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16 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
17 **CARSON CITY**

18 STRONG PUBLIC SCHOOLS NEVADA, a
19 political action committee; VICKI KREIDEL,
20 an individual; and CHRISTINA
21 GIUNCHIGLIANI, an individual,

22 Plaintiffs,

23 vs.

24 STATE OF NEVADA, ex rel. the Office of the
25 State Treasurer of Nevada; ZACH CONINE,
26 Nevada State Treasurer, in his official capacity; and,
27 JOE LOMBARDO, Nevada Governor, in his official
28 capacity,

Defendants.

Case No.: 24 DC 000241B

Dept: II

REC'D & FILED

2024 FEB -5 AM 11:56

WILLIAM SCOTT HOEN
CLERK

BY K. PETERSON

DEPUTY

29 **COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

30 **[Exemption from Arbitration Based on Equitable and Declaratory Relief Requested NAR**

31 **3(A), 5(A)]**

1 Plaintiffs STRONG PUBLIC SCHOOLS NEVADA, a political action committee
2 (“SPSN”), Vicki Kreidel, and Christina Giunchigliani, file this Complaint against Defendants the
3 State of Nevada; Joseph Lombardo, in his official capacity as Governor of the State of Nevada
4 and; Zach Conine, and in his official capacity as Nevada State Treasurer. Plaintiffs allege as
5 follows:

6 **JURISDICTION AND VENUE**

7 1. This Court has subject matter jurisdiction pursuant to Article 6, § 6(1) of the
8 Nevada Constitution and NRS 30.030 and NRS 30.100. Furthermore, because Plaintiffs seek
9 injunctive relief, this Court has original jurisdiction over such claims. *See Edwards v. Emperor’s*
10 *Garden Rest.*, 122 Nev. 317, 324, 130 P.3d 1280, 1284 (2006) (“The district court possesses
11 original jurisdiction . . . over claims for injunctive relief.”).

12 2. The Court has personal jurisdiction over all of the Defendants, who are residents
13 and officials of the State of Nevada, pursuant to NRS 14.065.

14 3. Venue is proper pursuant to NRS 13.010, 13.020(3), and 13.040 because all of the
15 Defendants either reside or carry out their official duties in Carson City.

16 **PARTIES**

17 4. Plaintiff SPSN is a state political action committee affiliated with the Nevada
18 State Education Association under the laws of Nevada and under section 527 of the Internal
19 Revenue Code to support public education and oppose the diversion of public money for private
20 or corporate use. It is authorized to do business in Nevada, and its members and supporters,
21 including Nevada public school teachers and students, will be harmed by SB1 (35th Special
22 Session Leg., Nev. 2023) (hereinafter “SB1 2023”).

23 5. Plaintiff Vicki Kreidel has been a Nevada resident for 10 years, working as an
24 elementary school reading specialist in Clark County, Nevada, and is the President of the
25 National Education Association of Southern Nevada.

26 6. Plaintiff Christina Giunchigliani is a 45-year Nevada resident, a former teacher in
27 Clark County, a former elected representative in Clark County and a former elected
28 representative in the Nevada State Assembly.

1 7. Defendant Joseph Lombardo currently serves as the Governor of the State of
2 Nevada, with chief executive authority under Nevada's Constitution and state law.

3 8. Defendant Zach Conine currently serves as the Nevada State Treasurer.

4 **INTRODUCTION**

5 9. This lawsuit challenges the constitutionality of SB1 2023, otherwise known as the
6 "Southern Nevada Tourism Innovation Act," which provides a method to finance the
7 development and construction of a baseball stadium in Clark County intended to host a Major
8 League Baseball team.

9 10. A true and correct copy of SB1 2023 as passed and enrolled by the Senate, and
10 then signed by Governor Lombardo into law, is attached to this complaint as **Exhibit 1**.

11 11. SB1 2023 violates 5 provisions of the Nevada Constitution. *First*, it violates
12 Article 4, § 18(2), which provides that a two-thirds majority in each legislature house is required
13 to pass any bill that "creates, generates, or increases any public revenue in any form, including
14 but not limited to taxes, fees, assessments and rates, or changes in the computation base for
15 taxes, fees, assessments and rates." SB1 2023 creates public revenue through its seat licensing
16 provisions, but it was not passed by the required two-thirds vote in either the Assembly or the
17 Senate.

18 12. *Second*, SB1 2023 violates Article 4, § 19, which states in pertinent part that "[n]o
19 money shall be drawn from the treasury but in consequence of appropriations made by law."
20 Nevada law is clear that in the absence of a specified amount, an appropriation must contain "a
21 clear legislative intent authorizing the expenditure and a maximum amount set aside for the
22 payment of claims or at least a formula by which the amount can be determined." *See Schwartz*
23 *v. Lopez* 132 Nev. 732, 753, 382 P.3d 886, 900-01 (2016). SB1 2023 fails this Constitutional
24 requirement because it authorizes the Nevada Treasurer to draw unspecified amounts of money
25 to prop up Clark County's bond debt, with no formula to determine the amount.

26 13. *Third*, SB1 2023 violates Article 4, § 21 because it is tantamount to a local law
27 where a general law could have been made applicable.

1 14. *Fourth*, SB1 2023 violates Article 9, § 3 because the requirement that Clark
2 County incur general obligation bonds impermissibly results in public debt incurred by the State
3 of Nevada, with a failure by the Nevada legislature to levy a new tax and specifically appropriate
4 the proceeds of that tax to repay the public debt created.

5 15. *Fifth*, SB1 2023 violates Article 9, § 4 because the law's pledge of taxes for bond
6 repayment and credit enhancement scheme both require the State to assume the debt of Clark
7 County.

8 16. The Court should therefore declare that SB1 2023 is unconstitutional and prevent
9 Defendants from implementing, enforcing or executing the law.

10 **FACTUAL ALLEGATIONS**

11 17. Plaintiff SPSN is a public interest, non-profit political action committee affiliated
12 with the Nevada State Education Association for the purposes of supporting public education and
13 opposing the diversion of public money for private or corporate uses. It is authorized to do
14 business in Nevada, and its members and supporters, including Nevada public school employees
15 and students, will be harmed by SB1 2023.

16 18. Plaintiffs Vicki Kreidel and Christina Giunchigliani are Nevada residents who
17 share the same concerns of Plaintiff SPSN that SB1 2023 is violative of the Nevada Constitution
18 and that, if implemented, will decrease money allocated to public school employees and students,
19 will decrease other services to the citizens of Nevada, and will otherwise result in serious and
20 irreparable harm to the Plaintiffs, and those whose interests they represent, if not overturned.

21 19. The Nevada Constitution requires the State to operate with a balanced budget,
22 including on an intra-year basis. Taxes or other revenues can be increased only with a two-thirds
23 vote of the legislature, curtailing the state's fiscal flexibility, but also adding a necessary
24 requirement of responsible spending approved by the voters who can vote out the legislators if
25 they disagree with their spending decisions.

26 ***SB1 2023***

27 20. On or about June 13, 2023, the Nevada State Senate passed SB1 2023. On or
28 about June 14, 2023, the Nevada State Assembly passed SB1 2023.

1 21. SB1 2023 did NOT receive an affirmative vote of more than 2/3rds of the
2 members of the Nevada State Senate and/or the Nevada State Assembly.

3 22. On or about June 15, 2023, SB1 2023 was signed into law by Governor Joe
4 Lombardo.

5 23. As stated in its Legislative Counsel’s Digest, 2023 SB1 is known as the “Southern
6 Nevada Tourism Innovation Act” and provides a method to finance the development and
7 construction of a Major League Baseball stadium project (the “Project”) in Clark County.¹

8 24. To pay for the Project, SB1 2023 mandates the issuance of general obligation
9 bonds by Clark County. *See* SB1 2023 at Section 34.

10 25. SB1 2023 pledges the proceeds of certain existing taxes, fees, and charges
11 imposed by (a) the State and (b) the County in the “Sports and Entertainment Improvement
12 District” to pay the principal and interest on the bonds. *See* SB1 2023 at Section 29.1.

13 26. The above-referenced pledge of taxes, fees and charges set forth in Section
14 29.1(a) of SB1 2023 (state tax proceeds) is subject to the qualification that it does not create
15 “[a]ny form of contract, obligation, or pledge granting, providing or otherwise securing the full
16 faith and credit of the State for any payment . . . of any public or private debts” nor is it a
17 “surrender by the Legislature of any sovereign power of the state government to enact, amend or
18 repeal any law . . .” *See* SB1 2023 at Section 29.8(a) and (b).

19 27. Despite the law’s illusory commitment to avoid saddling the State of Nevada with
20 public debt, other language in the law, and common sense, demonstrate that Nevada taxpayers
21 will necessarily incur public debt if SB1 2023 is implemented.

22 28. To support the bonds issued by Clark County, SB1 2023 requires the Nevada
23 State Treasurer to provide a “credit enhancement” on the bonds. The Nevada State Treasurer
24 must set aside money into a “designated fund” to fund that credit enhancement. *See* SB1 2023 at
25 Sections 30 and 41.

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¹ <https://legiscan.com/NV/bill/SB1/2023/X2>

1 29. SB1 2023 requires the Nevada State Treasurer to deposit into the designated fund
2 an amount equal to at least 50% of the debt service due on the bonds in the next two years. *See*
3 SB1 2023 at Section 30.5(a).

4 30. There is a “continuing appropriation” for the Nevada State Treasurer to “gather,
5 transfer and deposit . . . unencumbered money . . . in an amount sufficient to replenish the
6 designated fund from various sources,” including the unreserved fund balance in the State
7 General Fund. *See* SB1 2023 at Sections 30.5(b); and 30.9.

8 31. If revenues from the Project are insufficient to repay its obligations on the bonds,
9 SB1 2023 authorizes Clark County to take a loan from the designated fund. If Clark County
10 withdraws money from the designated fund to pay for the bond debt service, SB1 2023 requires
11 the Nevada State Treasurer to gather other money that is not already committed for expenditure
12 and to replenish the designated fund. *See* SB1 2023 at Section 30.5(b)(1)-(5).

13 32. SB1 2023 states that Clark County’s failure to repay the loan taken from the
14 designated fund for the credit enhancement to pay debt service on the bonds issued to fund the
15 Project would not constitute a default, nor will it be considered a general obligation of the
16 County, nor can the Nevada State Treasurer withhold payment of any other monies from any
17 other source that would otherwise be distributed to Clark County. *See* SB1 2023 at Section 30.8.
18 In other words, if Clark County fails to repay the loan, the State of Nevada would have no
19 recourse against Clark County, and therefore would be ultimately responsible for the loan debt.

20 33. SB1 2023 empowers the “Stadium Authority” to sell licenses to generate revenue
21 for the construction of the Project. *See* SB1 2023 at Section 27.

22 ***Two-Thirds Majority***

23 34. The Nevada Constitution requires that any legislation that creates, generates, or
24 increases any public revenue in any form is subject to a two-thirds legislative supermajority
25 threshold for passage. *See* Nev. Const., Art 4, § 18(2).

26 35. The intent and purpose of the two-thirds requirement is to subject any revenue-
27 creating legislation to a heightened standard of legislative approval and to protect taxpayers from
28 new and increased taxes, fees, and other assessments.

1 36. SB1 2023 contains a license provision which has the impact of creating,
2 generating, or increasing public revenue. SB1 2023 states that the Stadium Authority “shall
3 retain the sole and exclusive right to enter into agreements to provide for the sale, license or
4 transfer of personal seat licenses, stadium builder’s licenses or similar instruments for any and all
5 seats in the Major League Baseball stadium project to generate revenues used for the
6 construction of the” stadium. *See* SB1 2023 at Section 27.1.

7 37. Proceeds “must be collected by or on behalf of the Stadium Authority for the
8 benefit of the” stadium. *See* SB1 2023 at Section 27.3.

9 38. The above-referenced provisions of SB1 2023 authorize the Stadium Authority to
10 issue, sell, license, or transfer personal seat licenses, *and collect sale proceeds*. SB1 2023
11 generates revenue through the sale of seat licenses, subjecting SB1 2023 to the Nevada
12 Constitution Article 4, § 18(2) requirement of obtaining the 2/3rds approval of both houses of the
13 legislature.

14 39. Because SB1 2023 creates public revenue that otherwise would not have existed
15 and did not obtain approval of 2/3rds of the members of both houses of the legislature, it is
16 invalid.

The Appropriations Clause

17
18 40. The Nevada Constitution provides in pertinent part that “[n]o money shall be
19 drawn from the treasury but in consequence of appropriations made by law.” Nev. Const., Art 4,
20 § 19.

21 41. An “appropriation” is “the setting aside from the public revenue of a certain sum
22 of money for a specified object, in such a manner that the executive officers of the government
23 are authorized to use that money, and no more, for that object, and no other.” *Schwartz v. Lopez*,
24 132 Nev. 732, 753, 382 P.3d 886, 900 (2016) (citations omitted). In the absence of a specified
25 amount, an appropriation must contain “a clear legislative intent authorizing the expenditure and
26 a maximum amount set aside for the payment of claims or at least a formula by which the
27 amount can be determined.” *Id.* at 753, 382 P.3d at 900-01.

1 42. The Nevada Constitution Appropriations Clause is intended to promote
2 transparency and accountability and to ensure that the people are informed about how their
3 government intends to expend public funds.

4 43. Sections 30.5 and 30.9 of SB1 2023 direct the Nevada State Treasurer to fund the
5 designated fund, but do not specify a maximum amount of money that can be utilized.
6 Specifically, Section 30.9 provides a “continuing appropriation” for the State Treasurer to
7 “gather, transfer and deposit . . . unencumbered money not already committed for expenditure, in
8 an amount sufficient to replenish the designated fund” from various sources, including “[t]he
9 unreserved fund balance in the State General Fund.” SB1 Section 30.5(b) and 30.9.

10 44. SB1 2023 requires the State to issue a “credit enhancement” and mandates the
11 creation of a “designated fund” to fund the credit enhancement. Because this provision is a draw
12 from the Nevada State Treasury, it is in violation of Nevada Constitution Article 4, § 19 because
13 it fails to specify the sum to be drawn, a limit on the sum that may be drawn, or a method for
14 determining the sum or limit to be drawn.

15 ***Requirement To Demonstrate Why A Law Cannot Be A General Law***

16 45. Article 4 of the Nevada Constitution states that “in all cases . . . where a general
17 law can be made applicable, all laws shall be general and of uniform operation throughout the
18 state.” Nev. Const., Article 4, § 21.

19 46. A local law is one that “operates over ‘a particular locality instead of over the
20 whole territory of the State.’” *Clean Water Coal. v. M Resort, LLC*, 127 Nev. 301, 312, 255 P.3d
21 247, 255 (2011) (alteration in original) (quoting *Damus v. County of Clark*, 93 Nev. 512, 516,
22 569 P.2d 933, 935 (1977)).

23 47. The Nevada Constitution requires that a general law be “made applicable” when
24 “the conditions the law addresses are found in at least a variety of places throughout the state.”
25 *Id.* at 321, 255 P.3d at 260-61 (quoting *Mun. City of South Bend v. Kimsey*, 781 N.E.2d 683, 692
26 (Ind. 2003)).

27 48. A local law is permissible where a general law is “insufficient to meet the peculiar
28 needs of a particular situation” and in an “emergency which require[s] more speedy action and

1 relief than could be had by proceeding under the existing general law.” *See Cauble v. Beemer* 64
2 Nev. 77, 96, 177 P.2d 677, 686 (1947).

3 49. SB1 2023 is a local law because it operates over Clark County instead of the
4 whole territory of Nevada. SB1 2023 provides for a stadium to be constructed in Clark County
5 (Las Vegas) and for Clark County to issue bonds. *See* SB1 2023 at Sections 2.1(c), 5, 22.2(a),
6 and 34.

7 50. SB1 2023 concludes that “the Las Vegas area is the only area in this State that . . .
8 [i]s appropriate and suitable for the development of such large-scale and one-of-a-kind
9 entertainment and sports venues and facilities” and “[h]as all the necessary local and special
10 attributes, conditions and resources.” SB1 2023 at Section 2.1(d)(1)-(2).

11 51. SB1 2023’s attempt to demonstrate why a general law could not have been
12 applied fails to include a population classification, and therefore SB1 2023 is invalid.

13 52. In making its conclusory finding that the Las Vegas area was the only suitable
14 area for this large-scale project, SB1 2023 contains no evidence of the required formal analysis
15 to explain why another Nevada locality could not have been appropriate and suitable for such a
16 development. Therefore, SB1 2023 is defective on its face because it failed to perform and set
17 forth the relevant analysis to satisfy the constitutional requirement of a general law vs. local law.

18 ***Impermissible Public Debt***

19 53. Article 9, Section 3 of the Nevada Constitution provides in pertinent part:

20 The State may contract public debts; but such debts shall never, in the aggregate,
21 exclusive of interest, exceed the sum of two per cent of the assessed valuation of
22 the State Every such debt shall be authorized by law for some purpose or
23 purposes, to be distinctly specified therein; and every such law shall provide for
24 levying an annual tax sufficient to pay the interest semiannually, and the principal
25 within twenty years from the passage of such law, and shall specially appropriate
26 the proceeds of said taxes to the payment of said principal and interest; and such
27 appropriation shall not be repealed nor the taxes postponed or diminished until the
28 principal and interest of said debts shall have been wholly paid.

1 54. Article 9, Section 4 of the Nevada Constitution provides in pertinent part:

2 The State shall never assume the debts of any county, town, city or other
3 corporation whatever, unless such debts have been created to repeal invasion[,]
4 suppress insurrection or to provide for the public defense.

5 55. “A public debt . . . is created when an obligation binds future legislatures to
6 successive appropriations.” *Employers Ins. Co. of Nev. v. State Bd. of Examiners*, 117 Nev. 249,
7 254, 21 P.3d 628, 631 (2001).

8 56. SB1 2023 requires the creation of a designated fund in the Nevada State Treasury
9 to pay or assist in payment of the bond debt issued by Clark County to fund the Project. Clark
10 County is allowed to draw from the designated fund as required to satisfy its bond debt
11 obligations, and when that occurs, SB1 2023 provides a “continuing appropriation” from the
12 Nevada State Treasury to replenish the designated fund.

13 57. SB1 2023 requires the Nevada State Treasury to deposit into the designated fund
14 an amount equal to at least 50% of the debt service due on the bonds in the next two years.² *See*
15 SB1 2023 Section 30.5(a). There is a “continuing appropriation” for the Nevada State Treasury
16 to “gather, transfer and deposit . . . unencumbered money . . . in an amount sufficient to replenish
17 the designated fund” from various sources, including the unreserved fund balance in the State
18 General Fund. *See* SB1 2023 Sections 30.5(b) and 30.9.

19 58. By creating a designated fund to pay or assist in payment of the bond debt issued
20 by Clark County, and by mandating the Nevada State Treasury to continually appropriate funds
21 into the designated fund to maintain a required level, SB1 2023 creates a public debt.

22 59. In violation of Article 9, Section 3 of the Nevada Constitution, SB1 2023 failed to
23 levy a new tax and specifically appropriate the proceeds of that tax to repay the public debt
24 created by SB1 2023.

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28 ² References and allegations made herein regarding responsibilities of the Nevada State Treasury are to be construed
as a responsibility of Defendant Zach Conine in his official capacity as the Nevada State Treasurer.

1 60. In violation of Article 9, Section 4 of the Nevada Constitution, SB1 2023 results
2 in the State assuming a debt of Clark County because it is ultimately responsible for any default
3 on a loan from the designated fund to assist in the payment of bond debt by Clark County.

4 **FIRST CAUSE OF ACTION**
5 **(Declaratory & Injunctive Relief - Violation of Two-Thirds Majority Requirement (Nev.**
6 **Const., Art. 4, Section 18)**

7 61. The foregoing paragraphs of this Complaint are realleged and fully incorporated
8 as if set forth in full herein.

9 62. SB1 2023 creates, generates, or increases public revenue and was therefore
10 subject to the Nevada Constitution's two-third supermajority requirement.

11 63. SB1 2023 did not garner a two-thirds supermajority in either the Assembly or the
12 Senate, instead passing with a simple majority in each chamber.

13 64. SB1 2023 therefore violates Article 4, Section 18 of the Nevada Constitution.

14 65. Without this Court's intervention, Defendants will proceed to implement SB1
15 2023, resulting in irrevocable and irreparable harm to the rights of Plaintiffs and other Nevada
16 citizens protected under Nevada's constitution.

17 66. There exists no adequate remedy at law to prevent these constitutional violations.

18 67. Plaintiffs, acting in the public interest, are entitled to injunctive relief to prevent
19 the constitutional violations alleged in this Complaint.

20 68. This Court has the power to grant such relief.

21 **SECOND CAUSE OF ACTION**
22 **(Declaratory & Injunctive Relief - Violation of The Appropriations Clause (Nev. Const.,**
23 **Art. 4, Section 19)**

24 69. The foregoing paragraphs of this Complaint are realleged and fully incorporated
25 as if set forth in full herein.

26 70. SB1 2023 requires the State Treasurer to allocate funds to the designated fund yet
27 fails to contain any appropriation that would permit the allocation of those funds.

28 71. SB1 2023 therefore violates Article 4, Section 19 of the Nevada Constitution.

1 72. Without this Court’s intervention, Defendants will proceed to implement SB1
2 2023, resulting in irrevocable and irreparable harm to the rights of Plaintiffs and other Nevada
3 citizens protected under Nevada’s constitution.

4 73. There exists no adequate remedy at law to prevent these constitutional violations.

5 74. Plaintiffs, acting in the public interest, are entitled to injunctive relief to prevent
6 the constitutional violations alleged in this Complaint.

7 75. This Court has the power to grant such relief.

8 **THIRD CAUSE OF ACTION**

9 **(Declaratory & Injunctive Relief - Violation of The General Law Requirement (Nev.
10 Const., Art. 4, Section 21)**

11 76. The foregoing paragraphs of this Complaint are realleged and fully incorporated
12 as if set forth in full herein.

13 77. SB1 2023 is a local law that applies to Clark County and the Las Vegas
14 metropolitan region, yet there is nothing in the law which demonstrates an adequate analysis and
15 explanation of why a general law could not apply.

16 78. SB1 2023 therefore violates Article 4, Section 21 of the Nevada Constitution.

17 79. Without this Court’s intervention, Defendants will proceed to implement SB1
18 2023, resulting in irrevocable and irreparable harm to the rights of Plaintiffs and other Nevada
19 citizens protected under Nevada’s constitution.

20 80. There exists no adequate remedy at law to prevent these constitutional violations.

21 81. Plaintiffs, acting in the public interest, are entitled to injunctive relief to prevent
22 the constitutional violations alleged in this Complaint.

23 82. This Court has the power to grant such relief.

24 **FOURTH CAUSE OF ACTION**

25 **(Declaratory & Injunctive Relief - Violation of Public Debt Requirement (Nev. Const.,
26 Art. 9, Section 3)**

27 83. The foregoing paragraphs of this Complaint are realleged and fully incorporated
28 as if set forth in full herein.

1 84. SB1 2023 creates a public debt by creating a designated fund to pay or assist in
2 payment of the bond debt issued by Clark County, and by mandating that the Nevada State
3 Treasury continually appropriate funds into the designated fund to maintain a required level
4 therein. However, SB1 2023 does not create or authorize a tax that would pay for the public
5 debt.

6 85. SB1 2023 therefore violates Article 9, Section 3 of the Nevada Constitution.

7 86. Without this Court's intervention, Defendants will proceed to implement SB1
8 2023, resulting in irrevocable and irreparable harm to the rights of Plaintiffs and other Nevada
9 citizens protected under Nevada's constitution.

10 87. There exists no adequate remedy at law to prevent these constitutional violations.

11 88. Plaintiffs, acting in the public interest, are entitled to injunctive relief to prevent
12 the constitutional violations alleged in this Complaint.

13 89. This Court has the power to grant such relief.

14 **FIFTH CAUSE OF ACTION**
15 **(Declaratory & Injunctive Relief - Violation of Public Debt Requirement (Nev. Const.,**
16 **Art. 9, Section 4)**

17 90. The foregoing paragraphs of this Complaint are realleged and fully incorporated
18 as if set forth in full herein.

19 91. SB1 2023 creates a public debt by creating a designated fund to pay or assist in
20 payment of the bond debt issued by Clark County, and by mandating that the Nevada State
21 Treasurer continually appropriate funds into the designated fund to maintain a required level
22 therein. However, SB1 2023 does not create or authorize a tax that would pay for the public
23 debt.

24 92. SB1 2023 does not hold Clark County ultimately responsible to repay any loans
25 from the designated fund established, maintained and replenished by the Nevada State Treasurer,
26 thus making the State of Nevada ultimately liable for a debt of Clark County.

27 93. SB1 2023 therefore violates Article 9, Section 4 of the Nevada Constitution.
28

1 94. Without this Court’s intervention, Defendants will proceed to implement SB1
2 2023, resulting in irrevocable and irreparable harm to the rights of Plaintiffs and other Nevada
3 citizens protected under Nevada’s constitution.

4 95. There exists no adequate remedy at law to prevent these constitutional violations.

5 96. Plaintiffs, acting in the public interest, are entitled to injunctive relief to prevent
6 the constitutional violations alleged in this Complaint.

7 97. This Court has the power to grant such relief.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs request this Court provide the following relief:

- 10 1. A judgment in the Plaintiffs’ favor and against the Defendants;
- 11 2. A declaration that SB1 2023 violates Article 4, Section 18 of the Nevada
12 Constitution;
- 13 3. A declaration that SB1 2023 violates Article 4, Section 19 of the Nevada
14 Constitution;
- 15 4. A declaration that SB1 2023 violates Article 4, Section 21 of the Nevada
16 Constitution;
- 17 5. A declaration that SB1 2023 violates Article 9, Section 3 of the Nevada Constitution;
- 18 6. A declaration that SB1 2023 violates Article 9, Section 4 of the Nevada Constitution;
- 19 7. An injunction prohibiting the Defendants from implementing, enforcing, or executing
20 any and all provisions of SB1 2023;
- 21 8. An award of reasonable attorney fees and costs to Plaintiffs; and
- 22 9. For such other and further relief as the Court may deem just and proper.

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1 DATED this ____ day of February 2024.

2
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