

Nevada

The 22nd Amendment to the Constitution, which limits a person to being elected to the presidency two times, and sets additional eligibility conditions for presidents who succeed to the presidency, was voted out of Congress by a supermajority vote in both chambers. Between 1947 and 1951, the 22nd Amendment was ratified by 41 state legislatures and officially came into effect after 36 states ratified the amendment in February 1951. Since the history of the 22nd Amendment's passage and the intent of those who ratified it has become relevant again, this factsheet is part of a series covering each state's ratification process.

Nevada's consideration of the 22nd Amendment:

- Nevada's legislature voted to ratify the 22nd Amendment on February 26, 1951, becoming the 36th state to do so, officially crossing the three-fourths threshold to become part of the Constitution.
- Joint Resolution No. 6 to ratify the amendment was introduced in the Assembly on January 31, 1951 by Representatives Cada Castolas Boak (R), Frank A. Buol (R), M.A. (Tiny) Fairchild (R), Samuel Boyd Francovich (R), George H. Hawes (R), Charles A. Hendel (R) and James C. Perkins (R).
- On February 26, 1951, the Assembly voted to pass the resolution ratifying the 22nd Amendment 29 to 12, including nine Democrats.
- Later that day, the Senate also voted in a bipartisan manner to ratify the amendment by a margin of 16 to 1.
- As the *Nevada State Journal* reported, the Republican controlled Senate gave "lifelong Democrat" Senator John Robbins the privilege of making the motion to ratify the amendment and to consider it as an emergency measure for approval.
- Senator Robbins said: "Some have given the measure the stigma of partisan politics. To me there is no such stigma. As a Democrat, active in Nevada Democratic circles for more than 40 years, I'd like to remove that stigma. I consider it a real honor that this Republican controlled Senate has picked me to make the motion to ratify the 22nd Amendment."

Nevada Vote Changes Constitution of U. S.

Silver State Becomes 36th to Ratify Law Limiting Presidential Terms

By ROBERT BENNHOFF, United Press Staff Correspondent

CARSON CITY, Feb. 26 (UPI)—Nevada, the 36th state to have ratified the 22nd amendment, became the 36th state to ratify the constitutional amendment limiting the president to two terms.

At 5:30 p.m., the Nevada senate voted 16 to one to pass the resolution ratifying the 22nd amendment. Earlier in the day, the assembly adopted the same resolution by a vote of 29 to 12, including nine Democrats.

Gov. Cliff Jones, a publican who took office Jan. 1 and who had been a member of the legislature, told Wayne Grover, chief archivist of the United States, that Nevada had become the 36th state to ratify the 22nd amendment, putting it in effect.

Waited Three Hours

The Nevada senate had waited for more than three hours for word from Utah, which only a few minutes earlier had become the 35th state to ratify the amendment.

Lieutenant Governor Cliff Jones of Las Vegas, who had been in the senate, telephoned the president of the Senate and was told the measure was to be voted on shortly. Jones was told that the Senate would be "happy to let Nevada become the 36th state to ratify."

The senate then recessed and when informed by United Press of the Utah action, voted 16 to one to pass 14 to eight, went immediately into session.

Five minutes later, the senate voted 16 to one to approve the amendment immediately.

Under the amendment, so, ratification of the 22nd amendment had been regarded by most Nevada lawmakers as a simple, almost technical issue. The Democrats, who hold a slight majority in the senate, had one time caucused and pledged all party members to vote against ratification.

However, after an appeal from Sen. John D. (Duke) Ritter, a Democratic rancher, that "this nation has too much for partisan politics," the Democrats held a special caucus today and released the pledge.

Nine Democrats joined 20 Republicans in voting to ratify. The record of the measure was sent to the senate.

Senate Act Swift

The house, where 29 Republicans held a 11 to six majority, acted quickly. Sen. John E. Robbins, an Elko Democrat and dean of the senate, moved that the measure be considered an emergency measure and that all sections be voted on at once.

"There seems to have been some tight partisan politics involved," Robbins said. "I think it was connected with this man [Robbins] who was nominated for president."

After a brief debate, the roll call was as follows:

For ratification: Boak, Buol, Byers, Capurso, Carson, Chapman, Couthard, Crawford, Danner, Dickey, Dugan, Frazier, Hawes, Hendel, Hunsaker, Jones, Lester, Lohman, McElroy, Ogle, Pritchett, Rangi, Wiley, Rosevear, Shattock, Turner, Vicks, Wadsworth, Williams.

Against ratification: Anderson, Barlow, Christensen, Edwards, Hawing, House, Johnson, Melody, Olson, Smith, and Swanson.

Not voting: Huggins, Nease, Severs.

\$68,355.34 Is Paid To War Prisoners

Total of \$68,355.34 has been paid by the War Claims Commission to 1,000 World War II veterans of war. The payments are being made under the Veterans' Compensation Act of 1948, according to S. C. Pat

The deadline for filing claims is March 1. It was emphasized that the money will be paid to the veterans and that of that date will not be accepted. The money will be paid to the War Claims Commission. Claim forms may be obtained through local Veterans Administrations offices or by writing to the War Claims Commission, Washington 25, D. C.

- The Senate went into recess and waited for confirmation that Utah voted to ratify the amendment in order for Nevada to become the 36th ratifying state.
- In a February 27, 1951 article [headlined](#) "Truman Gets Last Shot at Three Terms," The Nevada State Journal reported on the passage noting: "Final adoption of the 22nd amendment through action of the Nevada legislature left President Truman today as the last man who can aspire to more than two terms in the nation's biggest job."
- Despite the 22nd Amendment's exemption for the incumbent Truman, contemporaneous reporting indicated, "[s]ome politicians believe, though, that ratification presents an ethical obstacle to his seeking another term on the basis that it reflects widespread feeling that more than eight years is too long for any man."

Cases involving the 22nd Amendment in Nevada:

- The only relevant Nevada case law addressing the 22nd Amendment reaffirms that "the President is limited to two terms of office."
- In [*Harris v. Democratic Nat'l Comm.*](#), the plaintiff sued both the Democratic National Committee and the Republican National Committee for violating the 22nd Amendment and the Sherman Act based on the assertion that the president has been a member of one of those two parties since the nineteenth century. [No. 2:25-CV-00428-MMD-NJK, 2025 WL 1189770 \(D. Nev. Apr. 24, 2025\)](#), [appeal dismissed, No. 25-2888, 2025 WL 2237448 \(9th Cir. July 30, 2025\)](#).
- The court dismissed the case with prejudice due to frivolity, explaining: "[T]he 22nd Amendment, on its face, applies to 'person[s]', not the parties to which they belong. U.S. Const. amend. XXII(1). This view is broadly held. See, e.g., Ronald D. Rotunda, John E. Nowak, *Treatise on Constitutional Law - Substance & Procedure*, § 9.19(d)(i) *Popular Efforts to Impose Term Limits*, 2 *Treatise on Const. L.* § 9.19(d)(i) (Jul. 2024 Update) ('[T]he U.S. Constitution, since 1951, provides that the President is limited to two terms of office.') (footnote omitted).'" [2025 WL 1189770](#), at *1.