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CASE NO: A-24-896151-W
Department 16

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11 additional counsel on signature page
12 *Pro Hac Vice applications forthcoming

10 *Counsel for Petitioners*

11 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
12 **IN AND FOR THE COUNTY OF CLARK**

13 FREDERICK H. KRAUS, JOEY
14 PAULOS, PUBLIC INTEREST LEGAL
15 FOUNDATION,

Case No.:
Dept. No.:

16 *Petitioners,*

**PETITION FOR WRIT OF MANDAMUS
PURSUANT TO NRS 34.160 FOR CLARK
COUNTY REGISTRAR OF VOTERS TO
DETERMINE WHETHER COMMERCIAL
ADDRESSES ON VOTER ROLL ARE
ACCURATE AS REQUIRED BY NRS
293.530**

17 v.

Exempt from Arbitration

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

- **Action for Declaratory Relief**
- **Action Presents a Significant Issue of Public Policy**
- **Action Seeks Equitable or Extraordinary Relief**
- **Action Presents Unusual Circumstances that Constitute Good Cause for Removal from Arbitration Program**

23 *Respondent.*

26
27 Petitioners Frederick H. Kraus (Kraus), Joey Paulos (Paulos) and Public Interest Legal
28 Foundation (the "Foundation") submit this Petition for Writ of Mandamus to compel the Clark

1 County Registrar of Voters to perform her duties as required by NRS 293.675 and NRS 293.530 to
2 determine whether commercial addresses on the voter roll are accurate and, if not, make
3 corrections.

4 **NATURE OF THE CASE**

5
6 1. Nevada law mandates that “[e]ach county clerk shall use the database created by the
7 Secretary of State pursuant to this subsection to collect and maintain all records of preregistration
8 and registration to vote.” NRS 293.675. That list must, in relevant part, “[be] regularly maintained
9 to ensure the integrity of the registration process and the election process.” NRS 293.675(3)(i).

10 2. Pursuant to Nevada law, “County clerks may use any reliable and reasonable means
11 available to correct the portions of the statewide voter registration list which are relevant to the
12 county clerks and to determine whether a registered voter’s current residence is other than that
13 indicated on the voter’s application to register to vote.” NRS 293.530(1)(a).

14
15 3. Petitioners brought to Respondent’s attention evidence concerning whether
16 residential addresses listed on the statewide voter registration list are accurate as there is no
17 indication that individuals reside at the specific locations identified. Petitioners sought
18 Respondent’s compliance with state law regarding the accuracy of the statewide voter list through
19 investigations of specific addresses for accuracy. Respondent has not acted. Petitioners have no
20 other remedy at law and herein seeks a writ of mandamus ordering Respondent to investigate
21 possible commercial addresses.
22

23 **PARTIES**

24 4. Petitioner Kraus is an individual registered to vote in Nevada.

25 5. Petitioner Paulos is an individual registered to vote in Nevada.

26 6. Petitioner Public Interest Legal Foundation, Inc., (the “Foundation”) is a non-
27 partisan, public interest organization incorporated and based in Alexandria, Virginia. The
28

1 Foundation seeks to promote the integrity of elections in Nevada and other jurisdictions nationwide
2 through research, education, remedial programs, and litigation. The Foundation regularly analyzes
3 the programs and activities of state and local election officials to determine whether lawful efforts
4 are being made to keep voter rolls current and accurate. The Foundation also uses records and data
5 to produce and disseminate reports, articles, blog and social media posts, and newsletters to advance
6 the public education aspect of its organizational mission.
7

8 7. The Foundation has devoted significant resources to analyzing Nevada’s statewide
9 voter list. In conducting its analysis, it identified numerous addresses listed as residential that
10 appeared to be commercial buildings. The Foundation conducted a similar analysis in the past and
11 documented its findings in a video. *See* “Voting from Nevada Businesses,” Public Interest Legal
12 Foundation, <https://vimeo.com/465165902>.
13

14 8. The Foundation is especially concerned with the accuracy of Respondent’s voter
15 roll given that Nevada has recently expanded voting by mail. The Foundation has studied the effects
16 of errors on Nevada’s statewide voter list in terms of mail ballots being sent to incorrect addresses.
17 *See* “223 Clark County NV Mail Ballots Went to Wrong Addresses in 2020 Primary,”
18 [https://publicinterestlegal.org/reports/223k-clark-county-nv-mail-ballots-went-to-wrong-](https://publicinterestlegal.org/reports/223k-clark-county-nv-mail-ballots-went-to-wrong-addresses-in-2020-primary/)
19 [addresses-in-2020-primary/](https://publicinterestlegal.org/reports/223k-clark-county-nv-mail-ballots-went-to-wrong-addresses-in-2020-primary/) and “92K Clark County NV Mail Ballots Went to Wrong Addresses in
20 2020 Presidential Election,” [https://publicinterestlegal.org/reports/92k-clark-county-nv-mail-](https://publicinterestlegal.org/reports/92k-clark-county-nv-mail-ballots-went-to-wrong-addresses-in-2020-presidential-election/)
21 [ballots-went-to-wrong-addresses-in-2020-presidential-election/](https://publicinterestlegal.org/reports/92k-clark-county-nv-mail-ballots-went-to-wrong-addresses-in-2020-presidential-election/).
22

23 9. Respondent Portillo is the Clark County Registrar of Voters. “The registrar of
24 voters...shall assume all of the powers and duties vested in and imposed upon the county clerk of
25 the county with respect to elections...” NRS 244.164(2). “The county clerk shall maintain records
26 of any program or activity that is conducted within the county to ensure the accuracy and currency
27 of the statewide voter registration list for not less than 2 years after creation.” NRS 293.503(3).
28

1 3. The statewide voter registration list must:

2 (a) Be a uniform, centralized and interactive computerized list;

3 (b) Serve as the single method for storing and managing the official list of registered
4 voters in this State;

5 (c) Serve as the official list of registered voters for the conduct of all elections in this
6 State;

7 (d) Contain the name and registration information of every legally registered voter in
8 this State;

9 (e) Include a unique identifier assigned by the Secretary of State to each legally
10 registered voter in this State;

11 (f) Except as otherwise provided in subsection 9, be coordinated with the appropriate
12 databases of other agencies in this State;

13 (g) Be electronically accessible to each state and local election official in this State at
14 all times;

15 (h) Except as otherwise provided in subsection 10, allow for data to be shared with
16 other states under certain circumstances; and

17 (i) Be regularly maintained to ensure the integrity of the registration process and the
18 election process.

19 4. Each county and city clerk shall:

20 (a) Electronically enter into the database created pursuant to subsection 1 all
21 information related to voter preregistration and registration obtained by the county or city
22 clerk at the time the information is provided to the county or city clerk; and

23 (b) Provide the Secretary of State with information concerning the voter registration
24 of the county or city and other reasonable information requested by the Secretary of State
25 in the form required by the Secretary of State to establish or maintain the statewide voter
26 registration list.

27 15. NRS 293.530 states, in relevant part:

28 NRS 293.530 Authority of county clerk to correct statewide voter registration list,
determine whether residence is accurate and make investigations of registration;
duty of county clerk to cancel registration under certain circumstances, maintain
records regarding notices of cancellation and designate voter as inactive;
regulations; required notices after certain changes to statewide voter registration list.

1 1. Except as otherwise provided in NRS 293.541:

2 (a) County clerks may use any reliable and reasonable means available to
3 correct the portions of the statewide voter registration list which are relevant to the
4 county clerks and to determine whether a registered voter's current residence is other
5 than that indicated on the voter's application to register to vote.

6 **Nevada Does Not Allow Business Addresses in the "Home Address" Field of the Voter
7 Registration Application**

8 16. Nevada law states, "for the purposes of preregistering or registering to vote, the
9 address at which the person actually resides is the street address assigned to the location at which
10 the person actually resides." NRS 293.486(1). Further, "if the person does not reside at a location
11 that has been assigned a street address, the address at which the person actually resides is a
12 description of the location at which the person actually resides." NRS 293.486(2).

13 17. Nevada law states that the application to register to vote shall include:

14 (b) A line on which to enter the address at which the applicant actually resides, as set
15 forth in NRS 293.486.

16 (c) A notice that the applicant may not list a business as the address required pursuant to
17 paragraph (b) unless the applicant actually resides there.

18 NRS 293.507(4).

19 18. Indeed, the voter registration form for the State of Nevada includes a space for the
20 registrant's residential address. The instructions specifically state as follows:

21 **Box 3 – ADDRESS WHERE YOU LIVE:** Required. Your home address is the street address assigned
22 to the location at which you actually reside. If you reside at a location that has not been assigned
23 a street address, a description of the location at which you actually reside must be provided. A
P.O. Box or business address cannot be listed as a home address.

24 Voter Registration Form, available at <https://www.nvsos.gov/sosvoterregform/>.

25 19. Nevada states that a county clerk shall not knowingly "Preregister or register a
26 person who fails to provide satisfactory proof of identification and the address at which the person
27 actually resides." NRS 293.505(12)(b).
28

1 **Petitioners Sought Compliance with the Law**

2 20. On June 3, 2024, Petitioners wrote to Respondent Portillo requesting that she
3 investigate the commercial addresses listed on the voter roll in Washoe County. Exhibit A.

4 21. Specifically, Petitioners informed Respondent Portillo of voter registrations listing
5 the following apparent commercial addresses as the residential address:
6

- 7 a. **1007 Industrial Rd, Unit A**
8 **Boulder City, NV 89005**



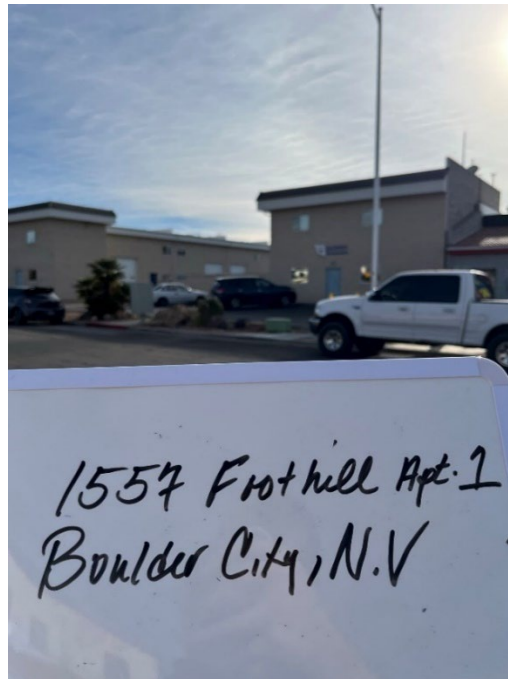
20 This address is located in an industrial park-like area, full of garages and warehouses. The
21 sign adjacent to this address reads “Century Plaza,” the supposed name of the development.

22 No activity was observed at this address, but it appears to be part of a larger development
23 of exclusively commercial/industrial properties.
24

25 On information and belief, no one resides at this location despite being listing as a
26 residence on the Nevada voter roll.
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1 **b. 1577 Foothill Dr, Apts 1 and 10**
2 **Boulder City, NV 89005**

3 These addresses were part of the same development in a commercial industrial park.



15 Site visitors located each unit, and both appeared to be light industrial / manufacturing
16 use, which comports with how the property is listed online.

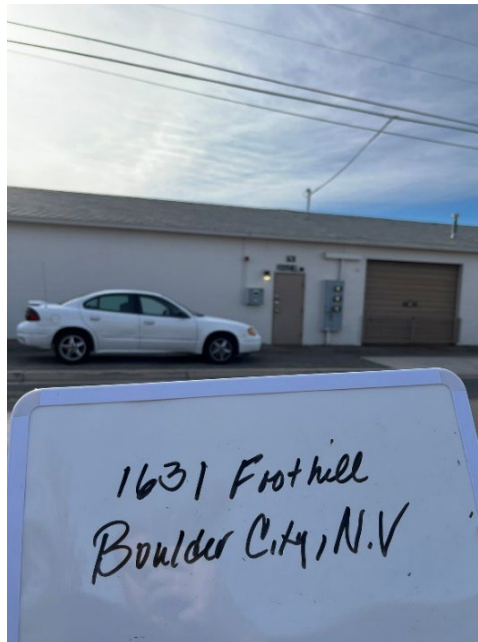
17 <https://www.loopnet.com/Listing/1557-Foothill-Dr-Boulder-City-NV/4885078/>.



1 Site visitors saw no indication of these addresses' use as residences. On information and
2 belief, no one resides at this location despite it being listed as a residence on the Nevada voter
3 roll.

4 **c. 1631 Foothill Dr,**
5 **Boulder City, NV 89005**

6 This address is located in an industrial area and had a garage door and door in a
7 windowless building fit for industrial and commercial purposes. On information and belief, no
8 one resides at this address despite being listed as a residence on the Nevada voter roll.



20
21 **d. 1632 Foothill Dr.**
22 **Boulder City, NV 89005**

23 This address is located in an industrial/commercial office park, with a sign appearing to
24 read "24/7 Companies." When for sale, it was listed as an industrial/warehouse property in the
25 Red Mountain Business Park. [https://www.loopnet.com/Listing/1632-Foothill-Dr-Boulder-City-](https://www.loopnet.com/Listing/1632-Foothill-Dr-Boulder-City-NV/22286116/)
26 [NV/22286116/](https://www.loopnet.com/Listing/1632-Foothill-Dr-Boulder-City-NV/22286116/).

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**e. 1634 Foothill Dr.
Boulder City, NV 89005**

This address is in an industrial business park, with signage reading "First Choice Auto." This is a mechanic shop with this address listed on their website.

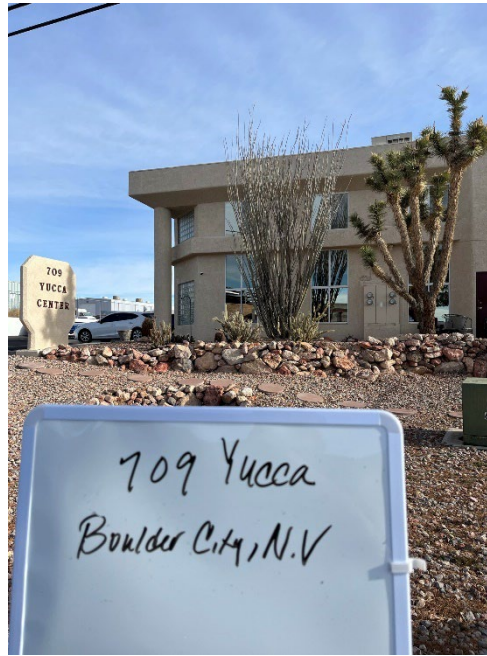
<https://www.firstchoiceautonv.com/contact>.

On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



1 **f. 709 Yucca St., Suites B and H**
2 **Boulder City, NV 89005**

3 This address appears to be an office park, with a “Yucca Center” sign at the entrance.



14 Suite B appeared to be an office front with a garage door, speaking to perhaps an
15 industrial/commercial use of the space. Suite H is listed on the voter roll but did not appear to
16 exist to site visitors.
17



1 On information and belief, no one resides at this location despite it being listed as a residence
2 on the Nevada voter roll, and one registration is under a unit number that does not appear to exist.

3 **g. 701 Foothill Court**
4 **Boulder City, NV 89005**

5 This address operates as a nondescript office building. Searching the address returns it as
6 the place of business of Evolution Expeditions, a company offering kayak tours.

7 <https://www.evolutionexpeditions.com/contact>.



18 On information and belief, no one resides at this location despite it being listed as a
19 residence on the Nevada voter roll.

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21 **h. 705 Foothill Court**
22 **Boulder City, NV 89005**

23 This address is an industrial property with signs of extensive commercial/industrial
24 activity, with trucks and equipment on the property. According to the Better Business Bureau,
25 Eagle Iron Company occupies the premises. [https://www.bbb.org/us/nv/boulder-](https://www.bbb.org/us/nv/boulder-city/profile/general-contractor/eagle-iron-company-1086-47390)
26 [city/profile/general-contractor/eagle-iron-company-1086-47390](https://www.bbb.org/us/nv/boulder-city/profile/general-contractor/eagle-iron-company-1086-47390)

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**i. 709 Foothill Court
Boulder City, NV 89005**

This address is home to Characters Unlimited, a manufacturer of animatronic figures. <https://www.charactersunlimited.com/contact/>. One such figure rests on the roof of the building. Clearly a commercial property, on information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

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**j. 1604 Boulder City Pkwy.
Boulder City, NV 89005**



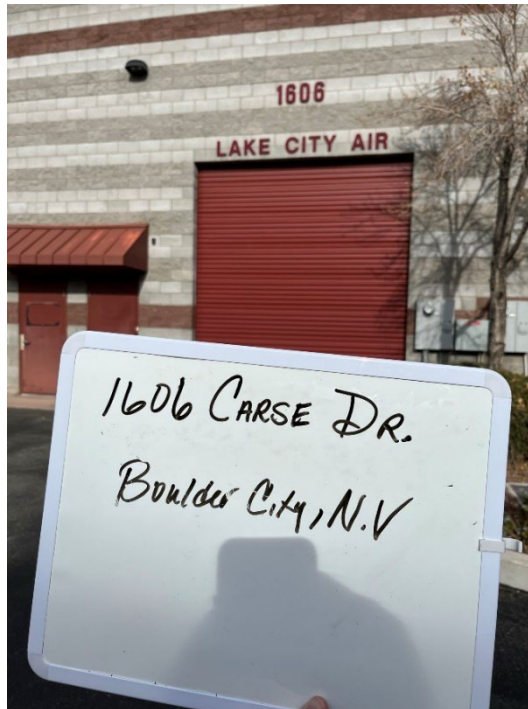
This address is home to “All Seasons Marine,” a boat dealership with this address on its Facebook page. <https://www.facebook.com/p/All-Seasons-Marine-Inc-100054401805468/>.

Visitors noticed an all-commercial property, with no signs of residences in the development.

1 On information and belief, no one resides at this location despite it being listed as a residence
2 on the Nevada voter roll.

3 **k. 1606 Carse Drive**
4 **Boulder City, NV 89005**

5 This address is home to Lake City Air, a company which confirms this property as one of
6 its locations. <https://lakecityair.com/contact-us/>.



19 Site visitors witnessed no signs of living quarters or other uses of the property. On
20 information and belief, no one resides at this location despite it being listed as a residence on the
21 Nevada voter roll.

22 **l. 1630 Carse Drive**
23 **Boulder City, NV 89005**

24 This address is home to JC Motors, a company that deals in trailers.
25 <https://www.bouldercitytrailers.com/index.php?p=location>.

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The property is part of a broader industrial development, with no signs of a private residence. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**m. 561 Hotel Plaza
Boulder City, NV 89005**

This address is home of Momo Sushi & Grill, a restaurant. <https://momosushibc.com/>. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

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**n. 509 Hotel Plaza
Boulder City, NV 89005**

This address is a commercial office, with a sign reading "Taxes." A business directory search indicates it may be the home of Ferrari Bookkeeping Services.

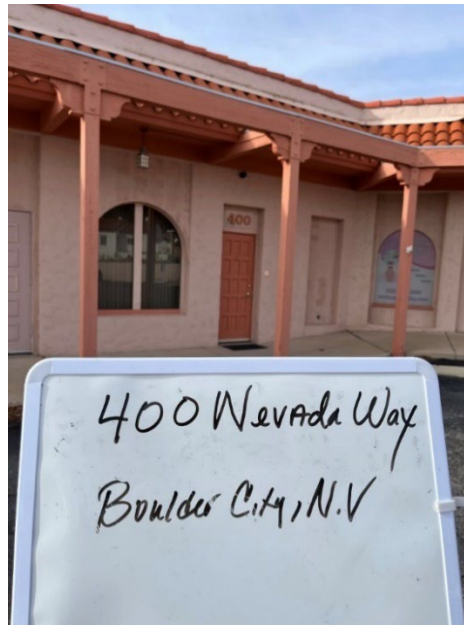
<https://www.manta.com/c/mm59bbb/ferrari-bookkeeping-services>.



On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

1 **o. 400 Nevada Way**
2 **Boulder City, NV 89005**

3 This address appeared to be a retail/office storefront and appeared to be vacant at the time
4 of visit. On information and belief, no one resides at this location despite it being listed as a
5 residence on the Nevada voter roll.



17 **p. 895 Adams Boulevard**
18 **Boulder City, NV 89005**

19 This address is home to “Family Doctors of Boulder City,” a medical office.
20 <https://familydoctorsbc.com/contact-us>. There is no indication of uses beyond that of a medical
21 office.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**q. 900 Buchanan Boulevard, Suite 5
Boulder City, NV 89005**

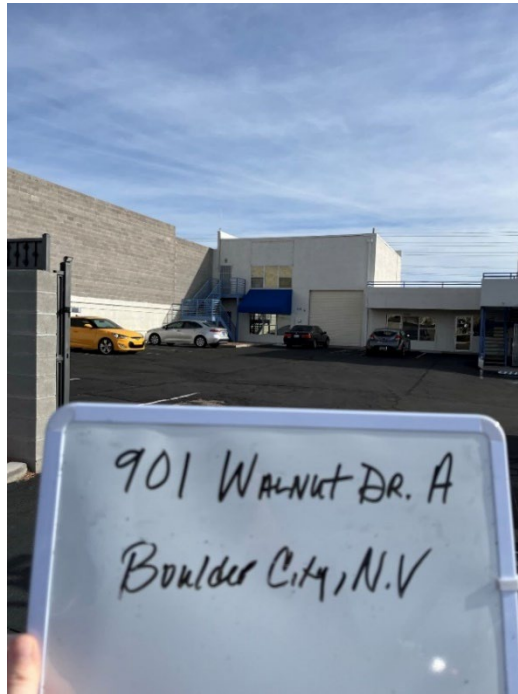
This address appears to be an art studio offering "Commissioned Oil Paintings" per a sign on the stairwell. It was not evident whether the space was still operating or occupied.



1 On information and belief, no one resides at this location despite it being listed as a
2 residence on the Nevada voter roll.

3 **r. 901 Walnut Dr. A**
4 **Boulder City, NV 89005**

5 This address features a commercial office space with a large loading dock. Several cars
6 were in the lot and activity indicative of a busy industrial workplace was observed.



19 On information and belief, no one resides at this location despite it being listed as a
20 residence on the Nevada voter roll.

21 **s. 1051 Olsen St. #3611**
22 **Henderson, NV 89011**

23 This address is in an industrial office park, and is home to SteinerBio, a company
24 specializing in bone graft technology. <https://www.steinerbio.com/>. The property had no signs of
25 being used as a residence and is listed as the company's headquarters online.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**t. 350 E. Basic Rd. Ste 14
Henderson, NV 89015**

This address is home to Montiel's, an auto body shop.

<https://www.bbb.org/us/nv/henderson/profile/car-restoration/montiels-customs-1086-90033993>.



1 Many cars were present in the lot and activity was visible. On information and belief, no
2 one resides at this location despite it being listed as a residence on the Nevada voter roll.

3 **u. 502 S. Boulder Hwy. Ste B**
4 **Boulder City, NV 89015**

5 This address is home to Sparkle Beauty Salon and was part of a larger retail/commercial
6 development. <https://www.yelp.com/biz/sparkles-beauty-salon-henderson>.

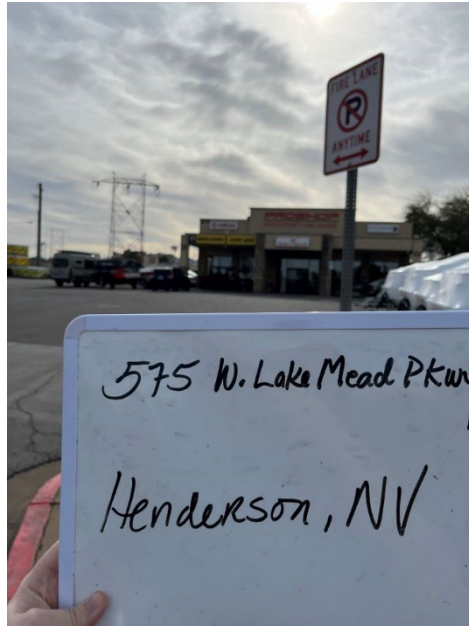


19 On information and belief, no one resides at this location despite it being listed as a
20 residence on the Nevada voter roll.

21 **v. 575 W. Lake Mead Pkwy.**
22 **Henderson, NV 89015**

23 This address is home to Proshop Motorsports and Marine, a boat dealership.
24 <https://www.proshoplv.com/map-and-hours-for-our-dealership--hours>. There was considerable
25 activity and signs of commercial business, and no indication of the existence of a residence on
26 property. On information and belief, no one resides at this location despite it being listed as a
27 residence on the Nevada voter roll.
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**w. 544 Parkson Rd. Ste E
Henderson, NV 89011**

This address is a nondescript, windowless building whose use is not immediately apparent. A voter registration exists under “Suite E,” but the mailbox only had numbers.



On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

1 **x. 2021 W. Sunset Road**
2 **Henderson, NV 89014**

3 This address is home to Chavelo's Mexican Bar and Grill. <https://chavelosrestaurant.com/>.

4 The building appeared to be solely a restaurant and not a residence.



16 On information and belief, no one resides at this location despite it being listed as a
17 residence on the Nevada voter roll.

18 **y. 4011 E. Sunset Rd.**
19 **Henderson, NV 89014**

20 This address is home to Abuzz Salon Suites, an “all suite” rental salon.

21 https://abuzzsalonsuites.com/?page_id=135. Despite offering suites for rental to stylists, the
22 website makes it clear these suites are for performing salon services such as haircare, nails, and
23 lashes, and not as residences.
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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**z. 411 Mark Leany Dr.
Henderson, NV 89011**

This address operates as Abbott Custom Printing and is a large industrial property speaking to its commercial use. <https://abbottscp.com/>. The largely windowless building left no indication of a potential residence.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**aa. 1860 E. Serene Ave.
Las Vegas, NV 89123**

This address operates as a Meineke Car Care Center, an outpost of a nationwide chain offering a variety of auto services. <https://www.meineke.com/locations/nv/las-vegas-1603/>.

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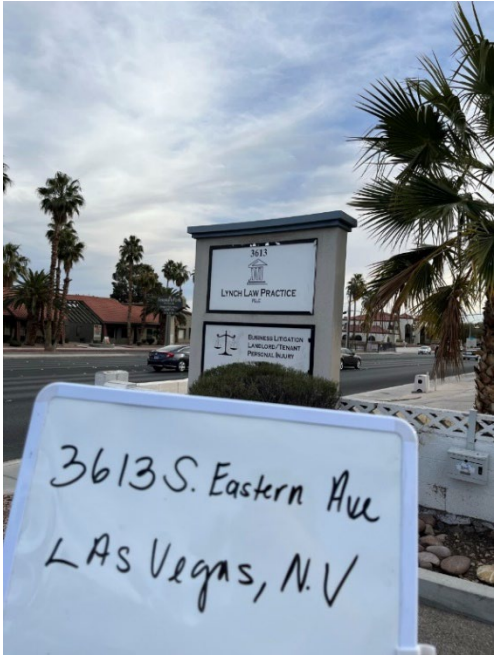


On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**bb. 3613 S. Eastern Ave.
Las Vegas, NV 89169**

This address operates as Lynch Law Practice, a commercial litigation firm.

[https://lynchlawpractice.com/contact-us.](https://lynchlawpractice.com/contact-us)



1 The building was on a main commercial thoroughfare and had the look of many smaller
2 office buildings in the surrounding area.



14 On information and belief, no one resides at this location despite it being listed as a
15 residence on the Nevada voter roll.

16 **cc. 3225 McLeod Drive**
17 **Las Vegas, NV 89121**

18 This address is the headquarters of Anderson Legal, Business, & Tax Advisors.

19 <https://andersonadvisors.com/locations/>. It is a commercial address with no signs of a residence
20 therein.
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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**dd. 3909 S. Maryland Pkwy. Ste 314
Las Vegas, NV 89119**

This address is an office building, and Suite 314 is home to a “Post Scan Mail” service for individuals and LLCs. <https://www.postscanmail.com/a/3909-s-maryland-pkwy-ste-314.html>.

This service functions somewhat similarly to a PO box, and therefore there is no one residing at this address, but rather, multiple individuals and entities can receive mail there.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**ee. 4850 E. Cartier Ave.
Las Vegas, NV 89115**

This address is home to an industrial lot, with trucks and heavy equipment being active at time of visit. There appeared to be pallets, lumber, and other materials being stored and moved at the address. The use and identity of this lot is not clear, but there appeared to be no residence onsite, and the address is in an industrial area.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**ff. 2512 Abels Lane
Las Vegas, NV 89115**

This address is home to an auction house and appears to be a warehouse with loading and storage facilities. Research shows that this is home to a weekly Clark County Public Auction.

<https://www.lasvegasauction.com/>. No signs of a residence were visible.



1 On information and belief, no one resides at this location despite it being listed as a
2 residence on the Nevada voter roll.

3 **gg. 4300 N. Pecos Rd. #16**
4 **Las Vegas, NV 89115**

5 This address is home to Burpee's Plumbing. <https://www.callburpees.com/>. The company
6 services the entire Las Vegas Valley and offers 24/7 on-call, but the space was in a compact unit
7 of a strip mall and there was no sign of a residence therein.



20 On information and belief, no one resides at this location despite it being listed as a
21 residence on the Nevada voter roll.

22 **hh. 4290 Boulder Hwy.**
23 **Las Vegas, NV 89121**

24 This address is occupied by Boating Lake Mead, a boat dealership.
25 <https://boatinglakemead.com/>. This address is home to the company's "dry dock boat sales." It is
26 a large building with showroom windows, with no indication of an onsite residence.

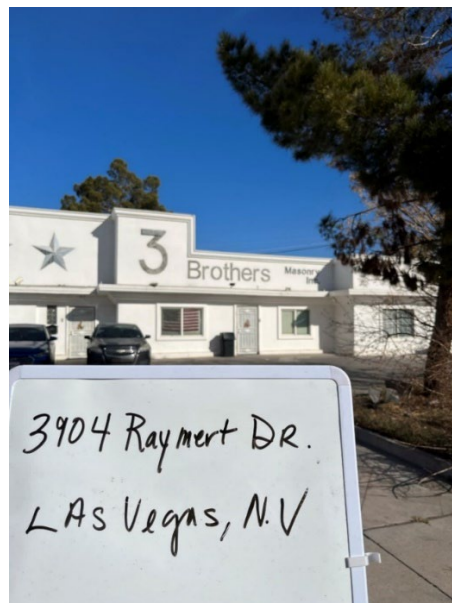
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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**ii. 3904 Raymert Drive
Las Vegas, NV 89121**

This address is occupied by 3 Brothers Masonry and is located in an area of similar commercial office buildings. <https://www.yelp.com/biz/three-brothers-masonry-las-vegas>. No signs of a residence were observed onsite.



1 On information and belief, no one resides at this location despite it being listed as a
2 residence on the Nevada voter roll.

3 **jj. 4220 W. Windmill Lane, Units 100 and 140**
4 **Las Vegas, NV 89139**

5 This address is a large warehouse, with multiple tenants in a very large building, complete
6 with loading docks. There are no signs whatsoever of residences at the address.



18 Unit 100 appears to be occupied by Steelhead Productions, which creates experiences and
19 booths for trade shows. <https://www.steelheadproductions.com/contact>.

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Unit 140 is occupied by Trigg Laboratories, a manufacturer of personal lubricants.

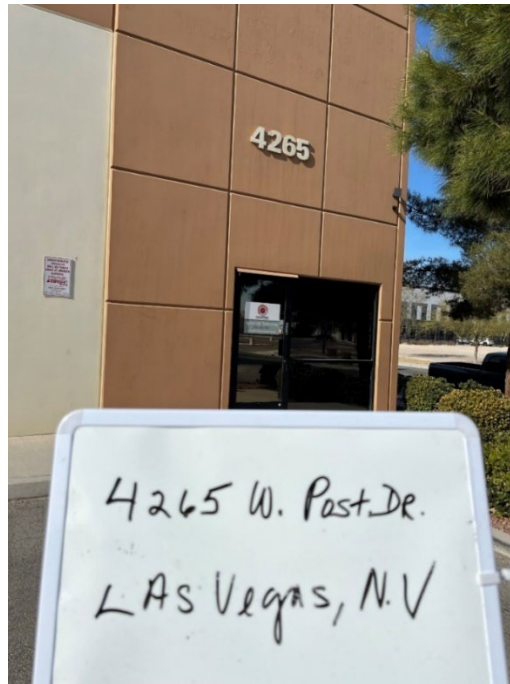
<https://www.wetlubes.com/pages/contact#ADDRESS>.



On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

1 **kk. 4265 W. Post Rd.**
2 **Las Vegas, NV 89118**

3 This address is home to Advanced Technology, a company installing fences and gates.
4 <https://www.yelp.com/biz/advanced-technology-las-vegas>. The address is in an
5 industrial/commercial area and had no indication of a residence therein.



17 On information and belief, no one resides at this location despite it being listed as a
18 residence on the Nevada voter roll.

19
20 **ll. 4705 S. Durango Dr. #100**
21 **Las Vegas, NV 89147**

22 This address is home to Mini Mart and Smoke Shop, a smoke shop also advertising beer,
23 slots, and a contract postal unit. <https://www.yelp.com/biz/mini-mart-and-smoke-shop-las-vegas>.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**mm. 3015 S. Jones Boulevard
Las Vegas, NV 89146**

This address is home to Award Realty, the real estate office of Jerry Masini. <https://jerry.masini.com/>. The office is in a single-story small building, typical of many smaller office spaces of its type in the surrounding area.



1 On information and belief, no one resides at this location despite it being listed as a
2 residence on the Nevada voter roll.

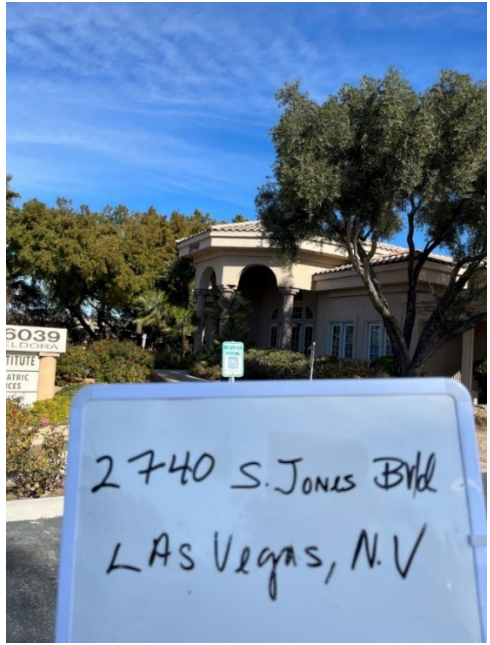
3 **nn.2740 S. Jones Boulevard**
4 **Las Vegas, NV 89146**

5 This address is home to the “Human Behavior Institute,” offering psychiatric, addiction,
6 and other such services. <https://www.hbinetwork.com/>. There is no indication of the group
7 offering residential services or housing.



19 The building is a larger office space, typical of other single-occupant spaces in the
20 surrounding area.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**oo. 222 S. Rainbow Boulevard #105
Las Vegas, NV 89145**

This address is the location of an office/retail strip mall, with a directory indicating occupants.



1 Unit 105 is purportedly occupied by "Service Pros." A company under that name operates
2 in the Vegas area but does not list this address as their place of business.

3 <https://www.servicepros3600.com/>. There was no sign of a residence, visitors found a typical
4 suburban office building.



17 On information and belief, no one resides at this location despite it being listed as a
18 residence on the Nevada voter roll.

19 **pp. 2704 N. Tenaya Way**
20 **Las Vegas, NV 89128**

21 This address is the location of Southwest Medical Healthcare Center and contains several
22 doctors' offices. [https://www.smalv.com/locations-nav/locations/nv/tenaya-healthcare-center-](https://www.smalv.com/locations-nav/locations/nv/tenaya-healthcare-center-2704-n-tenaya-way-las-vegas-nv-89128/DMC46398115.html)
23 [2704-n-tenaya-way-las-vegas-nv-89128/DMC46398115.html](https://www.smalv.com/locations-nav/locations/nv/tenaya-healthcare-center-2704-n-tenaya-way-las-vegas-nv-89128/DMC46398115.html).

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There is no indication that this facility houses long-term patients as residents and is focused on outpatient care.

On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**qq. 101 N. Decatur Boulevard
Las Vegas, NV 89107**

This address is home to Snappy's Burgers, a drive-through only burger restaurant that consists of a small building to service the drive-through. <https://www.yelp.com/biz/snappys-las-vegas>. They also show movies on an outdoor screen.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



**rr. 3605 Vegas Drive
Las Vegas, NV 89108**

This address is home to a nondescript business that advertises “DMV, SERVICE, TITLES, and REGISTRATION PERMITS.” It is located in a small office strip with no signs of a residence.

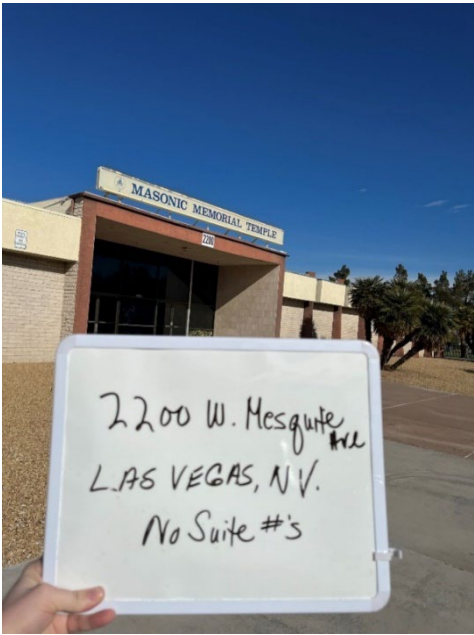
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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**ss. 2200 W. Mesquite Ave. Ste 160
Las Vegas, NV 89106**

This address is home to a Masonic Memorial Temple and did not have clearly identifiable unit numbers. <https://mmt.vegas/>. Nonetheless, it is a large building that hosts various Masonic events and had no indication of being a residence.



1 On information and belief, no one resides at this location despite it being listed as a
2 residence on the Nevada voter roll.

3 **tt. 3040 W. Charleston Boulevard**
4 **Las Vegas, NV 89102**

5 This address is home to Miracle Image OB/GYN, the practice of Dr. Jeffrey Liu.

6 <https://www.doc4women.com/>.



17 The building has the appearance of many such medical office buildings, with no sign of a
18 residence onsite. On information and belief, no one resides at this location despite it being listed
19 as a residence on the Nevada voter roll.

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**uu. 1500 W. Charleston Boulevard
Las Vegas, NV 89102**

This address is not developed or built on but is rather the address occupying the space of the overpass of I-15 at Charleston Boulevard.



1 On information and belief, no one resides at this location despite it being listed as a
2 residence on the Nevada voter roll.

3 **vv. 2425 E. McWilliams Ave.**
4 **Las Vegas, NV 89101**

5 This address is occupied by a nondescript “Computer Repair” business. It is like many
6 small commercial spaces in the area and had no signs of a residence therein.

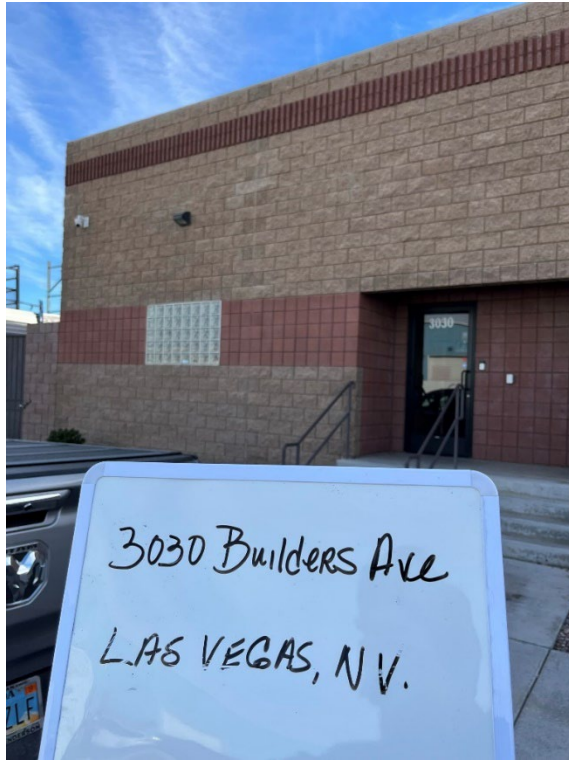


20 On information and belief, no one resides at this location despite it being listed as a
21 residence on the Nevada voter roll.

22 **ww. 3030 Builders Ave.**
23 **Las Vegas, NV 89101**

24 This address is a nondescript, windowless office space. The current tenant was not
25 obvious to visitors, but it was part of a broader complex of office spaces with no indications of
26 residences therein.

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On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**xx. 1414 E Lake Mead Blvd
North Las Vegas, NV 89030**



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This address is a U.S. Postal Service location in North Las Vegas. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

**yy. 2929 Van Der Meer St.
North Las Vegas, NV 89030**

This address is the Arcadia Masonic Lodge. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**zz. 3741 Civic Center Dr.
North Las Vegas, NV 89030**

This address is a vacant building. Site inspectors noted that previous signage on the

1 building was removed. Public property records describe the location as a free-standing
2 office/warehouse space “with large showroom, four (4) independent offices, two (2) ADA
3 restrooms, kitchen and conference room, ± 4,400 square foot warehouse” with forklift access
4 points. <https://www.loopnet.com/Listing/3741-Civic-Center-Dr-North-Las-Vegas-NV/31577934/>
5
6 On information and belief, no one resides at this location despite being listed as a residence on the
7 Nevada voter roll.



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16 **aaa. 3755 W Washburn Rd.**
17 **North Las Vegas, NV 89031**



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26 This is the Washburn Community Police Facility. The location serves as the Northwest Area
27 Command Facility. <https://www.cityofnorthlasvegas.com/residents/police>. On information and
28

1 belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

2 **bbb. 4310 Losee Rd 4**
3 **North Las Vegas, NV 89030**

4 Located in a strip mall, this location operates as Priority Appliances. A loading dock is
5 located on the backside of the building. On information and belief, no one resides at this location
6 despite being listed as a residence on the Nevada voter roll.
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1 **ccc. 4570 Berg St**
2 **North Las Vegas, NV 89081**

3 This address operates as Knight Transportation. This is a branch office for a national
4 trucking company with locations across the United States. [https://driveknight.com/5-reasons-to-](https://driveknight.com/5-reasons-to-drive-knight/)
5 [drive-knight/](https://driveknight.com/5-reasons-to-drive-knight/). On information and belief, no one resides at this location despite being listed as a
6 residence on the Nevada voter roll.



18 **ddd. 5031 Wagon Trail Ave 107**
19 **Las Vegas, NV 89118**

20 Suite 107 appears to be vacant with removed signage. It previously operated as Vegas
21 Yoga. Business review website Yelp also confirms that as of April 2024, the location is
22 permanently closed. <https://www.yelp.com/biz/bikram-yoga-las-vegas-las-vegas-3>. On
23 information and belief, no one resides at this location despite being listed as a residence on the
24 Nevada voter roll.
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eee. **5145 Arville St C**
Las Vegas, NV 89118

This address is BSP Company, Inc. It is a wholesale installation supplies store, “serving the Beverage Industry since 1985.” <https://bspcompany.com/about-us/>. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**fff. 5340 W. Robindale Rd.
Las Vegas, NV 89139**

This is an office building that is home to Dri Tech. <https://www.dritechcorp.com/>. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**ggg. 5735 S. Durango Dr. B
Las Vegas, NV 89113**

This address is home to Speedy Car Loans. <https://speedycarloans.com/contact.html>. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**hhh. 5757 Wayne Newton Blvd
Las Vegas, NV 89119**

This address is the Las Vegas Harry Reid International Airport. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**iii. 5965 Harrison Dr 1
Las Vegas, NV 89120**

This location and suite are part of a nondescript office and warehouse park with no signage or website promoting Suite 1. Site visitors noted a sign telling visitors to drop off

1 packages at a back door with a loading dock. Online corporation indexes indicate the suite was
2 recently occupied by Arvessa LLC. [https://www.buzzfile.com/business/Arvessa-LLC-760-453-
3 1863](https://www.buzzfile.com/business/Arvessa-LLC-760-453-1863). On information and belief, no one resides at this location despite being listed as a residence
4 on the Nevada voter roll.
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15 **jjj. 5977 Mcleod Dr.**
16 **Las Vegas, NV 89120**

17 This address is Tower Services Inc., a BBB accredited business. On information and
18 belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



1 **kkk. 612 S. 10th ST**
2 **Las Vegas, NV 89101**

3 This address is home to Williams Starbuck, Attorneys at law. On information and belief,
4 no one resides at this location despite being listed as a residence on the Nevada voter roll.



15 **III. 6135 Harrison Dr. Ste 4**
16 **Las Vegas, NV 89120**

17 On information and belief, no one resides at this location despite being listed as a
18 residence on the Nevada voter roll.



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**mmm. 625 S Decatur Blvd
Las Vegas, NV 89107**

This address operates as Fast DMV Services. According to signage on the building, this business handles taxes, divorces, living trusts, and more. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**nnn. 6250 N. Durango Dr.
Las Vegas, NV 89149**

This address is in a strip mall. It is JB & Associates, a CPA firm. There are reserved

1 parking spaces for JB & Associates. On information and belief, no one resides at this location
2 despite being listed as a residence on the Nevada voter roll.



12 **ooo. 6260 N. Durango Dr.**
13 **Las Vegas, NV 89149**

14 This address is in a strip mall. It is the Randolph Law Firm. There are reserved spaces for
15 the firm in the parking lot. On information and belief, no one resides at this location despite being
16 listed as a residence on the Nevada voter roll.



1 **ppp. 631 S 10th St.**
2 **Las Vegas, NV 89101**

3 This address is for the Car Accident Lawyer Pros. On information and belief, no one
4 resides at this location despite being listed as a residence on the Nevada voter roll.



14 **qqq. 6415 S Fort Apache Rd. Ste. 185**
15 **Las Vegas, NV 89148**

16 This address is in the Longford Shoppes Strip Mall. Suite 185 is Mailbox USA, a shipping
17 and mailing business. On information and belief, no one resides at this location despite being
18 listed as a residence on the Nevada voter roll.



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**rrr. 7080 La Cienega St 200
Las Vegas, NV 89113**

This address is a building that appears to have only one occupant, the USDA Service Center. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**sss.7120 Rafael Ridge Way
Las Vegas, NV 89113**

This address is a large office complex with multiple occupants. The voter roll entry is not specific on which suite is claimed as a residence. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**ttt. 7375 S Pecos Rd, Suite 103
Las Vegas, NV 89113**

The building at this address hosts multiple physician and medical clinics. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**uuu. 8110 W. Warm Springs Rd 110
Las Vegas, NV 89113**

This address appears to be vacant. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**www. 8716 Spanish Ridge Ave 100
Las Vegas, NV 89113**

This address is the business Gantry. <https://www.gantryinc.com/locations/las-vegas>. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**www. 9145 Mann St.
Las Vegas, NV 89113**

This address is vacant land with fencing on the perimeter. No building structures were seen on the land by site visitors. Online real property directories note the two-acre lot was

1 previously vacated by an industrial tenant. <https://www.loopnet.com/Listing/9145-Mann-St-Las->
2 [Vegas-NV/16174937/](https://www.loopnet.com/Listing/9145-Mann-St-Las-Vegas-NV/16174937/). On information and belief, no one resides at this location despite being
3 listed as a residence on the Nevada voter roll.



13 **xxx. 916 S. Casino Center Blvd.**
14 **Las Vegas, NV 89113**

15 This address appears to be a vacant building. It was previously occupied by the law
16 offices of Earl Hawley. <https://www.yelp.com/biz/hawley-l-earl-atty-las-vegas>, It was also
17 occupied in the past by Shaw & Associates property managers. [https://www.yelp.com/biz/shaw-](https://www.yelp.com/biz/shaw-and-associates-las-vegas)
18 [and-associates-las-vegas](https://www.yelp.com/biz/shaw-and-associates-las-vegas). On information and belief, no one resides at this location despite being
19 listed as a residence on the Nevada voter roll.



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**yyy. 9390 Redwood St.
Las Vegas, NV 89113**

This address is occupied by Truline, a trucking company. <https://www.trulinecorp.com/>.

On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**zzz. 9525 W. Russell Rd.
Las Vegas, NV 89113**

This address is Summerlin Smiles, an orthodontics office. <https://summerlinsmiles.com/>.

On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**aaaa. 965 White Dr.
Las Vegas, NV 89113**

This address is home to Chopvalue, a sustainable furniture company.

<https://chopvalue.com/>. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



1 **bbbb. 998 Sierra Vista Dr.**
2 **Las Vegas, NV 89113**

3 This address is a 7-Eleven. On information and belief, no one resides at this location
4 despite being listed as a residence on the Nevada voter roll.



15
16 **cccc. 128 Fremont Street**
17 **Las Vegas, NV 89101**

18 This address is Binion’s Gambling Hall, an iconic staple of downtown Las Vegas.
19 <https://www.binions.com/>. Site visitors were unsuccessful in reaching the individual(s) claiming
20 the location as their home. The address styling in the Nevada voter roll does not indicate a
21 particular room or suite which could otherwise be claimed as a residence. On information and
22 belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.

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**dddd. 300 S. Boulder Highway
Henderson, NV 89015**

This address is home to an operational Sonic Drive-In restaurant. Site visitors were unable to witness any evidence of a residence at the location. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



1 **eeee. 13050 E. Flamingo Road, Suites 177 and 191**
2 **Henderson, NV 89015**

3 This address leads to a strip retail mall featuring restaurants and other small businesses.
4 No obvious residential features were witnessed during the site visit. On information and belief, no
5 one resides at this location despite being listed as a residence on the Nevada voter roll.



17 **ffff. 1500 E Tropicana Avenue, Suites 156 and 240**
18 **Las Vegas, NV 89119**

19 This address is home to the Rock Ridge Business Center. Suite 156, as mentioned in the
20 Nevada voter roll, did not appear in the building directory during the site visit. Suite 240 is a
21 health and wellness shop also offering collectible postage stamps. On information and belief, no
22 one resides at this location despite being listed as a residence on the Nevada voter roll.

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ROCK RIDGE BUSINESS CENTER	
FIRST FLOOR	
101 TRINITY HEALTH OF NEVADA LLC	114 APTIVE ENVIROMENTAL
102 THE LAS VEGAS CHIROPRACTOR	118 U.C.C. HEALTHCARE SERVICES
103 THE SERENITY CENTER	119 TRADE & FASHION ACADEMY LV
105 Vegas Best Plumbing	120 Phoenix Rising Auto Group LLC
107 LEGACY HOME HEALTH CARE LLC	121 SKY HOSPICE INC.
108 Divination Life Coaching	122 ROCK RIDGE MANAGEMENT
109 AMETHYST HOSPICE & LIFE	123 WEISSMAN, KENNETH
110 ALKI MOTORCARS, LLC	124 AVAILABLE FOR LEASE
111 AVAILABLE FOR LEASE	125 ION Solar
112 A CARING HEART & PALLIATIVE CARE	126 E-Z AUTO INSURANCE
	127 EMERALD HOSPICE & LIFE
SECOND FLOOR	
203 BARON HR HOSPITALITY	236 Business Depot of Nevada
212 AVAILABLE FOR LEASE	238 TANCELL CARE BUSINESS OFFICE
214 Total Customer Connect	240 AU NATURELE / M&M STAMP
217 Maleko Personnel	244 TANCELL CARE
219 DESERT WIRELESS	246 TANCELL CARE
226 Mojave Payments	248 TANCELL CARE
	250 TANCELL CARE
	260 TANCELL CARE

gggg. 4905 W Tropicana Avenue
Las Vegas, NV 89103

This address references a Walgreens drug store location. Site visitors noted no obvious shelters on the premises. According to the retailer, this location is store #5154.

<https://www.walgreens.com/locator/walgreens-4905+w+tropicana+ave-las+vegas-nv-89103/id=5154>. On information and belief, no one resides at this location despite being listed as a

1 residence on the Nevada voter roll.



12
13 **hhhh. 1695 N Nellis Boulevard**
14 **Las Vegas, NV 89115**

15 This location is home to a free-standing small casino and gaming room. Site visitors did
16 note at the time that the business was operational on a 24-hour basis, but no one was living there.
17 On information and belief, no one resides at this location despite being listed as a residence on the
18 Nevada voter roll.



1 **iiii. 3540 W Sahara Avenue 290**
2 **Las Vegas, NV 89102**

3 This address leads to a strip retail center featuring a gambling hall and other smaller shops
4 and businesses. Site visitors noted that the “290” references in the voter roll address did not match
5 how suites were labeled. On information and belief, no one resides at this location despite being
6 listed as a residence on the Nevada voter roll.



16
17 **jjj. 6007 Dean Martin Drive**
18 **Las Vegas, NV 89118**

19 This address is Larry Flynt’s Hustler Club. <https://vegashustlerclub.com/>. Despite being
20 open 24 hours, it does not serve as a residence. On information and belief, no one resides at this
21 location despite being listed as a residence on the Nevada voter roll.

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**kkkk. 5195 S Las Vegas Boulevard
Las Vegas, NV 89119**

This address is an office location for Terrible’s Herbst, Incorporated, a Nevada-based gas station chain. <https://www.terribles.com/>. On information and belief, no one resides at this location despite being listed as a residence on the Nevada voter roll.



**lll. 6650 S Torrey Pines Drive
Las Vegas, NV 89118**

This address is the UFC Performance Institute. This is the home location for UFC training

1 in the United States. The Institute offers MMA fight training, nutrition guidance, sports medicine,
2 psychological services, and other amenities befitting a mixed martial arts gym. [https://ufc-
3 pi.webflow.io/](https://ufc-pi.webflow.io/). The site does not offer residential features, according to its website and
4 conversations with staff. On information and belief, no one resides at this location despite being
5 listed as a residence on the Nevada voter roll.
6



16 **Respondent Portillo's Refusal to Act Is Harming the Foundation and the Public**

17 22. As of the date of this Petition, Respondent Portillo has not responded to the June 3,
18 2024, letter.

19 23. On information and belief, Respondent Portillo has not taken any action pursuant to
20 NRS 293.530 to investigate the addresses that were brought to her attention on June 3, 2024.

21 24. Respondent Portillo's actions and inactions have frustrated and harmed Petitioners.

22
23 25. A central activity of the Foundation is to promote election integrity and compliance
24 with federal and state statutes that are designed to improve the accuracy of voter rolls across the
25 country. The Foundation has been required to divert resources to Nevada to investigate erroneous
26 addresses on the voter roll. Respondent Portillo's violations of Nevada law have impaired and will
27 impair the Foundation from carrying out its mission.
28

1 **COUNT I**

2 **Writ of Mandamus and Declaratory Relief for Violation of the NRS 293.530 and 293.675**

3 26. Petitioners realleges paragraphs 1 through 25 as if fully stated herein.

4 27. Respondent Portillo has failed to investigate and, if need, fix known commercial
5 addresses listed as residential addresses in violation of her duties to maintain the voter registration
6 list.

7
8 28. Petitioners have sought compliance with NRS 293.530 and 293.675 but Respondent
9 has not responded and, on information and belief, has not acted.

10 29. Petitioners will continue to be injured by Respondent Portillo's failure to act unless
11 and until she is required to fulfill his duties under Nevada law.

12 30. Petitioners seek a declaratory judgment that Respondent is not in compliance with
13 NRS 293.530 and 293.675.

14 31. Petitioners seek a writ of mandamus requiring Respondent to investigate known
15 commercial addresses.
16

17 **PRAYER FOR RELIEF**

18 WHEREFORE, Petitioners pray for relief as follows:

19 1. For a writ of mandamus compelling Respondent to investigate known commercial
20 addresses listed as residences on the voter roll;

21 2. Declaring that Respondent is in violation of NRS 293.530 and 293.675;

22 3. For any necessary injunctive or declaratory remedies or relief;

23 4. For an award of reasonable costs and attorneys' fees;
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27 *(signature on following page)*
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5. Any additional relief this Court deems just, proper, and equitable.

Dated: June 25, 2024.

THE O'MARA LAW FIRM, P.C.

Respectfully submitted,

/s/ David C. O'Mara
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**Pro Hac Vice applications forthcoming*