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13 *Attorneys for Plaintiffs*

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

16 MICHAEL HALEY and THERESA )  
17 NAVARRO, individuals, TU CASA LATINA,) )  
18 a Nevada nonprofit organization. )

19 Plaintiffs, )

20 vs. )

21 PREVENT SANCTUARY CITIES, a )  
22 registered Nevada political action committee; )  
23 JEREMY HUGHES, in his capacity as )  
24 President of PREVENT SANCTUARY )  
25 CITIES PAC; and BARBARA CEGAVSKE, )  
in her official capacity as Secretary of State of )  
Nevada, )

26 Defendants. )  
27  
28

REC'D & FILED

2017 NOV 21 PM 4: 22

SUSAN MERRIWETHER  
CLERK

BY V. Alegria  
DEPUTY

Case No.: *170C002391B*

Dept. No. *I*

**COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF PURSUANT  
TO NRS 295.009 CHALLENGING THE  
PREVENT SANCTUARY CITIES  
INITIATIVE**

1 Plaintiffs, Michael Haley and Theresa Navarro, individuals registered to vote in  
2 Nevada, and Tu Casa Latina, a nonprofit organization in Nevada (collectively "Plaintiffs"), file  
3 this Complaint for declaratory and injunctive relief against Defendants, Prevent Sanctuary  
4 Cities PAC, Jeremy Hughes, in his capacity as registered agent and President of Prevent  
5 Sanctuary Cities PAC, and Barbara Cegavske, in her official capacity as the Nevada Secretary  
6 of State, pursuant to NRS 30.030, 33.010, and 295.061. Plaintiffs allege as follows:  
7

### 8 **INTRODUCTION**

9 1. On October 30, 2017, the Prevent Sanctuary Cities PAC filed an initiative  
10 petition, entitled "Prevent Sanctuary Cities Initiative" (the "Petition"), with the Secretary of  
11 State of Nevada. *See* Ex. 1. The Petition seeks to prohibit, limit, or discourage the legislature,  
12 counties, and cities from adopting, enforcing, or endorsing "a policy which prohibits, limits or  
13 discourages cooperation with the enforcement" of federal immigration law. *Id.*  
14

15 2. The Petition suffers from multiple deficiencies. In particular, the Petition is  
16 legally deficient because: (1) it embraces more than a single subject; (2) the description of  
17 effect does not inform voters of the Petition's effects; and (3) it does not involve legislative  
18 policy.  
19

### 20 **JURISDICTION AND VENUE**

21 3. This Court has jurisdiction to hear Plaintiffs' claims pursuant to NRS 295.061  
22 and to grant declaratory and injunctive relief pursuant to NRS 30.030, 30.040, and 33.010.  
23

24 4. Venue is proper under NRS 13.020 and 13.040 because this action is against a  
25 public officer for acts done in her official capacity.

### 26 **PARTIES**

27 5. Plaintiff, Michael Haley, is a resident of, and registered voter in, Washoe  
28 County, Nevada. He served as Washoe County Sheriff from January 2, 2007, to January 5,

1 2015. Haley began his career with the Washoe County Sheriff's Department in 1980 and  
2 served the Department in several capacities. As a former career police officer and the senior  
3 law enforcement executive of a county with a population over 410,000 that hosts  
4 approximately 5.1 million visitors annually, he has firsthand knowledge of the problems that  
5 arise when local law enforcement agencies are forced to comply with overreaching federal  
6 mandates, including the enforcement of federal immigration laws.  
7

8 6. Plaintiff, Theresa Navarro, is a resident of, and registered voter in, Washoe  
9 County, Nevada. Plaintiff Navarro is a long-time immigrant rights advocate, serving on the  
10 National Immigration Caucus and working with the Catholic Diocese in regards to a project  
11 called "Justice for Immigrants." She also served as a member of the Nevada Advisory  
12 Committee to the U.S. Commission on Civil Rights.  
13

14 7. Plaintiff, Tu Casa Latina, a non-profit corporation, offering assistance in the  
15 form of direct service, education, advocacy, and community involvement to immigrant women,  
16 men, and children who are victims of crimes, domestic violence, abuse and trafficking. The  
17 organization is devoted to serving members of the Northern Nevada immigrant community,  
18 regardless of their immigration status. Direct services offered by Tu Casa Latina include: U  
19 Visa applications (for undocumented victims of crime), VAWA applications (for abused  
20 undocumented women married to American citizens or Permanent Residents), T Visa  
21 applications (for victims of human trafficking for sexual exploitation or labor), assistance with  
22 immigration and citizenship forms, translation of documents, and referrals to local agencies  
23 and services.  
24

25 8. Defendant, Prevent Sanctuary Cities PAC, is named herein as the proponent  
26 of the initiative petition titled the "Prevent Sanctuary Cities Initiative." Prevent Sanctuary  
27 Cities PAC is a Nevada political action committee organized and existing pursuant to Chapter  
28

1 294A of the Nevada Revised Statutes. It was organized for the purpose of advocating for the  
2 Petition.

3 9. Defendant, Jeremy Hughes, is named herein as a proponent of the Petition.  
4 Hughes is the President and registered agent of the Prevent Sanctuary Cities PAC. Defendant  
5 Hughes is an individual and, upon information and belief, at all times relevant herein, was and  
6 is a resident of the State of Nevada.  
7

8 10. Defendant, Barbara Cegavske, is named herein in her official capacity as the  
9 Nevada Secretary of State. As the Secretary of State, Cegavske is the Chief Officer of  
10 Elections of Nevada and is responsible for the execution, administration, and enforcement of  
11 Nevada's election laws. *See* NRS 293.124. The Secretary of State specifically has initiative  
12 responsibilities, including determining the number of signatures required to be gathered,  
13 qualifying initiatives for submission to the Nevada Legislature and/or the Nevada electorate,  
14 and disqualifying initiatives that are determined to be invalid.  
15

## 16 **FACTUAL ALLEGATIONS**

### 17 **A. The Petition**

18  
19 11. On October 30, 2017, the Prevent Sanctuary Cities PAC filed the Petition with  
20 the Secretary of State of Nevada. The Petition proposes to amend the Nevada Constitution to  
21 prohibit, limit, or discourage the legislature, counties, and cities from adopting, enforcing, or  
22 endorsing "a policy which prohibits, limits or discourages cooperation with the enforcement"  
23 of federal immigration law. Ex. 1. The Petition states:  
24

25 **Section 1:** Article 15 of the Nevada Constitution is hereby amended by adding a  
26 new section to read as follows:

27 1. The Legislature shall not enact a law or otherwise adopt, enforce or  
28 endorse a policy which prohibits, limits or discourages cooperation with the  
enforcement of the immigration laws of the United States.

1 2. A board of county commissioners shall not enact an ordinance or  
2 otherwise adopt, enforce or endorse a policy which prohibits, limits or  
3 discourages cooperation with the enforcement of the immigration laws of the  
4 United States.

5 3. The governing body of a city shall not enact an ordinance or otherwise  
6 adopt, enforce or endorse a policy which prohibits, limits or discourages  
7 cooperation with the enforcement of the immigration laws of the United States.

8 Exhibit 1.

9 12. The Petition's "Description of Effect" merely recycles the amendment  
10 language and gives the voter no indication of any effect of the Petition, stating:

11 If enacted, this measure will add a new section to the Nevada Constitution that  
12 will prohibit the legislature, a county or a city from enacting a law or ordinance  
13 or otherwise adopting, enforcing or endorsing a policy which prohibits, limits or  
14 discourages cooperation with the enforcement of the immigration laws of the  
15 United States. To become effective this measure must be approved by a  
16 majority of voters in two general elections.

17 ("Description of Effect"). *Id.*

### 18 **FIRST CLAIM FOR RELIEF**

#### 19 **Declaratory and Injunctive Relief** 20 **Violation of the Single Subject Requirement, NRS 295.009(1)(a)**

21 13. Plaintiffs hereby repeat, re-allege, and incorporate Paragraphs 1 to 12, as if  
22 fully set forth herein.

23 14. NRS 295.009(1)(a) requires that an initiative petition "[e]mbrace but *one*  
24 *subject* and matters necessarily connected therewith and pertaining thereto." (Emphasis added).  
25 This single subject requirement is met "if the parts of the proposed initiative . . . are  
26 functionally related and germane to each other in a way that provides sufficient notice of the  
27 general subject of, and of the interests likely to be affected by, the proposed initiative." NRS  
28 295.009(2).

1           15.       The single subject rule is violated if more than one subject is addressed in an  
2 initiative. *See, e.g., Nevadans for the Protection of Prop. Rights v. Heller*, 122 Nev. 894, 908  
3 (2006).

4           16.       An initiative also violates the single subject rule if it uses phrases that are  
5 “excessive[ly] general[.]” *Las Vegas Taxpayer Accountability Comm. v. City Council*, 125  
6 Nev. 165, 181 (2009) (citations omitted).

7           17.       Here, the Petition violates the single-subject requirement because it addresses  
8 more than one subject as the term “sanctuary cities” in and of itself contains multiple subjects,  
9 and has no established legal definition.

10          18.       The Petition also violates the single subject requirement because it uses  
11 excessively general and broad language.

12          19.       As a result, the Petition is invalid and must be stricken.

13                   **SECOND CLAIM FOR RELIEF**

14                   **Declaratory and Injunctive Relief**  
15                   **Violation of Description of Effect Requirement, NRS 295.009(1)(b)**

16          20.       Plaintiffs hereby repeat, re-allege, and incorporate Paragraphs 1 through 19, as  
17 if fully set forth herein.

18          21.       NRS 295.009(1)(b) requires that an initiative petition set forth, in not more  
19 than 200 words, a “description of the effect of the initiative . . . if the initiative . . . is approved  
20 by the voters.”

21          22.        “[A] description of effect . . . [can]not be deceptive or misleading.” *Educ.*  
22 *Initiative PAC v. Comm. to Protect Nevada Jobs*, 293 P.3d 874, 879 (Nev. 2013) (internal  
23 quotation marks and citation omitted). It must also “explain these ramifications of the proposed  
24  
25  
26  
27  
28

1 amendment,” in order to allow voters to make an informed decision. *Nev. Judges Ass’n v. Lau*,  
2 112 Nev. 51, 59 (1996).

3 23. Here, the Description of Effect is fundamentally flawed because it fails to  
4 provide any information regarding the effects of the Petition, including financial and public  
5 safety impacts. Instead, the Description of Effect simply recycles the language of the proposed  
6 constitutional amendment itself.  
7

8 24. This failure renders the Description of Effect invalid and, as such, the Petition  
9 must be stricken.

### 10 **THIRD CLAIM FOR RELIEF**

#### 11 **Declaratory and Injunctive Relief** 12 **Violation of the “Policy Only” Rule**

13 25. Plaintiffs hereby repeat, re-allege, and incorporate Paragraphs 1 through 24, as  
14 if fully set forth herein.  
15

16 26. Nevada law requires that an initiative involve legislative policy and not be  
17 executive or administrative in character. *See, e.g., Nevadans for Prop. Rights*, 122 Nev. at 898  
18 (striking petition sections that violate the requirement to “only propose policy”); *Forman v.*  
19 *Eagle Thrifty Drugs & Markets, Inc.*, 89 Nev. 533 (1973), *vacated on other grounds by Garvin*  
20 *v. Ninth Judicial Dist. Court ex rel. Cnty. of Douglas*, 118 Nev. 749 (2002).  
21

22 27. An initiative is executive or administrative in character if it “simply puts into  
23 execution previously-declared policies, or previously-enacted laws.” *See, e.g., Forman*, 89  
24 Nev. at 537, *vacated on other grounds by Garvin*, 118 Nev. at 749.  
25

26 28. Here, the Petition does not set forth legislative policy. Instead, the Petition is  
27 executive in character because it involves the enforcement of previously-enacted federal  
28 immigration laws.



1 29. As a result, the Petition is invalid and must be stricken.

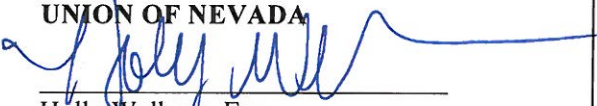
2  
3 **PRAYER FOR RELIEF**

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

- 5 1. Declare that the Petition is invalid because:
- 6 a. It violates NRS 295.009(1)(a) by addressing more than a single subject; and
- 7 b. It violates the "policy only" rule, which renders invalid petitions that are
- 8 executive in character.
- 9 2. Declare that the Description of Effect is invalid, because it does not adequately inform
- 10 voters of the Petition's effects, in violation of NRS 295.009(1)(b);
- 11 3. Enjoin Defendant Prevent Sanctuary Cities PAC, its proponents, officers, or agents,
- 12 including Defendant Hughes, from circulating the signatures for verification pursuant
- 13 to NRS 293.1276 to 293.1279, inclusive;
- 14 4. In the circumstance that Defendants have obtained any signatures of Nevada voters,
- 15 invalidate those signatures;
- 16 5. Enjoin Defendant Secretary of State from placing the Petition on the 2018 general
- 17 election ballot;
- 18 6. Award Plaintiffs their reasonable costs and attorneys' fees; and
- 19 7. Grant such other relief as the Court deems appropriate.

20 Dated: November 21, 2017

**AMERICAN CIVIL LIBERTIES  
UNION OF NEVADA**

  
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**PREVENT SANCTUARY CITIES INITIATIVE**

EXPLANATION: Matter in ***bolded italics*** is new.

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

**Section 1:** Article 15 of the Nevada Constitution is hereby amended by adding a new section to read as follows:

- 1. The Legislature shall not enact a law or otherwise adopt, enforce or endorse a policy which prohibits, limits or discourages cooperation with the enforcement of the immigration laws of the United States.***
- 2. A board of county commissioners shall not enact an ordinance or otherwise adopt, enforce or endorse a policy which prohibits, limits or discourages cooperation with the enforcement of the immigration laws of the United States.***
- 3. The governing body of a city shall not enact an ordinance or otherwise adopt, enforce or endorse a policy which prohibits, limits or discourages cooperation with the enforcement of the immigration laws of the United States.***

**DESCRIPTION OF EFFECT**

If enacted, this measure will add a new section to the Nevada Constitution that will prohibit the legislature, a county or a city from enacting a law or ordinance, or otherwise adopting, enforcing or endorsing a policy which prohibits, limits or discourages cooperation with the enforcement of the immigration laws of the United States. To become effective this measure must be approved by a majority of voters in two general elections.

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Office Use Only

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	YOUR SIGNATURE	DATE / /	CITY COUNTY	
47	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	
48	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
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	YOUR SIGNATURE	DATE / /	CITY COUNTY	
50	PRINT YOUR NAME (first name, initial, last name)	RESIDENCE ADDRESS ONLY		
	YOUR SIGNATURE	DATE / /	CITY COUNTY	



THE FOLLOWING AFFIDAVIT MUST BE COMPLETED AND SIGNED:

**AFFIDAVIT OF CIRCULATOR**  
(TO BE SIGNED BY CIRCULATOR)

STATE OF NEVADA     )  
                                  )  
COUNTY OF \_\_\_\_\_)

I, \_\_\_\_\_, (print name), being first duly sworn under penalty of perjury, depose and say:

(1) that I reside at \_\_\_\_\_  
(print street, city and state); (2) that I am 18 years of age or older; (3) that I personally circulated this document; (4) that all signatures were affixed in my presence; (5) that the number of signatures affixed thereon is \_\_\_\_\_; and (6) that each person who signed had an opportunity before signing to read the full text of the act or resolution on which the initiative or referendum is demanded.

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

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

\_\_\_\_\_  
Notary Public or person authorized to administer oath  
EL501C  
Revised Feb. 2012