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16 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
17 **IN AND FOR THE COUNTY OF WASHOE**

18 FREDERICK H. KRAUS, PUBLIC
19 INTEREST LEGAL FOUNDATION,

20 *Petitioners,*

21 v.

22 CARRIE-ANN BURGESS, in her official
23 capacity as Washoe County Interim
24 Registrar of Voters,

25 *Respondent.*

Case No.:

Dept. No.:

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

Exempt from Arbitration

- **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**

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27 Petitioners Frederick H. Kraus (Kraus) and Public Interest Legal Foundation (the
28 "Foundation") submit this Petition for Writ of Mandamus to compel the Washoe County Registrar

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

3 **NATURE OF THE CASE**

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

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

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

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

24 5. Petitioner Public Interest Legal Foundation, Inc., (the “Foundation”) is a non-
25 partisan, public interest organization incorporated and based in Alexandria, Virginia. The
26 Foundation seeks to promote the integrity of elections in Nevada and other jurisdictions nationwide
27 through research, education, remedial programs, and litigation. The Foundation regularly analyzes
28

1 the programs and activities of state and local election officials to determine whether lawful efforts
2 are being made to keep voter rolls current and accurate. The Foundation also uses records and data
3 to produce and disseminate reports, articles, blog and social media posts, and newsletters to advance
4 the public education aspect of its organizational mission.

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

11
12 7. The Foundation is especially concerned with the accuracy of Respondent’s voter
13 roll given that Nevada has recently expanded voting by mail. The Foundation has studied the effects
14 of errors on Nevada’s statewide voter list in terms of mail ballots being sent to incorrect addresses.
15 *See* “223 Clark County NV Mail Ballots Went to Wrong Addresses in 2020 Primary,”
16 [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/)
17 [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
18 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/)
19 [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/).

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

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 14. 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 15. 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 16. 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 17. 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 18. 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).
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1 **Petitioners Sought Compliance with the Law**

2 19. On April 11, 2024, Petitioners wrote to Respondent Burgess requesting that she
3 investigate the commercial addresses listed on the voter roll in Washoe County. Exhibit A.

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

- 7 a. **2745 Elementary Drive**
8 **Reno, NV 89512**



17 This address is home to Tegli's Paradise Park Activity Center and is listed as a residential
18 address on Nevada's voter roll. According to City of Reno webpage, the Park "has acres of open
19 space, a community garden, play areas and walking trails. Includes a kitchen, large multi-purpose
20 room, 5' round tables, 6' rectangular tables and 100 folding chairs for indoor use" available for rent
21 at \$45 per hour, Reno Parks & Facilities Directory,
22 <https://www.reno.gov/Home/Components/FacilityDirectory/FacilityDirectory/10/2864?npage=4> .
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24 Absent amongst the listed services or programs is any indication that the Park facility serves as a
25 residence or shelter for members of the community. Recent news reports suggest the opposite to be
26 true.
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10 According to a news article from 2023, Reno Parks staff visit the site and surrounding land
11 each weekday to “make sure there are no [homeless] camps,” due to repeated police reports of
12 stabbings and fires there and in the immediate vicinity. Mark Hernandez, *Private land near school,*
13 *Paradise Park draws concerns from citizens* (April 23, 2023),
14 [https://thisisreno.com/2023/04/private-land-near-school-paradise-park-draws-concerns-from-](https://thisisreno.com/2023/04/private-land-near-school-paradise-park-draws-concerns-from-citizens/)
15 [citizens/](https://thisisreno.com/2023/04/private-land-near-school-paradise-park-draws-concerns-from-citizens/) . On information and belief, no one resides at this location despite one individual listing it
16 as a residence on the Nevada voter roll.

17 **b. 100 N. Arlington Avenue proper, Suite 230, and Suite 350**
18 **Reno, NV 89501**

19 This address is a 22-story high rise office and condominium tower in downtown Reno.
20 Within the Nevada voter roll, the address is represented in three different styles. “100 N Arlington
21 Ave” is apparently claimed by seven registered voters. These seven are not apparently tied to any
22 specific unit or suite number. Site visitors walked several floors of the building and noted clear
23 evidence of subdivided mail delivery based upon unit or suite number.
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The second address style, “100 N Arlington Ave 230” is claimed by two registrants in the Nevada voter roll. Suite 230’s door sign reads “Arlington Towers Commercial.” There did not appear to be any activity inside the suite during weekday business hours.



The third address style, “100 N Arlington Ave 350,” is claimed by two registrants in the Nevada voter roll. During the site visit, Suite 350 appeared to be subdivided into three parts: Suite 350, operating as West End Reno; Suite 350-C, operating as Alpen Mortgage; and, Suite 350-G, operating as Reid Reiker Accountancy.

On information and belief, no one resides at Suites 230 and 350 despite being listed as residences on the Nevada voter roll.

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**c. 248 W. First Street
Reno, NV 89501**



This address is home to Café Capello, a coffee shop. According to Café Capello’s website, it is “is a local family owned coffee shop, eatery and community gathering space in the gorgeous Riverwalk District of Downtown Reno.” About Us, <https://www.cafecapello.com/> .

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

**d. 128 E. Sixth Street
Reno, NV 89501**

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The above cited address relates to a 35,000 square foot vacant lot covered with loose gravel. Public real estate records show it was last sold in 2007 and previously featured a single-family home. https://www.zillow.com/homedetails/128-E-6th-St-Reno-NV-89501/124179007_zpid/. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**e. 200 W Fourth Street
Reno, NV 89501**

A well-maintained parking lot serving downtown motorists now sits at the above address.



1 The 0.28 acre lot was the previous location for the Mardi Gras Motor Lodge, which was
2 demolished in 2018. See The Western Nevada Historic Photo Collection,
3 <https://wnhpc.com/details/flickr25690449821>. The structure, along with at least four other motel
4 properties, was torn down by Jacobs Entertainment to redevelop the area for the Reno Neon Line
5 District. Jenny Kane, *Town House Motor Lodge becomes latest motel demolished by Jacobs*
6 *Entertainment* (February 22, 2021), [https://www.rgj.com/story/news/2021/02/22/town-house-](https://www.rgj.com/story/news/2021/02/22/town-house-motor-lodge-demolished-jacobs-entertainment/4492678001/)
7 [motor-lodge-demolished-jacobs-entertainment/4492678001/](https://www.rgj.com/story/news/2021/02/22/town-house-motor-lodge-demolished-jacobs-entertainment/4492678001/) . On information and belief, no one
8 resides at this location despite it being listed as a residence on the Nevada voter roll.
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10 **f. 135 N Sierra Street, A-1**
11 **Reno, NV 89501**

12 This address operates as a U.S. Post Office Approved Postal Provider. The address styling
13 as listed in the Nevada voter roll does not indicate if the registration address reflects the business
14 or a postal box rental.
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25 On information and belief, no one resides at this location despite it being listed twice as a
26 residence on the Nevada voter roll.
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1 **g. 280 W Fourth Street**
2 **Reno, NV 89501**

3 This address is a 0.1 acre lot serving as a public art a green space adjacent to a parking lot
4 serving downtown motorists.



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

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18 **h. 1500 E Fourth Street**
19 **Reno, NV 89512**

20 This address is home to Acuna Total Car Care. Site visitors did not witness any adjacent
21 living quarters or vehicles at the location. On information and belief, no one resides at this location
22 despite it being listed as a residence on the Nevada voter roll.

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**i. 2501 E Fourth Street
Reno, NV 89512**



Casale's Halfway Club restaurant is situated at this address. The owners claim to be "Reno's oldest restaurant." <https://casaleshalfwayclub.com/about-us/>

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Site visitors did notice residential buildings immediately adjacent to the restaurant, however, those buildings had a separate, dedicated address at 2515 E Fourth. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**j. 1125 S. Wells Avenue
Reno, NV 89502**

This address is home to Torn Arts tattoo studio. The location is part of a strip of smaller retail and office spaces. The business' hours run from "Sunday - Saturday: 10am - 6pm."

<https://torn-arts.com/>



1 Site visitors walked the location's perimeter to see if any detached living quarters or vehicles could
2 be parked in the rear and witnessed none. On information and belief, no one resides at this location
3 despite it being listed as a residence on the Nevada voter roll.
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15 **k. 120 Mary Street A**
16 **Reno, NV 89509**

17 This address is home to local business apparently named E. T. Carpet Cleaning Service. At
18 the location is a free-standing building subdivided into units A and B with little to no signage.



1 Site visitors walked the chain-link fenced perimeter of Unit A, finding no detached living
2 quarter or vehicle clearly serving the same purpose on site. On information and belief, no one
3 resides at this location despite it being listed as a residence on the Nevada voter roll.
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16 **I. 120 Linden Street**
17 **Reno, NV 89502**

18 Present at this address, according to online business listings and signage at the property, are
19 two businesses: Mac's Window Tinting (Suite A) and Sierra Transmission & Auto Repair (Suite
20 B).
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The address styling within the Nevada voter roll does not clearly indicate which suite is claimed as a residence for voting. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



**m. 1510 S Wells Avenue
Reno, NV 89502**

This address is where the Eagle Framing & Art Gallery is located. Site visitors walked the perimeter of the location and found no detached or otherwise external living quarters. Visitors then toured the interior of the store in search of evidence of a person sleeping on the premises and found

1 none. On information and belief, no one resides at this location despite it being listed as a residence
2 on the Nevada voter roll.



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14 **n. 218 Vassar Street**
15 **Reno, NV 89502**

16 This address is where Art Dogs Glass Shop, a smoke accessories retail outlet, is located.
17 The store follows varying hours of operation and does not offer 24-hour service any day of the
18 week. <https://artdogsandgrace.com/>.



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 **o. 1170 Harvard Way**
4 **Reno, NV 89502**

5 This address is home to a building operated by the United States Social Security
6 Administration. There does not appear to be any mixed uses for this building beyond government
7 programs administration.
8



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 **p. 16750 Mt. Rose Highway, Ste 103**
23 **Reno, NV 89511**

24 This address apparently operates as a Coldwell Banker real estate brokerage office. The unit
25 sits within a larger suburban office building with other larger tenants, namely the Great Basin
26 Institute.
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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. 877 Ralston Street
Reno, NV 89503**

This address operates as the Darrell Dunkle Post 1 meeting house affiliated with the American Legion. The site offers events space for rent including a main hall and kitchen facility.

<https://darreldunkle.org/hall-rental/>.



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. 888 W. Second Street, Ste. 206**
4 **Reno, NV 89503**

5 This address features a multi-story office building with divided units with at least 20
6 tenant spaces, according to a unit directory posted in the entryway of the building.
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17 Unit 206, according to the building directory, lists “Second Creek LLC” as the tenant.



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

2 **s. 690 W. Second Street**
3 **Reno, NV 89503**

4 This address operates as a business by the name P6 Healing & Performance. The company
5 specializes in chiropractic treatment, “nervous system analysis,” and “custom movement”
6 programs, <https://p6healing.com/>. The company website does not advertise any short- or long-term
7 bed stays like a medical or surgical clinic may offer.
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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 **t. 411 W. Fourth Street**
22 **Reno, NV 89503**

23 This vacant lot is claimed by seven registrants in the Nevada voter roll. On the site’s
24 perimeter sits temporary chain-link fencing and signage promoting the Reno Neon Line District
25 development.
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The site is the former location of the demolished Rancho Sierra Motel, which was acquired by Jacobs Entertainment for redevelopment purposes in 2022.

<https://www.rgj.com/story/news/money/business/2022/10/10/jacobs-entertainment-acquires-rancho-sierra-motel-downtown-reno/8237048001/> . On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**u. 465 W. Second Street
Reno, NV 89503**

This vacant lot is claimed by three registrants in the Nevada voter roll. On the site’s perimeter sits temporary chain-link fencing and signage promoting the Reno Neon Line District development. Site visitors witnessed heavy machinery in use and earthworks in progress for new construction.



10 The site is the former location of the demolished 7/11 or Seven Eleven Motor Lodge, which
11 was recently acquired by Jacobs Entertainment for redevelopment purposes.
12 [https://www.propublica.org/article/he-tore-down-motels-where-poor-residents-lived-during-a-](https://www.propublica.org/article/he-tore-down-motels-where-poor-residents-lived-during-a-housing-crisis-city-leaders-did-nothing)
13 [housing-crisis-city-leaders-did-nothing](https://www.propublica.org/article/he-tore-down-motels-where-poor-residents-lived-during-a-housing-crisis-city-leaders-did-nothing) . On information and belief, no one resides at this location
14 despite it being listed as a residence on the Nevada voter roll.

15 **v. 500 W. Second Street**
16 **Reno, NV 89503**

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18 This address operates as a business by the name Easy Market. The single-story, free-
19 standing building has limited parking on the site.



1 Site visitors walked the perimeter of the location to spot detached living quarters or other
2 vehicles serving a similar purposes and found none.



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

14 **w. 400 E. Fourth Street**
15 **Reno, NV 89512**

16 This address is to the now shuttered Morris Burner Hostel. Site visitors noted that the
17 premises was boarded, prohibiting entry to the building.



28 In May 2020, building ownership reportedly alerted all occupants to permanently vacate the

1 premises within 30 days due to “unsafe living conditions in light of the novel coronavirus
2 pandemic.” [https://www.rgj.com/story/news/2020/05/07/morris-burner-hostel-gives-residents-30-
4 days-notice-due-covid-19/3089051001/](https://www.rgj.com/story/news/2020/05/07/morris-burner-hostel-gives-residents-30-
3 days-notice-due-covid-19/3089051001/). By November 2021, ownership had reportedly sold the
5 property. <https://renohistorical.org/items/show/50>. On information and belief, no one resides at this
6 location despite it being listed as a residence on the Nevada voter roll.

7 **x. 520 Valley Road**
8 **Reno, NV 89512**

9 This address operates as Three C’s Auto Repair. The free-standing, single-unit building did
10 not feature any attached residential quarters. Signage at the location also advertised that it did not
11 offer 24-hour service.



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

24 **y. 640 Eureka Avenue, Unit D**
25 **Reno, NV 89512**

26 This address features a subdivided light industrial/office strip building. Unlike its
27 neighbors in the building, Unit D offers no apparent signage. Site visitors witnessed no obvious
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1 activity at the unit at the time.



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

14 **z. 403 Hill Street**
15 **Reno, NV 89501**

16 This address operates as the offices of Coulter Harsh Law. The free-standing residential
17 construction was renovated to serve as office space. See <https://coulterharshlaw.com/>



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

2 **aa. 435 Marsh Avenue**
3 **Reno, NV 89509**

4 This address operates as the offices of Thomas C. Bradley, attorney at law.
5 <https://tombradleylaw.com/>. The free-standing residential construction was renovated to serve as
6 office space.



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 **bb. 777 S. Center Street, Ste. 103**
19 **Reno, NV 89501**

20 This address operates as My Religion Tattoo – No Piercings.
21 <https://www.facebook.com/MyReligionTattooReno/about/> . The building in question also hosts a
22 jewelry store (Suite 102), a restaurant (Suite 100), and a beer and wine shop (Suite 101).

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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.

**cc. 800 Haskell Street
Reno, NV 89509**

This address represents the anchor suite of a two-story office/retail building which is currently vacant and available for lease.



Site visitors witnessed real estate signs advertising that the anchor suite of 800 Haskell Street ("the entire 1st floor") was immediately available for lease.

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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. 801 S. Center Street
Reno, NV 89501**

This address operates as “Teak and Hardwood Floors,” per the signage at the site. The building is originally single-family residential construction repurposed for retail use.



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

1 **ee. 811 Ryland Street**
2 **Reno, NV 89502**

3 This address represents the anchor suite of a split retail building. 811 Ryland Street is
4 occupied by Liberty Safes of Reno, open six days a week. <https://libertysafesofreno.com/>.



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 **ff. 820 Kuenzli Street**
17 **Reno, NV 89502**

18 This address represents the anchor suite of an office building. Occupying the address is
19 Cool Breeze HVAC Services. <https://www.coolbreezenv.com/>.



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. 836 E. Second Street**
4 **Reno, NV 89502**

5 This address is home to the Potentialist Workshop, “a multidisciplinary collaborative arts
6 collective.” <http://www.potentialistworkshop.com/>. The website notes that space is available for
7 rent for art studios yet makes no mention of residential offerings.



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

20 **hh. 960 S. Virginia Street**
21 **Reno, NV 89502**

22 This address is home to the Arch Society, “Reno’s one and only dessert bar.”
23 <https://www.thearchsociety.com/>.

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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. 501 Casazza Drive
Reno, NV 89502**

This address is the former location of Intercept Offender Monitoring, a drug and alcohol testing company. <https://www.interceptoffendermonitoring.com/> . During visitation of the site, a sign posted to the front door listing the new address effective August 28, 2023, was witnessed. The company website confirms the new address on Kuenzli Street.



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

1 **jj. 310 Gentry Way**
2 **Reno, NV 89502**

3 This address is home to Valhalla Auto Service. According to the company’s Facebook
4 page, the shop does not offer 24-hour service.



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

15 **kk. 3710 Grant Drive, Ste. D**
16 **Reno, NV 89509**

17 This address is occupied by Levity Sports Massage and Aromatherapy Studio, according
18 to the posted building directory on site.



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 **II. 3710 Grant Drive, Ste. H**
4 **Reno, NV 89509**

5 This address is occupied by Peter Wilday Architectural Services, according to the posted
6 building directory on site.



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 **mm. 9393 Gateway Drive**
20 **Reno, NV 89521**

21 This address is home to the South Reno Athletic Club. The club's website makes no
22 mention of offering any residential or rooming services. <https://southrac.com/>.

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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.

**nn. 9790 Gateway Drive, Ste. 100
Reno, NV 89521**

This address is home to a two-story office building hosting at least eight occupants known as the Thomas Creek Office Building.



Suite 100 is currently occupied by the Nevada Gaming Control Board. Given its function as a high-profile state agency, residential uses within the suite would be highly unlikely.

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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. 35 N. Edison Way, Ste. 11
Reno, NV 89502**

This address is a light industrial strip of businesses. Suite 11 shows no obvious signage at the property and appeared to be dormant at the time of site visitation.



A search for an online footprint related to Suite 11 also failed to reveal any reliable information.

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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.

**pp. 1550 Vance Way
Sparks, NV 89431**

This address is home to Paul's Market, a liquor store. The location does not offer 24-hour service, according to the shop's Facebook page. <https://www.facebook.com/paulandsandip/>



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

1 **qq. 761 Greenbrae Drive**
2 **Sparks, NV 89431**

3 This address is the location of an office/retail strip anchored by the dental offices of Dr.
4 Harry C. Frye. Due to the styling of the address in the Nevada voter roll, it is unclear which suite
5 a registrant is claiming as their residence.



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

17
18 **rr. 1845 Prater Way, Ste. L**
19 **Sparks, NV 89431**

20 This address is the location of an office/retail strip center. Suite L is currently occupied by
21 HR Appliances Veracruz.

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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. 1920 Glendale Avenue
Sparks, NV 89431**

This address is home to a free-standing retail building operating as All Star Rents, an equipment rental company.



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

1 **tt. 1505 Glendale Avenue**
2 **Sparks, NV 89431**

3 This address is home to a free-standing light-industrial building operating as Palomino's
4 Rims, Tires, & Mufflers auto services company.



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 **uu. 1553 Hymer Avenue**
17 **Sparks, NV 89431**

18 This address is home to a free-standing light-industrial office building occupied by Jet
19 Plumbing and Drain Services.



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. 906 Victorian Avenue**
4 **Sparks, NV 89431**

5 This address is home to a strip retail/restaurant center. The specific address in question is
6 occupied by Paddy & Irene's Irish Pub.



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
19 **Respondent Burgess's Refusal to Act Is Harming the Foundation and the Public**

20 21. On April 12, 2024, George Guthrie, Registrar of Voters Media Production
21 Specialist, responded to the Foundation's letter stating that the office was "reviewing your letter
22 now along with the provided information you've found. Would you be able to send us the
23 documents you're using as reference to find these addresses?" Exhibit B at 4.

24 22. The Foundation's representative responded that the information was found by
25 reviewing "the Nevada voter roll directly to identify commercial addresses. We visited each
26 location and took the included pictures." Exhibit B at 3.

27
28 23. Mr. Guthrie responded, asking several questions:

1 When we're talking about the Nevada voter roll, are you talking about a list
2 provided by our office? NV SOS? Federal voter list including Nevada?

3 When we took a look at a few of the examples provided, some were not showing
4 any active registrations under the address. Or the address was just appropriately
5 marked as commercial so it would be impossible to register at the location. I just
6 want to make sure I am able to reference the same information that you used to
7 conduct your investigations, so we can discuss the full picture.

8 If not, I can give you responses based on the information we have on hand.

9 Exhibit B at 2-3.

10 24. That same day, the Foundation's representative responded "Yes, the voter roll is
11 from the NVSOS data portal, focusing on the residential address fields—not the mailing ones. Our
12 research noted active, inactive, or a combination of those at the addresses shown in the presentation
13 list. Please let me know if you have any other questions. Thank you for your attention on this
14 matter." Exhibit B at 2.

15 25. On April 22, 2024, Mr. Guthrie responded that they are "taking a look at all the
16 addresses provided in your letter" and would be "sending a bulk response to each in the coming
17 weeks." Exhibit B at 2.

18 26. Hearing nothing further, the Foundation's representative reached out on May 2,
19 2024, for an update. Exhibit B at 1.

20 27. On May 6, 2024, Mr. Guthrie responded, stating:

21 After further evaluation of the information you've provided to our office, I
22 would suggest bringing the information to the Secretary of State's office.

23 Furthermore, I would also note that we are within the 90 day list maintenance
24 window as described by the NVRA...

25 Exhibit B at 1.

26 28. On information and belief, Respondent Burgess has not taken any action pursuant
27 to NRS 293.530 to investigate the addresses that were brought to her attention on April 11, 2024,
28 nor made any corrections.

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- 3. For any necessary injunctive or declaratory remedies or relief;
- 4. For an award of reasonable costs and attorneys' fees;
- 5. Any additional relief this Court deems just, proper, and equitable.

AFFIRMATION
(Pursuant to NRS 239B.030)

The undersigned does hereby affirm that the preceding document filed in the above referenced matter does not contain the social security number of any person.

Dated: May 10, 2024. THE O'MARA LAW FIRM, P.C.

Respectfully submitted,

/s/ David C. O'Mara
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adams@publicinterestlegal.org
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**Pro Hac Vice applications forthcoming*

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EXHIBIT A

EXHIBIT A



VIA EMAIL

April 11, 2024

Cari-Ann Burgess, Interim Registrar of Voters
1001 E. Ninth Street, Bldg A, Rm 135
Reno, NV 89512-2845
Email: electionsdepartment@washoecounty.gov

Dear Ms. Burgess:

On behalf of the Public Interest Legal Foundation (“Foundation”) and its client, we request that you immediately perform your duties under Nevada law to determine whether addresses on the Nevada voter roll are accurate and, if not, make appropriate corrections.

Nevada law mandates that “[t]he Secretary of State shall establish and maintain an official statewide voter registration list, which may be maintained on the Internet, in consultation with each county and city clerk.” NRS 293.675. That list must, in relevant part, “[be] regularly maintained to ensure the integrity of the registration process and the election process.” NRS 293.675(2)(i).

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

Nevada law states, “for the purposes of preregistering or registering to vote, the address at which the person actually resides is the street address assigned to the location at which the person actually resides.” NRS 293.486(1).

In our analysis of Nevada’s statewide voter list dated April 9, 2024, we identified numerous addresses listed as residential that appeared to be commercial buildings where no one resides. Attached to this letter is a list of addresses from Washoe County. We are including pictures that we have taken at each location along with additional information we collected.

We request that you conduct your investigation and make any appropriate corrections to the voter roll by May 1, 2024. Please provide an update when your investigations have concluded.

Ensuring the accuracy of the voter roll is especially critical given that Nevada has recently expanded voting by mail. Action is needed prior to mailing out ballots for the June primary election.

Should further clarification be required, please email lchurchwell@publicinterestlegal.org.

Thank you in advance for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read "Logan Churchwell". The signature is fluid and cursive, with a prominent initial "L" and a long, sweeping underline.

Logan Churchwell
Research Director
Public Interest Legal Foundation

**1. 2745 Elementary Drive
Reno, NV 89512**



This address is home to Teglia's Paradise Park Activity Center and is listed as a residential address on Nevada's voter roll. According to City of Reno webpage, the Park "has acres of open space, a community garden, play areas and walking trails. Includes a kitchen, large multi-purpose room, 5' round tables, 6' rectangular tables and 100 folding chairs for indoor use" available for rent at \$45 per hour, Reno Parks & Facilities Directory, <https://www.reno.gov/Home/Components/FacilityDirectory/FacilityDirectory/10/2864?npage=4>. Absent amongst the listed services or programs is any indication that the Park facility serves as a residence or shelter for members of the community. Recent news reports suggest the opposite to be true.



According to a news article from 2023, Reno Parks staff visit the site and surrounding land each weekday to “make sure there are no [homeless] camps,” due to repeated police reports of stabbings and fires there and in the immediate vicinity. Mark Hernandez, *Private land near school, Paradise Park draws concerns from citizens* (April 23, 2023), <https://thisisreno.com/2023/04/private-land-near-school-paradise-park-draws-concerns-from-citizens/>. On information and belief, no one resides at this location despite one individual listing it as a residence on the Nevada voter roll.

**2. 100 N. Arlington Avenue proper, Suite 230, and Suite 350
Reno, NV 89501**

This address is a 22-story high rise office and condominium tower in downtown Reno. Within the Nevada voter roll, the address is represented in three different styles. “100 N Arlington Ave” is apparently claimed by seven registered voters. These seven are not apparently tied to any specific unit or suite number. Site visitors walked several floors of the building and noted clear evidence of subdivided mail delivery based upon unit or suite number.



The second address style, “100 N Arlington Ave 230” is claimed by two registrants in the Nevada voter roll. Suite 230’s door sign reads “Arlington Towers Commercial.” There did not appear to be any activity inside the suite during weekday business hours.



The third address style, “100 N Arlington Ave 350,” is claimed by two registrants in the Nevada voter roll. During the site visit, Suite 350 appeared to be subdivided into three parts: Suite 350, operating as West End Reno; Suite 350-C, operating as Alpen Mortgage; and, Suite 350-G, operating as Reid Reiker Accountancy.

On information and belief, no one resides at Suites 230 and 350 despite being listed as residences on the Nevada voter roll.

**3. 248 W. First Street
Reno, NV 89501**



This address is home to Café Capello, a coffee shop. According to Café Capello’s

website, it is “is a local family owned coffee shop, eatery and community gathering space in the gorgeous Riverwalk District of Downtown Reno.” About Us, <https://www.cafecapello.com/>.

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

**4. 128 E. Sixth Street
Reno, NV 89501**



The above cited address relates to a 35,000 square foot vacant lot covered with loose gravel. Public real estate records show it was last sold in 2007 and previously featured a single-family home. https://www.zillow.com/homedetails/128-E-6th-St-Reno-NV-89501/124179007_zpid/. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**5. 200 W Fourth Street
Reno, NV 89501**

A well-maintained parking lot serving downtown motorists now sits at the above address.



The 0.28 acre lot was the previous location for the Mardi Gras Motor Lodge, which was demolished in 2018. *See* The Western Nevada Historic Photo Collection, <https://wnhpc.com/details/flickr25690449821>. The structure, along with at least four other motel properties, was torn down by Jacobs Entertainment to redevelop the area for the Reno Neon Line District. Jenny Kane, *Town House Motor Lodge becomes latest motel demolished by Jacobs Entertainment* (February 22, 2021), <https://www.rgj.com/story/news/2021/02/22/town-house-motor-lodge-demolished-jacobs-entertainment/4492678001/>. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**6. 135 N Sierra Street, A-1
Reno, NV 89501**

This address operates as a U.S. Post Office Approved Postal Provider. The address styling as listed in the Nevada voter roll does not indicate if the registration address reflects the business or a postal box rental.



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

**7. 280 W Fourth Street
Reno, NV 89501**

This address is a 0.1 acre lot serving as a public art a green space adjacent to a parking lot serving downtown motorists.



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

**8. 1500 E Fourth Street
Reno, NV 89512**

This address is home to Acuna Total Car Care. Site visitors did not witness any adjacent living quarters or vehicles at the location. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



**9. 2501 E Fourth Street
Reno, NV 89512**

Casale's Halfway Club restaurant is situated at this address. The owners claim to be "Reno's oldest restaurant." <https://casaleshalfwayclub.com/about-us/>



Site visitors did notice residential buildings immediately adjacent to the restaurant, however, those buildings had a separate, dedicated address at 2515 E Fourth. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**10. 1125 S. Wells Avenue
Reno, NV 89502**

This address is home to Torn Arts tattoo studio. The location is part of a strip of smaller retail and office spaces. The business' hours run from "Sunday - Saturday: 10am - 6pm."

<https://torn-arts.com/>



Site visitors walked the location's perimeter to see if any detached living quarters or vehicles could be parked in the rear and witnessed none. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



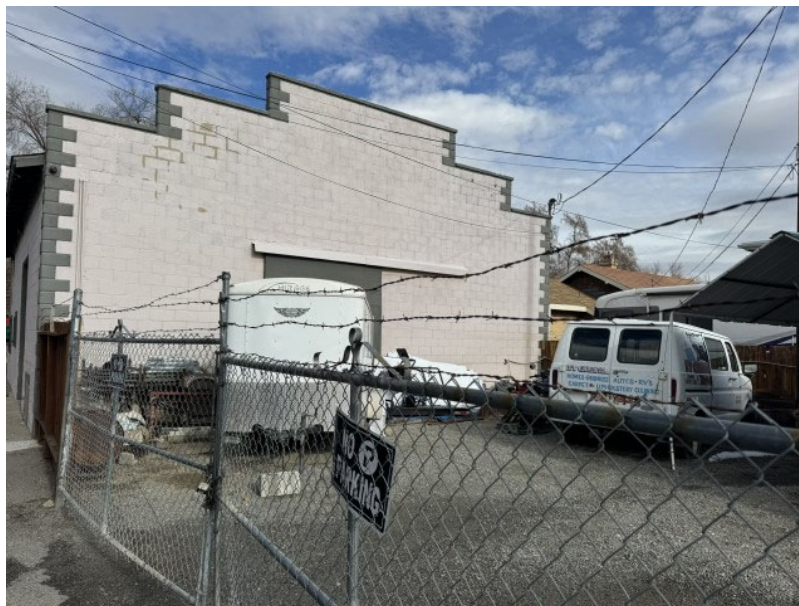
**11. 120 Mary Street A
Reno, NV 89509**

This address is home to local business apparently named E. T. Carpet Cleaning Service.

At the location is a free-standing building subdivided into units A and B with little to no signage.



Site visitors walked the chain-link fenced perimeter of Unit A, finding no detached living quarter or vehicle clearly serving the same purpose on site. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



**12. 120 Linden Street
Reno, NV 89502**

Present at this address, according to online business listings and signage at the property, are two businesses: Mac's Window Tinting (Suite A) and Sierra Transmission & Auto Repair (Suite B).



The address styling within the Nevada voter roll does not clearly indicate which suite is claimed as a residence for voting. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



13. 1510 S Wells Avenue

Reno, NV 89502

This address is where the Eagle Framing & Art Gallery is located. Site visitors walked the perimeter of the location and found no detached or otherwise external living quarters. Visitors then toured the interior of the store in search of evidence of a person sleeping on the premises and found none. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.



**14. 218 Vassar Street
Reno, NV 89502**

This address is where Art Dogs Glass Shop, a smoke accessories retail outlet, is located. The store follows varying hours of operation and does not offer 24-hour service any day of the week. <https://artdogsandgrace.com/>.



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

**15. 1170 Harvard Way
Reno, NV 89502**

This address is home to a building operated by the United States Social Security Administration. There does not appear to be any mixed uses for this building beyond government programs administration.



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

**16. 16750 Mt. Rose Highway, Ste 103
Reno, NV 89511**

This address apparently operates as a Coldwell Banker real estate brokerage office. The unit sits within a larger suburban office building with other larger tenants, namely the Great Basin Institute.



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

**17. 877 Ralston Street
Reno, NV 89503**

This address operates as the Darrell Dunkle Post 1 meeting house affiliated with the American Legion. The site offers events space for rent including a main hall and kitchen facility.
<https://darreldunkle.org/hall-rental/>



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

**18. 888 W. Second Street, Ste. 206
Reno, NV 89503**

This address features a multi-story office building with divided units with at least 20 tenant spaces, according to a unit directory posted in the entryway of the building.



Unit 206, according to the building directory, lists “Second Creek LLC” as the tenant.



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

**19. 690 W. Second Street
Reno, NV 89503**

This address operates as a business by the name P6 Healing & Performance. The company specializes in chiropractic treatment, “nervous system analysis,” and “custom movement” programs, <https://p6healing.com/>. The company website does not advertise any short- or long-term bed stays like a medical or surgical clinic may offer.



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

**20. 411 W. Fourth Street
Reno, NV 89503**

This vacant lot is claimed by seven registrants in the Nevada voter roll. On the site's perimeter sits temporary chain-link fencing and signage promoting the Reno Neon Line District development.



The site is the former location of the demolished Rancho Sierra Motel, which was acquired by Jacobs Entertainment for redevelopment purposes in 2022. <https://www.rgj.com/story/news/money/business/2022/10/10/jacobs-entertainment-acquires-rancho-sierra-motel-downtown-reno/8237048001/>. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**21. 465 W. Second Street
Reno, NV 89503**

This vacant lot is claimed by three registrants in the Nevada voter roll. On the site's

perimeter sits temporary chain-link fencing and signage promoting the Reno Neon Line District development. Site visitors witnessed heavy machinery in use and earthworks in progress for new construction.



The site is the former location of the demolished 7/11 or Seven Eleven Motor Lodge, which was recently acquired by Jacobs Entertainment for redevelopment purposes. <https://www.propublica.org/article/he-tore-down-motels-where-poor-residents-lived-during-a-housing-crisis-city-leaders-did-nothing>. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**22. 500 W. Second Street
Reno, NV 89503**

This address operates as a business by the name Easy Market. The single-story, free-standing building has limited parking on the site.



Site visitors reviewed the perimeter of the location to spot detached living quarters or other vehicles serving a similar purposes and found none.



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

**23. 400 E. Fourth Street
Reno, NV 89512**

This address is to the now shuttered Morris Burner Hostel. Site visitors noted that the premises was boarded, prohibiting entry to the building.



In May 2020, building ownership reportedly alerted all occupants to permanently vacate the premises within 30 days due to “unsafe living conditions in light of the novel coronavirus pandemic.” <https://www.rgj.com/story/news/2020/05/07/morris-burner-hostel-gives-residents-30-days-notice-due-covid-19/3089051001/>. By November 2021, ownership had reportedly sold the property. <https://renohistorical.org/items/show/50>. On information and belief, no one resides at this location despite it being listed as a residence on the Nevada voter roll.

**24. 520 Valley Road
Reno, NV 89512**

This address operates as Three C’s Auto Repair. The free-standing, single-unit building did not feature any attached residential quarters. Signage at the location also advertised that it did not offer 24-hour service.



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

**25. 640 Eureka Avenue, Unit D
Reno, NV 89512**

This address features a subdivided light industrial/office strip building. Unlike its neighbors in the building, Unit D offers no apparent signage. Site visitors witnessed no obvious activity at the unit at the time.



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

**26. 403 Hill Street
Reno, NV 89501**

This address operates as the offices of Coulter Harsh Law. The free-standing residential construction was renovated to serve as office space. See <https://coulterharshlaw.com/>



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

**27. 435 Marsh Avenue
Reno, NV 89509**

This address operates as the offices of Thomas C. Bradley, attorney at law. <https://tombradleylaw.com/>. The free-standing residential construction was renovated to serve as office space.



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

**28. 777 S. Center Street, Ste. 103
Reno, NV 89501**

This address operates as My Religion Tattoo – No Piercings.

<https://www.facebook.com/MyReligionTattooReno/about/>. The building in question also hosts a jewelry store (Suite 102), a restaurant (Suite 100), and a beer and wine shop (Suite 101).



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

**29. 800 Haskell Street
Reno, NV 89509**

This address represents the anchor suite of a two-story office/retail building which is currently vacant and available for lease.



Site visitors witnessed real estate signs advertising that the anchor suite of 800 Haskell Street (“the entire 1st floor”) was immediately available for lease.



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

**30. 801 S. Center Street
Reno, NV 89501**

This address operates as “Teak and Hardwood Floors,” per the signage at the site. The building is originally single-family residential construction repurposed for retail use.



On information and belief, no one resides at this location despite it being listed as a

residence on the Nevada voter roll.

**31. 811 Ryland Street
Reno, NV 89502**

This address represents the anchor suite of a split retail building. 811 Ryland Street is occupied by Liberty Safes of Reno, open six days a week. <https://libertysafesofreno.com/>.



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

**32. 820 Kuenzli Street
Reno, NV 89502**

This address represents the anchor suite of an office building. Occupying the address is Cool Breeze HVAC Services. <https://www.coolbreezenv.com/>.



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

**33. 836 E. Second Street
Reno, NV 89502**

This address is home to the Potentialist Workshop, “a multidisciplinary collaborative arts collective.” <http://www.potentialistworkshop.com/>. The website notes that space is available for rent for art studios yet makes no mention of residential offerings.



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

**34. 960 S. Virginia Street
Reno, NV 89502**

This address is home to the Arch Society, “Reno’s one and only dessert bar.”

<https://www.thearchsociety.com/>.



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

**35. 501 Casazza Drive
Reno, NV 89502**

This address is the former location of Intercept Offender Monitoring, a drug and alcohol testing company. <https://www.interceptoffendermonitoring.com/>. During visitation of the site, a sign posted to the front door listing the new address effective August 28, 2023, was witnessed. The company website confirms the new address on Kuenzli Street.



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

**36. 310 Gentry Way
Reno, NV 89502**

This address is home to Valhalla Auto Service. According to the company's Facebook page, the shop does not offer 24-hour service.



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

**37. 3710 Grant Drive, Ste. D
Reno, NV 89509**

This address is occupied by Levity Sports Massage and Aromatherapy Studio, according to the posted building directory on site.



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

**38. 3710 Grant Drive, Ste. H
Reno, NV 89509**

This address is occupied by Peter Wilday Architectural Services, according to the posted building directory on site.



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

**39. 9393 Gateway Drive
Reno, NV 89521**

This address is home to the South Reno Athletic Club. The club's website makes no mention of offering any residential or rooming services. <https://southrac.com/>.



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

**40. 9790 Gateway Drive, Ste. 100
Reno, NV 89521**

This address is home to a two-story office building hosting at least eight occupants known as the Thomas Creek Office Building.



Suite 100 is currently occupied by the Nevada Gaming Control Board. Given its function as a high-profile state agency, residential uses within the suite would be highly unlikely.

THOMAS CREEK OFFICE BUILDING	
FIRST FLOOR	
Nevada Gaming Control Board	Suite 100
Greater Nevada Credit Union	Suite 120
SECOND FLOOR	
Laxalt Law Group	Suite 200
Sutton Hague Law Corporation	Suite 200
Greater Nevada Credit Union	Suite 204
Greater Nevada Credit Union	Suite 210
Sage Neuroscience Specialists	Suite 220
LRES Corporation	Suite 230

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

**41. 35 N. Edison Way, Ste. 11
Reno, NV 89502**

This address is a light industrial strip of businesses. Suite 11 shows no obvious signage at the property and appeared to be dormant at the time of site visitation.



A search for an online footprint related to Suite 11 also failed to reveal any reliable information.



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

**42. 1550 Vance Way
Sparks, NV 89431**

This address is home to Paul's Market, a liquor store. The location does not offer 24-hour service, according to the shop's Facebook page. <https://www.facebook.com/paulandsandip/>



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

**43. 761 Greenbrae Drive
Sparks, NV 89431**

This address is the location of an office/retail strip anchored by the dental offices of Dr. Harry C. Frye. Due to the styling of the address in the Nevada voter roll, it is unclear which suite a registrant is claiming as their residence.



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

**44. 1845 Prater Way, Ste. L
Sparks, NV 89431**

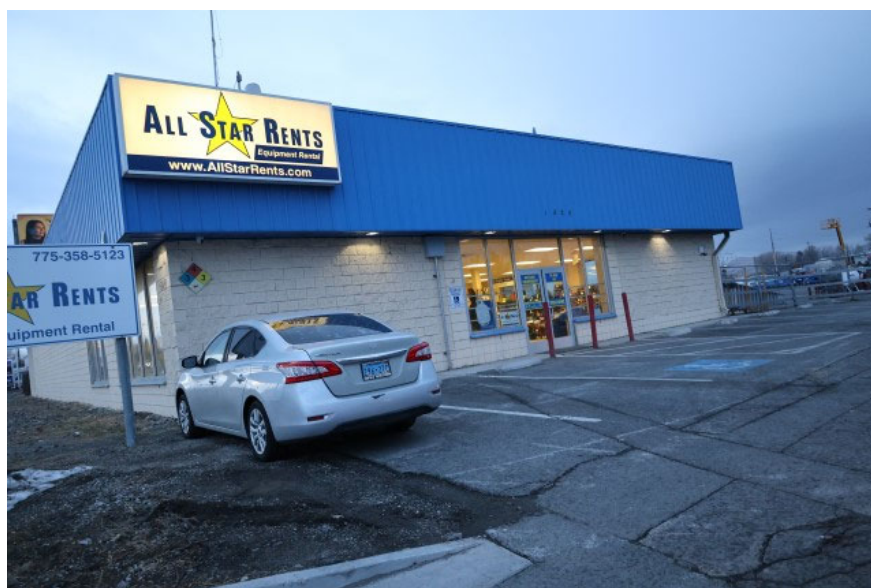
This address is the location of an office/retail strip center. Suite L is currently occupied by HR Appliances Veracruz.



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

**45. 1920 Glendale Avenue
Sparks, NV 89431**

This address is home to a free-standing retail building operating as All Star Rents, an equipment rental company.



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

**46. 1505 Glendale Avenue
Sparks, NV 89431**

This address is home to a free-standing light-industrial building operating as Palomino's Rims, Tires, & Mufflers auto services company.



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

**47. 1553 Hymer Avenue
Sparks, NV 89431**

This address is home to a free-standing light-industrial office building occupied by Jet Plumbing and Drain Services.



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

**48. 906 Victorian Avenue
Sparks, NV 89431**

This address is home to a strip retail/restaurant center. The specific address in question is occupied by Paddy & Irene's Irish Pub.



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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EXHIBIT B

EXHIBIT B

RE: Official review requested under NRS 293.486(1)

Guthrie, George <GGuthrie@washoecounty.gov>

Mon 5/6/2024 7:05 PM

To: Logan Churchwell <LChurchwell@publicInterestLegal.org>;

Good afternoon Logan,

After further evaluation of the information you've provided to our office, I would suggest bringing your information to the Secretary of State's office.

Furthermore, I would also note that we are within the 90 day list maintenance window as described by the NVRA which started back in March, therefore any action would have to be taken after the June Primary. In the meantime, you may wish to pursue other options laid out in NRS 293.535 and NRS 293.547.

Thanks,



George Guthrie

Media Production Specialist | Registrar of Voters

GGuthrie@washoecounty.gov | Cell: 775.512.0199

[1001 E 9th Street, Building A, Reno, NV 89512](#)

From: Logan Churchwell <LChurchwell@publicInterestLegal.org>

Sent: Thursday, May 2, 2024 11:31 AM

To: Guthrie, George <GGuthrie@washoecounty.gov>

Subject: Re: Official review requested under NRS 293.486(1)

[NOTICE: This message originated outside of Washoe County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Mr. Guthrie,

Our letter dated April 11, 2024, requested that you conduct your investigation and make any appropriate corrections by May 1, 2024. We noted that action is needed prior to mailing out ballots for the June primary election.

Your last email dated April 22, 2024, stated that you were taking a look at all the addresses we provided. Which addresses have you reviewed and what actions have been taken?

From: Guthrie, George <GGuthrie@washoecounty.gov>

Sent: Monday, April 22, 2024 9:46 PM

To: Logan Churchwell

Subject: RE: Official review requested under NRS 293.486(1)

Thank you,

We're taking a look at all the addresses provided in your letter. I'll be sending the bulk response to each in the coming weeks.



George Guthrie

Media Production Specialist | Registrar of Voters

GGuthrie@washoecounty.gov | Cell: 775.512.0199

[1001 E 9th Street, Building A, Reno, NV 89512](#)

From: Logan Churchwell <LChurchwell@publicInterestLegal.org>

Sent: Tuesday, April 16, 2024 11:48 AM

To: Guthrie, George <GGuthrie@washoecounty.gov>

Subject: Re: Official review requested under NRS 293.486(1)

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Yes, the voter roll is from the NVSOS data portal, focusing on the residential address fields -- not the mailing ones. Our research noted active, inactive, or a combination of those at the addresses shown in the presentation list. Please let me know if you have any other questions. Thank you for your attention on the matter.

From: Guthrie, George <GGuthrie@washoecounty.gov>

Sent: Tuesday, April 16, 2024 2:12 PM

To: Logan Churchwell

Subject: Re: Official review requested under NRS 293.486(1)

When we're talking about the Nevada voter roll, are you talking about a list provided by our office? NV SOS? Federal voter list including Nevada?

When we took a look at a few of the examples provided, some were not showing any active registrations under the address. Or the address was just appropriately marked as commercial so it would be impossible to register at the location. I just want to make sure I am able to reference the same

information that you used to conduct your investigations, so we can discuss the full picture.

If not, I can give you responses based on the information we have on hand.

Thanks,

George Guthrie

Media Production Specialist | Registrar of Voters

GGuthrie@washoecounty.gov | Cell: 775.512.0199

1001 E 9th Street, Building A, Reno, NV 89512

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From: Logan Churchwell <LChurchwell@publicInterestLegal.org>
Sent: Tuesday, April 16, 2024 10:44:35 AM
To: Guthrie, George <GGuthrie@washoecounty.gov>
Subject: Re: Official review requested under NRS 293.486(1)

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Good afternoon George. Thank you for your response. We reviewed the Nevada voter roll directly to identify commercial addresses. We visited each location and took the included pictures.

Thank you for your attention to this important matter.

From: Guthrie, George <GGuthrie@washoecounty.gov>
Sent: Friday, April 12, 2024 2:45 PM
To: Logan Churchwell
Subject: RE: Official review requested under NRS 293.486(1)

Good afternoon Logan,

We're reviewing your letter now along with the provided information you've found. Would you be able to send us the documents you're using as reference to find these addresses?

Thanks,



George Guthrie

Media Production Specialist | Registrar of Voters

GGuthrie@washoecounty.gov | Cell: 775.512.0199

[1001 E 9th Street, Building A, Reno, NV 89512](#)

From: Logan Churchwell <LChurchwell@publicInterestLegal.org>
Sent: Thursday, April 11, 2024 2:49 PM
To: Elections Department <ElectionsDepartment@washoecounty.gov>
Subject: Official review requested under NRS 293.486(1)
Importance: High

[NOTICE: This message originated outside of Washoe County -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Dear Ms. Burgess: Please review the attached letter and exhibits and advise on next steps you plan to take in reviewing the information. Thank you.

Logan Churchwell

Research Director

Public Interest Legal Foundation

lchurchwell@publicinterestlegal.org

107 S. West Street, Suite 700

Alexandria, VA 22314