

BENSON LAW NEVADA
123 W. Nye Lane, Suite 478
Carson City, NV 89706
(775) 884-0838

1 KEVIN BENSON, ESQ.
Nevada State Bar No. 9970
2 BENSON LAW, LLC.
123 W. Nye Lane, Suite #487
3 Carson City, NV 89706
4 Telephone: (775) 884-0838
Email: kevin@bensonlawnv.com
5 *Attorneys for Plaintiff*

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ASHLEY R. HATT
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7 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
8 **IN AND FOR CARSON CITY**

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10
11 REV. LEONARD JACKSON,
12 Plaintiff,
13 v.
14 FAIR MAPS NEVADA PAC, and
15 BARBARA CEGAVSKE, in her official
16 capacity as Nevada Secretary of State,
17 Defendants.

Case No.: 1902 00209 13
Dept. No.: #

**OPENING BRIEF IN SUPPORT OF
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

18
19 Plaintiff, Rev. Leonard Jackson, by and through counsel, Kevin Benson, Esq. of BENSON
20 LAW, LLC, seeks declaratory and injunctive relief against Defendants that the Redistricting
21 Commission Initiative Petition does not comply with the requirements of state law and therefore
22 cannot appear on the general election ballot for 2020.

23 **I. FACTS**

24 On November 4, 2019, Sondra Cosgrove, in connection with Defendant Fair Maps Nevada
25 PAC, filed a constitutional initiative petition designated as #C-02-2019 by the Secretary of State. The
26 initiative petition seeks to amend the Nevada Constitution to require that redistricting be performed
27 by a commission rather than by the Legislature ("the Petition"). The Petition proposes to add a new
28

1 Section 5A to Article 4, Section 5 of the Nevada Constitution, which would be titled:
2 “Apportionment; Creation of Independent Redistricting Commission.” Petition, Section 5A.¹

3 The Petition would create the “Independent Redistricting Commission” (“Commission”)
4 within the legislative branch of state government. Petition, Section 5A(1). Starting in the year 2023,
5 the Commission would apportion the number of Senators and Assemblymen among the state
6 legislative districts and would apportion the number of representatives to the United States House of
7 Representatives among the congressional districts. *Id.*

8 The Commission would consist of seven members. Petition, Section 5A(2). The Senate
9 Majority Leader, Senate Minority Leader, Speaker of the Assembly, and Assembly Minority Leader
10 each appoint one commissioner. *Id.* These four commissioners appoint three additional
11 commissioners, each of whom has not been registered or affiliated with either of the two largest
12 political parties in the State within the last four years, and is not registered or affiliated with the same
13 political party as another commissioner. *Id.*

14 Additionally, a commissioner cannot, within the four years preceding appointment and during
15 their term on the Commission, be a registered lobbyist, a candidate for partisan office, an elected
16 official to a partisan office, an officer or member of the governing body of a political party, a paid
17 consultant or employee of a partisan elected official, candidate, PAC, or caucus, an employee of the
18 Legislature or the State of Nevada (except employees of the judicial branch, the armed forces, or a
19 state institution of higher education). Petition, Section 5A(3). Nor may a commissioner be related
20 within the third degree of consanguinity or affinity to any such individual. *Id.*

21 All meetings of the Commission must be open to the public and the Commission shall ensure
22 that the public has the opportunity to view, present testimony, and participate in the hearings before
23 the Commission. All Commission materials shall be public records. Petition, Section 5A(5).

24 The Commission shall adopt a redistricting plan not later than July 1, 2023, and thereafter not
25 later than 180 from the release of the decennial census. Petition, Section 5B(2).

26
27 _____
28 ¹ Unless otherwise noted, the citations to the text of the Petition are to the *proposed* constitutional section and subsection numbers in Section 2 of the Petition.

1 A final plan requires five affirmative votes, including votes from at least one commissioner
2 from each of the two largest political parties and one commissioner not registered or affiliated with
3 either of those parties. *Id.*

4 The Commission must draw districts according to certain criteria, and must apply those criteria
5 in the order listed in the Petition. Petition, Section 5B(1). These criteria include ensuring that, on a
6 statewide basis, the districts “do not unduly advantage or disadvantage a political party.” *Id.* The last
7 criteria that the Commission may consider is the number of politically competitive districts. *Id.*

8 The Description of Effect of the Petition states in full:

9 This measure will amend the Nevada Constitution to establish an Independent Redistricting
10 Commission to oversee the mapping of fair and competitive electoral districts for the
11 Nevada Senate, Nevada Assembly, and U.S. House of Representatives.

12 The Commission will consist of seven Nevada voters, four who will be appointed by the
13 leadership of the Nevada Legislature, and three who are unaffiliated with the two largest
14 political parties who will be appointed by the other four commissioners. Commissioners
15 may not be partisan candidates, lobbyists, or certain relatives of such individuals. All
16 meetings of the Commission shall be open to the public who shall have opportunities to
17 participate in hearings before the Commission.

18 The Commission will ensure, to the extent possible, that the electoral districts comply with
19 the United States Constitution, have an approximately equal number of inhabitants, are
20 geographically compact and contiguous, provide equal opportunities for racial and
21 language minorities to participate in the political process, respect areas with recognized
22 similarities of interests, including racial, ethnic, economic, social, cultural, geographic, or
23 historic identities, do not unduly advantage or disadvantage a political party, and are
24 politically competitive.

25 This amendment will require redistricting by the Commission beginning in 2023 and
26 thereafter following each federal census.

27 Petition, p. 3, Description of Effect.

28 II. ARGUMENT

A. Legal Standard for the Description of Effect.

NRS 295.009(1)(b) requires that every initiative “[s]et forth, in not more than 200 words, a
description of the effect of the initiative or referendum if the initiative or referendum is approved by
the voters.” The purpose of the description of effect is to “prevent voter confusion and promote
informed decisions.” *Nevadans for Nev. v. Beers*, 122 Nev. 930, 939, 142 P.3d 339, 345 (2006).

1 The description of effect must appear on every signature page. NRS 295.009(1)(b). Thus “[t]he
2 importance of the description of effect cannot be minimized, as it is what the voters see when
3 deciding whether to even sign a petition.” *Coal. for Nev.’s Future v. RIP Commerce Tax, Inc.*, No.
4 69501, 2016 Nev. Unpub. LEXIS 153, at *5 (May 11, 2016) (unpublished decision – NRAP 36(c),
5 citing *Educ. Initiative PAC v. Comm. to Protect Nev. Jobs*, 129 Nev. 35, 37, 293 P.3d 874, 876
6 (2013) and *Las Vegas Taxpayer Accountability Comm. v. City Council*, 125 Nev. 165, 177, 208 P.3d
7 429, 437 (2009)).

8 For that reason, the description of effect “must be a straightforward, succinct, and
9 nonargumentative summary of what the initiative is designed to achieve.” *Educ. Initiative*, 129 Nev.
10 at 37, 293 P.3d at 876. The district court must also analyze “whether the information contained in the
11 description is correct and does not misrepresent what the initiative will accomplish and how it intends
12 to achieve those goals.” *Id.*, 129 Nev. at 35. 293 P.3d at 883.

13 **B. The Description of Effect inaccurately states that the Commission would be**
14 **“independent,” and therefore is misleading.**

15 The first sentence of the Petition’s description of effect states in relevant part: “This measure
16 will amend the Nevada Constitution to establish an **Independent** Redistricting Commission.”
17 (Emphasis added.) However, the Commission is not independent, thus that statement is inaccurate
18 and seriously misleading. The Commission is not independent for two main reasons: its composition
19 and its funding.

20 1. **The Commission is not independent because legislative leadership would directly**
21 **appoint a majority of the commissioners.**

22 First, a majority of the Commission is directly appointed by the major parties’ legislative
23 leadership. Petition, Section 5A(2). The Petition prohibits certain politically-active people from
24 serving as commissioners. *See* Petition, Section 5A(3) (prohibiting from serving those who in the
25 previous four years have been partisan candidates or elected officials, lobbyists, most state
26 employees, paid political staff, etc., and their close relatives). These exclusions only prevent a certain
27 sub-set of politically-involved people from serving on the Commission. For example, it does not
28 prevent a legislator from appointing a campaign volunteer, nor does it prevent county commissioners

1 or city council members from being appointed. The exclusions do not create independence because
2 the appointments are still directly made by legislative leadership. Thus the exclusions do nothing to
3 ensure that appointees are insulated from political pressures, are not beholden to the legislative
4 leadership, and do not stand to gain personally or politically from serving on the Commission.

5 The composition and selection of the Commission as proposed in the Petition is contrary to
6 truly “independent” redistricting commissions that have been adopted in other states. Four other
7 states have given primary redistricting responsibility to independent commissions. In each of them,
8 the independence of the commissioners is ensured by having a body *other than* the legislative
9 leadership either appoint the commissioners directly, or create the pool from which commissioners
10 are chosen.

11 In Arizona, the commission on appellate court appointments creates an initial pool of 25
12 nominees, ten from each of the two largest parties, and five not from those two parties. Ariz. Const.
13 art. IV, pt. 2, § 1(4), (5). Legislative leadership can only appoint commissioners from this pool. *Id.* at
14 (6).

15 In Colorado, a panel of three retired appellate court justices or judges randomly select
16 nominees from all applicants who meet the minimum qualifications, then the panel creates pools for
17 each of the two major parties and for nonpartisans. Colo. Const. Art. V, Section 44.1. Applicants are
18 selected based on, among other things, their experience, analytical skills, and ability to remain
19 impartial. *Id.* at 44.1(8)(1),(2). The panel of judges must ensure that the commission reflects
20 Colorado’s racial, ethnic, gender, and geographical diversity. *Id.* at 44.1(10). Legislative leadership
21 can choose sub-pools from their respective party’s pool, but ultimately the panel of retired judges
22 make the final selection. *Id.* at 44.1(8)-(10).

23 In California, Proposition 11 of 2008 amended the California Constitution to create the
24 Citizens Redistricting Commission. That amendment expressly states: “The selection process is
25 designed to produce a commission that is independent from legislative influence and reasonably
26 representative of this State’s diversity.” Cal. Const. Art. XXI, Section 2(c)(1). Government auditors
27 create a pool from the qualified applicants. Cal. Govt. Code § 8252. Legislative leadership can reduce
28 the pool, but then the auditors pick a majority of the commissioners by lottery, and those

1 commissioners appoint additional commissions from the remaining members of the pools, who form
2 a minority of the commission. *Id.*

3 In Michigan, the secretary of state must make the application to serve as a commission widely
4 available to the general public in all areas of the state. Mich. Const., Art. IV, § 6. The secretary of
5 state must also mail 10,000 applications to randomly selected voters. *Id.* The secretary of state then
6 creates the pools by randomly selecting from the qualified applicants, but shall also use accepted
7 statistical methods to ensure that the pool represents the geographical and demographic diversity of
8 the state. *Id.* Similar to California, legislative leadership can reduce the pools by striking a certain
9 number of names, but the secretary of state, by lottery, makes the final selections of commissioners
10 from the remaining pool. *Id.*

11 Additionally, most states prohibit commissioners from running for partisan office or being
12 appointed to an office or government employment for a certain period of time *after* serving on the
13 commission. *See e.g.*, Ariz. Const. art. IV, pt. 2, § 1(13) (ineligible for public office and cannot be a
14 paid lobbyist for three years after serving); Cal. Const. Art. XXI, Section 2(c)(6) (ineligible for office
15 for 5 to 10 years, depending on the office); Mich. Const. Art. IV § 6(1)(e). This reduces the incentive
16 for commissioners to draw maps that would favor their own future political ambitions.

17 By contrast, the Petition in this case: (1) allows legislative leadership to directly appoint a
18 majority of the Commission; (2) allows the commissioners to run for an office for which they just
19 finished drawing new districts; and (3) allows the commissioners to be appointed to an office or any
20 other government position immediately after completing redistricting. Thus the Petition permits
21 substantial political influence over individual commissioners and the Commission itself. Nor does the
22 Petition prevent individual commissioners from acting solely for their own political interests.

23 2. The Commission is not independent because it has no independent funding.

24 Redistricting is an expensive and difficult process. *See* “Reapportionment and Redistricting,”
25 Legislative Counsel Bureau Bulletin No. 11-04 (January 2011).² It requires a huge amount of data,
26 staff with technical expertise, and specialized software. *Id.* Additionally, the Commission would
27

28 ² Available at: <https://www.leg.state.nv.us/Division/Research/Publications/InterimReports/2011/Bulletin11-04.pdf>

1 require administrative staff to manage its materials, schedule, notice, and hold its meetings, and
2 respond to requests and input from the public. The Commission will also need legal guidance to
3 ensure that it complies with the Voting Rights Act and other federal requirements, as well as the
4 requirements in the Petition.

5 Despite these substantial costs, the Petition does not provide for any funding or funding
6 mechanism for the Commission. In fact, the Petition does not require that the Commission be funded
7 at all. Again, this contrasts starkly with truly independent commissions in other states.

8 For example, the Michigan Constitution mandates that the legislature shall fund the
9 commission, and sets forth a formula for the amount. It states: “the legislature **shall** appropriate funds
10 sufficient to compensate the commissioners and to enable the commission to carry out its functions,
11 operations and activities, which activities include retaining independent, nonpartisan subject-matter
12 experts and legal counsel, conducting hearings, publishing notices and maintaining a record of the
13 commission's proceedings, and any other activity necessary for the commission to conduct its
14 business, **at an amount equal to not less than 25 percent of the general fund/general purpose**
15 **budget for the secretary of state for that fiscal year.”** Mich. Const. Art. IV § 6(5) (emphasis
16 added).

17 Other states have similar language, and also mandate that the legislature fund the commission
18 adequately to ensure that it can carry out its duties.

19 California requires that the legislature appropriate funds for the commission according to a
20 formula, but in no event less than \$3 million for each cycle of redistricting. Cal. Govt. Code. §
21 8253.6.

22 The Arizona Constitution similarly requires that the legislature fund the commission, and
23 mandates that it be appropriated \$6 million for its first year of operation. Ariz. Const. Art. 4, Part 2,
24 Section 1(18). The commission has express authority to challenge the sufficiency of the funding
25 appropriated. *Id.*

26 The Legislature is the branch of government that holds the purse strings. *State Emps. Ass'n v.*
27 *Daines*, 108 Nev. 15, 21, 824 P.2d 276, 279 (1992). As such, it has tremendous power to control the
28 Commission by deciding whether, when, how much, and for what purposes to appropriate money for

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1 the Commission. Likewise, it can direct the Legislative Counsel Bureau whether or not provide
2 assistance to the Commission. *See* NRS 218F.110 (LCB staff hired and duties defined pursuant to
3 budget approved by Legislative Commission).

4 In the context of the separation of powers doctrine, the Nevada Supreme Court has recognized
5 that the judiciary cannot truly function as an independent branch of government if it is not able to
6 require the disbursement of funds necessary to carrying out its basic duties. *State ex rel. Harvey v.*
7 *Second Judicial Dist. Ct.*, 117 Nev. 754, 770, 32 P.3d 1263, 1273 (2001). Similarly here, the
8 Commission cannot operate independently of the Legislature if it has no independent control of the
9 funding necessary to perform its duties. Indeed, the problem is exacerbated in this case because the
10 Petition declares the Commission to be part of the legislative branch and to be executing legislative
11 powers. Petition, Section 5A(7). That raises the question of whether it would itself be a violation of
12 the separation of powers doctrine should a court attempt to order the Legislature to fund the
13 Commission, or fund it in any particular way or amount. *Cf. Ariz. Const. Art. 4, Part 2, Section 1(18)*
14 *(expressly granting the commission standing in court and the power to challenge the adequacy of its*
15 *funding).*

16 3. The Description of Effect is inaccurate and misleading because the Commission is
17 not “independent.”

18 “[A]n initiative petition signer must be informed at the time of signing of the nature and effect
19 of that which is proposed. Failure to so inform the signatories and voters is deceptive and
20 misleading...” *Stumpf v. Lau*, 108 Nev. 826, 833, 839 P.2d 120, 124 (1992) (internal quotations
21 omitted).

22 The Petition’s Description of Effect states that the Petition would establish an “independent”
23 redistricting commission. The Description of Effect is invalid because it would mislead voters into
24 believing that the Commission is independent from the political influence of the Legislature and other
25 officials, when in fact it is not.

26 As discussed above, the Commission is not “independent” because a majority of the
27 Commission is directly appointed at the sole discretion of the legislative leadership. Additionally, the
28 Petition does not prevent Commissioners from running for or being appointed to an office

1 immediately after redistricting is complete. Finally, the Petition does not require that the Commission
2 be funded. Consequently, the Legislature will be able to exercise substantial, if not total, control over
3 the Commission by determining whom to appoint and how or whether to fund the Commission.

4 This case is closely analogous to *Las Vegas Taxpayer Accountability v. City Council of Las*
5 *Vegas*, 125 Nev. 165, 183-84, 208 P.3d 429, 441 (2009). In that case, the description of effect stated
6 that the petition would prevent the redevelopment agency from undertaking any *additional*
7 redevelopment projects in a certain area. *Id.* However, the actual effect of the petition would be to
8 stop *all* redevelopment projects, including those already underway. *Id.* The court held that the
9 description of effect was inaccurate and materially misleading and it invalidated the petition. *Id.*

10 In this case, the Description of Effect states that the Commission will be “independent,” but
11 the text of the Petition itself shows that to be an inaccurate statement of the Petition’s effect. Like in
12 *Taxpayer Accountability*, that inaccuracy renders the Description of Effect materially misleading
13 because the independence of the Commission is a critical factor for voters in determining whether to
14 support to the Petition. Accordingly, this Petition therefore violates NRS 295.009(1)(b) and cannot be
15 placed on the ballot.

16 **C. The Description of Effect inaccurately states that the Commission will create “fair**
17 **and competitive” districts.**

18 The U.S. Supreme Court recently held, again, that partisan gerrymandering presents a non-
19 justiciable political question. *Rucho v. Common Cause*, 139 S. Ct. 2484, 2506-07 (June 27, 2019).
20 Accordingly, the federal laws and the U.S. Constitution do not provide voters with any relief from
21 unfair partisan gerrymanders. The Petition’s Description of Effect represents that it will end partisan
22 gerrymandering in Nevada by creating “fair and competitive electoral districts.” But this is a promise
23 it cannot and will not keep. The Description of Effect is materially misleading because in fact the
24 Petition requires neither fairness nor competitiveness.

25 The Petition sets forth various criteria that the Commission must use when creating districts.
26 *See* Petition, 5B(1). The Petition states that the criteria must be followed in the order listed in the
27 Petition. *Id.* Most of these criteria reflect the general federal requirements to comply with the Voting
28 Rights Act and the one-person, one-vote doctrine. *See id.* In addition to these minimum requirements,

1 the Petition states that the Commission should ensure that the districts “do not unduly advantage or
2 disadvantage a political party.” *Id.* By use of the term “unduly,” it is clear that the Petition is designed
3 and intended to tolerate **un**fairness between the political parties. The Petition sets forth no definitions
4 or mechanism for determining when a party is “unduly” advantaged or disadvantaged. There will
5 obviously be disagreement on that question, and the lack of any guidelines leaves every plan open to
6 being challenged through litigation.

7 The Petition also invites other types of unfairness, besides partisan bias. The Petition contains
8 no requirements that the Commissioners fairly represent Nevada’s racial, language, ethnic, gender,
9 geographic, or demographic diversity. All of the Commissioners could be white, male, wealthy
10 residents of Las Vegas, for example. This would leave all other Nevadans without any formal
11 representation in drawing districts that, among other things, are supposed to keep communities intact,
12 while also ensuring that minorities retain their political voice.

13 Finally, partisan competitiveness is the very *last* of the criteria that the Commission is to
14 consider when drawing districts. The Petition provides that the criteria must be applied in the order
15 presented, so competitiveness will always be the last item considered. Petition, 5(B)(1). The Petition
16 in fact expressly makes competitiveness subordinate to all other criteria. *Id.* And most importantly,
17 the Petition does not even require that the Commission create competitive districts, and instead
18 instructs it to “consider” competitiveness “to the extent practicable.” *Id.*

19 In conclusion, the Description of Effect is inaccurate and materially misleading because it
20 states that the Commission will create “fair and competitive electoral districts,” but the Petition does
21 not in fact require “fairness,” nor does it require “competitive” districts. Voters will therefore be
22 misled into believing that the Petition will prevent partisan gerrymandering and that the Commission
23 will create truly fair and nonpartisan maps, when it actually need not do so.

24 **D. The Description of Effect is Invalid Because it Fails to Inform Voters of the Cost of**
25 **the Commission.**

26 As described above, the Petition does not provide for funding or any funding source for the
27 Commission. But in order to operate, the Commission necessarily needs funding. Redistricting is
28 complex and expensive, requiring specialized software and often involving special experts to analyze

1 the data. *See* LCB Bulletin No. 11-04, *supra* at 6. As described above, other states expressly require
2 the legislature to fund the commission, and typically set forth a formula intended to ensure that the
3 funding is adequate. Several years ago, California set a baseline of \$3 million, while Arizona used a
4 baseline of \$6 million.

5 However, the Description of Effect fails to describe any of these costs, nor does it notify voters
6 of these costs. Furthermore, the Petition is likely to generate more litigation over the validity of the
7 maps drawn by the Commission, because it states that no political party should be “unduly”
8 advantaged or disadvantaged, but provides no guidelines, safe harbors, or other mechanism for the
9 parties or the courts to evaluate when that criterion has been satisfied or when it has been violated.
10 This type of litigation will further increase the costs of redistricting.

11 Additionally, the Description of Effect fails to inform voters that the Commission will “undo”
12 whatever maps are drawn by the Legislature in 2021. The Description of Effect states that the
13 Commission will begin drawing maps in 2023, but fails to describe the practical consequence: that
14 the Legislature will have just drawn new districts 2021, which will only be operative for the 2022
15 election, and then the Commission will immediately start redrawing the maps. Thus the State will
16 potentially spend twice the resources (or more) as it would normally on redistricting efforts in the
17 three-year period following the 2020 census.

18 In *Coal. for Nev.'s Future v. RIP Commerce Tax, Inc.*, No. 69501, 2016 Nev. Unpub. LEXIS
19 153, at *5 (May 11, 2016) (unpublished decision – NRAP 36(c)), the Nevada Supreme Court held
20 that a referendum’s description of effect was deceptive because it failed to inform voters of its
21 practical consequences. The referendum’s description of effect accurately summarized the *legal*
22 effect it would have: it would repeal the commerce tax. *Id.* at *9-10. However, the description of
23 effect contained no description of the *practical* consequences of repealing the commerce tax, which
24 would be to unbalance the state budget for the biennium. *Id.* The court therefore held that the
25 referendum’s “description is deceptive for failing to accurately identify the practical ramification of
26 the commerce tax's disapproval.” *Id.*

27 It is not enough for a petition’s description of effect to merely recite or summarize the
28 petition’s language. *See id.*; *Prevent Sanctuary Cities v. Haley*, 421 P.3d 281, No. 74966, 2018 Nev.

1 Unpub. LEXIS 442, at *9-10 (May 16, 2018) (unpublished decision – NRAP 36(c)). The purpose of
2 the description of effect is to inform the voters of the practical ramifications of the petition. Failure to
3 do so renders the description of effect deceptive and misleading.

4 Like in *RIP Commerce Tax* and *Prevent Sanctuary Cities*, the Petition’s Description of Effect
5 simply repeats the language of the Petition without actually informing voters of the Petition’s real
6 consequences. These practical consequences include at potentially doubling the cost of redistricting
7 for the 2020 census, and failing to inform voters that the Commission will require substantial
8 taxpayer funding to carry out its duties. Therefore, like the petitions in *RIP Commerce Tax* and
9 *Prevent Sanctuary Cities*, the Petition must be declared invalid for failure to comply with NRS
10 295.009(1)(b).

11 **III. CONCLUSION**

12 For the reasons discussed above, Plaintiff respectfully requests that the Court enter an order:

- 13 1. Declaring that the Petition does not comply with NRS 295.009(1)(b) and is therefore
14 invalid;
15 2. Prohibiting the Secretary of State from placing the Petition on any ballot; and,
16 3. Granting any other relief the Court deems just.

17 Dated this 26th day of November, 2019.

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19 BENSON LAW, LLC

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21 By: 
22 KEVIN BENSON, ESQ.
23 Nevada State Bar No. 9970
24 123 W. Nye Lane, Suite #487
25 Carson City, NV 89706
26 Telephone: (775) 884-0838
27 Email: kevin@bensonlawnv.com
28