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13 Attorneys for Plaintiff

14 Nevada Policy Research Institute

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 NEVADA POLICY RESEARCH INSTITUTE, a
18 Nevada domestic nonprofit corporation,

19 Plaintiff,

20 vs.

21 NATHA C. ANDERSON, an individual engaging in
22 dual employment with the Nevada State Assembly
23 and Washoe County School District; REUBEN
24 D'SILVA, an individual engaging in dual
25 employment with the Nevada State Assembly and
26 Clark County School District; CECELIA
27 GONZÁLEZ, an individual engaging in dual
28 employment with the Nevada State Assembly and
University of Nevada, Las Vegas; LISA
KRASNER, an individual engaging in dual
employment with the Nevada State Senate and
Truckee Meadows Community College; SELENA
LA RUE HATCH, an individual engaging in dual
employment with the Nevada State Assembly and
Washoe County School District; BRITTNEY
MILLER, an individual engaging in dual
employment with the Nevada State Assembly and
Clark County School District; DINA NEAL, an

Case No.: A-20-817757-C

Dept. No.: VIII

HEARING REQUESTED

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE SECOND AMENDED
COMPLAINT AND TO AMEND
CAPTION IN CONFORMITY
THEREWITH**

1 individual engaging in dual employment with the
2 Nevada State Senate and Nevada State College and
3 College of Southern Nevada; JAMES
4 OHRENSCHALL, an individual engaging in dual
5 employment with the Nevada State Senate and Clark
6 County Public Defender; DAVID ORENTLICHER,
7 an individual engaging in dual employment with the
8 Nevada State Assembly and University of Nevada,
9 Las Vegas; SHONDRA SUMMERS-
10 ARMSTRONG, an individual engaging in dual
11 employment with the Nevada State Assembly and
12 Regional Transportation Commission; and SELENA
13 TORRES, an individual engaging in dual
14 employment with the Nevada State Assembly and a
15 Clark County Public Charter School,

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Defendants,

and Legislature of the State of Nevada,

Intervenor-Defendant.

Pursuant to NRCP 15, Plaintiff Nevada Policy Research Institute (“NPRI”), by and through its attorneys of record, Deanna L. Forbush, Esq. and Colleen E. McCarty, Esq., of Fox Rothschild LLP, hereby files its Motion for Leave to File Second Amended Complaint (“Motion to Amend”).

Following certification of the 2022 General Election by the Nevada Supreme Court, NPRI reviewed the results and found seven (7) additional individuals who, at the time of hearing of this matter, will be simultaneously holding elected office in the Nevada State Legislature and paid positions in the Executive Branch, in alleged violation of the Separation of Powers requirement of the Nevada Constitution, Nevada Const. Art. 3, § 1, ¶ 1. NPRI seeks to file the Second Amended Complaint, a copy of which is attached hereto as **Exhibit 1**, to add these individuals to ensure their rights are properly adjudicated. Additionally, since the matter was originally filed, a number of Defendants have ceased engaging in dual service and have either been voluntarily dismissed by NPRI or dismissed by way of either stipulation or court order. NPRI further seeks amendment to amend the case caption to remove these former Defendants to avoid confusion in future proceedings.

1 This Motion to Amend is made and based on the following Memorandum of Points and
2 Authorities; the Declaration of Deanna L. Forbush included therein; the proposed Second Amended
3 Complaint attached thereto as **Exhibit 1**, all pleadings and papers already on file; and any oral
4 argument the Court may permit at a hearing of this matter.

5 Dated this 15th day of December, 2022.

6 **FOX ROTHSCHILD LLP**

7
8 By: /s/ Deanna L. Forbush

9 DEANNA L. FORBUSH

10 Nevada Bar No. 6646

11 COLLEEN E. MCCARTY

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15 Telephone: (702) 262-6899

16 Attorneys for Plaintiff

17 Nevada Policy Research Institute

18 **DECLARATION OF DEANNA L. FORBUSH, ESQ. IN SUPPORT OF**
19 **MOTION TO AMEND**

20 I, Deanna L. Forbush, hereby declare as follows:

21 1. I am an attorney licensed to practice law in the State of Nevada, and I am a Partner
22 with Fox Rothschild LLP, attorneys for Plaintiff, Nevada Policy Research Institute.

23 2. I have personal knowledge of the facts stated in this Declaration. If called upon to
24 testify to the same, I am competent to do so.

25 3. NPRI filed the instant action for declaratory and injunctive relief on July 9, 2020. At
26 that time, NPRI was aware of 13 individuals who were engaging in dual service by simultaneously
27 holding elected office in the Nevada State Legislature and paid positions with Nevada State or local
28 governments, in alleged violation of the Separation of Powers requirement of the Nevada
Constitution, Nevada Const. Art. 3, § 1, ¶ 1.

1 4. Over the course of this litigation, including while the matter was on appeal with the
2 Nevada Supreme Court, nine 9 of the originally named Defendants, i.e. Nicole Cannizzaro, Kasina
3 Douglass-Boone, Jason Frierson, Osvaldo Fumo, Heidi Seevers Gansert, Glen Leavitt, Melanie
4 Scheible, Teresa Benitez-Thompson and Jill Tolles, ceased engaging in dual service and were
5 dismissed by voluntary notice, stipulation or court order.

6 5. Following certification of the 2022 General Election, NPRI conducted a due diligence
7 review of the results and determined that, in addition to the 4 Defendants remaining from the
8 original pleading of this matter, there are seven 7 additional individuals, i.e. Natha C. Anderson,
9 Reuben D'Silva, Cecelia González, Lisa Krasner, Selena La Rue Hatch, David Orentlicher and
10 Shondra Summers-Armstrong, who will be simultaneously holding elected office in the Nevada
11 State Legislature and paid positions with Nevada State or local governments at the time of the
12 hearing of this matter.

13 6. NPRI respectfully seeks leave to file the Second Amended Complaint, attached hereto
14 as **Exhibit 1**, and to amend the case caption in conformity therewith, to ensure all individuals who
15 are similarly situated with regard to their alleged violation of the Separation of Powers requirement
16 of the Nevada Constitution are properly named and adjudicated herein.

17 I declare under penalty of perjury under the laws of the State of Nevada (NRS 53.045)¹ that
18 the foregoing is true and correct.

19 Dated this 15th day of December, 2022.

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23 /s/ Deanna L. Forbush
24 DEANNA L. FORBUSH

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26
27 ¹ NRS 53.045. Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence
28 or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an
unsworn declaration of its existence or truth signed by the declarant under penalty of perjury, and dated, in substantially
the prescribed form.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **INTRODUCTION**

4 NPRI filed its nonpartisan declaratory and injunctive relief action on July 9, 2020. It named
5 all individuals known at that time to be engaging in dual service by simultaneously holding elected
6 office in the Nevada State Legislature and paid positions in the Executive Branch, in alleged
7 violation of the Separation of Powers requirement of the Nevada Constitution, Nevada Const. Art. 3,
8 § 1, ¶ 1. Of the 13 individuals so named, 9 subsequently ceased engaging in dual service by either
10 leaving elected office or resigning from government employment and were subsequently dismissed
11 from the case. Their names, however, remain reflected in the case caption.

12 Following its review of the results of the 2022 General Election, which were certified by the
13 Nevada Supreme Court on November 22, 2022, NPRI identified 7 additional individuals who will be
14 engaging in dual service as of the date of hearing of this matter. By way of the instant Motion to
15 Amend, NPRI seeks to ensure all proper parties are present in the litigation going forward and that
16 the case caption properly reflects the same. NPRI does not seek to change its causes of action or
17 otherwise make any substantive changes to its complaint allegations. This is simply a
18 straightforward request that does not warrant opposition by any existing party and is appropriate to
19 be heard and granted on order shortening time.
20

21 **II.**

22 **STATEMENT OF FACTS**

23 The facts relevant to the instant Motion to Amend are contained within the Declaration of
24 Deanna L. Forbush, supra, and are incorporated by reference as though fully set forth herein.

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III.

LEGAL ARGUMENT

A. NPRI Meets the Legal Standard Applicable to a Motion to Amend.

1. Leave to Amend Is to Be Freely Given.

NRCP 15 provides that when ruling on a Motion to Amend, “[t]he court should freely give leave when justice so requires.” NRCP 15(a)(2). The Nevada appellate courts have held that “[t]he liberality embodied in NRCP 15(a) requires courts to err on the side of caution and permit amendments....because denial of a proposed pleading amendment amounts to the denial of an opportunity to explore any potential merit it might have had.” *Gardner v. Eighth Judicial District Court*, 133 Nev. 730, 732, 405 P.3d 651, 654 (2017) (quoting *Nutton v. Sunset Station*, 131 Nev. 279, 292, 357 P.3d 966, 975 (Ct. App. 2015). The Nevada Supreme Court has further explained that “in the absence of any apparent or declared reason – such as undue delay, bad faith or dilatory motive on the part of the movant – the leave sought should be freely given.” *Stephens v. S. Nev. Music Co.*, 89 Nev. 104, 105-06, 507 P.2d 138, 139 (1973) (citing *Foman v. Davis*, 371 U.S. 178, 182 (1962) (additional citation omitted)).

Thus, NRCP 15(a) contemplates the liberal amendment of pleadings, which means that most such motions ought to be granted unless a strong reason exists not to do so, such as prejudice to the opponent or lack of good faith by the moving party. *Stephens*, 89 Nev. at 105, 507 P.2d at 139.

2. Under This Standard, Leave to Amend Should Be Freely Granted in This Case.

No matter the outcome before this Court, this case will inevitably return to the Nevada Supreme Court for a final determination of whether Defendants’ dual employment in the Executive Branch while serving as elected members of the Legislature violates the separation of powers clause of the Nevada Constitution. So whether this Court ultimately agrees with NPRI that all dual employment service is precluded, or it makes a distinction between the types of service or for whom that service is provided to only grant in part NPRI’s requested relief, it is inevitable that someone

1 will appeal to obtain certainty on the issue that the Nevada Supreme Court has already noted is
2 sorely lacking. As such, the outcome here will impact all individuals engaging in dual service at the
3 time such decision is rendered. For this reason alone, the 7 individuals who are not yet parties to the
4 case – Natha C. Anderson, Reuben D’Silva, Cecelia González, Lisa Krasner, Selena La Rue Hatch,
5 David Orentlicher and Shondra Summers-Armstrong – should have the opportunity to appear as
6 parties and respond as needed concerning their dual service circumstances.

7
8 Additionally, no parties will be prejudiced by their addition to this litigation, where the
9 Nevada Legislature itself has already been permitted to intervene, and, along with the existing
10 parties, all Defendants are receiving full advocacy to which the new Defendants may add their voice
11 or simply seek joinder. Conversely, NPRI’s failure to join these necessary parties could have
12 negative procedural impacts. Further, despite its age, this case remains in its procedural infancy due
13 to the errant dismissal order by this Court’s predecessor that was subsequently reversed and
14 remanded by the Nevada Supreme Court, as well as the additional dismissal requests that remain
15 under advisement at the time of this filing. For this reason, there can be no prejudice to any of the
16 parties, where the case still remains in the responsive pleading stage, with only informal discovery
17 efforts having commenced to date. And, finally, leave is being sought timely and only for the
18 purposes of confirming the proper parties; no new claims or causes of action are proposed.

19
20 If leave to amend is not granted in the instant case, a just outcome may be prevented.
21 Accordingly, this Court should grant NPRI’s Motion to Amend, pursuant to NRCP 15, and permit
22 the filing of the proposed Second Amended Complaint attached hereto as **Exhibit 1**.

23
24 **B. NPRI’s Request to Amend the Case Caption Should Also Be Granted.**

25 As noted above, NPRI is now seeking relief in its Second Amended Complaint against 11
26 individual Defendants, a number which is reduced from the 13 Defendants originally named, but
27 which number is inclusive of only 4 original Defendants. The additional 7 Defendants are newly-
28 named, and such a significant change to the parties named herein justifies the Clerk of the Court

1 being ordered to replace the current caption with the caption reflected in the amended pleading.

2 NPRI notes, too, that the Nevada Legislature filed a similar request while the matter was
3 pending appeal with the Nevada Supreme Court. In that request, the stated basis was to ensure all
4 parties were properly named and the caption conformed to the operative pleading. *See* Notice
5 Requesting Clerk to Make Revisions to Appellate Record to Include Legislature of the State of
6 Nevada as Respondent and to Make Other Technical Revisions to Caption (“Notice to Amend
7 Caption”), filed January 30, 2021 in Supreme Court Case No. 82341. NPRI filed its Joinder to the
8 Notice to Amend Caption shortly thereafter on February 1, 2021, recognizing along with opposing
9 counsel the need for an accurate caption to avoid future confusion.
10

11 In keeping with the parties’ practice of ensuring pleading conformity then, and importantly,
12 to eliminate any confusion regarding to whom future rulings of this Court are applicable, NPRI
13 requests the Court permit amendment of the case caption upon the granting of its Motion to Amend.
14

15 **IV.**

16 **CONCLUSION**

17 Based upon the foregoing, NPRI respectfully requests the Court grant it leave to file the
18 Second Amended Complaint attached as **Exhibit 1** and to amend the caption of the case in
19 conformity therewith. NPRI’s request is made in good faith, and both outcomes are justified under
20 the applicable legal standard and will not result in prejudice to any party.

21 Dated this 15th day of December, 2022.

22 **FOX ROTHSCHILD LLP**

23 By: /s/ Deanna L. Forbush

24 DEANNA L. FORBUSH (#6646)
25 COLLEEN E. MCCARTY (#13186)
26 1980 Festival Plaza Drive, Suite 700
27 Las Vegas, Nevada 89135
28 Attorneys for Plaintiff
Nevada Policy Research Institute

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Fox Rothschild LLP and that on this 15th day of December, 2022, the foregoing document entitled **PLAINTIFF’S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT AND TO AMEND CAPTION IN CONFORMITY THEREWITH** was caused to be served upon each of the parties, listed below, via electronic service through the Eighth Judicial District Court’s Odyssey E-File and Serve system.

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/s/ Jineen DeAngelis
An Employee of Fox Rothschild LLP

EXHIBIT 1

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12 Facsimile: (702) 597-5503

13 Attorneys for Plaintiff

14 Nevada Policy Research Institute

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 NEVADA POLICY RESEARCH INSTITUTE, a
18 Nevada domestic nonprofit corporation,

19 Plaintiff,

20 vs.

21 NATHA C. ANDERSON, an individual engaging in
22 dual employment with the Nevada State Assembly
23 and Washoe County School District; REUBEN
24 D'SILVA, an individual engaging in dual
25 employment with the Nevada State Assembly and
26 Clark County School District; CECELIA
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MILLER, an individual engaging in dual
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Clark County School District; DINA NEAL, an

Case No.: A-20-817757-C

Dept. No.: VIII

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

[Exemption from Arbitration Based on
Equitable Relief Requested]

1 individual engaging in dual employment with the
2 Nevada State Senate and Nevada State College and
3 College of Southern Nevada; JAMES
4 OHRENSCHALL, an individual engaging in dual
5 employment with the Nevada State Senate and Clark
6 County Public Defender; DAVID ORENTLICHER,
7 an individual engaging in dual employment with the
8 Nevada State Assembly and University of Nevada,
9 Las Vegas; SHONDRA SUMMERS-
10 ARMSTRONG, an individual engaging in dual
11 employment with the Nevada State Assembly and
12 Regional Transportation Commission; and SELENA
13 TORRES, an individual engaging in dual
14 employment with the Nevada State Assembly and a
15 Clark County Public Charter School,

16 Defendants,

17 and Legislature of the State of Nevada,

18 Intervenor-Defendant.

19 NEVADA POLICY RESEARCH INSTITUTE (“NPRI”), by and through its attorneys of
20 record, Deanna L. Forbush, Esq. and Colleen E. McCarty, Esq., of Fox Rothschild LLP, hereby
21 alleges and complains against NATHA C. ANDERSON, REUBEN D’SILVA, CECELIA
22 GONZÁLES, LISA KRASNER, SELENA LA RUE HATCH, BRITTNEY MILLER, DINA NEAL,
23 JAMES OHRENSCHALL, DAVID ORENTLICHER, SHONDRA SUMMERS-ARMSTRONG,
24 and SELENA TORRES (collectively herein “Defendants”), as follows:

25 **FACTS COMMON TO ALL CLAIMS**

26 1. NPRI files this Complaint for Declaratory and Injunctive Relief in the public interest
27 to address the ongoing constitutional violations by Defendants, and each of them, for engaging in
28 dual employment by simultaneously holding elected offices in the Nevada State Legislature and paid
positions with Nevada State or local governments.

2. The Nevada Constitution reads in relevant part:

The powers of the Government of the State of Nevada shall be divided
into three separate departments, the Legislature, the Executive and the
Judicial; and no person charged with the exercise of powers properly
belonging to one of these departments shall exercise any functions,

1 appertaining to either of the others, except in the cases expressly directed
2 or permitted in this constitution. Nevada Const. Art. 3, §1, ¶1.

3 3. The rationale underlying the Separation of Powers requirement of Nevada Const. Art.
4 3, §1, ¶1 can be traced to the desires of the constitutional framers to encourage and preserve the
5 independence and integrity of the actions and decisions of individual members of the Nevada State
6 Legislature and to guard against conflicts of interest, concentration of powers, and dilution of the
7 separation of powers.

8 4. Defendants' dual employment by simultaneously holding elected offices in the
9 Nevada State Legislature and paid positions with Nevada State or local governments expressly
10 violates the Separation of Powers requirement of Nevada Const. Art. 3, §1, ¶1 and undermines the
11 ethics of their legislative service by creating conflicts, concentrating power, and diluting the
12 separation of powers.

13 5. If allowed to proceed with the dual employment stated herein, legislative
14 expenditures or appropriations and taxpayer monies will be paid to Defendants in violation of
15 Nevada Const. Art. 3, §1, ¶1. NPRI presents this action, pursuant to NRS 30.030, *et seq.*, and NRS
16 33.010, *et seq.*, respectively, and can and will fully advocate for: (1) the Court's declaration that it is
17 unconstitutional for Defendants to engage in the dual employment stated herein, and (2) the Court's
18 injunction to prevent Defendants from continuing to engage in the unconstitutional dual employment
19 stated herein.

20 **PARTIES**

21 6. NPRI is a public interest nonprofit, nonpartisan corporation organized under the laws
22 of the State of Nevada whose primary missions are to conduct public policy research and advocate
23 for policies that promote transparency, accountability, and efficiency in government.

24 7. At all relevant times, Defendant Natha C. Anderson has simultaneously held the
25 elected office of Nevada State Assemblyperson and the paid government position of Teacher with
26 the Washoe County School District.

27 8. At all relevant times, Defendant Reuben D'Silva has simultaneously held the elected
28 office of Nevada State Assemblyperson and the paid government position of Teacher with the Clark
County School District.

1 9. At all relevant times, Defendant Cecelia González has simultaneously held the elected
2 office of Nevada State Assemblyperson and the paid government position of Part-Time Instructor
3 with the University of Nevada, Las Vegas.

4 10. At all relevant times, Defendant Lisa Krasner has simultaneously held the elected
5 office of Nevada State Assemblyperson and the paid government position of Adjunct Professor with
6 the Truckee Meadows Community College.

7 11. At all relevant times, Defendant Selena La Rue Hatch has simultaneously held the
8 elected office of Nevada State Assemblyperson and the paid government position of Teacher with
9 the Washoe County School District.

10 12. At all relevant times, Defendant Brittney Miller has simultaneously held the elected
11 office of Nevada State Assemblyperson and the paid government position of Teacher with the Clark
12 County School District.

13 13. At all relevant times, Defendant Dina Neal has simultaneously held the elected office
14 of Nevada State Senator and the paid government position of Adjunct Professor with the Nevada
15 State College and the College of Southern Nevada.

16 14. At all relevant times, Defendant James Ohrenschall has simultaneously held the
17 elected office of Nevada State Senator and the paid government position of Deputy Public Defender
18 with the Clark County Public Defender’s Office.

19 15. At all relevant times, Defendant David Orentlicher has simultaneously held the
20 elected office of Nevada State Assemblyperson and the paid government position of Professor with
21 the William S. Boyd School of Law at the University of Nevada, Las Vegas.

22 16. At all relevant times, Defendant Shondra Summers-Armstrong has simultaneously
23 held the elected office of Nevada State Senator and the paid government position of Management
24 Analyst with the Regional Transportation Commission.

25 17. At all relevant times, Defendant Selena Torres has simultaneously held the elected
26 office of Nevada State Assemblyperson and the paid government position of Teacher with a Clark
27 County Public Charter School.

1 **JURIDICTION AND VENUE**

2 18. The Court has jurisdiction over all parties, where Plaintiff conducts business in the
3 County of Clark, State of Nevada, and all Defendants either reside in or carry out the duties of their
4 elected offices throughout the State of Nevada, including in the County of Clark.

5 19. Venue is appropriate because the events giving rise to Plaintiff's causes of action
6 have occurred, and continue to occur, in the County of Clark, State of Nevada.

7 **FIRST CAUSE OF ACTION**
8 **Violation of Separation of Powers**
9 **(Declaratory Relief)**

10 20. Plaintiff realleges and incorporates by reference herein each and every foregoing
11 paragraph of this Complaint as if set forth in full.

12 21. There is an actual controversy between Plaintiff, acting in the public interest, and the
13 Defendants and each of them, as to the meaning of the Separation of Powers requirement of Nevada
14 Const. Art. 3, §1, ¶1 and its application to Defendants and their conduct. Plaintiff has taken the
15 position that Defendants are persons simultaneously holding elected offices in the Nevada State
16 Legislature and paid positions with Nevada State or local governments in violation of the Separation
17 of Powers requirement of Nevada Const. Art. 3, §1, ¶1. Upon information and belief, Defendants
18 disagree with Plaintiff's position stated above.

19 22. Plaintiff seeks relief pursuant to NRS 30.010, *et seq.*, in the form of a declaration that
20 Defendants simultaneously holding elected offices in the Nevada State Legislature and paid
21 positions with Nevada State or local governments violates the Separation of Powers requirement of
22 Nevada Const. Art. 3, §1, ¶1. A declaration resolving the actual controversy between Plaintiff and
23 Defendants will serve a useful purpose in settling the legal issues in this action and offering relief
24 from uncertainty for all parties to this action.

25 23. It was necessary for Plaintiff to retain the services of an attorney to bring this cause
26 of action, and it should be properly compensated therefore.
27
28

SECOND CAUSE OF ACTION
Violation of Separation of Powers
(Injunctive Relief)

24. Plaintiff realleges and incorporates by reference herein each and every foregoing paragraph of this Complaint as if set forth in full.

25. Defendants are persons simultaneously holding elected offices in the Nevada State Legislature and paid positions with Nevada State or local governments in violation of the Separation of Powers requirement of Nevada Const. Art. 3, §1, ¶1.

26. Without this Court’s intervention, legislative expenditures or appropriations and taxpayer monies will be paid to Defendants in violation of Nevada Const. Art. 3, §1, ¶1, and irrevocable and irreparable harm will occur to the rights provided under this provision of the Nevada Constitution.

27. There exists no adequate remedy at law to prevent the constitutional violation caused by Defendants simultaneously holding elected offices in the Nevada State Legislature and paid positions with Nevada State or local governments in violation of the Separation of Powers requirement of Nevada Const. Art. 3, §1, ¶1.

28. Plaintiff, acting in the public interest, is entitled to injunctive relief to stop and prevent the Separation of Powers violations by Defendants stated herein. The Court has the power to grant such relief, pursuant to its inherent ability to grant equitable relief and the provisions of NRS 33.010, *et seq.*

29. It was necessary for Plaintiff to retain the services of an attorney to bring this cause of action, and it should be properly compensated therefore.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For a declaration that Defendants simultaneously holding elected offices in the Nevada State Legislature and paid positions with Nevada State or local governments violates the Separation of Powers requirement of Nevada Const. Art. 3, §1, ¶1;
2. For an injunction against Defendants prohibiting each and every one of them from continuing to simultaneously hold elected offices in the Nevada State Legislature and paid positions

1 with Nevada State or local governments in violation of the Separation of Powers requirement of
2 Nevada Const. Art. 3, §1, ¶1;

3 3. For reasonable attorneys' fees and costs; and

4 4. For such other and further relief as the Court may deem just and proper.

5 Dated this 15th day of December, 2022.

6 **FOX ROTHSCHILD LLP**

7
8 By: /s/ Deanna L. Forbush

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