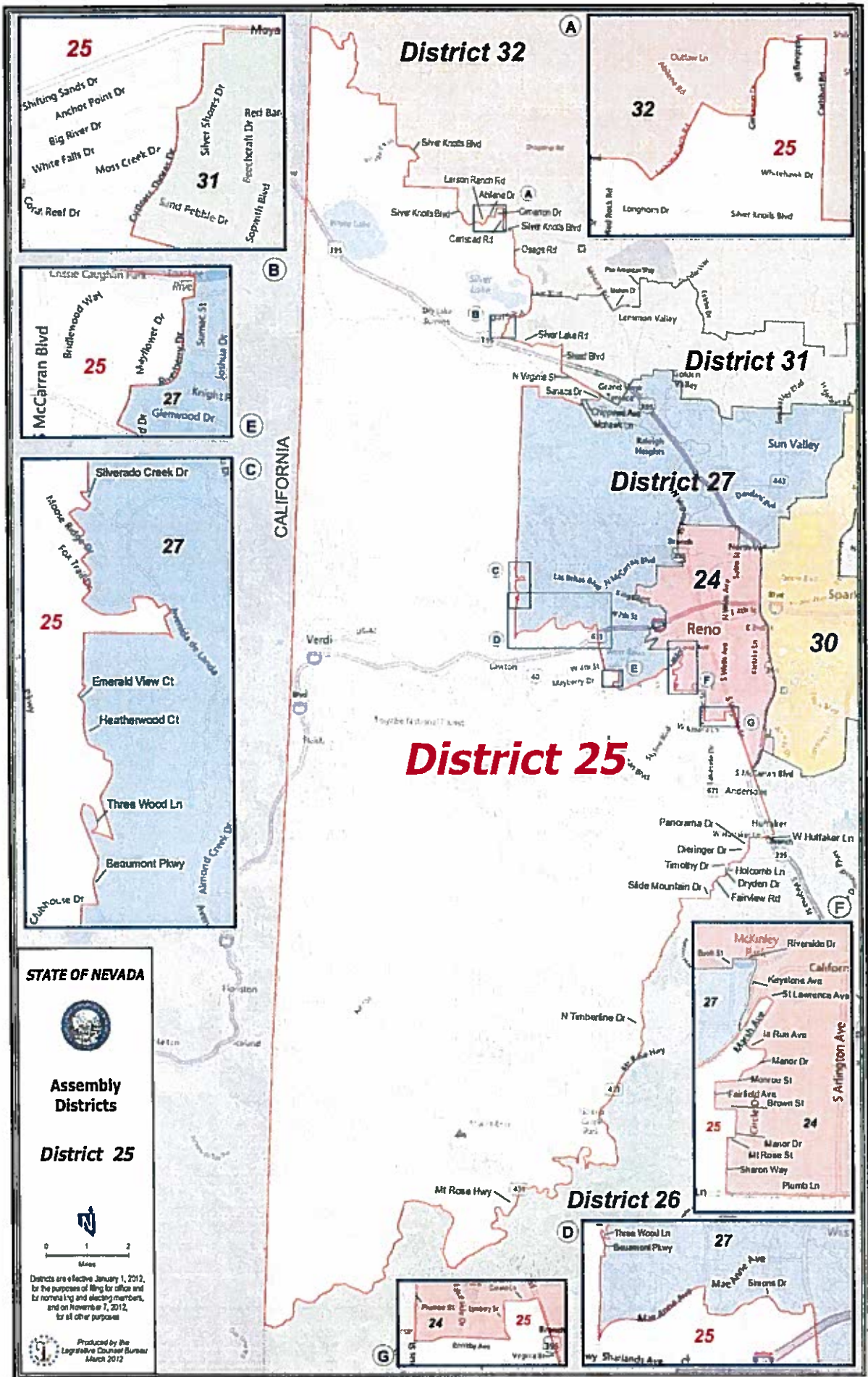
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**INDEX OF EXHIBITS**

<u>Exhibit No.</u>	<u>Description</u>	<u>Number of Pages</u>
"1"	2011 LCB Maps for Assembly Districts 25, 32, 33 and 36 and Senate Districts 14, 15 and 19	08
"2"	2021 LCB Maps for Assembly Districts 25, 32, 33 and 36 and Senate Districts 14, 15 and 19	08
"3"	Assembly District 32 and Assembly District 36 2021 Maps showing certain Elko County and Nye County precincts	03
4870-4083-9690, v. 1		



# **EXHIBIT “1”**



**25**

Shifting Sands Dr  
Anchor Point Dr  
Big River Dr  
White Falls Dr  
Moss Creek Dr  
Silver Skans Dr  
Red Bar  
Beechcraft Dr  
Sopranis Blvd

**31**

Corral Reef Dr  
Cottonwood Dr  
Lund Pebble Dr

**25**

McCarran Blvd  
Bradfordwood Way  
McArthur Dr  
Glenwood Dr

**27**

Knights Dr

**27**

Silverado Creek Dr  
Emerald View Ct  
Heatherwood Ct  
Three Wood Ln  
Beaumont Pkwy

**25**

**District 32**

Silver Knolls Blvd  
Larson Ranch Rd  
Ablene Dr  
Carmichael Rd  
Cage Rd

**32**

Outlaw Ln  
Whitehawk Dr  
Silver Knolls Blvd  
Longhorn Dr

**25**

**District 31**

**District 27**

**District 24**

**Reno**

**30**

Sun Valley  
Spark

**District 25**

**District 26**

McKinley  
Riverside Dr  
Keylona Ave  
St Lawrence Ave  
La Rue Ave  
Manor Dr  
Monroe St  
Fairfield Ave  
Brown St  
Manor Dr  
Mt Rose St  
Sharon Way  
Plumb Ln

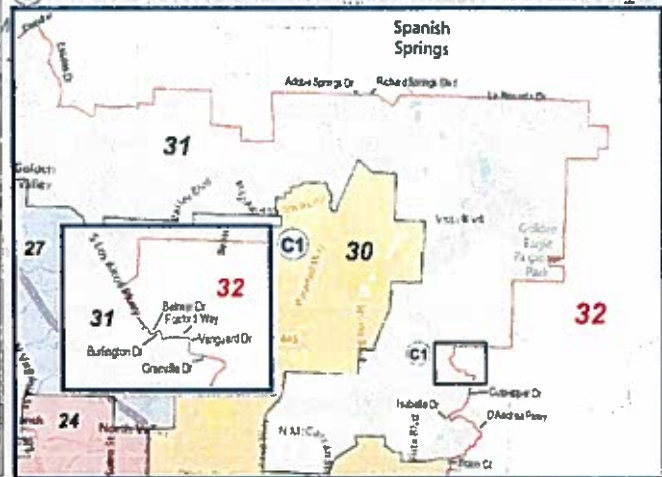
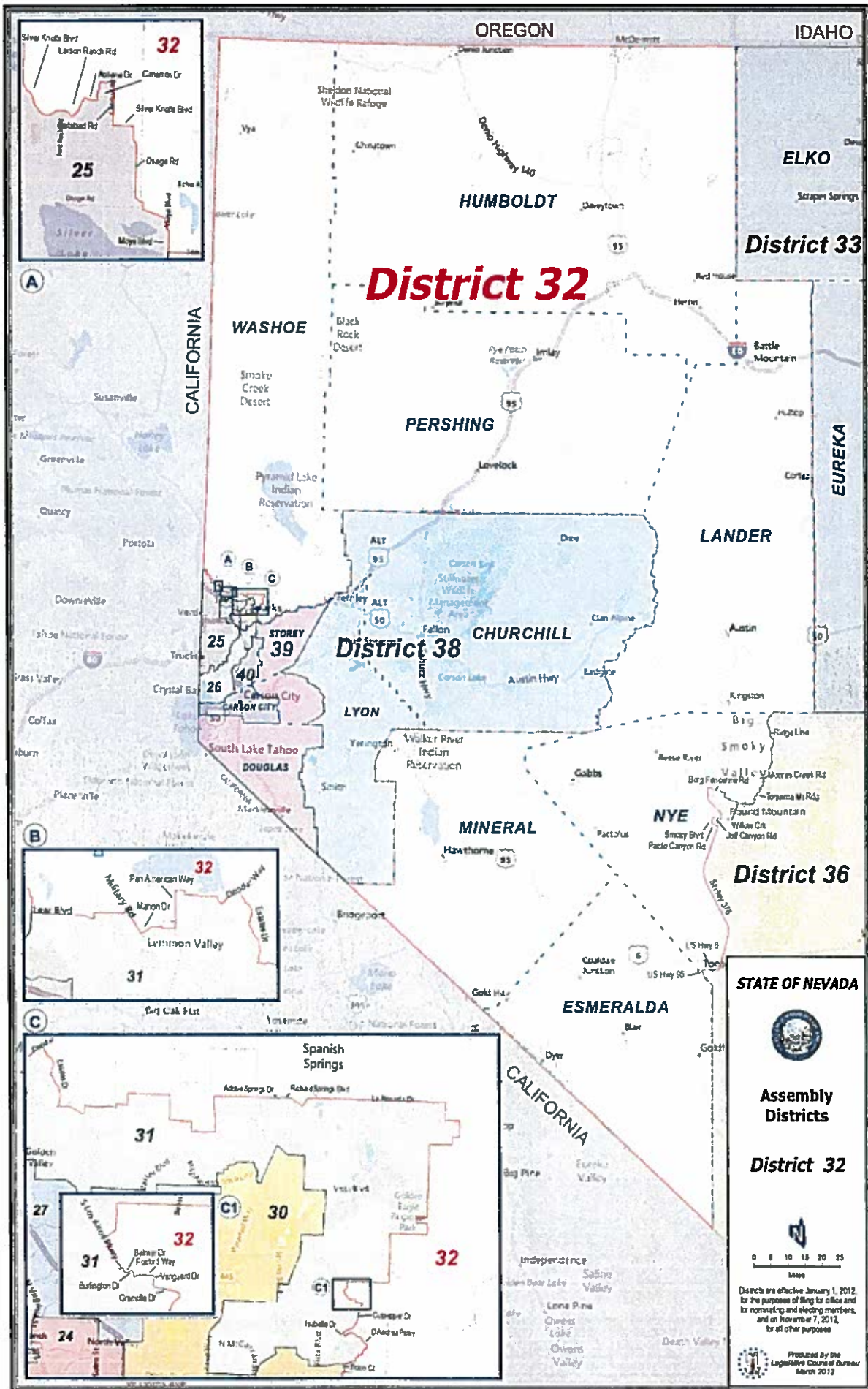
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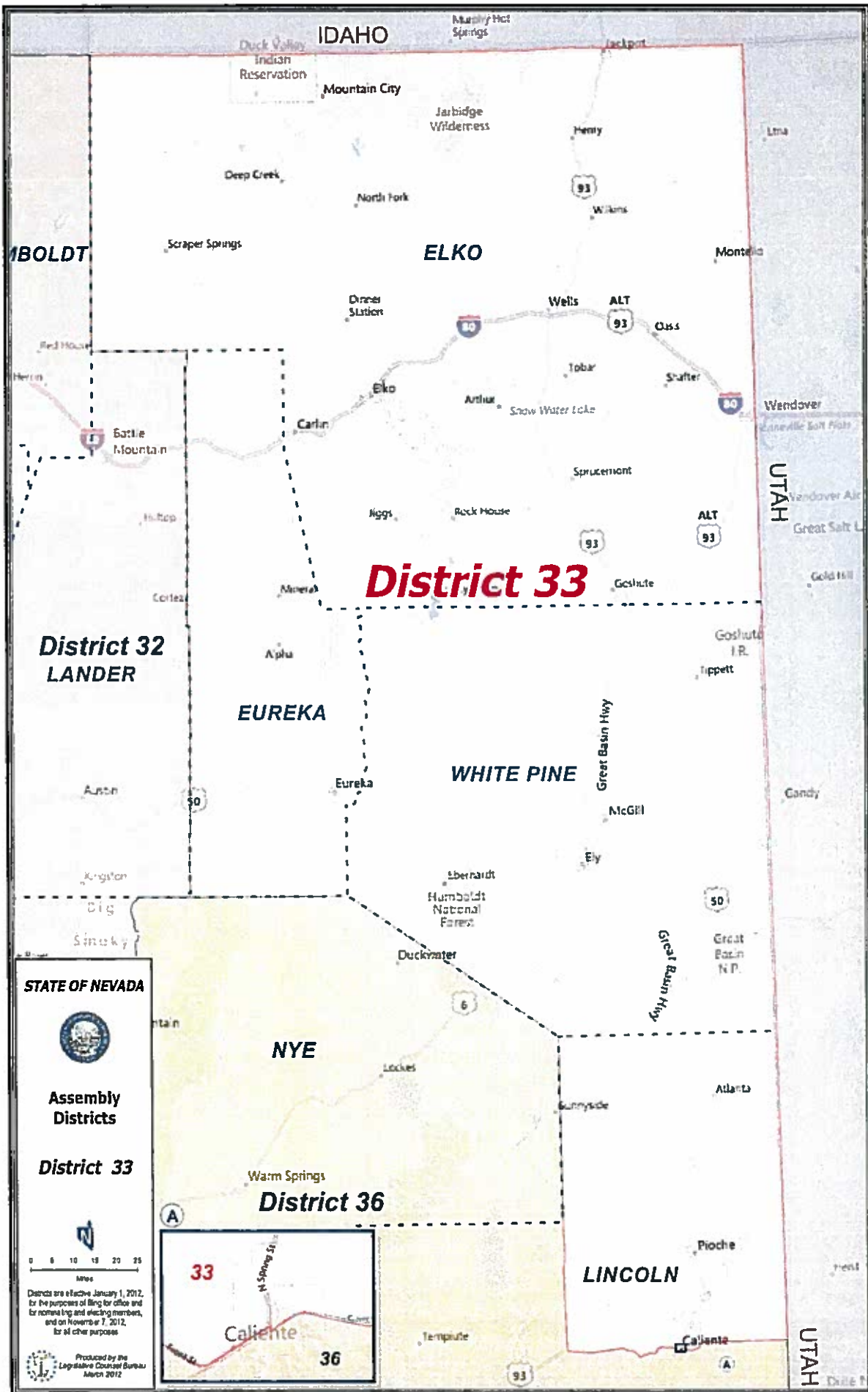
**25**

**27**

**25**







IDAHO

ELKO

WHITE PINE

EUREKA

LINCOLN

NYE

HUMBOLDT

District 32  
LANDER

District 36

**District 33**

STATE OF NEVADA



Assembly  
Districts

District 33

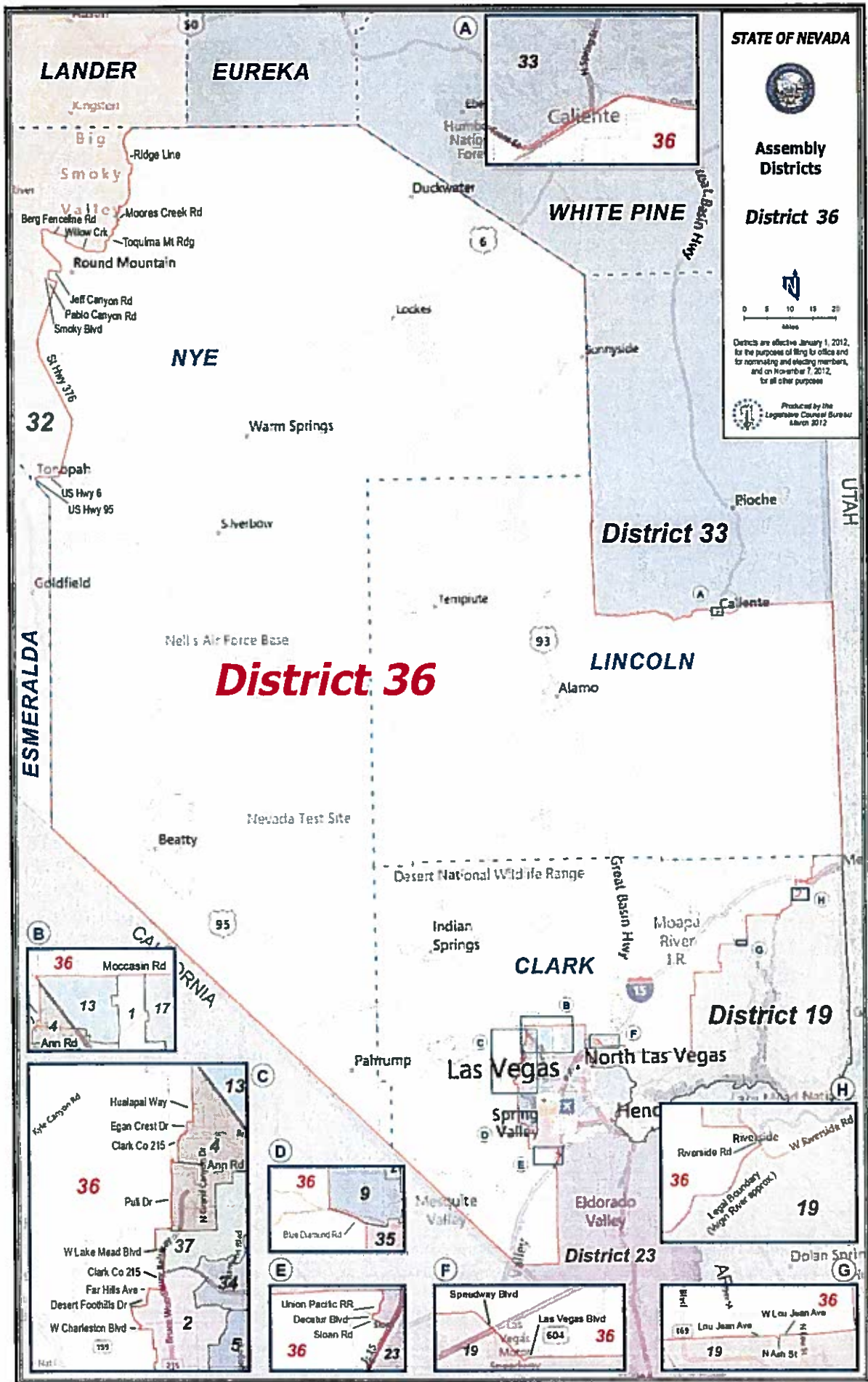
0 5 10 15 20 25  
Miles

Districts are effective January 1, 2012,  
for the purposes of filing for office and  
for nominal filing and election members,  
and on November 7, 2012,  
for all other purposes.


Produced by the  
Legislative Counsel Bureau  
March 2012







**STATE OF NEVADA**



**Assembly Districts**

**District 36**

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miles

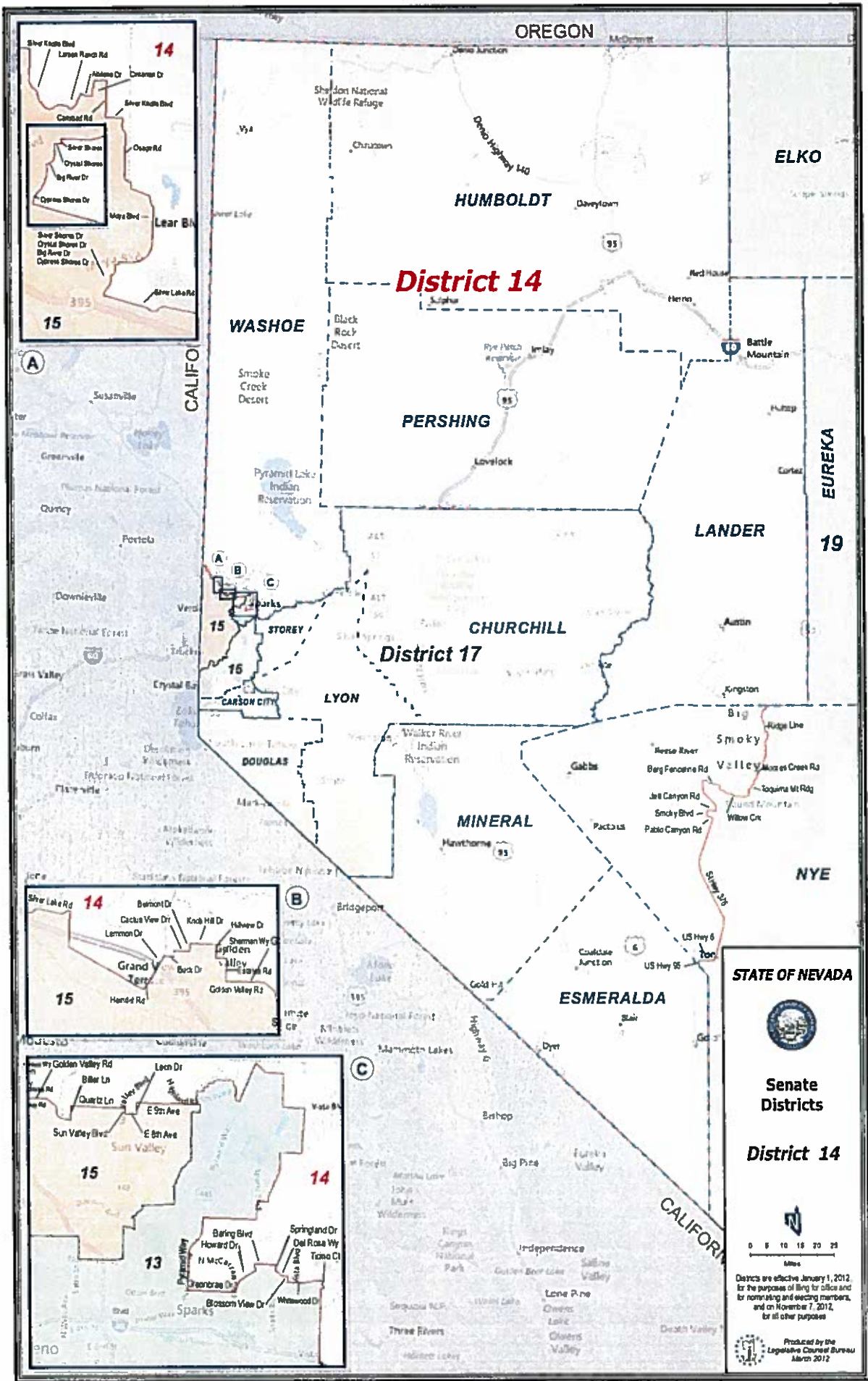
Districts are effective January 1, 2012, for the purposes of filing for office and for nominating and electing members, and on November 7, 2012, for all other purposes.

Produced by the Legislative Council Bureau  
March 2012


**District 36**

**District 19**

**District 23**





**STATE OF NEVADA**



**Senate Districts**

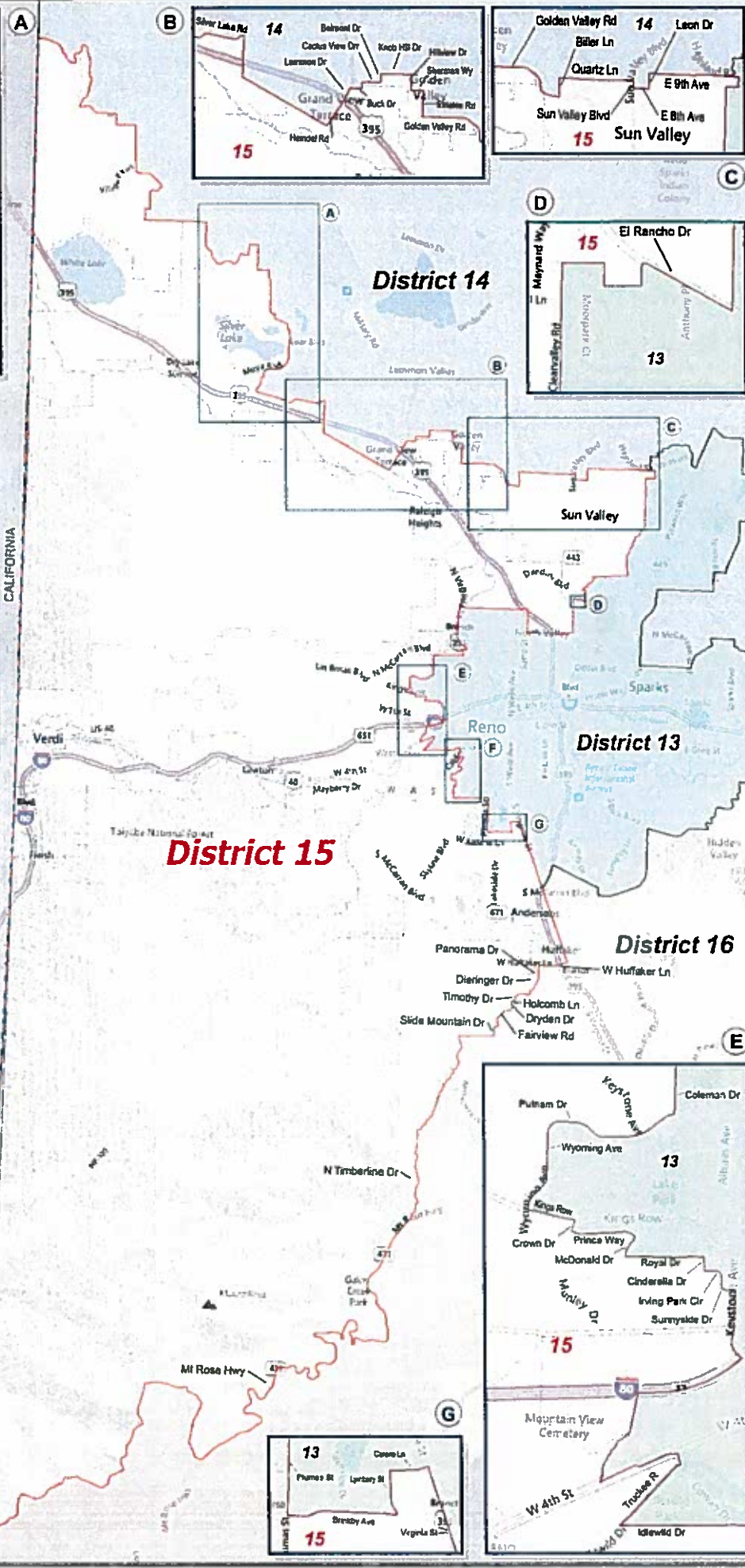
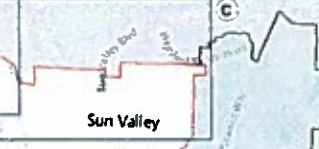
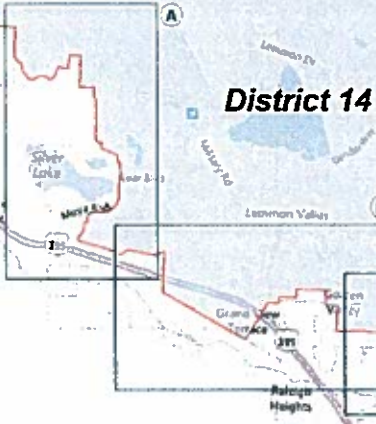
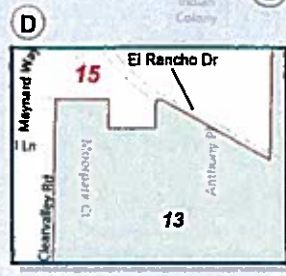
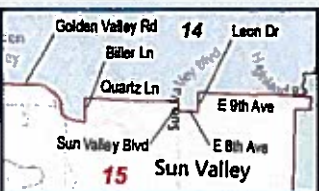
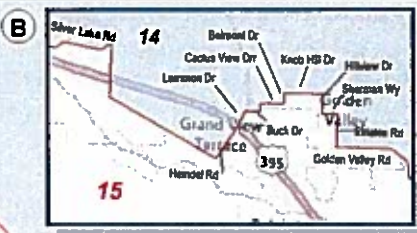
**District 14**


Districts are effective January 1, 2012, for the purposes of filing for office and for nominating and securing members, and on November 7, 2012, for all other purposes.

Produced by the Legislative Counsel Bureau March 2012







**STATE OF NEVADA**



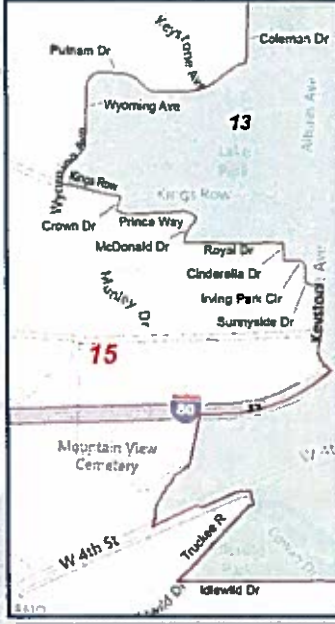
**Senate Districts**

**District 15**

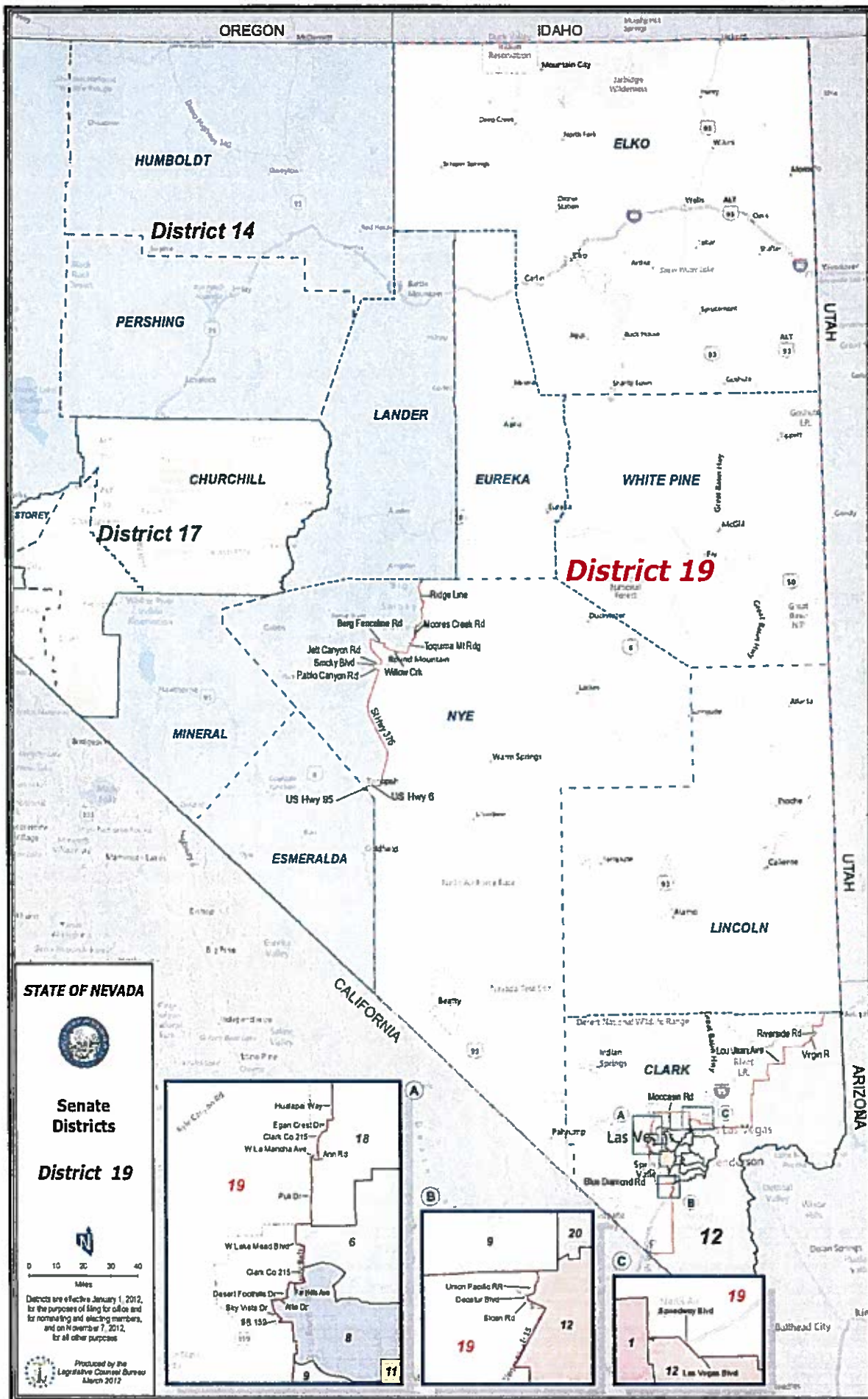



Districts are effective January 1, 2012 for the purposes of filing for office and for nominating and electing members, and on November 7, 2012, for all other purposes.

Produced by the Legislative Counsel Bureau March 2012





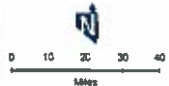


**STATE OF NEVADA**



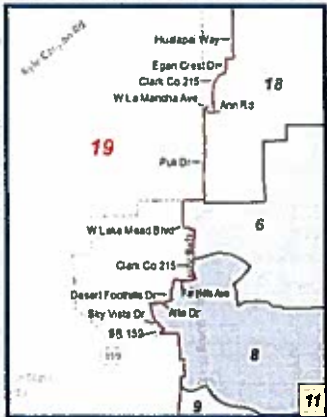
**Senate Districts**

**District 19**



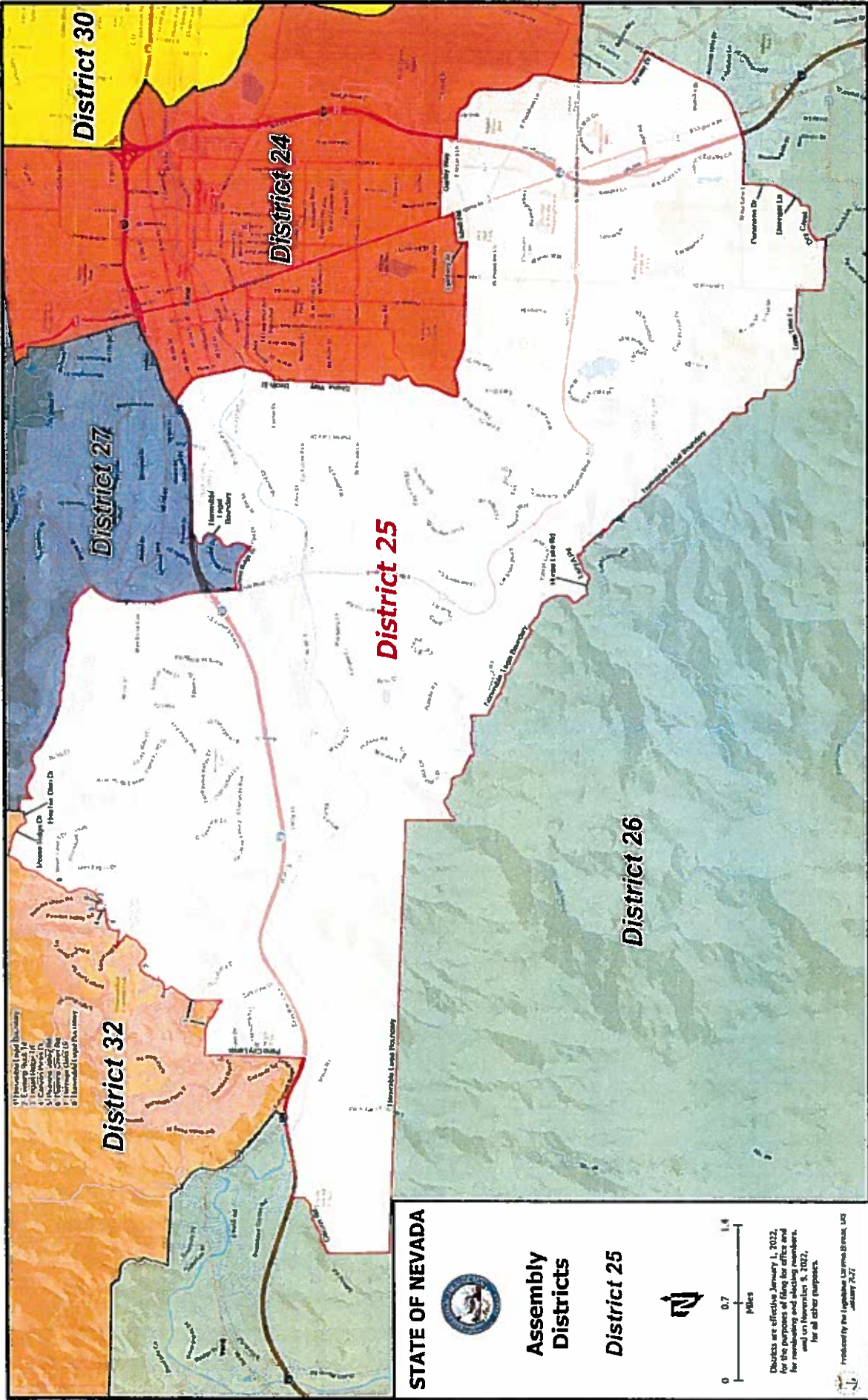
Districts are effective January 1, 2012, for the purposes of filing for office and for nominating and electing members, and on November 7, 2012, for all other purposes.

Produced by the Legislative Counsel Bureau March 2012





# **EXHIBIT “2”**







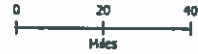


STATE OF NEVADA



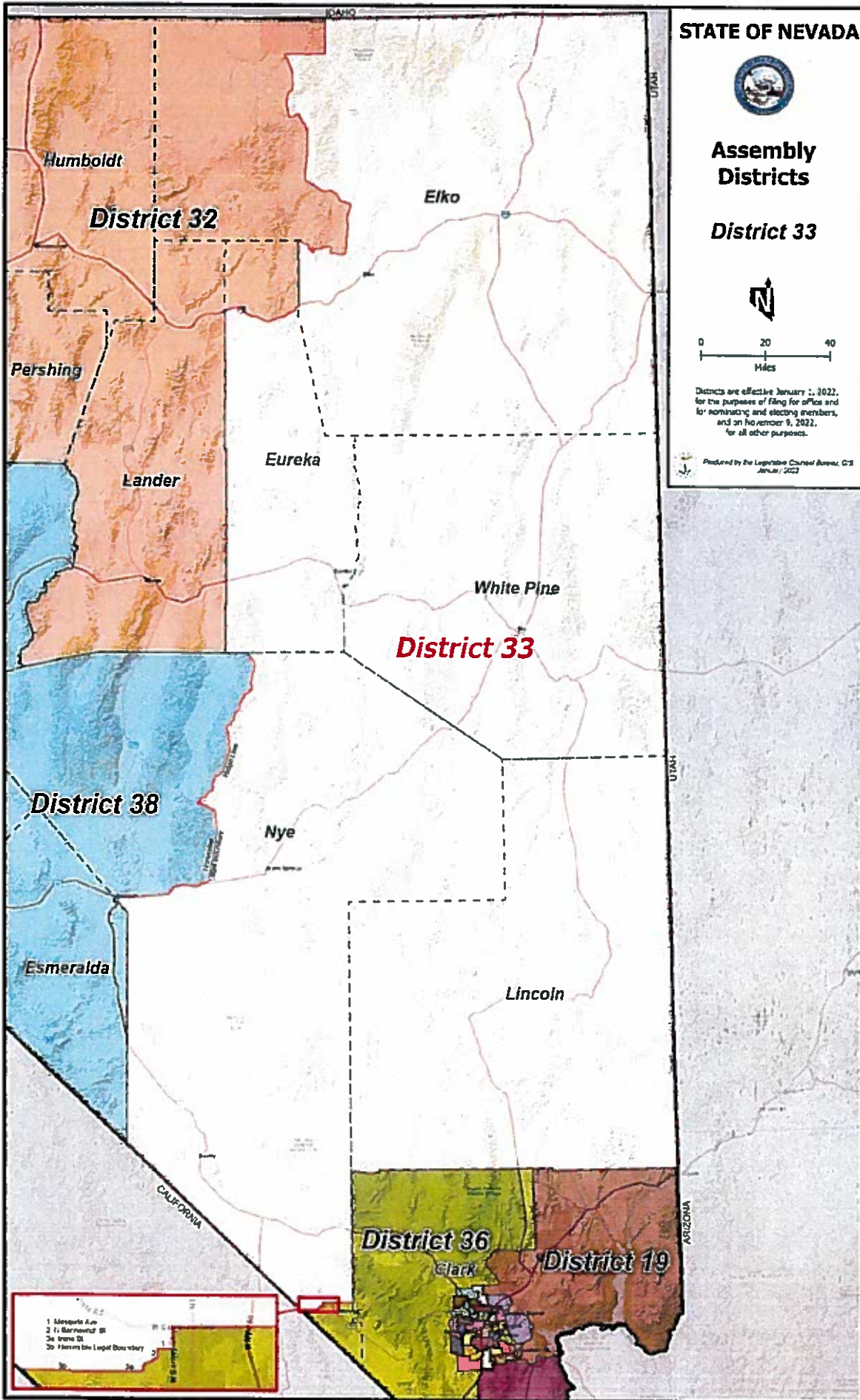
Assembly  
Districts

District 33



Districts are effective January 1, 2022,  
for the purposes of filing for office and  
for nominating and electing members,  
and on no later than 9, 2022,  
for all other purposes.

Produced by the Legislative Council Bureau, C3  
January 2022





STATE OF NEVADA



Assembly Districts

District 36



Districts are effective January 1, 2022, for the purposes of filing for office and for nominating and electing members, and on November 9, 2022, for all other purposes.

Produced by the Legislative Counsel Bureau, 02/21 January 2022

A



33

B



Pahrump

District 36

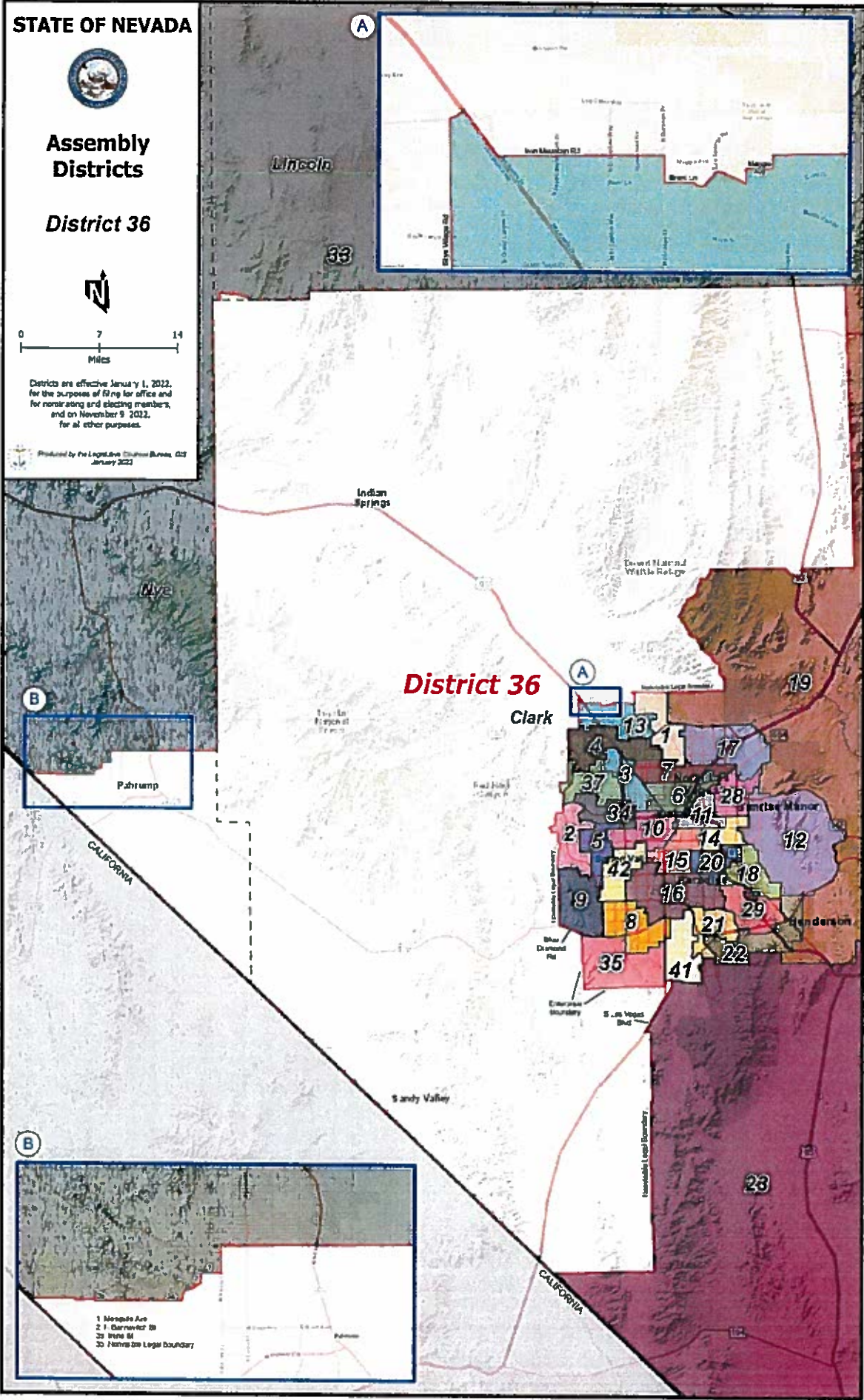
Clark

A

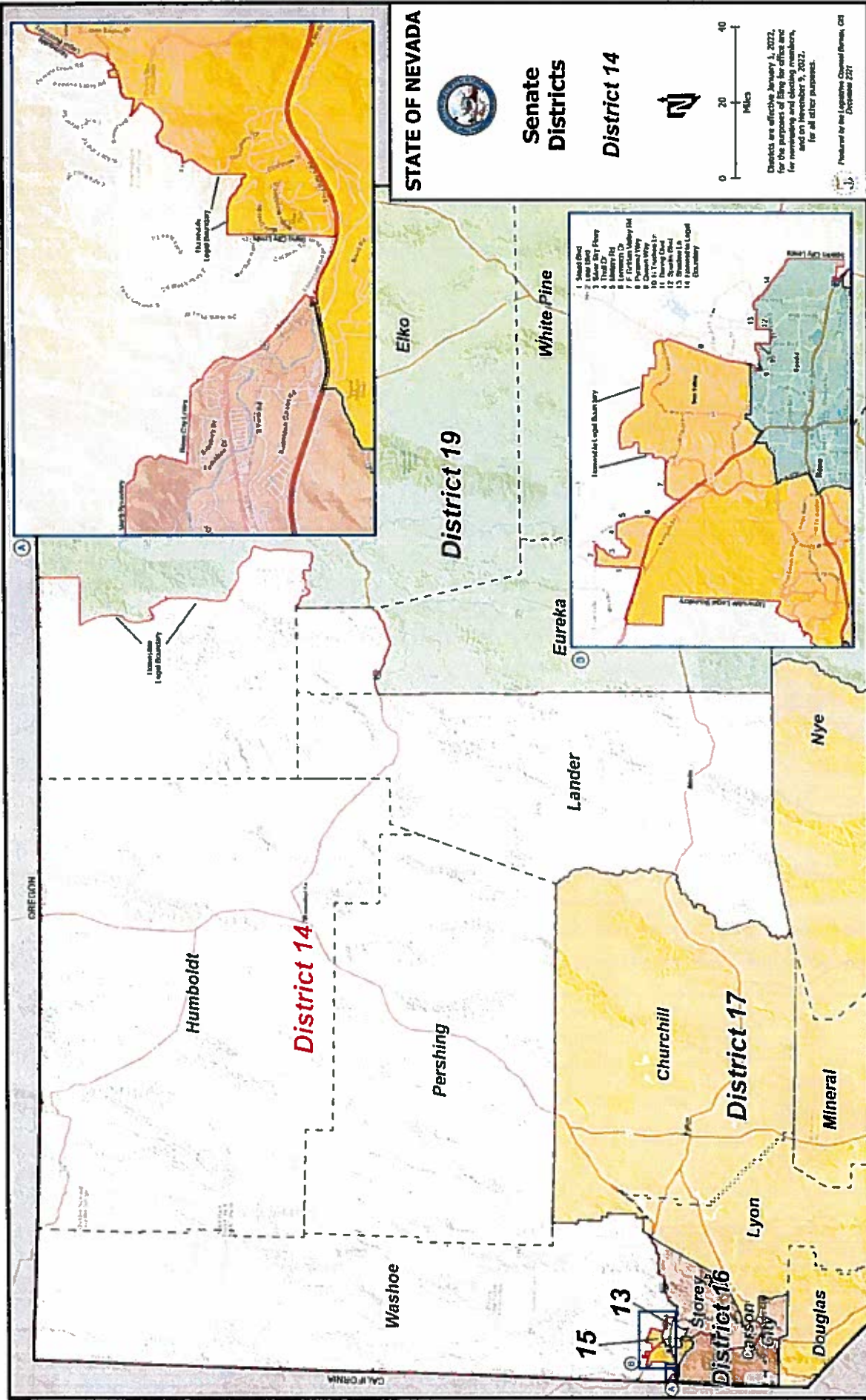
B



- 1 Mesquite Ave
- 2 I. Garwood Dr
- 33 Irene St
- 30 Nevada Legal boundary







STATE OF NEVADA



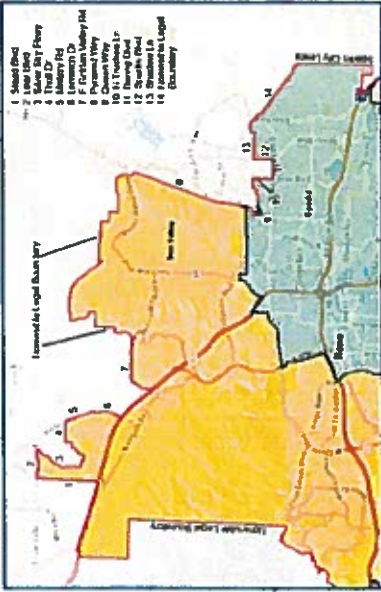
Senate Districts

District 14



Districts are effective January 1, 2022, for the purpose of filing for office for nominating and election purposes, and on November 9, 2022, for all other purposes.

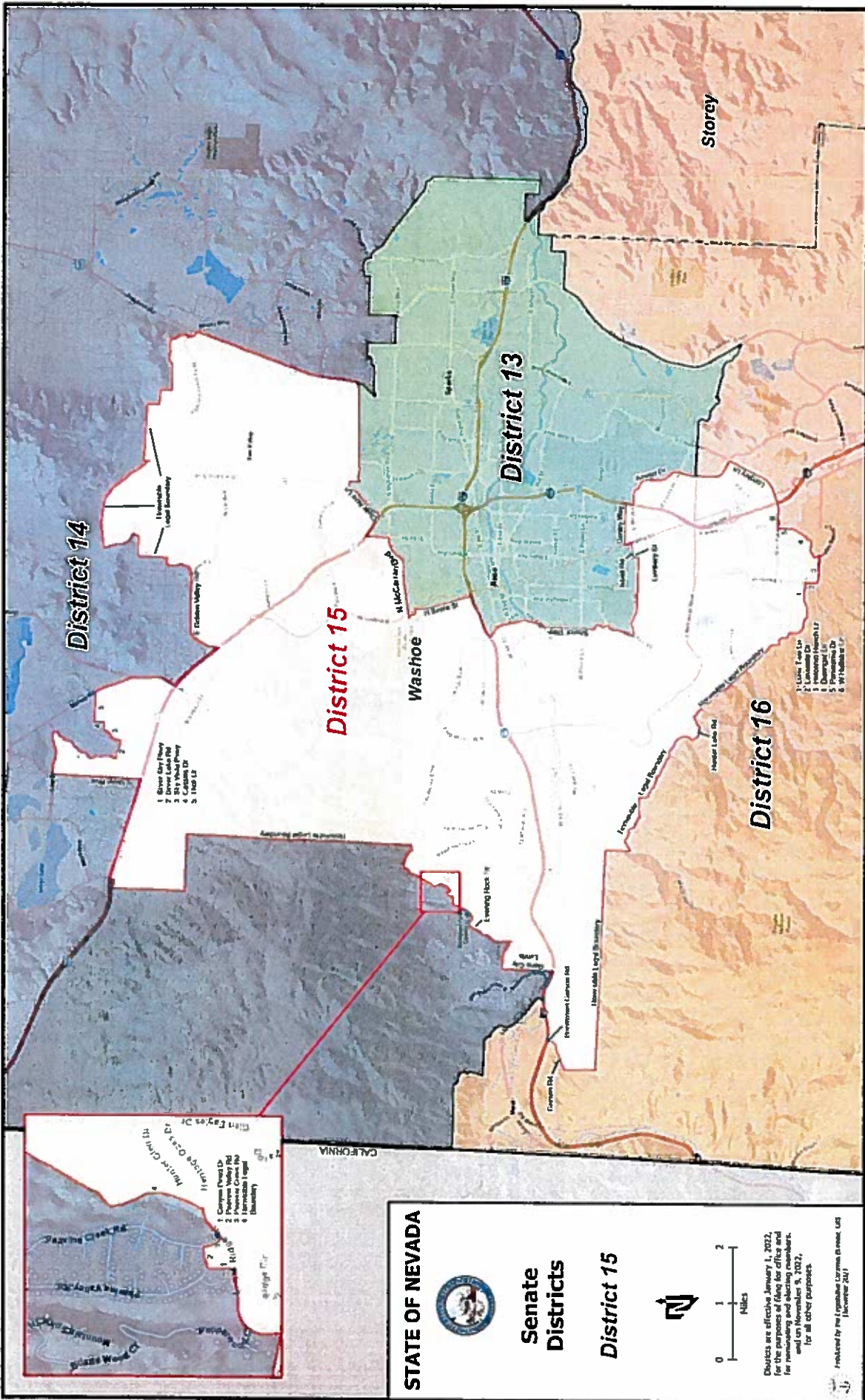
Prepared by the Legislative Counsel Bureau, OS  
December 2021



OREGON

CALIFORNIA





**District 14**

**District 13**

**District 15**

**District 16**

Washoe

Storey



- 1. Silver City Precinct
- 2. Drive Lake Precinct
- 3. Washoe Valley Precinct
- 4. Carson City Precinct
- 5. I-405 I-15

- 1. Carson Precinct
- 2. Washoe Valley Precinct
- 3. Henderson Precinct
- 4. Henderson Precinct
- 5. Henderson Precinct
- 6. Henderson Precinct

STATE OF NEVADA



Senate Districts

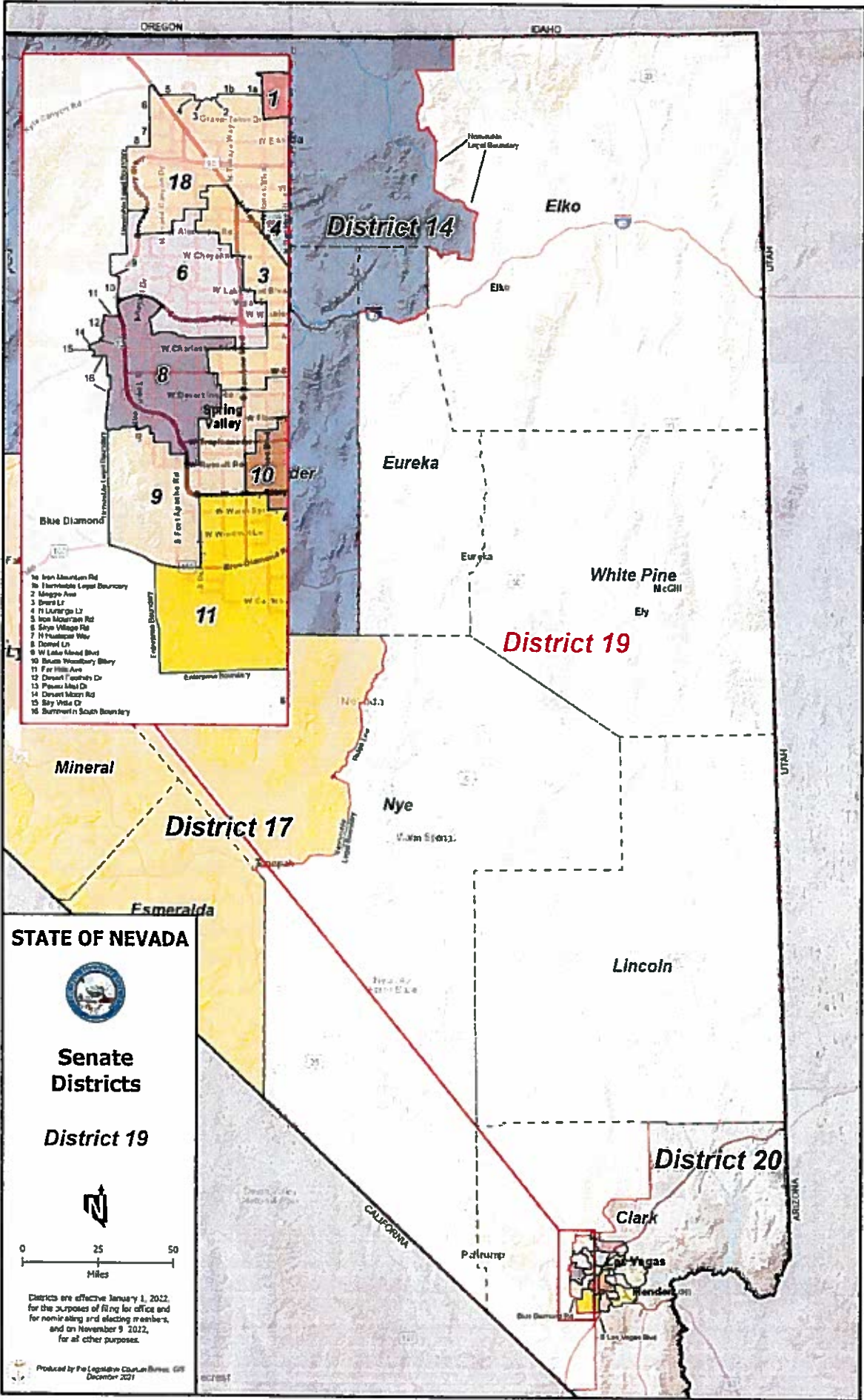
District 15



Districts are effective January 1, 2022, for the purposes of filing for office and for nominating and electing members, and on November 9, 2022, for all other purposes.

Produced by the Legislative Committee on Rules, 2021 (November 2021)





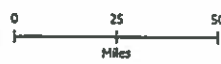
- 16 Iron Mountain Rd
- 15 Farmdale Legal Boundary
- 14 Maggie Ave
- 13 Grant Ln
- 12 N Luning Ln
- 11 Iron Mountain Rd
- 10 Sage Village Rd
- 9 N Mustang Way
- 8 Desert Ln
- 7 W Lake Road Blvd
- 6 Baker Woodbury Blv
- 5 Far Hills Ave
- 4 Desert / Appleby Dr
- 3 Pecos Mesa Dr
- 2 Desert Moon Rd
- 1 Sky Vista Dr
- 16 Turnover N South Boundary

**STATE OF NEVADA**



**Senate Districts**

**District 19**



Districts are effective January 1, 2022, for the purposes of filing for office and for nominating and electing members, and on November 9, 2022, for all other purposes.



# **EXHIBIT “3”**

