

EXHIBIT A

EXHIBIT A

AFFIDAVIT OF JOSEPH PAUL GLORIA

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

JOSEPH PAUL GLORIA, having been duly sworn states as follows:

1. That I am the Registrar of Voters of Clark County, Nevada and I make this affidavit in that capacity.
2. That the Clark County Registrar of Voters is responsible for the printing and mailing of the mail/absentee ballots and sample ballots, as well as the preparation of all voting equipment used by the voters in Clark County.
3. That printing, proofing, and preparing mail/absentee ballots requires a substantial amount of time to insure accuracy. Because Nevada statutes require we report election results by precinct, Clark County mail/absentee ballots are prepared by precinct, thus necessitating 1,116 printed ballot versions with each ballot individually numbered. Preparation for printing takes four to five days of work to setup the files and proof the data for accuracy. After printing, the ballots are trimmed, folded, and tracked for any damage from the production process that may require reprinting to meet the necessary order quantities for the election. Finally, an insertion machine inserts each mail/absentee ballot along with voting instructions into an envelope.
4. That upon delivery of the mail/absentee ballots to the Clark County Election Center, such ballots must be sorted into 1,116 different, applicable trays, inventoried, and randomly proofed to ensure the appropriate ballot versions are in the proper envelopes. This process normally finishes three days after the last delivery of ballots.
5. That Nevada Color Litho (NCL) is our printer and it is the only printer in the state of Nevada certified to print mail/absentee ballots. NCL's normal production mode is 12 to 18 hours per day, 5 to 6 days per week. If we require "rush" mode printing, NCL works 24/7, including holidays. In "rush" mode, an increasing percentage of NCL's non-election work from (other customers) becomes displaced until eventually the entire plant is devoted exclusively to election-related printing. When this happens, internal overtime increases, outsourcing and all of its associated costs increases, and additional temporary staff must be hired. NCL estimates "rush" mode increases job costs from 2% to 10% per day of the total printing cost, depending upon how compressed the schedule is and the extent of additional resources that must be devoted to printing our material.
6. That Federal law and NRS 293D.320(1) mandate that mail/absentee ballots must be mailed to military and overseas voters not later than 45 days before the date of the General Election and, for the upcoming November 8, 2016 General Election that date is September 24, 2016. To allow the Clark County Election Department adequate time to inventory, sort,

and quality control the mail/absentee ballots we receive from NCL, the delivery of these ballots must be no later than September 16, 2016.

7. That August 25, 2016 is the last date for the Clark County Election Department to provide the mail/absentee ballot files to NCL for normal production mode printing and subsequent delivery of all mail/absentee ballots to the Election Center by September 16, 2016. As previously stated, after August 25, costs begin increasing until they reach the maximum "rush" mode rate on September 1. After September 1, NCL cannot meet the September 16 deadline, *even in "rush" mode*. Each additional day after September 1 that NCL does not receive the mail/absentee ballot files extends the delivery date another day beyond September 16. Although we will do all we can to expedite processing of overseas ballots, each day after September 1 equates to a day subtracted from the state and federal requirements to mail overseas ballots 45 days before Election Day.

8. That for normal production mode printing, August 15, 2016 is the last date for the Clark County Election Department to receive ballot questions and related information for the supplemental ballot question booklet that we provide with each mail/absentee ballot. This booklet contains the questions with corresponding explanations and arguments for and against passage. Additionally, the Department of Justice requires Clark County to provide all election materials in Spanish and Filipino, as well as English. If Clark County is responsible for translation, we will need the complete text for the booklet a minimum of 10 days prior to the August 25, 2016 date by which we will send it to NCL for normal production mode printing.

9. That in addition to printing and mailing mail/absentee ballots, the Clark County Election Department is responsible for support of the entire election process. This includes, but is not limited to, the printing and mailing of up to 1,000,000 sample ballot booklets that contain, among other things, ballot questions, corresponding explanations, and arguments for and against passage. For early voting and Election Day voting, we must program, proof, and conduct statutorily required pre-election logic and accuracy testing for approximately 4,500 voting machines that contain ballot questions and contests. Every day of delay increasingly compresses the preparation schedule and that in turn increases potential errors that could affect the election outcome. We do everything possible to achieve our goal of an error-free election. Nevertheless, the reality is that a 24-hour schedule and corresponding reduction in time available for quality control will increase the potential for error. Conducting a successful election has become incredibly complex in a county the size of Clark County. Adequate preparation time is critical to our ability to provide this county's residents with the high-quality, professional elections they deserve and expect.

FURTHER AFFIANT SAYETH NAUGHT.

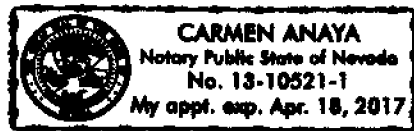

JOSEPH PAUL GLORIA

REGISTRAR OF VOTERS
CLARK COUNTY, NV

SUBSCRIBED and SWORN before me

this 28th day of June, 2016.


NOTARY PUBLIC



IN THE SUPREME COURT OF THE STATE OF NEVADA

NO SOLAR TAX PAC, A NEVADA
COMMITTEE FOR POLITICAL
ACTION,

Appellant,

vs.

CITIZENS FOR SOLAR AND
ENERGY FAIRNESS, A NEVADA
COMMITTEE FOR POLITICAL
ACTION; AND BARBAR
CEGAVSKE, IN HER OFFICIAL
CAPACITY AS THE NEVADA
SECRETARY OF STATE,

Respondents.

Electronically Filed
Jun 29 2016 03:46 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

Case No. 70146

**AFFIDAVIT OF WAYNE THORLEY,
ELECTION DEPUTY, NEVADA SECRETARY OF STATE**

STATE OF NEVADA)
 : ss.
CARSON CITY)

I, WAYNE THORLEY, do hereby swear under penalty of perjury that the following assertions are true to the best of my knowledge and belief:

1. I am the Deputy Secretary of State for Elections. I make this affidavit in response to this Court's Order of June 24, 2016,

wherein the Court required the Secretary of State to inform the Court of the deadlines for preparation, printing, and circulation of the applicable ballots. I make this affidavit upon personal knowledge and on behalf of the Secretary of State, Barbara Cegavske.

2. Each county clerk or registrar of voters is responsible for the printing and mailing of the absentee ballots and sample ballots, and preparation of all voting equipment used by the voters in their county. Each clerk or registrar or voters, may choose their own state certified printer and each printer may have different timing requirements for printing the ballots. The population of each county impacts the scheduling because the greater the population, the greater the number of ballots that must be prepared, printed, and distributed.

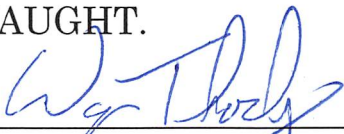
3. Clark County has the largest population of voters, more voter precincts and more ballot styles than any other county in the state.

4. The Affidavit of Joseph Paul Gloria, Clark County Registrar of Voters, attached as Exhibit A, sets forth the timing requirements for this upcoming general election in Clark County where there are 1,116 voting precincts.

5. The Citizens for Solar and Energy Fairness referendum petition, which is the subject of this appeal, is a state-wide measure and must be included in the ballots for all counties, including Clark County. As a result, the deadlines outlined by Mr. Gloria are the most accurate and reasonable deadlines available to ensure that all ballots in Nevada are accurately printed and ready for distribution to absentee and overseas voters as required by state and federal election laws.

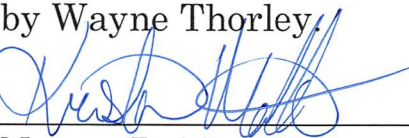
6. Based upon the information available, the deadline for the Secretary of State to provide the text and related information on any state-wide ballot question to the various county clerks and registrars of voters in order to avoid extraordinary expense and increased risk of error is August 15, 2016.

FURTHER AFFIANT SAYETH NAUGHT.

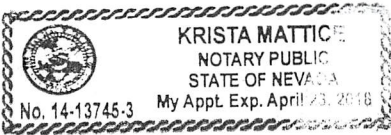


WAYNE THORLEY
Deputy Secretary Of State

SIGNED and SWORN to before
me on the 29th day of June, 2016,

by Wayne Thorley


Notary Public



CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this this 29th day of June, 2016, I served a copy of the foregoing AFFIDAVIT OF WAYNE THORLEY, ELECTION DEPUTY, NEVADA SECRETARY OF STATE, by electronic service to:

KEVIN BENSON, ESQ.
White Hart Law
2310 South Carson Street, Suite 6
Carson City, Nevada 89701
Email: kbenson@whitehartlaw.com

JAMES R. CAVILIA, ESQ.
JUSTIN TOWNSEND, ESQ.
Allison MacKenzie, Ltd.
Post Office Box 646
Carson City, Nevada 89702
Email: jcavilia@allisonmackenzie.com
jtownsend@allisonmackenzie.com
sprice@allisonmackenzie.com

/s/ Dorene A. Wright