

CASE NO: A-20-825067-P
Department 32

PET
CRAIG A. MUELLER, ESQ.
Nevada Bar No. 4703
MUELLER & ASSOCIATES, INC.
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Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

APRIL BECKER, as an individual, as a
Candidate for NEVADA STATE SENATE
DISTRICT 6, and as a Voter in Clark
County, Nevada,

Case No.:

Dept No.:

Plaintiffs,

vs.

**STATEMENT OF CONTEST OF THE
NOVEMBER 3, 2020 ELECTION
PURSUANT TO NRS.293.407 AND 293.410**

NICOLE CANNIZZARO, an individual and
as Candidate for NEVADA STATE
SENATE DISTRICT 6, DOES I through X,
and ROE CORPORATIONS I through X,
inclusive,

Defendants.

COMES NOW APRIL BECKER, as a voter and as a Candidate for Senate District 6, by
and through counsel CRAIG A. MUELLER, ESQ., of Mueller and Associates, Inc, and files this
written statement of contest with the clerk of district court pursuant to NRS 293.407:

- (a) The name of the contestant is APRIL BECKER, and that APRIL BECKER is a registered
voter of the political subdivision in which the election to be contested or part of it was held;
- (b) The name of the defendant is NICOLE CANNIZZARO;
- (c) The office to which the defendant NICOLE CANNIZZARO was declared elected is the
NEVADA STATE SENATE DISTRICT 6;
- (d) Plaintiff contests the particular grounds of contest as identified in the section of Nevada
Revised Statutes 294.410(2)(c).

NRS 293.410 Statement of contest must not be dismissed for deficiencies of form; grounds for contest.

1. A statement of contest shall not be dismissed by any court for want of form if the grounds of contest are alleged with sufficient certainty to inform the defendant of the charges the defendant is required to meet.

2. An election may be contested upon any of the following grounds:

(a) That the election board or any member thereof was guilty of malfeasance.

(b) That a person who has been declared elected to an office was not at the time of election eligible to that office.

(c) That:

(1) Illegal or improper votes were cast and counted;

(2) Legal and proper votes were not counted; or

(3) A combination of the circumstances described in subparagraphs (1) and (2) occurred.

in an amount that is equal to or greater than the margin between the contestant and the defendant, or otherwise in an amount sufficient to raise reasonable doubt as to the outcome of the election.

...

Plaintiff asserts that evidence shows there were illegal or improper votes cast and counted, and that legal and proper votes were not counted; and a combination of the circumstances described in subparagraphs (1) and (2) occurred to the extent that the Board of County Commissioners, Clark County Nevada, could not and would not certify the ballot tabulations in CLARK COUNTY COMMISSION DISTRICT C ("Commission District C").

SEE EXHIBIT 1. Plaintiff was a candidate in NEVADA STATE SENATE DISTRICT 6 ("Senate District 6"). Senate District 6 lies directly within Commission District C. **SEE EXHIBIT 2.**

On November 16, 2020, the Registrar of Voters, Joseph P. Gloria ("Registrar Gloria") presented the results of the canvas for the 2020 General Election to the Board of County Commissioners, Clark County, Nevada ("the Board"). At the Hearing, the Registrar Gloria confirmed there were many discrepancies and revealed the following:

Registrar of Voters Joe Gloria delivered a full report to county commissioners in Monday's special meeting. The report is required by law, and Gloria revealed the following discrepancies:

- 936 in ballots
- 710 with mail-in precincts
- 121 in early voting precincts
- 105 on Election Day
- 6 voters voted twice

1 Gloria stated that they had found the discrepancies in tracking, moving from signature to
2 manual signature verifications, as well as in the ballot curing process. Some of the
discrepancies found in the early voting and election day results included:

- 3 • Inadvertent canceled votes
- 4 • Voter check-ins
- 5 • Reactivated voter cards
- 6 • Duplicate activations
- 7 • Check-in errors

8 Gloria also noted there were 60,109 provisional ballots cast in the election. He said 57,866 of
9 these ballots were accepted, and 2,243 were rejected. He cited the following reasons for
10 rejections:

- 11 • 115 voters had already voted
- 12 • 142 voted in wrong district or wrong precincts
- 13 • 8 were not eligible to vote
- 14 • 1,925 were not registered to vote
- 15 • 53 did not provide adequate proof-of-residence or a valid identification

16 A provisional ballot is cast by a voter who believes they are registered, but does not appear as
17 registered. A provisional ballot can also be issued when there are questions about a voter's
18 eligibility to vote.

19 Gloria said some discrepancies are not uncommon, especially with mail-in balloting on this
20 scale¹

21 A transcript of the proceedings confirms the discrepancies and Registrar Gloria's
22 statement "We have found discrepancies that we can't explain that would cast a doubt on
23 whether or not that margin of victory is solid". **See EXHIBIT 3.** Plaintiff requested a recount of
24 the ballots at the hearing of contest under NRS 293.423. However, the Registrar Gloria stated
25 that a recount would not change the discrepancies that were identified.

26 The above referenced discrepancies identified by Registrar Gloria are not the only issues.
27 There were many more other voting irregularities identified within Senate District 6, which were
28 discussed at the Hearing and outlined in a Writ Petition ("Writ") attached as **EXHIBIT 4** and
incorporated by reference as fully set forth herein. As discussed in the Writ, there is no statutory
authority for mechanical signature verification. The Nevada Constitution Election Ordinance

¹ <https://www.8newsnow.com/news/local-news/clark-county-to-certify-election-at-1-p-m/>

1 and NRS Chapter 293, as amended by Section 23 of Assembly Bill 4 (“AB4”) requires that the
2 clerk or employee “shall” check the signature used for the mail ballot. However, Registrar
3 Gloria, with no authority, decided to use a mail ballot processing machine with signature
4 recognition software (“Agilis”) to verify signatures on the mail ballot, instead of a person as
5 required by statute. The use of the Agilis mail ballot processing system by Registrar of Voter
6 Joseph Gloria for signature verification amounts to a violation of the voter election laws and
7 compromised of the integrity of the voting procedures in Nevada and counting of the ballots cast
8 by the voters.
9

10 To compound error on top of error, the Clark County Election Department, again with no
11 authority, lowered the factory settings on its signature verification machine, as reported by
12 Victor Joecks in an article titled “County Lowers Confidence Level” for Ballot Signatures,”
13 [https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-county-](https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-county-lowers-confidence-level-for-ballot-signatures-2156478/)
14 [lowers-confidence-level-for-ballot-signatures-2156478/](https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-county-lowers-confidence-level-for-ballot-signatures-2156478/). *See* Writ, Ex. 4. The Agilis signature
15 verification software requires signatures scanned at a minimum resolution of 200 D.P.I.
16 However, Registrar Gloria used signatures from the Department of Motor Vehicles, which
17 captures signatures at 100 D.P.I.
18

19 Furthermore, Registrar Gloria failed to allocate sufficient time for postcard change of
20 address forms to be mailed, returned and processed within the federally mandated timeframe,
21 thus preventing him from moving voters from the voter list to the inactive voter list. The mailing
22 of up to 93,856² ballots of voters on the active voters that should have been on the inactive lists
23 led to questionable votes being cast in the 2020 General election. An example of this is that in
24 Senate District 6, there were 57 ballots that were returned undeliverable in the Primary, and were
25 mailed to the same address in the General and yet still voted their mail ballots. *See* Writ, Ex. 9.
26
27

28 ² Undeliverable Active Voters account for 42% of 223,469 of the USPS Undeliverable. SEE EXHIBIT 2.

1 A canvass of those 57 addresses and voters resulted in confirmation that the ballot
2 addressee moved to California, moved to China, but most confirmed the subject voter did not
3 live at that address, they did not receive their mail in ballot. The remaining of the 57 were not
4 reachable in such a short time so the percentage may even be higher. This problem is
5 compounded by the lack of a proper signature verification process, as demonstrated by the
6 Declarations concerning the Agilis issues and the signatory observer's observations of the
7 process. *See* Writ, Ex. 10.
8

9 The flooding of ballots that should not have been mailed coupled with the Agilis mail
10 ballot processing machine being utilized for signature verification that is not permitted calls the
11 integrity of the election and the results into question. Furthermore, a recount of ballots is
12 impossible as the signatures on the envelopes have been were separated from the ballot, thus
13 compromising the entire election process. A recount is not an available option under NRS
14 293.465.
15

16 The many irregularities in Senate District 6 and the failure to conduct the election as
17 statutorily required has compromised the entire election process. Because the discrepancies in
18 Commission District C exist to the extent a revote is the only mechanism for cure, and State
19 Senate 6 lies directly within that district, Plaintiff is entitled to a revote of her race.
20

21 DATED this 16th day of November, 2020.

22 **MUELLER & ASSOCIATES, INC.**

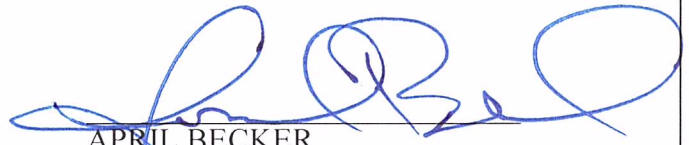
23 */s/ Craig A. Mueller*

24 _____
25 CRAIG A. MUELLER, ESQ.,
26 Nevada Bar No. 4703
27 723 South Seventh Street
28 Las Vegas, Nevada 89101
Attorney for Plaintiff

VERIFICATION

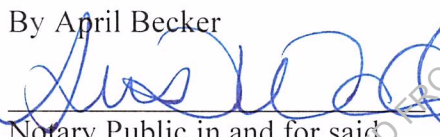
I, APRIL BECKER, being first duly sworn, deposes and says: That I am the Plaintiff in the above-entitled action; that I answered the foregoing Interrogatories and the same is true of my own knowledge, except for those matters stated on information and belief, and as to those matters, I believe them to be true.

Dated this 18 day of November, 2020.


APRIL BECKER

STATE OF NEVADA)
) ss.
COUNTY CLARK)

Subscribed and Sworn before me
this 18th day of November, 2020

By 
Notary Public in and for said
County of Clark, State of Nevada



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EXHIBIT 1

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 1

SUMMARY OF FINAL ACTION

AGENDA

1:00 P.M. MONDAY, NOVEMBER 16, 2020
CLARK COUNTY COMMISSION CHAMBERS, GOVERNMENT CENTER
500 SOUTH GRAND CENTRAL PARKWAY, LAS VEGAS, NEVADA

This meeting has been properly noticed and posted in the following locations:		Agenda Also Available At:	
CC Government Center 500 S. Grand Central Pkwy Las Vegas, NV Criminal Office	Regional Justice Center 200 Lewis Ave., 1st Fl Las Vegas, NV	City of Las Vegas 400 E. Stewart Ave. Las Vegas, NV	City of North Las Vegas 2200 Civic Center Dr. North Las Vegas, NV
Third Street Building 303 S. Third St. Las Vegas, NV	Paradise Park Pool & Center 4775 McLeod Dr. Las Vegas, NV	City of Henderson 200 Water St. Henderson, NV	City of Boulder City 400 California Ave. Boulder City, NV
Winchester Park & Center 3130 S. McLeod Dr. Las Vegas, NV	Desert Breeze Park & Community Ctr 5275 Spring Mountain Rd. Las Vegas, NV	City of Mesquite 101 E. Mesquite Blvd Mesquite, NV	Clark County Reg. Govt. Center 101 Civic Way Laughlin, NV

Join in to the County's news magazine "Chronicles" Monday, November 16, 2020, at 6:30 p.m.
The min agenda is available on Clark County's Internet Web Site: <http://www.accessclarkcounty.com>
This meeting will be broadcast live on Clark County Television, Channel 4 (CCTV 4) and over the Internet, <http://www.accessclarkcounty.com>. It will be replayed over CCTV 4 on Monday, November 16, 2020, at 8:00 p.m.
For more programming information, call the Public Communications Office at 455-6888.

CALL TO ORDER

1. Public Comment
2. Approval of Agenda (For possible action)

MOVED BY: Jim Gibson
ACTION: APPROVED AGENDA AS RECOMMENDED
VOTE: 6-0
VOTING AYE: Michael Naft, Justin Jones, Larry Brown, Marilyn Kirkpatrick, Jim Gibson, Tick Segerblom
VOTING NAY: NONE
ABSTAINING: NONE
ABSENT: Lawrence Weekly

BUSINESS ITEM

3. Receive a report from the Registrar of Voters, canvass the returns of the General Election held on November 3, 2020; and direct the Registrar to submit a copy of the abstract of votes cast to the Nevada Secretary of State within ten (10) days after the election per AB4. (For possible action)

ATTACHMENT: [Clark County Agenda Item.docx](#)

MOVED BY: Larry Brown
ACTION: RECEIVED/ACCEPTED CANVASS OF THE VOTE AND CERTIFIED ELECTION RESULTS WITH THE EXCEPTION OF COUNTY COMMISSION DISTRICT C; DIRECTED REGISTRAR TO RETURN TO THE DECEMBER 1, 2020 REGULAR MEETING WITH OPTIONS FOR A SPECIAL ELECTION IN THE DISTRICT C RACE AND TO SUBMIT A COPY OF ABSTRACT OF VOTES CAST TO NEVADA SECRETARY OF STATE AS RECOMMENDED
VOTE: 6-1
VOTING AYE: Michael Naft, Larry Brown, Marilyn Kirkpatrick, Lawrence Weekly, Jim Gibson, Tick Segerblom
VOTING NAY: Justin Jones
ABSTAINING: NONE
ABSENT: NONE

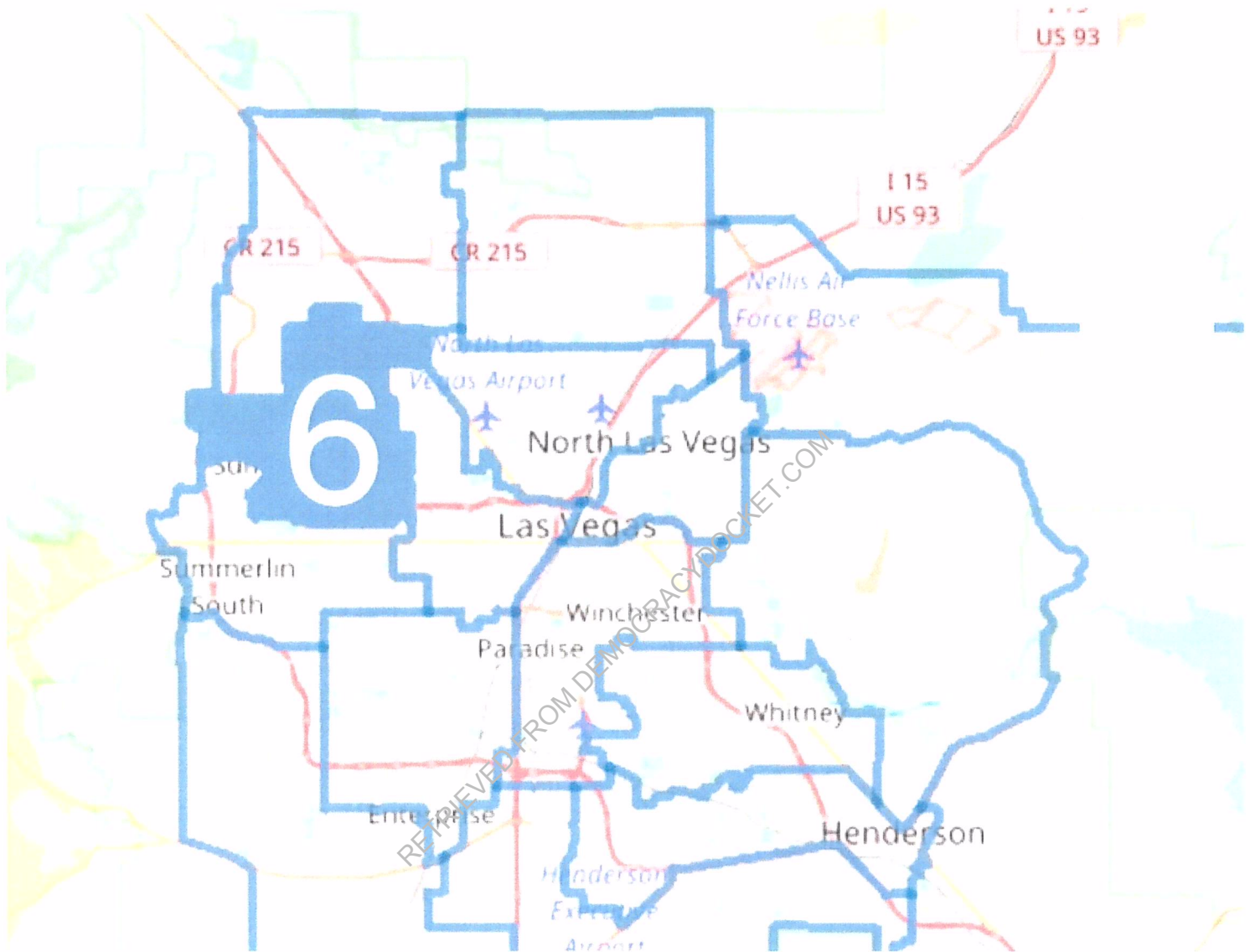
A MOTION WAS MADE BY COMMISSIONER BROWN TO ACCEPT CANVASS OF THE VOTE AND CERTIFY THE RESULTS OF THE ELECTION WITH THE EXCEPTION OF COUNTY COMMISSION DISTRICT C; DIRECTING THE REGISTRAR TO RETURN TO THE NEXT REGULAR BOARD MEETING WITH OPTIONS FOR A RESOLUTION FOR DISTRICT C.

COMMISSIONER BROWN AMENDED THE MOTION; DIRECTING THE REGISTRAR TO RETURN TO THE DECEMBER 1, 2020 REGULAR MEETING WITH OPTIONS FOR A SPECIAL ELECTION IN THE DISTRICT C RACE AND TO SUBMIT A COPY OF ABSTRACT OF VOTES CAST TO THE NEVADA SECRETARY OF STATE.

EXHIBIT 2

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 2



Closeup on the Las Vegas Valley with District 6 colored

More details

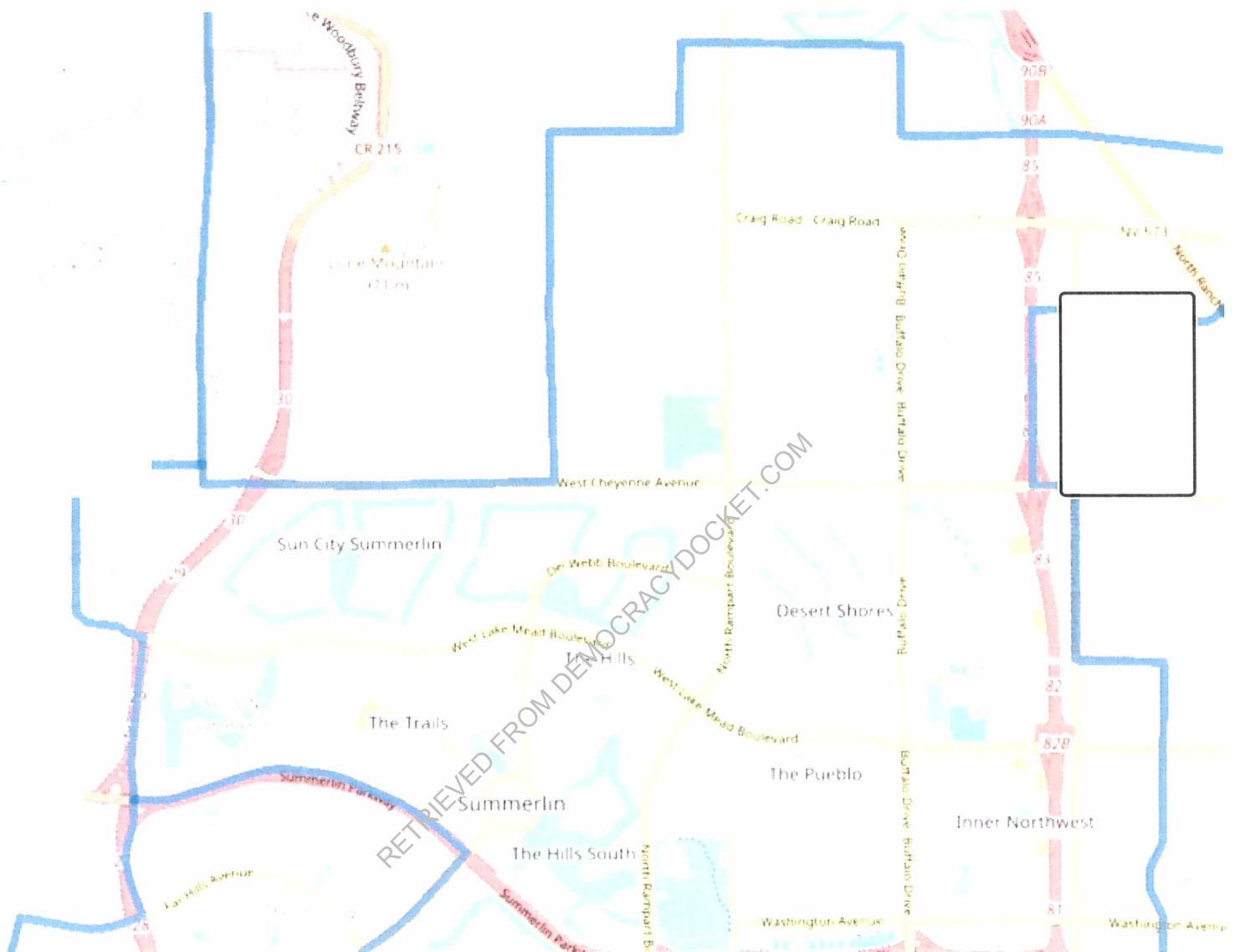
OpenStreetMap contributors - <http://mapserver1.leg.state.nv.us/whoRU/>

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Map of the Las Vegas Metro Area with the sixth senatorial district colored blue.

File: Nevada
Senate, District 6.png
Created: 24
December 2016

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Closeup map of District 6

More details

OpenStreetMap contributors - <http://mapserve1.leg.state.nv.us/whoRU/>

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Map of the sixth senatorial district.

File: Nevada
Senate District 6.png

Created: 24
December 2016

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STATE OF NEVADA

SENATE
DISTRICT 6

CLARK COUNTY, NEVADA

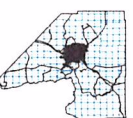


LEGEND

WORD DESCRIPTION AREA 1:

FROM SUN CITY BLVD
NORTH ON HIGHLAND FALLS DR
TO VILLA RIDGE DR;
WEST TO SENATE BDRY;
NORTH TO W CHEYENNE AVE;
EAST TO SPRING SHADOW RD;
NORTH TO SUGARVIEW AVE;
EAST TO BISHOP FINE ST;
EAST TO AGENCY FINE ST;
NORTH TO SUGARLAND AVE;
EAST TO N HUAPAI WAY.

DRAFT NOTED: OCTOBER 24, 2000
NO SCALE



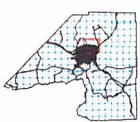
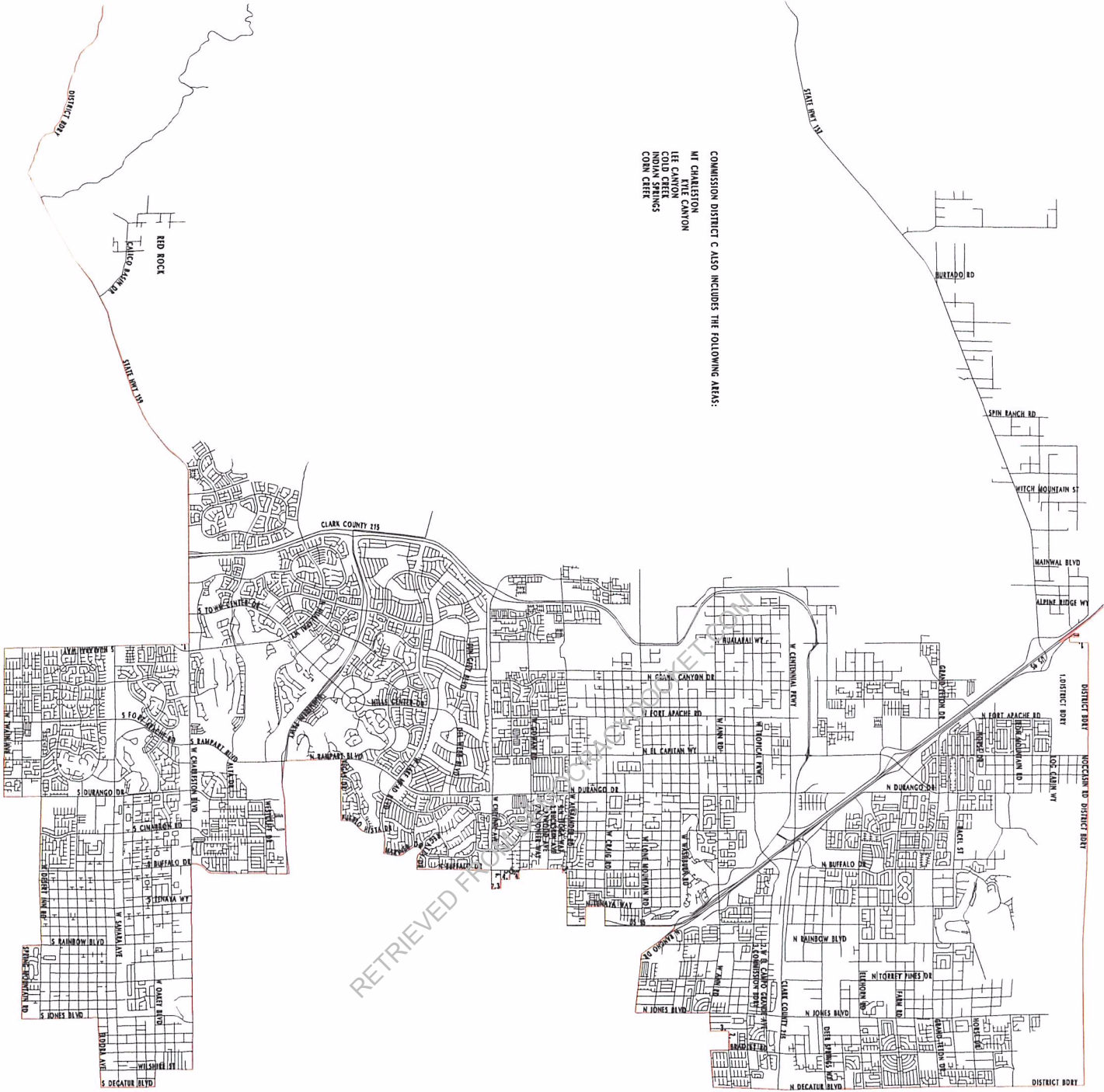
LEGEND: 1:10,000 SCALE
The location of the district is shown in black.

CLARK COUNTY, NEVADA



COMMISSION DISTRICT C ALSO INCLUDES THE FOLLOWING AREAS:

MT CHARLSTON
RTLE CANYON
LEE CANYON
COLD CREEK
INDIAN SPRINGS
CORN CREEK



DATE PLOTTED: APRIL 07, 2004
NO SCALE

VICINITY MAP - NO SCALE

EXHIBIT 3

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 3

**TRANSCRIPT OF BOARD OF COUNTY COMMISSIONS MEETING
CLARK COUNTY, NEVADA
NOVEMBER 16, 2020**

Speaker: Okay. We're going to go ahead and call to order the special meeting for Monday, November 16. Ms. King?

Ms. King: Good afternoon, Madam Chair and Commissioners. The first item on your agenda is public comment.

Speaker: This is the first time set aside for public comment. Anybody wishing to speak on public comment regarding this item, please come forward. Please state your name for the record.

Next Speaker: Can I...do I have...I haven't been here for public comment. Can I talk without this?

Speaker: Yeah, but there's hand sanitizers up there, Lisa.

Lisa: Okay.

Speaker: And if you could wipe off the mic when you're done and everything else, that would be great.

Lisa: Absolutely. Okay. My name is Lisa Mayo De-Riso, and I'm here...I want to put in public record this letter. I'm here on behalf of the Stavros Anthony campaign for Clark County Commissioner and I'd like to read this letter into the record. I believe you should have received it this morning by email, thank you, but I just wanted to make sure that we read it into the record. It's addressed to Joe Gloria, Registered Voters, Clark County Election Department. Dear Mr. Gloria, the Law Firm of Hutchison & Steffen serves as legal counsel to the Stavros Anthony for County Commission Campaign, the Anthony Campaign. As we prepare to report to the Clark County Board of Commissioners on the canvassing of the 2020 general election returns on Monday, November 16, we as specifically on behalf of the Anthony Campaign that you seriously consider delaying the presentation for approval of the vote to Clark County Commission District C. As the Anthony Campaign reviewed Election Department voter data, some possible voter irregularities may have occurred in District C, including over two dozen residents of District C have provided written statements that they had a ballot returned from their address by people who do not live there. This information has been researched and gathered by the Anthony Campaign's field and phone teams. This research and outreach is continuing and very well may result in securing additional affidavits. There are approximately 160 voters who were mailed ballots in the primary election that were returned to the post office as undeliverable. Those same voters were again mailed ballots in the general election to the same addresses that were previously shown as undeliverable, yet votes were cast in the general election for those 160 votes. There are 19 voters who cast two ballots. There are approximately 150 addresses to which mail was delivered and from which votes were cast, but the addresses were inaccurate. This should have resulted in the ballot being returned to Clark County.

The Anthony Campaign respectfully requests that you investigate and give due consideration to these potential voting irregularities before presenting the election results to the County Commission for approval. With a 10 vote margin, which is .000653 difference separating Mr. Anthony and Mr. Miller, the utmost consideration and careful review should be given to the voters of District C and the counting of their votes so an accurate final tally can be confidently given. Additionally, as the Anthony Campaign proceeds in the days ahead it weighs its options, including a recount. The Anthony Campaign respectfully requests that you seriously consider and make all necessary arrangements to include not just a recount of ballots, but a thorough review of all mail envelopes that contained the ballots and signatures to ensure they comply with the Nevada law. With the extra...can I continue? Thank you.

With the extraordinary circumstances of the 2020 general election, when the normal mail ballot load received by election department increased from 5% of the total vote to roughly 50% of the total vote, the envelopes take on crucial importance. In addition, the corresponding workload placed on county staff was significantly higher than a normal general election and must be considered ensuring that the final vote count is accurate. Because the legitimacy of all mail in ballots are tied directly to the envelopes that they were mailed in, a complete review and careful evaluation of all envelopes should be undertaken. It is imperative that any envelope from which a ballot was received, extracted, accepted, and then counted meets all requires for a legal submission. Ballots arriving in envelopes that fail to comply with the county guidelines or Nevada law should be considered for rejection.

On behalf of the Anthony Campaign and Stavros Anthony personally, thank you for taking the time to ensure that the final vote tally is correct and the voters of Clark County Commission District D can be confident the canvassing of the election is accurate because it was completed in a careful and deliberate matter in light of the concerns expressed above.

I jut wanted to read that. Thank you very much for allowing me to do that.

Speaker: Yep, thank you. Anybody else wishing to speak during public comment?

Craig: Thank you, good afternoon Commissioners. May I speak? My name is Craig Mueller. I'm an attorney. I was on the phone yesterday with Stavros Anthony and also second his motion for a continuation. I am actually also here on the behalf of April Becker, Dan Gilliam, William ****, Jim Merchant, and Melinda Schumacher. We had a little more time to go through the data and we believe that pursuant to statute that a partial or a total revote is necessary. I draw the Commission's attention to Nevada revised statute 293465. Upon receipt of affidavits or application of any candidate or any office to be revoted, the registered voters of that precinct, the Board of County Commissioners shall order a new election in precincts or districts. What our investigation has revealed is Mr. Gloria, for whatever reason, flooded the county with 93,000 additional ballots. The 93,000 ballots should not have gone out. Normally, that wouldn't necessarily have been a problem had there been a meaningful signature verification of these ballots as they came in. Unfortunately, there was no. Mr. Gloria, apparently on his own initiative, decided to use an artificial intelligence program called Agilis so that he didn't have to manually check them.

Speaker: So, Mr. Mueller, here's what I'm going to tell you. Please be respectful. Mr. Gloria has done yeoman's work.

Craig: Yes, he has.

Speaker: So you do not have to call him out by name as you speak and he's our Registrar if you'd like to refer to him, but it is not solely his decision. We all direct him to do things, so please be respectful of Mr. Gloria.

Craig: Thank you, Commissioner. The answer is there was so many fundamental flaws here with this election that nobody could reasonably believe that these outcomes, whichever side of the party, whichever side your issues are, can believe that this election reflects the will of the people. I have assembled what I was able to attend to and get it put together on short notice. I've got a copy for each of the Commissioners. There are statutory provisions for such a circumstance. Those of you who have been in Las Vegas for a long time may remember we actually revoted Assembly District back in '94, '95. That was actually my home district. I actually participated as a voter. There is authority to revote. There is reason to revote. And if the Anthony Campaign wants to ask for a few additional days, we would join them, but I believe statutorily and factually, there is actually no other option here but to revote the entire election and I will submit this to the Clerk so each of you will have a copy of the exhibits and the information we've put together.

Speaker: Thank you, Mr. Mueller. Appreciate that.

Craig: There's a copy there for everybody.

Speaker: Okay, appreciate that. Anybody else wishing to speak during public comment? Seeing none, I'm just going to go ahead and close the public comment and I just want to start by saying, Mr. Gloria, I know that you and your staff have worked tirelessly and we can't say thank you enough and we appreciate all the work that they have done and everything that they've done to ensure that our process is fair, so thank you. Okay, Ms. King?

Ms. King: The next item on the agenda is item number two, approval of the agenda.

Speaker: Okay, I'll entertain a motion to approve the...I have a motion by Commissioner Gibson to approve the agenda. Any discussion? Seeing none, please cast your vote. And that motion passes.

Ms. King: Next we have item number three, which is to receive the report from the Registrar of Voters, canvass the returns of the general election held on November 3, 2020, and direct the Registrar to submit a copy of the abstract of votes cast to the Nevada Secretary of State within 13 days after the election pursuant to Assembly Bill Four.

Speaker: Okay. Mr. Gloria?

Mr. Gloria: Thank you. Good afternoon. For the record, Joe Gloria, Registrar of Voters, Clark County, Nevada. I'd like to start by thanking a long list of people who provided critical support to us this election season. We couldn't have done what we did without assistance from so many different areas and, first, I'd like to thank the Commissioners for your support and the resources as we communicated on what our concerns were. You've consistently come through with what our office needed in order to carry out this election,

so it really means a lot to our department that you are here for us. Also, the County Manager and her senior management team and a long list of agencies and departments that I hope you'll bear with me because they all deserve praise; Human Resources, Risk Management, Parks and Recreation, with all the facilities that we used in order to provide voting, IT, Cyber Security Protection and all of the work that they did to support. We can't provide the process that we do efficiently without constant IT support, so thanks to them. Automotive, Park Police for providing security, Metro Police for additional security provided at our facility and also throughout the early voting and election day period. The City of North Las Vegas and their police department the City of Henderson, the City of Boulder City and their police department, the City of Mesquite and their fire department, the City of Las Vegas and the City Marshalls, all of the owners of the shopping centers that let us have polling places on their property. There are many challenges that come with allowing us to come in and provide this service. They provided support for additional parking, additional security, all throughout the period, so thank you to all of those property owners. The more than 3,400 county residents who stepped up to work at the polls during such a difficult process with the pandemic going on and the large number of voters who showed up to vote. My staff at the Election Department who I simply cannot say enough about, sticking it through long hours day after day without any days off. I simply can't say enough for the effort that they've put forth in supporting this election. And then, most importantly, the voters in Clark County.

With that, I'll go ahead and read the results of the canvass into the record and then answer any questions that you may have. Results of the canvass for the 2020 general election, November 3, 2020. The results of the November 3, 2020 general election were canvassed comparing the computer printout of ballots counted and the results thereof, with the official ballot statement for each of the 1,150 precincts utilized in this election. Of the 974,185 ballots cast in the 1,150 precincts, we identified 936 discrepancies. 710 were in the mail precincts, 121 in the early voting precincts, and 105 in the election day precincts. Six voters have been identified who voted twice in this election. The mail ballot discrepancies represent issues related to tracking the process of ballots, moving from signature verification to manual signature verification, the ballot cure process, and counting board process. The early voting and election day discrepancies are related to inadvertent cancelled voter check-ins, reactivated voter cards, duplicate activations, or check-in errors. Of the 60,109 provision ballots cast in the election, 57,866 were accepted and 2,243 were rejected. Of those that were rejected, 115 had already voted in the election, 142 voted in the wrong district or precinct, 8 were not eligible to vote, 1,925 were not registered to vote, and 53 did not provide adequate proof of residence or identification. There were no tabulation errors in the 1,150 precincts and that ends my report.

Speaker: Thank you, Mr. Gloria. Anybody have any questions? Co-Chair Brown.

Co-Chair Brown: Madam Chair, thank you, and I'd like to make a motion, understanding that I would welcome comments and questions from my colleagues. Based upon the report of the Registrar of Voters, I would like to make the following motion, that we accept the canvass of the vote and certify the election results with the exception of County Commission District C. The Commission has received individual briefings in the last 24 hours and to the best of my knowledge, some of the discrepancies outlined by the Registrar indicate that those discrepancies surpassed the narrow margin of victory in the District C race, calling into question the validity of the election results in just District C. I would like to as the Registrar, as part of my motion, to come back at the next regular scheduled BCC meeting with options a District C resolution.

Speaker: Okay, Commissioner Jones?

Comm. Jones: Thank you, Madam Chair, and I appreciate my colleague from District C's motion. I would suggest that under NRS 293.032, our job in conducting a canvass means a review of the election results by the Board of County Commissioners by which any errors within the election results are officially noted and the official election results are declared. So our job in canvassing the vote is not to ensure that every single ballot has been double checked and triple checked and quadruple checked. It's simply to note any errors within the election results, to note them, and the official election results are declared, and we are to complete that under NRS 293.387 today, the 10th day following the election. In terms of how to resolve any concerns that are brought up, that is, under NRS 293, designated for a recount in which the candidate can ask for recount and under 293.405 the cost of the recount are borne by the challenging party, so I can't support the motion. I think that our job here is to note any discrepancies. I think that Mr. Gloria has, in his canvass noted any discrepancies, and our job is simply to accept them and any candidate can challenge them through the recount process.

Speaker: Okay, thank you. Commissioner Gibson?

Comm. Gibson: Thank you, Madam Chair. A couple of questions. First, to our counsel, what is your counsel to us respecting the things that have just been commented upon by my colleague? So...

Ms. Miller: Which colleague?

Comm. Gibson: Well, Mr. Jones.

Ms. Miller: There is some authority for the proposition that your job is just administrative, that has not been the custom of the Commission in the past when there has been discrepancies that make it impossible for the Registrar to say that the results are totally valid and the will of the people.

Comm. Gibson: So, is the motion that Commissioner Brown offered up something that goes without or beyond the authority of this Board to do?

Ms. Miller: No. I think it's within the authority and the responsibility of the Board.

Comm. Gibson: I have a question about the discrepancies. We've talked about a number of discrepancies, 936 discrepancies, countywide I take it. What are the circumstances respecting discrepancies in District C, in the District C vote? Are there ballots that are District C ballots where you have found discrepancies and what are the nature of the discrepancies?

Mr. Gloria: Commissioner Gibson, in my review, I have found discrepancies that surpass the amount of the victory, the margin of victory, in Commission C specifically.

Comm. Gibson: And can you give us a number and then tell us...give us a sense of what these discrepancies are?

Mr. Gloria: I've identified 139 discrepancies in the Commission C race that follow pretty closely to what I described in the canvass document, basically there are records that were transferred back and forth from different responsibilities within the mail process that cancelled check-ins, things of that nature, that we can't reconcile, and so they very much or very well could represent a discrepancy that would affect the outcome of the election.

Comm. Gibson: So then the nature of these discrepancies is such that you can't just look at them again or in the context of a recount apply them to one candidate or another? You cannot do that?

Mr. Gloria: That is correct, sir. The privacy of the ballot prevents us from doing anything with identifying specific ballots according to a particular voter where we would have the ability to pull those up. It's not possible.

Comm. Gibson: Okay. For now, I have a couple other questions, but I'd like to wait just for a minute.

Speaker: Does anybody else have any questions that they'd like answered? Commissioner Segerblom?

Comm. Segerblom: I'm still not clear. So you're saying that 900 people, in this district over 100 people, show they have voted but you don't have actual vote counts for them or?

Mr. Gloria: The vote count will not change. So what we've tallied represent the results in all of the contests within the election. However, we have found discrepancies that we can't explain that would cast a doubt on whether or not that margin of victory is solid and that I could certify it to say that it's definitely accurate.

Comm. Segerblom: But is the discrepancy that you don't know if the person's vote was counted or not counted? What is the discrepancy.

Ms. Miller: An example of a discrepancy is when you sign in, when you go to vote in person, you sign in at the check-in table and then they check your...you know, you're given a card and led to a machine. If somebody fails to actually sign in, but is then led to a voter machine and votes, then that precinct is going to be off by one vote. Or conversely, if that person checks in to vote and then for some reason he decides he doesn't want to hit the cast button, cast ballot button, but he leaves and doesn't tell a clerk what has happened, there's going to be a discrepancy there, in the number of voters in each precinct and then the number of votes recorded for that precinct.

Comm. Segerblom: But you would know the person who...

Ms. Miller: Not necessarily.

Comm. Segerblom: Okay.

Ms. Miller: Like, for example, if they haven't signed in, we don't know who that extra person is, necessarily. Sometimes we're able to do enough investigation that we can figure it out, but not in these cases, not in these particular ones that Mr. Gloria is reporting today.

Mr. Gloria: If I could follow up as well, Commissioner, to maybe clarify. In the course of a day at a particular site, you may have 50 voters who vote at precinct 1105. There are two areas where we track that activity. One is in the voter registration database where we have our poll book that signs voters in. That varies from time to time. What we tally into the system as a vote, does not change. So if I end up with 50 votes in my voter registration but then only 49 in my democracy suite or tabulation for voting systems, I have a discrepancy, and because there were 50 votes in that, I can't determine exactly which individual it was affected by, but I know that I'm off, and so we go through with every single precinct by tally type, mail, early voting, and election day, and wherever there's a discrepancy, it should be a balance. It should be 50/50. But, where we have areas in a precinct where it's 51 and 50, or 49 and 50, there's a discrepancy there, and so we search through our documentation to identify if the team leader has identified with paperwork to document that so that we can explain it. If we don't have documentation, then we can't make a determination as to exactly why that discrepancy occurred, but we know we have one.

In the Commission C race, I've identified 139. That's the only race in the entire election where we have any concern related to the outcome, and it's because of the close margin. It's a district with 218 precincts. A margin of 10 is very difficult to audit.

Comm. Segerbom: So to follow up on that, if there's a recount, the recount would still be the same based on this discrepancy.

Mr. Gloria: Not necessarily, I couldn't guarantee it would come out 100% the same. In 2016, we recounted over 800,000 ballots, I believe it was, and at the end of the day, we had a discrepancy of four, so it was very tight and all those votes that were cast, it was only changed by four. So that's pretty tight as far as the process and the fact that we counted fairly accurately in that election. I can't tell you whether or not it will be that close or there would be a wider margin with a recount.

Comm. Segerbom: But I'm just saying this discrepancy would not be identified by the recount because the recount just counts the 50 or the 49.

Mr. Gloria: Precisely. According to statute, we would count those ballots in the exact same way we counted them in for this result.

Comm. Segerbom: So if I can ask the attorney then, so what happens if we have a recount and the same thing happens? Does the winner have a recourse to go to court or something?

Ms. Miller: Contestants always have the ability to file a contest rather than a recount and the contest grounds are more broad. In this case, there would be grounds for a contest because there were enough discrepancies to raise a question about the final vote, so rather than a recount, it would be more likely that somebody would file a contest because, as Mr. Gloria said, a recount is not going to solve those discrepancies for you.

Comm. Segerbom: And just one more question, so if we do certify today, this does not prevent a request for recount or for the other process you talked about?

Ms. Miller: Well, for the other races, they could file their contests. You can't file a contest of a race that hasn't been certified because technically there's not a winner, somebody hasn't been declared a winner there. There might be other legal avenues that they could follow, but not technically a contest.

Comm. Segerbom: So, if we don't certify, then are we then saying potentially we're going to ask for a revote ourselves?

Ms. Miller: What's what the Board has done in the past is set up a special election just with those two candidates to rerun the election.

Speaker: Can I ask who bears that cost? Do we, the county? Is that what we did last...I feel like there was a Public Administrator that we did this for.

Next Speaker: The only time we've ever done it.

Ms. Miller: It's not the only time. Yeah, it's not an unusual practice, but most recently, we did it with the Republican Primary for the Public Administrator. That was just in 2018. It happens more likely in assembly races because they're smaller and then they're more likely to be close than a bigger race, but...

Speaker: Commissioner Jones?

Comm. Jones: Ms. Miller, what's the statutory basis for holding a special election. I'm trying to understand that.

Ms. Miller: In this case, you could use the same statute that you cited, saying that, because there is a catch all clause there, you could determine that the will of the voters had not been determined and hold a special election.

Comm. Jones: Which statute specifically?

Ms. Miller: I believe you cited 293.45.

Speaker: All these attorneys up here, I feel nervous. Commissioner Naft?

Comm. Naft: Thank you, Madam Chair. While he's reviewing that, Ms. Miller, could you speak a little bit more to where the proper forum for this to proceed would be? I understand, from your interpretation, it is in this body's ability not to certify, but if we don't, it would go through the court process, leaving candidates some options still to protest the outcome?

Ms. Miller: If you certified the results, the losing candidate could file a contest tomorrow. I believe that's the deadline is why I mentioned tomorrow.

Speaker: So explain to me again what does that mean? So, a contest?

Ms. Miller: A contest is going to court and essentially doing the same sort of analysis. The judge would do the same sort of analysis that you're doing today and determine whether or not the person declared the winner was legally declared the winner.

Speaker: Okay. Commissioner Weekly?

Comm. Weekly: And with that being said, Ms. Miller, the judge could declare another race?

Ms. Miller: Yes.

Comm. Weekly: Or the judge could defer back to us for us to make a decision? Could it go that way as well? I'm just trying to understand as well.

Ms. Miller: Well, they would probably direct...the judge would probably say, yes, it has to be another race, but the County Commissioners would have to call that and the circumstances under which it's called, but he wouldn't set the date for it probably.

Comm. Weekly: Okay.

Speaker: Commissioner Gibson?

Comm. Gibson: In the motion, it seems as though the objective there would be a special election.

Ms. Miller: Yes.

Comm. Gibson: Because you can't...I mean unless the candidate who is behind gives up in a negotiation and says I'm not going to contest this. Otherwise, the only way you get something that you can certify is by taking the...once given, you have to take into account these discrepancies, would be if you held the election again. So, the question is, what if...do we have authority to withhold certification and direct that there be a second vote? Do we have that authority?

Ms. Miller: Yes.

Comm. Gibson: Does it require that all the parties or the two parties come together and agree to that end?

Ms. Miller: No.

Comm. Gibson: Or do we have authority, plenary authority under the statutes today, or in two weeks?

Ms. Miller: Well, I don't know that it's plenary authority, but you do have authority to declare that there's enough concerns about an election in a particular race that you won't certify the result and direct staff to...you guys have to call the special election.

Comm. Gibson: So we have that authority today.

Ms. Miller: Yes.

Comm. Gibson: We don't have to wait for a judge to decide then?

Ms. Miller: That's correct.

Speaker: Commissioner Brown?

Comm. Brown: Thank you. A couple questions. Joe, the discrepancies that you have referenced, are they common in all elections?

Mr. Gloria: Commissioner Brown, yes. There's no election that goes without discrepancies that are identified. In particular, this time with such a large mail ballot number, that number that I've identified is actually in the thousandth of percent, so it was fairly accurate work, it's as a result of such a close margin of victory. With 218 precincts and a margin of victory of 10, it's very difficult to get through that without having the discrepancies being larger than the margin of victory.

Comm. Brown: So the past practice of just disregarding discrepancies in those races that the total number would have no impact on the outcome. That has been standard practice at the county and probably challenged on a rare occasion.

Mr. Gloria: That is correct, Commissioner Brown. We have for as long as I can remember since I've been here. It has always been the practice to go through and identify what the discrepancies are and ensure that the margin of victory surpasses that so that you can certify.

Comm. Brown: And Joe or Mary on this one, questions that were brought up in the earlier speakers in reference to the letter received, do we have the ability to or do we have an obligation to look into those accusations?

Ms. Miller: In the letter that you were sent, it's certainly within the Board's discretion. There's not a lot of backup on there. You'd have to create your own backup to support those allegations or perhaps that candidate would provide it to you.

Comm. Brown: Okay. And to Commissioner Segerbom's point, so a recount is going to serve no purpose to change what we know today. Is that correct? Other than perhaps 4 out of 800,000 that you referenced. It doesn't address the discrepancies?

Mr. Gloria: No, it does not. We have the ability to recount and we would recount in the same manner according to statute as we read them originally into the system, but that wouldn't change the discrepancies that I've identified.

Comm. Brown: Madam Chair, and Mary Ann, correct me if I overstep here, but I'd like to amend the last portion of my amendment, where I indicated at the next regular meeting with options for the District C race only, I would say the Registrar to come back at the next regular scheduled meeting with options for a special election in that race only. Would that be allowable?

Speaker: Can I ask for some clarification, Commission Brown. Tomorrow is our next regular scheduled meeting, so you don't mean tomorrow, right?

Comm. Brown: How about the first meeting in December? Is that appropriate?

Speaker: Okay.

Comm. Brown: And during that time, again, I for one, with less than 20 hours of briefing, have so many additional questions, if we could, during that two week timeframe, meet with Joe and counsel to find out all the other pieces that have come into this and I'm guessing, would it be appropriate as was mentioned earlier that the Registrar reach out to both candidates to get some sense of what a special election looks like from a programmable standpoint, from a practical standpoint, from a timing standpoint? Would that be appropriate?

Ms. Miller: That would certainly be my recommendation?

Speaker: Commissioner Naft and then Commissioner Jones.

Comm. Naft: Commissioner Brown, I was going to suggest if there is more briefings that's required, which I think would be helpful, do we then want to broaden the direction to Mr. Gloria rather than make it more specific?

Comm. Brown: That was my earlier motion, but I got the sense that we were focusing in on the only thing that could happen.

Comm. Naft: That might be the will of the Board. I just raise the question, if there is more briefings required, or perhaps you're meaning more briefing specifically on what a future subsequent election would look like.

Comm. Jones: Thank you, Madam Chair. NRS 293.387 requires us to complete our canvass today, so I guess in terms of reviewing discrepancies before the December meeting, so we even have discretion, Ms. Miller, to do anything other than hold a special election if we don't certify today?

Ms. Miller: I'm not aware of any other options.

Comm. Jones: So we either certify today or we don't and it has to go to a special election.

Ms. Miller: That's my understanding.

Comm. Jones: So we're not going to look at discrepancies because looking at discrepancies isn't going to matter. Right?

Next Speaker: Mr. Gloria's staff has already looked at the discrepancies. [Inaudible] is going to bring out anything that's going to change [inaudible].

Speaker: Okay. Commissioner Segerbom and then Commissioner Gibson.

Comm. Segerbom: Just to clarify, Commissioner Jones, when you initially stated this, you said, I thought, that you interpreted state law to say our only obligation was to certify. That's your legal interpretation of what's at stake, right?

Comm. Jones: Yes, I'm not counsel for the Board, though.

Comm. Segerbom: I know, but I'm saying that's...there's certainly an argument to be made that we don't have the discretion to say we're going to call an election. We're just saying certify.

Speaker: Anything else, Commissioner, any other Commissioners? Commissioner Gibson?

Comm. Gibson: Of course, when the phone started ringing last week and people from both sides were reaching out, the first thing that occurred to me was, this is easy. We'll just do a recount and that will be the end of it. This additional complication, in my estimation, elevates it to a place where the transcendent importance of the Commission and this institution, the county, Mr. Gloria's reputation, and the entire Election Department's reputation, in my estimation, is affected by the action that we take, and I believe that the way that we address it, as imperfect as it may be, apparently only is to do a special election. So, I guess for that reason, since there really are no other viable options, we can either wait and some court tells us to do a special election, or we can get out of the way and get something going so that the people in District C can find a new Commissioner and it's disappointing that there have been things like the ones that are described. I imagine there are other things that have happened. Were any of the ballots returned and not readable? Marked in a way that is confusing? Did that happen? I don't even know how you do that? Are there any other things? Is there any voter negligence in the way that these discrepancies get characterized?

Mr. Gloria: In the hundreds of thousands of ballots, Commissioner, there are issues with ballots. That's why we have a Duplication Board that can take a look at the ballot and as long as we follow the prescribed determinations that we're reviewed with our County DA, they have the ability to duplicate a ballot and then we can get it into the system. The system performed relatively flawlessly because we are able to review the document and make sure that it's not in a condition that would damage the machine. So there weren't many instances where the ICC scanner was unable to read ballots, but we did see ballots that were identified, we did see ballots that were damaged, that had to be duplicated to run into the system, but nothing that would reach to the level that we'd call it a discrepancy. That's just a normal course of an election.

Comm. Gibson: So the work that would be done for any race that was on this ballot, has been done? Everything has been reviewed and what we're suggesting here today has no implication or bears not at all on outcomes in any other race? It is only in this race? Now we had a couple other up here. I went back and looked at the report and it looks there are several thousand votes different in the case of some of the people whose names were mentioned at candidate who are seeking relief and maybe there is something they can do, but I see this so dramatically differently from any of the rest of them because of the number and you've isolated it down to 139, I think you said, ballots, and I just don't think we have any option. I think that the credibility of everything that we do is something that can be affirmed by simply doing that rather than waiting for some court to tell us how to conduct our business, so I think that's where I come down, but thank you very much, Madam Chair.

Speaker: Okay, Commissioner Jones.

Comm. Jones: What is the estimated cost of a special election in this case?

Mr. Gloria: That would depend on how we hold the election, Commissioner. So I will have those costs with me when I present to you on what the options are and if there are any discussions between now and the next Commission meeting, I will be prepared to have those numbers.

Comm. Jones: Ms. Miller, if we certified today and a contest were filed and a judge were to not agree with our certification or canvass of the result, would the cost then be borne by Mr. Anthony?

Ms. Miller: Not the cost of the election. I think they can recover court costs against the other parties to the contest, but if a judge orders a new election, the jurisdiction bears the cost of that election.

Comm. Jones: Thank you.

Speaker: Okay. Commissioner Naft.

Comm. Naft: Ms. Miller, could you speak a little bit more to the eventuality that the court would rule, or your estimation that court would rule that a revote needs to occur?

Ms. Miller: I don't think, because of the nature of the discrepancies, that any court presented with these discrepancies would be comfortable saying that the results really reflect the will of the voters in Commission C with just such a close race. We're unable to go back and find out which way those votes went, one way or the other. A court would not be able to do that in any event too, so the court would really be in a very similar situation to where the Commissioners are today.

Speaker: Okay. Commissioner Brown, do you want to restate your amended motion?

Comm. Brown: Thank you, Madam Chair. I would like to make the following motion that we accept the canvass of the vote and certify the election results with the exception of County Commission District C. The Commission has received individual briefings over the last 24 hours and some of the discrepancies outlined by the Registrar indicate that the discrepancies surpass the narrow margin of victory in that race, calling into the question the validity of the election results in just the District C race. I would like the Registrar to come back at the next regular meeting. No, I take that back. I would like the Registrar to come back the first meeting in December with options for a special election in the District C race only and submit a copy of the abstract of votes cast to the Nevada Secretary of State per AB4.

Speaker: Okay, you've heard the motion. Any other discussion? Seeing none, please cast your vote. That motion passes. Can I ask a question, Mr. Gloria, outside of that long discussion we just had? So what happens to the people that voted twice? I hope that we're going to go after them, correct? If we can prove that it was egregious and on purpose?

Mr. Gloria: There would need to be an investigation done where we would interview the individuals. We definitely have the evidence to provide that they did, in fact, vote twice, so I can't tell you exactly in each scenario what might or might not happen, but we'd definitely be submitting them to the Secretary of State.

Speaker: And then how long does that process...I mean I just would like you to put us back in the loop because I just want to make sure that we keep up with the integrity of elections and we remind folks the importance of doing it the right way, once.

Mr. Gloria: Sure. At your request, Madam Chair, I'll be sure to stay abreast of what's going on in the investigation once we submit.

Speaker: Okay. So, Ms. King, does that conclude us except for public comment.

Ms. King: Yes, it does, Madam Chair.

Speaker: Okay. This is the second time set aside for public comment. Anybody wishing to speak on public comment? Seeing none, we are going to go ahead and close the public comment and we are adjourned.

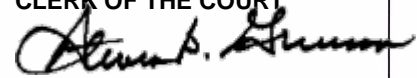
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EXHIBIT 4

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EXHIBIT 4



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CASE NO: A-20-824878-W
Department 4

7 **DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9 APRIL BECKER, as an individual, as a
10 Candidate for Senate District 6, and as a
11 Voter in Clark County, Nevada,

12 Plaintiffs,

13 vs.

14 JOSEPH P. GLORIA, in his official
15 capacity as Registrar of Voters for Clark
16 County, Nevada, CLARK COUNTY, a
17 political subdivision of the State of Nevada,
18 DOES I through X; and ROE
19 CORPORATIONS I through X, inclusive,

20 Defendants.

Case No.:

Dept No.:

NOTICE: PURSUANT TO NRS 295.210(4)
THIS MATTER MUST BE SET FOR
HEARING NOT LATER THAN 3 DAYS
AFTER IT IS FILED

ELECTION RELATED

21 **PETITION FOR WRIT OF MANDAMUS**

22 **AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**
23 **PURSUANT TO NRS 293.465 AND NRS 30.030**
24 **(Immediate Hearing Requested)**

- 25 1. COMES NOW Petitioners by and through counsel CRAIG A. MUELLER, ESQ., of Mueller
26 and Associates, Inc., and petition this Honorable Court for a Writ of Mandamus compelling
27 the Clark County Commissioners to Order a new election based on the Registrar of Voter's
28 failure to follow multiple required statutory procedures for conducting an election.
Specifically, flooding the County with un-trackable ballots and the use of Agilis mail ballot
processing machine with signature recognition software instead of a person as required under

the Nevada Revised Statutes as amended including AB4 provisions.

NATURE OF THE ACTION

2. This is an action pursuant to NRS 293.465 for declaratory and injunctive relief pursuant to NRS 34.150 through 34.350 for writ of mandate enforcing the ministerial non-discretionary duty of the Clark County Commissioners to order a new election pursuant to NRS 293.465. The act of the Registrar of Voters sending unsolicited ballots to both active and inactive voters list resulted in overflowing precincts with ballots. This act satisfies the requirements or any other cause in the statute and is supported by case law with regards to flooding precincts. The Clark County Commission must order a new election under the statute.
3. The Nevada State Legislature delayed changes to the voting scheme whereby making it impossible for Clark County Registrar of Voter to comply with Federal mandates resulting in a decision to send mail in ballots to all active voters and large numbers of what should have been inactive voters. Approximately one-third of votes coming from addresses that were returned as undeliverable¹ in the 2020 Primary do not reside at the stated addresses.
4. This results in ballots being sent to voting districts of persons no longer qualified to vote on that elector as they do not reside in that voting district. Persons voting in districts to which they have no interest wrongfully floods the precinct with voters that do not qualify to vote for those electors.
5. This resulted in the flooding of precincts with ballots for persons no longer residing in the district to which their ballot was printed and specific to certain offices.

PARTIES

¹ The Public Interest Legal Foundation's statistics for Clark County included 1,325,934 Total Mail Ballots Transmitted, 223,469 being marked as USPS Undeliverable, 42% (93,857) of those coming from the Active list and 58% (129,612) coming from the Inactive list. SEE EXHIBIT 2.

- 1 6. Petitioner APRIL BECKER, is a Candidate for Senate District 6, as well as a Voter in Clark
2 County, Nevada a registered voter in Clark County, Nevada.
- 3 7. Respondent JOSEPH P. GLORIA is the Registrar of Voters for Clark County, Nevada and is
4 therefore responsible for ensuring the integrity of the voter register, change of address
5 notifications for ballots returned as undeliverable, and updating voters from active status to
6 inactive status if the address is not confirmed from the returned ballots, signature
7 verification, separating the voting ballots from the ballot envelopes with accompanying voter
8 signatures.
- 9 8. Respondent CLARK COUNTY, a political subdivision of the State of Nevada, CLARK
10 COUNTY BOARD OF COMMISSIONERS is a political subdivision of Clark County and a
11 county legislative body who is under a mandate to order a new election based on NRS
12 293.465.

13 **NRS 293.465 Loss or destruction of ballots, or other cause, preventing election in precinct or**
14 **district; new election.** If an election is prevented in any precinct or district by reason of the loss or
15 destruction of the ballots intended for that precinct, or any other cause, the appropriate election officers in
16 that precinct or district shall make an affidavit setting forth that fact and transmit it to the appropriate board
17 of county commissioners. Upon receipt of the affidavit and upon the application of any candidate for any
18 office to be voted for by the registered voters of that precinct or district, the board of county commissioners
shall order a new election in that precinct or district. (Added to NRS by 1960, 268; A 1987, 353; 1999,
264; 2015, 3158)

FACTS

- 19 9. Section 23 of AB4 that amended Chapter 293 of the Nevada Revised Statutes also requires
20 the clerk (a person) or employee (a person) as mandatory "shall" check the signature used for
21 the mail ballot.
- 22 Sec. 23.
- 23 1. Except as otherwise provided in NRS 293D.200, for any affected election, when a
24 mail ballot is returned by or on behalf of a voter to the county or city clerk,
25 as applicable, and a record of its return is made in the mail ballot record for
26 the election, the clerk or an employee in the office of the clerk shall check the
signature used for the mail ballot in accordance with the following procedure:
27 (a) The clerk or employee shall check the signature used for the mail ballot
against all signatures of the voter available in the records of the clerk.
28 (b) If at least two employees in the office of the clerk believe there is a

reasonable question of fact as to whether the signature used for the mail ballot matches the signature of the voter, the clerk shall contact the voter and ask the voter to confirm whether the signature used for the mail ballot belongs to the voter.

10. On March 24, 2020, Nevada Secretary of State Barbara K. Cegavske announced there would be an all-mail election for the June 9, 2020 primary election, and that all active registered voters in Nevada would be mailed an absentee ballot. **SEE EXHIBIT 1.**

11. On April 22, 2020, a motion or preliminary injunction was filed in the First Judicial District Court, Case No. 20 OC 00064 1B, requesting the Court order the defendants² to mail ballots to all registered voters, including inactive voters, and to expand the number of polling locations in the June Primary to better reflect the population and geographic size of each county.

12. Clark County Registrar of Voters Joseph P. Gloria submitted a brief and took it upon himself to agree to send out mail in ballots to both active and inactive voters for the 2020 Primary election in response to a Motion for Preliminary Injunction in Case No. 20 OC 00064 1B. Rather than wait for the Courts to direct Mr. Gloria as to the proper avenue regarding the mail ballots and for direction as to what voter lists to be used for mailing ballots, Gloria offered, and then agreed, to mail to all voters, inactive and inactive, without waiting for proper Court determination and legal direction.

13. On May 5, 2020, the preliminary injunction in Case No. 20 OC 00064 1B was withdrawn as “specific, concrete steps are being taken to address Plaintiffs’ concerns as they relate to the coming June Primary election”. One such response of Joe Gloria was that he agreed to mail ballots to all active and inactive voters for the upcoming primary election, in violation of the

² The named Defendants in Case No. 20 OC 00064 1B are: BARBARA CEGAVSKE, in her official capacity as Nevada Secretary of State; JOSEPH P. GLORIA, in his official capacity as Registrar of Voters for Clark County, Nevada; DEANNA SPIKULA, in her official capacity as Registrar of Voters for Washoe County, Nevada.

1 current Nevada Revised Statutes.

2 14. This resulted in no court findings as to the legality of Joseph Gloria's illegal decision which
3 then resulted in a flooding of the precincts with mail in ballots for the 2020 Primary election
4 that included both the active and inactive voter lists.

5 15. On July 30, 2020, The Governor of Nevada called a special session of the Legislature whose
6 only agenda item was to change the voting process in Nevada. As a result, AB4 was passed,
7 and made retroactive to July 1, 2020.

8
9 16. NRS 293.530 sets forth the authority of a county clerk to correct the countywide voter
10 registration list, determine whether residence is accurate and make investigations of
11 registration. Change of address cards were mailed late by Clark County Registrar of Voters
12 Joseph P. Gloria to the returned undeliverable ballots from the 2020 Primary election. Clark
13 County Registrar of Voters Joseph P. Gloria failed to allocate sufficient time for postcard
14 change of address forms to be mailed, returned and processed within the federally mandated
15 timeframe, thus preventing him from moving voters from the active voter list to the inactive
16 voter list.

17
18 17. The Public Interest Legal Foundation reported that 305,008 ballots were "Voter returned and
19 Accepted" while 223,469 ballots were USPS undeliverable, meaning up to 93,856 voters
20 should have been moved from active to inactive status. They were not. **SEE EXHIBIT 2**

21
22 18. On October 20, 2020³, the Registrar of Voters took it upon himself to send a letter to
23 Secretary of State Barbara Cegavske advising her that due to space limitations "we are
24 processing our mail ballots in two different facilities", and then identifies one of the locations
25 as using "Agilis mail ballot processing". **SEE EXHIBIT 3.**

26
27 ³ Although this is a three page letter with the first page being dated October 20, 2020, Pages 2 and 3 of the letter
28 have the date of March 14, 2018 in the heading portion and caption in the letter.

19. Secretary of State Barbara Cegavske takes issue with the number of seats for observation and says nothing about the Agilis mail ballot processing system, as Clark County Registrar of Voters Joseph P. Gloria failed to disclose or indicate in that letter that the Agillis mail ballot processing system was being used in conjunction with its software ability for signature verification, which is something that is NOT permitted under the Nevada Revised Statutes, as amended by AB4 as these require is a person to review the ballot signatures.

20. The use of the Agilis mail ballot processing system by Clark County Registrar of Voters Joseph P. Gloria for signature verification violates the voter election laws. Furthermore, Clark County Registrar of Voters Joseph P. Gloria's actions compromised the integrity of the voting procedures in Nevada and the counting of the ballots cast by the voters.

21. The voting machine is not in compliance with NRS 293B.063 states:

NRS 293B.063 System to meet or exceed federal standards. No mechanical voting system may be used in this State unless it meets or exceeds the standards for voting systems established by the United States Election Assistance Commission. (Added to NRS by 1993, 2199; A 2003, 2186; 2005, 1438; 2019, 3394)

22. To compound error on top of error, The Clark County Election Department lowered the factory settings on its signature verification machine, as reported by Victor Joecks in an article titled "County lowers 'confidence level' for ballot signatures", <https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-county-lowers-confidence-level-for-ballot-signatures-2156478/> **SEE EXHIBIT 4.**

23. The futile act of lowering the factory settings makes the signature verification process flawed and defective.

24. The Clark County Registrar of Voters is used a defective signature matching computer system which violates the express requirements of AB4.⁴ Section 23 of AB4 states that, with

⁴ This machine is only being used in Clark County and a similar device is not being used in any other county in this state which appears inconsistent with the Nevada Voters Bill of Rights which assure uniformity in the counting of votes. See NRS 293.2546(10).

respect to each mail ballot received, "the clerk or an employee in the office of the clerk shall check the signature used for the mail ballot." Although Section 22 generally permits "mail ballots to be processed and counted by electronic means," any such electronic processing may not "conflict with the provisions of sections 2 to 27, inclusive, of this act." Nothing in AB4 permits the use of a machine to check mail ballot signatures in lieu of the statutory requirement that this critically important task be conducted by "the clerk or an employee in the office of the clerk." Indeed, the Legislature's specific use of the words "or an employee in the office of the clerk" reinforces its statutory mandate that all signature verification must be conducted by a human being.⁵

25. NRS 293B.104 provides the following for approval of a mechanical voting system:

NRS 293B.104 Secretary of State not to approve system that does not meet or exceed federal standards. The Secretary of State shall not approve any mechanical voting system which does not meet or exceed the standards for voting systems established by the United States Election Assistance Commission. (Added to NRS by 1993, 2198; A 2005, 1438; 2019, 3394)

26. NRS 293B.105 provides the following for adoption for use at elections of any mechanical voting systems:

NRS 293B.105 General authority. The board of county commissioners of any county or the city council or other governing body of any city may purchase and adopt for use at elections any mechanical voting system and mechanical recording device. The system or device may be used at any or all elections held in the county or city, for voting, registering and counting votes cast. (Added to NRS by 1975, 1523; A 1985, 1100; 1995, 2787; 2017, 548)

27. Clark County Registrar of Voters Joseph P. Gloria was required to obtain specific approval under mechanisms outlined in NRS 293B.104 and NRS 293B.105 for use of any system and that was not given, granted or approved.

28. Ballot envelopes were scanned by an Agilis mail ballot processing machine in an attempt

⁵ Election officials lack authority to undertake any action contrary to governing statute or regulation. *Kelly v. Murphy*, 79 Nev. 1 (1963). Any such unauthorized conduct is a "futile act," a term of art that means it is thus void as a matter of law. *Id.* at 4. Thus, as AB 4 expressly requires that mail ballot signatures be checked by "the clerk or an employee of the clerk," Registrar's use of the Agilis Ballot Packing Sorting System ("Agilis System") to check mail ballot signatures has been futile.

1 to use artificial intelligence or software to match the signature on the envelope with that
2 of the voter using other sources, such as the Department of Motor Vehicles (DMV).

3 Although the Agilis machine requires signatures scanned at a minimum resolution of 200
4 D.P.I., the Registrar is ignoring that minimum as DMV signatures are scanned at less than
5 200 D.P.I. However, signatures obtained by the DMV are scanned at 100 D.P.I. Clark
6 County Registrar of Voters Joseph Gloria ignored that the DMV signatures were below
7 the minimum resolution required by the Agilis machine to properly function.
8

9 29. Nevertheless, the Clark County Registrar of Voters Joseph Gloria has been using the
10 Agilis machine to match ballot signatures with DMV signatures, *none* of which are
11 submitted at or above 200 D.P.I. Vote-by-mail voters in Clark County thus have an
12 advantage over voters anywhere else in the state because many thousands of vote-by-
13 mail ballots are never reviewed by a human being.
14

15 30. All votes under the Nevada Revised Statutes, and as amended by AB4 require a person
16 to review all the signatures and ballots, not a machine. The Clark County vote-by-mail
17 process is subject to intolerable error and misconduct that will inevitably dilute lawful
18 votes and disenfranchise Nevadans.

19 31. Flaws in the signature verification process are readily available as shown by eight of the
20 nine ballots signed that were designed not to match signatures on file made it through
21 Joseph Gloria's signature verification system.

22 [https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-](https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-clark-county-election-officials-accepted-my-signature-on-8-ballot-envelopes-2182390/)
23 [clark-county-election-officials-accepted-my-signature-on-8-ballot-envelopes-2182390/](https://www.reviewjournal.com/opinion/opinion-columns/victor-joecks/victor-joecks-clark-county-election-officials-accepted-my-signature-on-8-ballot-envelopes-2182390/)
24

25 **SEE EXHIBIT 4.**

26 32. Victor Joecks' article also indicates "This could explain how a ballot 'signed' by
27 Rosemarie Hartle, who died in 2017, made it through signature verification, as reported
28

1 by 8 News Now. **SEE EXHIBIT 4.**

2 33. Tucker Carlson also reported in Dead People voting using Mail-In Balots.

3 https://www.realclearpolitics.com/video/2020/11/12/tucker_carlson_yes_dead_people_did_vote_using_mail-in_ballots.html **SEE EXHIBIT 4.**

5 34. This is not the only dead person that voted. See I-Team: County received mail-in ballot
6 from Nevada woman who died in 2017; state investigating 2 allegations.

7 [http://sunrise.8newsnow.com/news/2569052-i-team-county-received-mail-ballot-nevada-](http://sunrise.8newsnow.com/news/2569052-i-team-county-received-mail-ballot-nevada-woman-who-died-2017-state-investigating-2-allegations)
8 [woman-who-died-2017-state-investigating-2-allegations](http://sunrise.8newsnow.com/news/2569052-i-team-county-received-mail-ballot-nevada-woman-who-died-2017-state-investigating-2-allegations) **SEE EXHIBIT 4.**

10 35. Observers to the Clark County mail ballot processing facility on 965 Trade Drive in
11 North Las Vegas also related their observance of the issues with the Agilis machine and
12 its mechanical issues. Robert Thomas, III, was one such observer. Thomas stated that
13 if the machine rejected the ballot, it was placed back in the same envelope in which it
14 was received. The result of this action is the board member reviewing the ballot knows
15 the identity of the voter who cast the ballot and can now observe or even record how that
16 individual voted. This process is concerning because it does not ensure ballot secrecy
17 and if the staff member reviewing the ballots does not agree with how the individual
18 voted, this knowledge may become an incentive for the staff member to invalidate the
19 ballot, risking voter disenfranchisement. See Declaration of Robert Thomas, III., dated
20 October 22, 2020, **SEE EXHIBIT 5.**

22 36. Additionally, the tabulation and ballot counting process is called into question as to the
23 procedures concerning ballot secrecy when it comes to verifying the rejected ballots.
24 Specifically, if the staff member reviewing the ballots does not agree with how the
25 individual voted, this knowledge may become an incentive for the staff member to
26 invalidate the ballot, risking voter disenfranchisement. See Declaration of Fred Kraus
27
28

1 dated October 23, 2020, **EXHIBIT 6**.

2 37. Kanoa Ikeda-Flynn was a Counting Board Member who counted approximately 14,000
3 ballots and personally witnessed disregard of signature verification as well as other
4 irregularities. Kanoa Ikeda-Flynn observed a significant number of signatures on the mail in
5 ballots that did not match the name and that should have been reviewed, but was told to push
6 the envelope through without verification anyway. Kanoa Ikeda-Flynn stopped working on
7 November 6, 2020 due to the concerns of how the votes were being counted. See Affidavit
8 of Kanoa Ikeda-Flynn dated November 7, 2020, **EXHIBIT 7**.

10 38. Furthermore, the mailing of up to 93,857⁶ ballots to addresses of voters that should have
11 been on the inactive voter list led to questionable votes being cast in the 2020 General
12 election. An example, in Senate District 6, there were 57 ballots returned as undeliverable in
13 the Primary. Contrary to election laws, mail ballots were mailed to these same addresses in
14 the General and these mail ballots were returned. **SEE EXHIBIT 8**.

16 39. Nineteen voters have been identified as voted BOTH by Mail AND by Early Vote in Senate
17 District 6. **SEE EXHIBIT 9**. The examination of this single district goes to the heart of the
18 voter fraud that exists in this election county wide due to the policies and procedure in place
19 by Clark County Registrar of Voters Joseph P. Gloria for processing the ballots. In fact,
20 there were 34 voters who voted BOTH by Mail AND by Early Vote in Commission District
21 C. **SEE EXHIBIT 10**. There were at least 225 voters who voted BOTH by Mail AND by
22 Early Vote countywide. **SEE EXHIBIT 11**.

24 40. As further proof of the voter fraud and irregularities that exist in this election is the fact that
25 people at the addresses on the ballots never received ballots addressed for the prior registered
26

27 ⁶ Undeliverable Active Voters account for 42% of 223,469 of the USPS Undeliverable. SEE EXHIBIT 2.
28

1 voter. A canvass of those 57 addresses identified in Senate District 6 resulted in
2 confirmation that over one-third of the ballot addresses no longer lived at those addresses.
3 Some had moved to California, one couple had even moved to China. Over one-third of the
4 subject voters did not live at those addresses and they did not receive their mail in ballot. See
5 Declarations attached as **EXHIBIT 12**. This begs the questions, and the facts remain
6 unknown: (1) Where did these ballots go and (2) How did these voters vote by mail if they
7 are not at these addresses/residences?
8

9 **41.** Approximately one-third of the 57 residents interviewed either did not receive ballots that
10 were claimed to have been mailed, and if they did, they were not for people that live at that
11 address. The remaining were not reachable in such a short time so the percentage may even
12 be higher. This begs another question: How can people vote using their mail in ballots,
13 when the person on the receiving end acknowledges the ballots were not received and the
14 person to whom a ballot was addressed does not live at that address? The proof of potential
15 voter fraud due to the irregularity of the voter process is overwhelming. The glaring scenario
16 no one wants to think is the obvious: those undeliverable addresses from the Primary were
17 mailed ballots somehow or somewhere those ballots were processed and counted as voted
18 through the "new" ballot processing procedure which is compounded by the lack of a proper
19 signature verification process as demonstrated by the Declarations concerning the Agilis
20 issues and the signatory observer's observations of the process.
21

22
23 **42.** Senate District 6 is a subset of Commission District C and lies directly within the boundaries
24 within County Commission District C. If there is an issue within County Commission
25 District C, it affects Senate District 6.

26 **43.** The problem is also clear when it comes to Commission C. On top of the 34 voters who
27 voted BOTH by Mail AND by Early Vote in Commission District C (**SEE EXHIBIT 10**),
28

there were also voters who were identified on the log as having resided at that address that did not. **SEE EXHIBIT 13.**

44. A result of the actions of Registrar of Voters Joseph Gloria, ballots mailed to the Active List in the General 2020 election included those that were returned in the Primary election as undeliverable and should have been moved to inactive status in Commission District C.

45. A similar canvass of persons residing at the addresses in Commission District C shows similar results as to the Senate District 6 results. Persons who live at those addresses did not receive ballots mailed to the voter in question. See Declarations attached as **EXHIBIT 14.**

46. With the number of votes in the Commission District C race being decided and is within 10 votes, the extra 34 votes that were cast twice by voters using both the mail in and early voting methods cannot be counted. This invalidates 68 votes, and due to ballot secrecy, a new election in the Commission District C is required.

47. The flooding of ballots that should not have been mailed coupled with the Agilis mail ballot processing machine being utilized for signature verification that is not permitted calls the integrity of the election and the results into question.

48. This flooding of ballots and Joseph Gloria's improper identification of voters from active to inactive voting list and the use of an unauthorized machine for signature verifications resulted in the voting irregularities throughout the entire county.

49. The inbound Ballot Process created as a part of the Cybersecurity and Infrastructure Security Agency (CISA) Elections Infrastructure Government Coordinating Council and Sector Coordinating Council's Joint COVID Working Group requires Clark County Registrar of Voters Joseph P. Gloria is required to store the ballots, ballot envelopes and miscellaneous contents that arrive, such as the secrecy sleeves. Nothing should be thrown away until after the period to challenge the election is passed. **SEE EXHIBIT 15.** Therefore these ballots

and the ballot envelopes with signatures are available.

50. A review of the ballot envelopes and person (human) review of the ballot signature verification is warranted as a result of the illegal use of the Agillis mail ballot processing machine for signature verification.

51. A recount of ballots and inspection of all ballot materials and signature verification on the ballot envelopes is impossible as the signatures on the envelopes have been separated from the ballot, as demonstrated in the attached affidavits, thus compromising the entire election process. A recount is not an available option under NRS 293.465.

52. A Petition for Revote was made at the Board of County Commissioners on November 16, 2020 for Senate District 6.

CLAIMS FOR RELIEF

Count One: Petition for Writ of Mandamus

53. Plaintiff incorporates by reference the allegations of the preceding paragraphs as though fully set forth herein.

54. Respondents have a plain, constitutionally mandated and ministerial duty to order a new election.

55. The Nevada Revised Statutes presently and amended by AB4 require a person to review ballots and signatures.

56. The use of the Agilis machine violates the Nevada Revised Statutes as amended or including AB4 provisions.

57. The procedures in place by Clark County Registrar of Voters Joseph P. Gloria have destroyed the integrity of the ballots to the matching envelope with signature that can be verified. A recount was made impossible by the acts and procedures of Joseph Gloria. The ballots and envelopes, having been separated, are essentially destroyed as they can not be

rematched up with any degree of certainty to ensure a fair and impartial election.

58. The loss of these ballots constitute malfeasance or at a minimum a declaration or demarcation of those ballots being declared lost or destroyed for the purposes of being able to now be verified by a person as required under the Nevada Revised Statutes amended or including AB4 provisions relating to same.

Count Two: Declaratory and Injunctive Relief

59. Plaintiff incorporates by reference the allegations of the preceding paragraphs as though fully set forth herein.

60. NRS 30.030 et seq. grants this Court the power to issue a writ and states that "Courts of record within their respective jurisdictions shall have power to declare rights, status and other legal relations whether or not further relief is or could be claimed. No action or proceeding shall be open to objection on the ground that a declaratory judgment or decree is prayed for. The declaration may be either affirmative or negative in form and effect; and such declarations shall have the force and effect of a final judgment or decree."

61. NRS 30.040 permits any person whose rights are affected by a statute "may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract or franchise and obtain a declaration of rights, status or other legal relations thereunder."

62. On Monday, November 16, 2020, the Clark County Commissioners were scheduled to canvass the return. Plaintiff petitioned the Board of County Commissioners for a revote based on voter irregularities, as testified to by Clark County Registrar of Voters Joseph P. Gloria. That request was denied by the Board of County Commissioners.

63. As a result of discrepancies and irregularities in the election process and processing of the mail ballots, the Board of County Commissioners did not certify County Commission

- 1 District C, but did certify Senate District 6. Senate District 6 is a subset of Commission
2 District C and lies directly within the boundaries within County Commission District C.
- 3 64. The discrepancies in the election process presented to the Clark County Commissioners by
4 Registrar of Voters Joseph P. Gloria were different discrepancies (or irregularities) and
5 additional than those identified by Plaintiffs. This did not include the irregularities that were
6 based on ballots that were run through an electronic signature machine and not verified by a
7 person as required under the Nevada Revised Statutes amended or including AB4 provisions.
- 8
9 65. This Court should issue an order declaring the Agilis mail ballot processing machine and its
10 software for signature verification is not permitted use for comparison of signatures on
11 ballots based on the plain language of the Nevada Revised Statutes amended or including
12 AB4 provisions.
- 13
14 66. This Court should issue an order declaring those signatures as read or verified by the Agilis
15 mail ballot processing machine and its software for signature verification as invalid, and
16 require a person to perform signature verification of those votes as required in the Nevada
17 Revised Statutes as amended or including AB4 provisions.
- 18
19 67. This Court should issue an order requiring Clark County Registrar of Voters Joseph P. Gloria
20 to provide a list of all voters with their addresses whose signatures were verified by the
21 Agilis mail ballot processing machine and its software for signature verification and a list of
22 all voters with their addresses whose signatures were submitted but rejected by the Agilis
23 mail ballot processing machine and its software for signature verification.
- 24
25 68. As the Clark County Registrar of Voters Joseph P. Gloria has separated the ballots from the
26 envelopes to be fed into and or read by the Agilis mail ballot processing machine and its
27 software for signature verification, this Court must otherwise declare those ballots as lost or
28 destroyed.

69. This Court should mandate the Clark County Commissioners to order a new election as mandated under NRS 293.465.

WHEREFORE, Petitioner pray;

1. That this Honorable Court hear the matter immediately;
2. That this Honorable Court issue a peremptory writ of mandate compelling the Board of County Commissioners to order a revote in all of Clark County based on the voter irregularities identified above, or in the alternative, issue a peremptory writ of mandate compelling the Board of County Commissioners to order a revote in Senate District 6, as it lies within Commission District C.
3. That this Honorable Court declare the use of the Agilis mail ballot processing machine and its software for signature verification violates the provisions of the Nevada Revised Statutes as amended or including AB4 provisions, order the lists of Agilis mail processed ballots that were accepted and those that were rejected;
4. That this Honorable Court issue preliminary and permanent injunctive relief requiring the Clark County Commissioners to order a new election under NRS 293.465.

Dated this 16th day of November, 2020.

CRAIG MUELLER & ASSOCIATES

By: _____
CRAIG A. MUELLER, ESQ.
Nevada Bar Number 4703
723 South 7th Street
Las Vegas, Nevada 89101

EXHIBIT 1

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EXHIBIT 1

Press Releases

Secretary Cegavske Announces Plan to Conduct the June 9, 2020 Primary Election by All Mail

Post Date: 03/24/2020 3:58 PM



NEVADA SECRETARY OF STATE
BARBARA K. CEGAVSKE

FOR IMMEDIATE RELEASE

Contact: Wayne Thorley

(775) 684-5720

wthorley@sos.nv.gov

(Carson City, NV; March 24, 2020) – Nevada Secretary of State Barbara Cegavske, in partnership with Nevada's 17 county election officials, announces today plans to conduct an all-mail election for the June 9, 2020 primary election. All active registered voters in Nevada will be mailed an absentee ballot for the primary election. No action or steps, such as submitting an absentee ballot request application, will be required by individual voters in order to receive a ballot in the mail. Voters will be able to mark their ballot at home and then return it by mail using a postage-prepaid envelope or by dropping it off in person at a designated county location. This announcement applies only to the June 9, 2020 primary election.

Secretary Cegavske seeks to reassure voters in Nevada that their health and safety while participating in voting is paramount to state and local election officials. "Because of the many uncertainties surrounding the COVID-19 pandemic, as well as the immediate need to begin preparations for the 2020 primary election, it became necessary for me to take action regarding how the election will be conducted," said Cegavske. "Based on extensive conversations with Nevada's 17 county election officials, we have jointly determined that the best option for the primary election is to conduct an all-mail election."

In order to slow the spread of the novel coronavirus, federal and state health officials have discouraged group gatherings. The training of thousands of poll workers who support Nevada's large in-person voter effort was scheduled to begin next week. The majority of Nevada's poll workers belong to groups that are at high-risk for severe illness from COVID-19. In order to maintain a high level of access to the ballot, while protecting the safety of voters and poll workers, the decision to conduct an all-mail primary election was made.

Even though the majority of voters will be casting a mail ballot for the June 9, 2020 primary election, the high standard Nevada has set for ensuring the security, fairness, and accuracy of elections will still be met. Deputy Secretary of State for Elections Wayne Thorley said, "The priority of the Secretary of State's Elections Division is to ensure every eligible Nevadan has the opportunity to safely vote in the primary election and that the integrity of the election is maintained. We are working with our 17 county election officials to implement the changes necessary to successfully administer this election."

In order to accommodate same-day voter registration, as well as assist voters who have issues with the ballot that was mailed to them, at least one in-person polling location will be available in each county for the June 9, 2020 primary election. These polling locations will be set up to ensure the safety of voters and poll workers alike.

Because in-person voting opportunities will be extremely limited for the primary election, Nevadans are encouraged to register to vote now and not rely on the same-day registration process. Voters are also encouraged to confirm that their voter registration information is up-to-date, including mailing address and political party affiliation. Visit www.RegisterToVoteNV.gov to register to vote online or make updates to your existing voter record.

Voters are reminded that absentee ballots must be dropped off in person by the close of polls on Election Day, or postmarked by Election Day. Ballots that are postmarked by Election Day and received no later than seven days after the election will be counted. Additionally, if a voter fails to sign the ballot return envelope or the voter's signature does not match the one on file with the county election official, the voter will be contacted, and the voter

has up to the seventh day after the election to make the necessary correction. It is important to understand that these statutory deadlines will result in updating vote totals and election results for up to seven days after the election. Close races may remain undecided until all ballots are counted. All counties must certify the election results no later than 10 days after the election.

For more information about the June 9, 2020 primary election, please contact the Secretary of State's Elections Division at (775) 684-5705 or nvelect@sos.nv.gov.

#

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EXHIBIT 2

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EXHIBIT 2

PUBLIC INTEREST

— LEGAL FOUNDATION —

223K Clark County NV Mail Ballots Went to Wrong Addresses in 2020 Primary

County Returns: 17% of Clark County Voter Roll Shows Wrong Addresses

AUGUST 2020 -- Unlike Washoe County and others, Clark County (Las Vegas metro) opted to send actual mail ballots to every registered voter on file for the June 2020 Primary election. The figures released by the Clark County Election Department to the Foundation outline the risks of the forthcoming all-mail election for Nevada purely from cost and process error standpoints.

Prior to the election, county officials testified that an all-county mailing would be needlessly expensive and result in significant amounts of ballots sent to wrong or outdated addresses, given that “inactive” registrants would be included in the bulk mailings. They projected an expense of \$184,738 to send to inactive registrants with an expectation that at least 90% would bounce back undeliverable in the mail.

Clark County	
Total Mail Ballots Transmitted	1,325,934
Voter Returned & Accepted	305,008
USPS Undeliverable	223,469
% Undeliverable Active	42%
% Undeliverable Inactive	58%
Mailed to Active & Inactive Registrants	

Washoe County	
Total Mail Ballots Transmitted	291,434
Voter Returned & Accepted	95,824
USPS Undeliverable	27,640
% Undeliverable Active	100%
% Undeliverable Inactive	0%

Some Context

According to the U.S. Election Assistance Commission Surveys spanning the 2012, 2014, 2016, and 2018 General Elections, the entire state of Nevada reported only **5,863 mail ballots returned undeliverable**.

What AB4 Does in November 2020

- All “active” registered voters will receive a mail ballot.
- Ballot harvesting: individuals other than family members will be able to return ballots for others.
- 140 polling places will be available throughout the state (down from 572 in 2016 Election)

PILF President J. Christian Adams

“These numbers show how vote by mail fails. New proponents of mail balloting don’t often understand how it actually works. States like Oregon and Washington spent many years building their mail voting systems and are notably aggressive with voter list maintenance efforts. Pride in their own systems does not somehow transfer across state lines. Nevada, New York, and others are not and will not be ready for November.”

Undeliverable Addresses by Party	
Democrat	92,337
Republican	53,129
Others	78,003
TOTAL	223,469

Undeliverable Addresses by Status		
Active	93,585	42%
Inactive	129,884	58%
TOTAL	223,469	100%

Sources

Clark County Voter Registrar Joe Gloria (August 3, 2020)

Washoe County Voter Registrar Deanna Spikula (June 10, 2020)

U.S. Election Assistance Commission; 2016 Election Administration & Voting Survey

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EXHIBIT 3



Election Department

965 Trade Dr • Ste A • North Las Vegas NV 89030
Voter Registration (702) 455-8683 • Fax (702) 455-2793

Joseph Paul Gloria, Registrar of Voters
Lorena Portillo, Assistant Registrar of Voters

October 20, 2020

The Honorable Barbara K. Cegavske
Secretary of State
State of Nevada
101 N. Carson St., Suite 3
Carson City, Nevada 89701-4786

Attention: Wayne Thorley
Deputy Secretary of State for Elections

RE: Accommodation of Members of the General Public at Polling Places, Mail Ballot Processing, and at the Central Counting Place

Dear Secretary Cegavske:

In accordance with NRS 293B.354, I am forwarding to you the following guidelines which are provided to our polling place team leaders and our election staff to ensure we accommodate members of the general public who wish to observe activities within a polling place and/or at the central counting facilities.

Polling Places (Early Voting and Election Day)

Designated public viewing areas are established in each polling place, both early voting and Election Day vote centers, where individuals may quietly sit or stand and observe the activities within the polling place.

Observation guidelines:

- Observers may not wear or display political campaign items
- Observers may not photograph, or record by any other means, any activity at any early voting or Election Day polling place
- Use of cell phones is prohibited in the polling place
- Observers may not disrupt the voting process
- If observers have questions, they must direct them to the polling place team leader

Mail Ballot Processing (Warehouse & Flamingo-Greystone Facility)

The general public is allowed, according to the NRS, to observe the counting of mail ballots. In addition, as a courtesy, members of the general public are also being allowed to observe our mail ballot processing procedures, which occur prior to tabulation.

Due to space limitations we are processing our mail ballots in two different facilities:

- 965 Trade Dr., North Las Vegas, NV 89030
 - AGILIS mail ballot processing
 - Signature audit team
 - Tabulation
 - Ballot duplication
- 2030 E. Flamingo Road, Las Vegas, NV 89119
 - Counting Board
 - Ballot duplication

Observation guidelines:

- Observers may not wear or display political campaign items
- Observers may not photograph, or record by any other means, any activity at any early voting or Election Day polling place
- Use of cell phones is prohibited in the polling place
- Observers may not disrupt the voting process
- If observers have questions, they must direct them to the polling place team leader

Election Night (Warehouse Tabulating)

In front of our tabulation area an area is provided for any observer who wishes to observe our counting activity. Reports are provided after each update to the general public and are also available on our website for review. The general public may access the website through our free county wi-fi access on their personal devices should they choose to do so.

The public viewing area allows the general public to view the tabulation room, where the processing of election night results may be observed through windows that provide full view of all counting activity. Observers are not allowed inside the room because of congestion and COVID restrictions.

The Registrar is available to answer questions, although it should be noted that very few

Page 3

Secretary of State Barbara K. Cegavske

March 14, 2018

individuals from the public have been at the Election Center Warehouse on election night since 2000. This will probably be different this year due to increased interest in observing our activities.

In accordance with NRS 293B.354, at link provided here is a link to the vote center polling places that will be used in the General Election on November 3, 2020 in Clark County. <https://cms8.revize.com/revize/clarknv/Election%20Department/VC-Web-20G.pdf?t=1602940110601&t=1602940110601>. An electronic copy is also attached to the e-mail.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph P. Gloria".

Joseph P. Gloria
Registrar of Voters

Enclosures

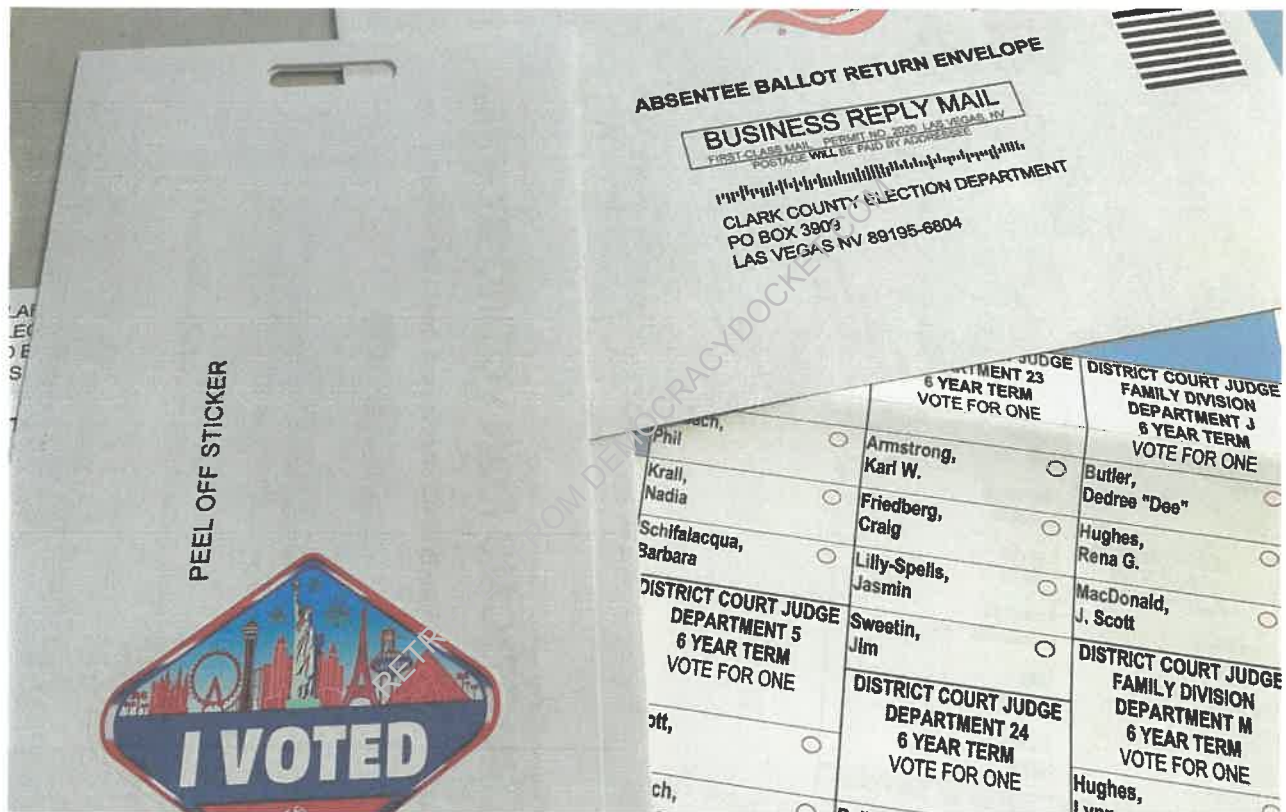
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EXHIBIT 4

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EXHIBIT 4

VICTOR JOECKS: County lowers 'confidence level' for ballot signatures



A mail-in ballot for the primary election. (Hali Bernstein Saylor/Boulder City Review)



By **Victor Joecks** Las Vegas Review-Journal



October 20, 2020 - 9:00 pm

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The Clark County Election Department lowered the factory settings on its signature verification machine. So much for

matching signatures as an impenetrable guard against election fraud.

Earlier this month, every active Clark County voter should have received a ballot. Some people received more than their share of ballots. Last week, I [shared the story of Laurel Morley](#), who received three ballots for two children who live out of state and a deceased aunt.

That's hardly the only concerning case. Another man wrote in to tell me his wife received two ballots. A reader sent me a picture of the two ballots he received in his name. He also received a ballot for his mom, who passed away five years ago. Audra Stagg sent a picture of her husband's ballot, which had been delivered to the wrong address.

These examples are just the tip of the loose-ballot iceberg. When confronted with situations like these, election officials claim signature verification makes mail ballots secure. They imply a signature is like finding a fingerprint at a crime scene: Everyone's signature is unique, and there's an impartial way to judge them.

There's not. Signature verification isn't an objective comparison but a sliding scale manipulated by election officials. Clark County is using an Agilis machine to do the first signature check. The machine uses an algorithm to compare variance in the signature. If the machine says the signatures match, then a

ballot is counted without any further review. The manufacturer recommends starting out at a 50 on a 0 to 100 scale.

That score is a “confidence level,” said Anthony Paiz, vice president of field services of Runbeck Election Services, which makes the machine. Paiz said his company recommends changes to that score are “done with bipartisan” buy-in.

That didn’t happen in Clark County, where officials downgraded the confidence level to a 40 out of 100.

“To determine what score to use, we ran tests of the system and concluded that 40 would accept all the signatures that are obvious matches,” the spokesman said.

When asked if the “40” confidence level allowed inaccurate ballots to get through, the spokesman didn’t respond by deadline. Registrar Joe Gloria refused to answer questions on Monday.

This is terrifying. Clark County is potentially the swing county in the swing state. It has tens of thousands of ballots floating around, legalized ballot harvesting and downgraded signature verification.

In the unlikely event that the Agilis machine — set at the lower threshold — rejects a signature, the ballot isn’t flagged immediately. At least three county workers have to reject the ballot before officials consider the signature a mismatch. The

voter then is contacted to verify that he or she sent in that ballot.

It's worth noting that there are many situations where even perfect signature verification wouldn't detect fraud. For instance, if you're sent two ballots because the voter rolls contain two variations of your name, signature verification isn't helping. Or if you have access to a copy of the signature of someone, such as a relative or deceased family member, you could easily forge a signature.

The Election Department's motto seems to be, "Trust, don't verify." This doesn't prove fraud is widespread, but it does show there is ample opportunity.

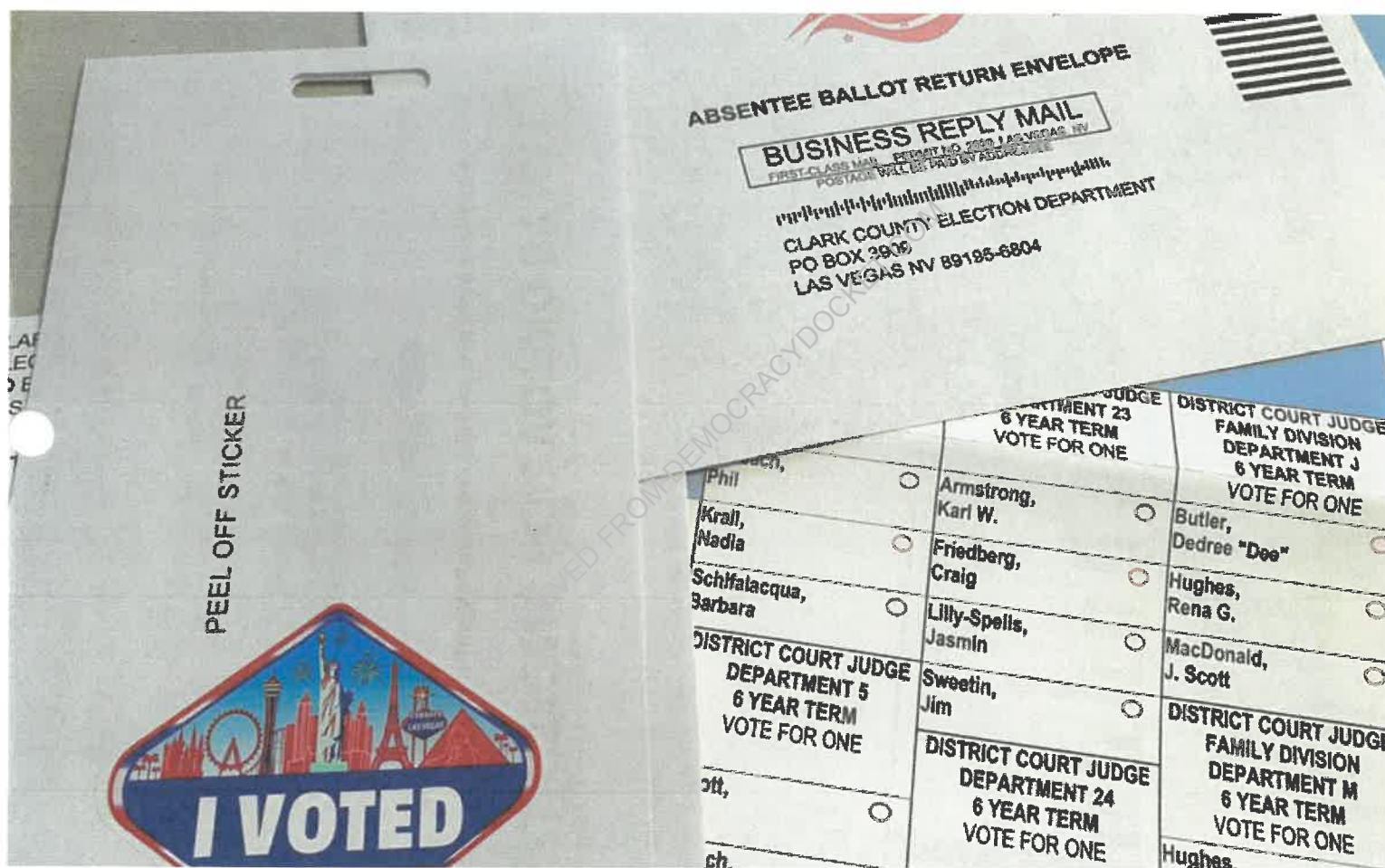
Victor Joecks' column appears in the Opinion section each Sunday, Wednesday and Friday. Listen to him discuss his columns each Monday at 3 p.m. with Kevin Wall on AM 670 KMZQ Right Talk. Contact him at vjoecks@reviewjournal.com or 702-383-4698. Follow [@victorjoecks](https://twitter.com/victorjoecks) on Twitter.

VICTOR JOECKS: Clark County election officials accepted my signature — on 8 ballot envelopes

By Victor Joecks

Las Vegas Review-Journal

1 day ago



A mail-in ballot for the primary election. (Hali Bernstein Saylor/Boulder City Review)

Clark County election officials accepted my signature on eight ballot return envelopes during the general election. It's more evidence that signature verification is a flawed security measure.

For months, election officials have told Nevadans not to worry about ballots piling up in apartment trash cans or sent to wrong addresses.

“Discarded mail ballots cannot just be picked up and voted by anyone,” a fact sheet from the secretary of state’s office says. “All mail ballots must be signed on the ballot return envelope. This signature is used to authenticate the voter and confirm that it was actually the voter and not another person who returned the mail ballot.”

I wanted to test that claim by simulating what might happen if someone returned ballots that didn’t belong to him or her. Plenty of people had this opportunity. Billy Geurin, a 10-year Las Vegas resident, found five loose ballots in his apartment mailroom. A reader emailed me a picture of a pile of mail on the side of the road, which included loose ballots. There are numerous pictures of similar examples on social media.

Nine people participated in this test. I wrote their names in cursive using my normal handwriting. They then copied my version of their name onto their ballot envelope. This two-step process was necessary to ensure no laws were broken.

On Monday, I asked Clark County Registrar Joe Gloria about this scenario. If ballots signed by someone else “came through, we would still have the signature match to rely on for identity,” he said. Asked if he was confident the safeguard would identify those ballots, he said, “I’m confident that the process has been working throughout this process.”

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He was wrong. Eight of the nine ballots went through. In other words, signature verification had an 89 percent failure rate in catching mismatched signatures.

This could explain how a ballot “signed” by Rosemarie Hartle, who died in 2017, made it through signature verification, as reported by 8 News Now. It could explain how Jill Stokke, a longtime Las Vegas resident, was told the signature on her ballot matched, even though she said she never received it.

County officials aren't working proactively to determine whether unscrupulous actors abused this vulnerability in a widespread fashion. Gloria's office doesn't “have an investigatory team.” He said his office catches fraudulent votes “when they're reported to us.” So if a criminal doesn't admit he committed voter fraud, Clark County is unlikely to find out about it. Willful ignorance isn't an election security strategy.

Leave aside the presidential race. Fewer than 200 votes separate the leading candidates in Senate District 5. In 2018, state Sen. Keith Pickard won his race by 24 votes. Even small amounts of fraud can swing results.

It's unclear how much voter fraud took place in Nevada. But it's clear signature verification isn't the fail-safe security check elections officials made it out to be.

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I-Team: County received mail-in ballot from Nevada woman who died in 2017; state investigating 2 allegations |

Title (Max 100 Characters)

I-Team: County received mail-in ballot from Nevada woman who died in 2017; state investigating 2 allegations

Submitted by [8NewsNOWStaff](#) (profile/101415/8newsnowstaff)

Monday, November 9th, 2020, 5:31pm

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LAS VEGAS (KLAS) – State elections officials are investigating at least two cases of ballots cast in the names of deceased individuals on Clark County's voter rolls, the I-Team confirmed.

A state law passed this year required all counties to send every registered voter a mail-in ballot. At least two ballots in Clark County were returned from individuals who remain on the voter rolls, but who are no longer alive.

Rosemarie Hartle of Las Vegas died in 2017 at age 52 from breast cancer, her husband, Kirk Hartle, told the I-Team. A ballot for Rosemarie was issued and later received by the county, but Kirk said the ballot never came to his house.

The I-Team found even though Rosemarie died in 2017, her name appears on the active voter list.

"It was disbelief," Kirk said when he found out a ballot was cast in his wife's name. "It made no sense to me."

Rosemarie's signature matched to what Clark County officials had on records, officials said. Until their investigation is complete, there is no way to know who signed the ballot.

"That is pretty sickening to me to be honest with you," Kirk said.

Rosemarie's ballot was issued on Oct. 9. It was returned the day before Election Day, according to BallotTrax, the system Clark County uses to track ballots from when they are dispatched to when they are counted.

"It certainly brings up a lot of discomfort," Kirk said. "There's a pretty exhausting process you go through when someone passes."

The county regularly updates its voter rolls, officials said. The data is updated as part of the Electronic Registration Information Center, a project among 30 states to share voter information.

In an unrelated case, a Las Vegas man who died in 2017 also had a mail-in ballot cast in his name. Clark County officials said it appears his ballot was returned by a family member, who herself did not vote.

Clark County Registrar of Voters Joe Gloria said any illegal activity will be flagged.

"We have the data," he said, adding the Secretary of State would "vigorously go after anyone who tried to test the system."

No charges have been filed in either case. Clark County does not directly investigate voter fraud or allegations of fraud and sends the information to the Secretary of State's Office and the attorney general.

Monday morning, President Trump tweeted Nevada was turning into a "cesspool of fake votes," but provided no evidence. Twitter flagged the tweet and provided the I-Team's reporting as evidence of a lack of widespread fraud, something Nevada and federal officials have consistently pressed.

Officials with the Nevada Attorney General's Office said they are aware of the allegations, but some complaints about the issues sent to them by Nevada Republicans were redacted.

"This morning, we received a redacted affidavit that does not contain the individual's name, signature or contact information," a spokesperson for the office told the I-Team. "As it stands, our office has not yet received a formal complaint and cannot conduct an investigation without such critical details. This office takes allegations of voter fraud extremely seriously and works with our elections officials, as well as law enforcement partners in Nevada and other states, to investigate and prosecute voter fraud when warranted by the evidence."

Any election-related complaint can be filed at ag.nv.gov (<http://ag.nv.gov>).

Sources close to the Trump campaign and the Nevada Republican Party said more allegations would be released soon.

As of Monday, President-Elect Joe Biden led President Trump by 65,000 votes.

11/16/2020

I-Team: County received mail-in ballot from Nevada woman who died in 2017; state investigating 2 allegations | | Sunrise News

Last week, a federal judge denied an emergency motion from Nevada Republicans after they sued Clark County and the Secretary of State's Office, claiming voter fraud. The lawsuit alleged the county's signature verification system uses lower quality images than its software requires.

[READ ORIGINAL STORY...](https://www.8newsnow.com/i-team/i-team-county-received-mail-in-ballot-from-nevada-woman-who-died-in-2017-state-investigating-2-allegations/) (<https://www.8newsnow.com/i-team/i-team-county-received-mail-in-ballot-from-nevada-woman-who-died-in-2017-state-investigating-2-allegations/>)

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RealClear Politics

Tucker Carlson: Yes, Dead People Did Vote Using Mail-In Ballots

Posted By **Ian Schwartz**
On Date November 12, 2020



FNC's Tucker Carlson said dead people did vote in the 2020 presidential election. Recommended Video: Tucker Carlson explained why voter fraud matters, even when it doesn't swing races on the late-night broadcast of his show.



Recommended

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TUCKER CARLSON: It's been more a week since the final voters were cast, and still many of Donald Trump's 72 million voters believe this election was fundamentally unfair. They're right about that. There was massive outside interference in our democracy, and it wasn't by Russia. The tech monopolies of Silicon Valley used their unprecedented control over news and information to silence Donald Trump's supporters, and to protect Joe Biden. At the same time, public health authorities and blue state governors wielded the pandemic like a partisan political weapon. It's hard to believe they did that, but they did. Corporate America helped them do it. In a moment, we'll have a report on big pharma's role in that scam. It's an

amazing story.

And then there's the question of the votes themselves, the actual ballots. Democrats completely changed the way we voted in this election. Our system has never been more disorganized and vulnerable to manipulation. Was there voter fraud last week? That's a question we've been working on since election night. We've tried to be as careful and precise as we can be in our reporting. In a moment like this, truth matters more than ever. False allegations of fraud can cause as much damage as fraud itself. Jussie Smollett hurt more people with his lies than any actual hate crime. The last thing America needs is more damage. So we want to be accurate. What we're about to tell you is accurate. It is not a theory. It happened. We can prove it.

Other news organizations could prove it too. They've simply chosen not to. The position of corporate media this week is simple: there was no fraud. The New York Times, once the paper of record, declared this as fact this morning, across the entire front page. Take a look at the banner headline: "Election Officials Nationwide Find No Fraud." No fraud. None. End of story. Move on, and listen to Kamala.

You're hearing the same from virtually everyone in media. At CNN, the anchors have been repeating that message for days. They say it with the kind of brittle intensity that suggests that, precisely because they don't really believe what they're saying, you absolutely must believe it. Shut up and accept the verdict, America:

JOHN BERMAN, CNN: "Sources tell CNN that top aides suggesting that the defeated president, President Trump, hold rallies to drum up bogus conspiracies about election fraud."

DON LEMON, CNN: "The GOP keeps spreading completely unsubstantiated

claims of voter fraud."

BROOKE BALDWIN, CNN: "The attorney general now telling federal prosecutors to look into those unsubstantiated claims of voter fraud."

CNN'S ANDERSON COOPER: "There is no evidence of widespread voter fraud. No evidence of wide-spread flaws in the mail-in voting process."

"Bogus conspiracy theories." "Completely unsubstantiated claims of voter fraud. What exactly are they talking about?" They won't tell you, so we will. Right now, fewer than 15,000 votes separate Donald Trump from Joe Biden in the state of Georgia. That's close enough that it's worth getting specific about what happened. Georgia's secretary of state has confirmed there will be a hand-recount of all votes. Among those votes, auditors will find a ballot cast by a woman called Deborah Jean Christiansen. You'd be pressed to find anyone who's got a bad word to say about Deborah Jean Christiansen. She's been well known in her community for years as a bird watcher, an avid gardener, and a committed fan of the Georgia Bulldogs. Those who knew her were sad when she died last May. They may be surprised to learn that, even after her death, Deborah Jean Christiansen still managed to register to vote and then cast a ballot, presumably for Joe Biden.

In some ways, it's an inspiring story — the triumph of voting over death. No one embodies it quite like James Blalock of Covington, Georgia. Mr. Blalock was a mailman for 33 years, until he passed away in 2006. Fourteen years later, according to state records, he was still mailing things. James Blalock cast a ballot in last week's election. How did he do that? It might be worth asking the New York Times. Maybe James Blalock was just one of those extraordinary mail carriers: neither rain, nor snow, nor gloom of night — nor even death itself — could keep him from exercising his sacred franchise. In his case, maybe voting from the grave wasn't really fraud. It was commitment.

OK. But what about Linda Kesler of Nicholson, Georgia? Linda Kessler died in 2003. Seven years later, she was still voting in presidential elections. Edward Skwiot of Trenton, Georgia spent his life working construction and teaching school. In his spare time, he loved bluegrass music. According to those who knew him, he “played multiple instruments and enjoyed jam sessions.” When he died five years ago at the age of 82, it seemed like he was gone from this world for good. But no. Last week he voted for president.

And he wasn’t the only one. On your screen right now you’ll see the names of other deceased voters. Each one of them played a role in last week’s election. So far, there aren’t enough of them to alter the outcome. That could change as we learn more. But for the moment, the point is, they exist. Dead people voted. The question is, how? How exactly did they cast ballots? The short answer is, mail-in voting. Dead people tend to vote more when you make it easy for them to vote, and this year we certainly did. States sent ballots and registration forms to millions of people unsolicited. The pretext was Covid. We had to do this for public health reasons, remember? We had no choice. The effect, of course, was encouraging fraud.

One 2012 study by Pew found there were close to two million dead people still on the voter rolls around the country. That study also found that approximately 24 million voter registrations — that is, one out of every eight — were wrong. They were no longer valid, or were significantly incorrect. Close to three million people had registrations in more than one state. If you start sending ballots and registrations to lists like this, you’re guaranteed to increase the amount of fraudulent voting. That’s exactly what Democrats did. Republicans, we should add, let them do it.

Take the state of Nevada, where Joe Biden is currently leading Donald Trump by fewer than 40,000 votes. This year, state Democrats and their lawyers made sure that Nevada sent ballots -- not ballot applications, but

actual ballots -- to every registered voter in the state, whether they requested them or not. They did this, even though they knew there were more than 41,000 people who are registered to vote in Nevada, but haven't voted or updated their registrations in more than ten years. Many of these people are dead or gone. But they got ballots anyway.

One of those people was a former elementary school teacher called Rosemarie Hartle. According to her 2017 obituary, Rosemarie Hartle was "loving, fun, sassy and sarcastic in a fun way; beautiful, powerful, relentless, and inspiring." Sadly, now she's gone. But her voter registration remains. She's still on the rolls. Someone received Rosemary Hartle's ballot in the mail and cast it. Who did this? We don't know. We wish we did. It's fraud. It's a threat to our system, and it's being hidden by a news media totally vested in a Biden presidency.

We should know much more about this. But thanks to the media blackout, it's left to independent conservative sites -- places like The Federalist -- to report what the rest should be reporting. Thanks to them, we know that on October 9, a man called Fred Stokes Jr., received an unsolicited ballot in Clark County, Nevada. Three weeks later, the county received his ballot. Voting records indicate the ballot was "completed." Fred Stokes has been dead for three years. He died in June of 2017 at the age of 92.

In Pennsylvania, the state that made Joe Biden the "president-elect," there are likely quite a few dead voters. According to a report from last December from the state's Department of Auditor General, nearly 3,000 potentially deceased voters remain on Pennsylvania's voter rolls. The Trump campaign says it's found evidence that some of them voted this year. For example, on October 24th, Allegheny County officials mailed a ballot to one Denise Ondick. She'd died two days before. Yet, somehow, records show that county officials received Denise Ondick's completed ballot on November 2. Again, we're showing you more names on the screen, just like Denise

Ondick's. We can confirm that they all voted in last week's election, and all of them were dead when they did.

None of this is conjecture — much less one of the “bogus conspiracy theories” CNN worries about. It's entirely real. It didn't happen by accident. Democrats understand that when you send mail-in ballots to an entire unverified voter roll, you can't really know who's voting. But just to be sure fraud remained likely, Democrats filed lawsuits in Nevada to eliminate signature verification. In 2019, well before the coronavirus panic, Ron Wyden, a Democratic senator from Oregon, sponsored the Vote by Mail Act. The bill demands that every state in the country mail ballots to their entire unverified voter lists. In other words, Democrats want fraud. They're pushing it.

This summer, Democrats in the House passed something called the "HEROES Act." It wouldn't have simply have provided, quote, "automatic mailing of absentee ballots to all voters" in this country. It also would have prevented states from restricting ballot harvesting, meaning that anyone could collect and return bundles of ballots to polling stations -- with no oversight.

Expect more of this. Loose voting rules are too useful for the left to pass up. In January, Democrats could gain control of the United States Senate. If that happens, they will pass the HEROES Act into law. Right now, they're claiming universal mail-in ballots are necessary because of the coronavirus. That's a lie. They've been pushing for this for years. According to Barack Obama, the most divisive president in US history, if you're against sending ballots to unverified voting lists, you're a racist. Watch:

OBAMA: "Even as we sit here, there are those in power who are doing their darnedest to discourage people from voting by closing polling locations and targeting minorities and students with restrictive ID laws and attacking our

voting rights with surgical precision, even undermining the postal service in the run up to an election. It's going to be dependent on mail-in ballots so people don't get sick."

Obey, or I'll call you racist. Obama spent eight years working that scam. Amazingly, a lot of people still fall for it. We shouldn't. If we care about our democracy, we've got to demand clean and honest voting, regardless of the outcome. That's the key to everything. Otherwise we'll find ourselves where we are now: cynical, distrustful, withdrawn. Social trust is essential to a democracy. If you want people to believe in the system, you can't just yell at them on TV. You have to create a system that's worth believing in.

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EXHIBIT 5

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EXHIBIT 5

DECLARATION OF ROBERT E THOMAS III

Robert E. Thomas, III, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I make this declaration in support of Petitioner's Petition for Writ of Mandamus, or in the alternative, Writ of Prohibition.

3. I am a Nye County registered voter in the State of Nevada.

4. As a registered voter in the State of Nevada, there is a mechanism for my status as a voter to be challenged if I physically show up to vote, however there is no such mechanism for voters who vote by mail to be challenged. I'm worried that the votes of people who vote in person will be diluted because it is possible to challenge them as opposed to people who vote by mail.

5. Moreover, as a member of public, I am expressly granted the right to observe the counting of the ballots at the central counting place.

6. On Monday, October 19, 2020 I went to a Clark County facility located at 965 Trade Dr., North Las Vegas, NV 89030 to observe mail ballot processing.

7. As part of my observation, I observed the AEGILIS machine. The observation area for the AEGILIS machine was at the end of the room.

8. The observation area was approximately 25ft away from the monitor that controlled the operation of the AEGILIS machine, and I was not able to see the monitor screen.

9. I noticed the machine would sporadically have mechanical issues. The worker would then go talk to support staff who would come to the monitor to correct something.

10. I was not close enough to see what was corrected or what the error was.

11. While there was a break, I asked my ambassador [an Extra-Help employee hired to escort observers] to see the screen. My ambassador said she talked to Joe Gloria and I was not allowed to see the screen. However, I was told there was an ongoing issue with the AEGILIS machine matching signatures from the DMV.

12. The observation I was allowed to do was meaningless because I could not see the process in its entirety and my ambassador could not answer some of my questions.

13. On Monday, October 19, 2020, I was also observing the verification stations at the same Clark County location. The observation area for the verification station is partitioned away from the station with plexiglass. The computer screens in the verification station are too far away from observers to have meaningful observation and the observers cannot hear the telephone calls being made.

14. On Wednesday, October 21, 2020 I returned to the Clark County facility located at 965 Trade Dr., North Las Vegas, NV 89030 to observe mail ballot processing.

15. As part of my observation, I observed ballot counting in a room with a wall of windows, like a fishbowl. I was stationed outside of the room looking in through the windows. Each station in the room has a computer monitor and terminal. As an observer, while I could identify an error message appear on the monitors, I was unable to read what the error was because the observation area was too far away.

16. During my observation, I was required to be with ambassadors at all times. Unfortunately, there are not enough ambassadors to allow consistent and meaningful observation of the entire process.

17. It was my observation that after a ballot has been opened, the staff member who opened the envelope reviews the ballot. I am informed and observed that if a ballot is rejected, the ballot is then placed back into the same envelope in which it was received. The result is that the board member reviewing the ballot knows the identity of the voter who cast the ballot and can now observe or even record how the individual voted. Moreover, I am informed that if the ballot has a deficiency that requires it to be duplicated by another staff member, the envelope is sent with the ballot to be duplicated, resulting in yet another staff member observe how the voter cast their ballot.

18. This process is concerning because it does not ensure ballot secrecy and if the staff member does not agree with how the individual voted, this knowledge may become an incentive for the staff member to invalidate the ballot, risking voter disenfranchisement.

MARQUIS AURBACH COFFING

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Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 22nd day of October, 2020.


Robert E. Thomas III

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EXHIBIT 6

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 6

DECLARATION OF FRED KRAUS

Fred Kraus, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I make this declaration in support of Petitioner's Petition for Writ of Mandamus, or in the alternative, Writ of Prohibition.

3. I am a Clark County registered voter in the State of Nevada.

4. As a registered voter in the State of Nevada, there is a mechanism for my status as a voter to be challenged because I voted in person, however there is no such mechanism to challenge voters who cast their vote by mail. I am concerned that people like me that are voting in person are having our votes diluted or cancelled because our votes can be challenged, unlike the votes of those that vote by mail.

5. Moreover, as a member of public, I am expressly granted to the right to observe the counting of the ballots at the central counting place.

6. On Thursday, October 15, 2020 I went to a Clark County facility located at 2060 E. Flamingo Road, Las Vegas, NV 89119 to observe mail ballot processing.

7. As part of my observation, I observed the preparation of duplicate ballots in lieu of damaged ballots.

8. I was confined to a rectangular space situated at the intersection of the long part of an L shaped room. From this vantage point, I was only able to observe a few tables on the base of the L shape of the room.

9. There were rooms or offices where staff would walk in and out with ballots, but we were not allowed to view the process or conduct of staff in these rooms. For example, at the East Flamingo location there was a room labelled "MB Vault." Inside were large bins with many shelves with blank ballots. I observed staff walking in and out of that room and retrieving blank ballots with green envelopes in their hands that contained ballots and then going to a part of the

1 room that I could not observe. At the Trade Drive location in the room with the Agilis Machine
2 there was a side door with a small window and a set of steps leading to a floor above. I was not
3 permitted in that room. I was told later by a county employee escorting me out of the Agilis room
4 that there were blank ballots stored upstairs. Before I left that room, I saw an employee returning
5 with papers in a tray.

6 10. For example, once the operations at the tables at Greystone were completed a box
7 of ballots would be taken to a supervisor's office located across from where we were seated that I
8 could not see into. On other occasions, the box of ballots was carried or wheeled in a cart past me
9 to a location that I could not see. However, on being escorted to my small location when I arrived
10 or being escorted out of the room during break times for employees' breaks, I could see that there
11 was an audit area but other than just noticing that area I was unable to observe the operations in
12 this audit area. I was told the boxes would be inspected for compliance with procedures.
13 Ultimately, I would see portable black vaults coming out of the supervisor's office and leaving the
14 room. I was told the portable black vaults contained the finished boxes. The portable black vaults
15 were to be taken to another vault room at Greystone and later were to be returned to the Trade
16 Drive campus. However, we were not permitted any meaningful opportunity to see what the
17 supervisor was looking to do during her inspection or what the process was in the audit area or, in
18 either case, to observe the sealing of the boxes for transport back to the Trade Drive location.

19 11. On Friday, October 16, 2020, I returned to the Clark County facility located at 2060
20 E. Flamingo Road, Las Vegas, NV 89119 to observe mail ballot processing.

21 12. I was escorted to the same area as the day before for observation. Although I was
22 able to walk past the duplicator desks, I was not given any time to make observations.

23 13. I viewed ballot examiners place defective ballots in a green folder. Roving
24 employees would then take these green folders to the ballot duplicators which were not visible
25 from the viewing area, but would often, but not in all cases, enter the Master Ballot Room where
26 sometimes I could see from a distance their removing a blank ballot and leaving the room and
27 heading in the direction of the duplicating tables.
28

1 14. On Saturday, October, 17, 2020, I returned to the Clark County facility located at
2 2060 E. Flamingo Road, Las Vegas, NV 89119 to observe mail ballot processing.

3 15. I was allowed to observe in the same confined area as the previous days.

4 16. There were 32 tables for ballot examiners. Of which, I was only able to see 24 of
5 the tables from a distance with all but a few located at a distance such that I could not engage in
6 meaningful observation.

7 17. Notably, I could only hear what was being discussed at the few tables closest to me.
8 There were also 7 duplicator tables which were not visible from my designated area.

9 18. On Tuesday October 20, 2020, I went to a Clark County facility located at 965
10 Trade Dr., North Las Vegas, NV 89030.

11 19. I observed the scanning/tabulation of ballots in the scanning room. The scanning
12 room is an enclosed area with two sections. The section closest to the observation area has a glass
13 window and the scanning operation takes place in that room. That room is connected to a back
14 room which has a glass wall facing the observers.

15 20. It was impossible for me to determine what processes were happening in the back
16 room because the designated area for observers was too far away.

17 21. I was shown two offices which were dedicated to resolving rejected ballot issues.
18 These offices were referred to as the Freedom Room and the Liberty Room. The Freedom Room
19 was staffed, but I was not allowed to enter or observe.

20 22. The Liberty Room was not staffed and I was not allowed to enter.

21 23. During my observation, I was required to be with ambassadors or minders at all
22 times. Unfortunately, there are not enough ambassadors to allow for more than a few observers
23 and the function of the ambassadors or minders is to make sure we were only able to observe
24 operations from specified locations, which would not permit a consistent and meaningful
25 observation of the entire process.

26 24. I was told by one of my ambassadors or minders at the East Flamingo location that
27 the only function performed there was an examination of ballots to see if the ballots were damaged,
28 soiled or obscured in some way such that they would not be suitable for tabulating when returned

1 to the Trade Drive location. However, I observed small envelopes at the tables I could see that
2 were labelled for rejected ballots. When I inquired about the rejection envelopes, I was told that
3 the only rejection that takes place at Greystone is when a voter signs the ballot. However, there
4 were white sheets of paper attached to the glass or plexiglass at each table that were labelled
5 "Rejected Ballot Codes" and which then listed seven (7) rejection codes. Rejection for a voter
6 signing the ballot was not among the rejection codes listed. The instructions in one rejection
7 category included a requirement that the employee "Find the ballot envelope with the voter's name
8 on it" and "place the ballot back in the ballot return envelope."

9 25. I also noticed a sign on the wall that stated "Rejecting Identified Ballots" which
10 was not consistent with an operation limited to examining ballots for those not machine worthy.

11 26. I was able to observe on a number of occasions that workers at tables placed
12 documents in Rejected Ballot envelopes. In addition, on the morning of October 17, 2020, I
13 overheard a worker at the table located just outside the offices across from me mention to a
14 supervisor that one of her envelopes had 2 ballots inside. That would be a rejection code of RT
15 from the Rejected Ballot Code papers affixed to each table working area. So, the statement made
16 to me on October 15, 2020 that the only rejected ballots processed at the East Flamingo location
17 were those where the voter signed or initialed the ballot was incorrect

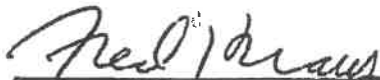
18 27. I did see a Rejected Ballot envelope sitting on top of the completed trans file at a
19 table where I overheard the employee mention to her supervisor that she had an envelope with 2
20 ballots. While I could not see the worker insert the ballots and the return ballot envelope, which
21 contains the voter's signature, into the Rejected Ballot envelope, I believe that she did so and thus
22 would have been able to observe the name of the voter who signed the return ballot envelope. I
23 believe this because one of the signs on the walls was entitled "Rejecting Identified Ballots." The
24 instructions in that separate rejection category included a requirement that the employee "Find the
25 ballot envelope with the voter's name on it" and "place the ballot back in the ballot return
26 envelope." In addition, when a ballot is rejected the only way to identify whose ballot was rejected
27 would be to place both the ballot and the return ballot envelope, which identified the voter whose
28 ballot was rejected, in the rejected ballot envelope.

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28. This process is concerning because it does not ensure ballot secrecy and if the staff member does not agree with how the individual voted, this knowledge may become an incentive for the staff member to invalidate the ballot, risking voter disenfranchisement

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 23rd day of October, 2020.


Fred Kraus

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EXHIBIT 7

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 7

AFFIDAVIT OF KANOA IKEDA-FLYNN

STATE OF NEVADA)
)ss:
COUNTY OF CLARK)

I, Kanoa Ikeda-Flynn, being first duly sworn, deposes and says:

1. I am over the age of 18 years old and reside at 10639 Cliffords Tower Court, Las Vegas, Nevada 89135. I swear that the following facts are true based on my personal knowledge and I am competent to testify thereto; as to any other matters, of which I have no personal knowledge, I base my statements upon information and belief;

2. I signed up with the Clark County Elections to be a poll worker. I was told I could not be a poll worker. I instead was offered to be a Counting Board Member. Amanda Garcia hired me early October of 2020. I began approximately October 13 or 14, 2020 as a non-partisan worker.

3. I participated in two training days. We met at a splinter location at Flamingo and Maryland Parkway. We had two training sessions of approximately 6 hours each day.

4. I stopped working on November 6, 2020 due to concerns about how the votes were being counting.

5. When I left, the facility was still counting ballots.

6. I counted approximately 3 boxes of ballots a day, each box containing 150 ballots. I conservatively estimate that I counted approximately 14,000 ballots.

7. I personally witnessed disregard of signature verification as well as other irregularities.

8. While working, I observed a significant number of signatures on mail-in ballots that I believe did not match the name and should have been reviewed. When I asked the

1 supervisors, Amanda Garcia and others, about it, instead of taking the ballot to verify the
2 signature in the electronic database, the supervisor told me to push the envelope through without
3 verification.

4 9. I personally observed an envelope on which the voter reported that he or she no
5 longer resides at the address on the ballot. This ballot should have been listed as a rejected ballot,
6 but the supervisor instructed me to push the ballot through.

7 10. I believe that other workers at the counting facility share the same concerns that I
8 have.

9 FURTHER YOUR AFFIANY SAYETH NAUGHT.

10
11
12 
13 KANOA IKEDA-FLYNN

14
15 SUBSCRIBED and SWORN to before me

16 By: KANOA IKEDA-FLYNN

17 this 7th day of November, 2020.



NOTARY PUBLIC

In and for said County and State

EXHIBIT 8

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 8

110696	PONTILLO, CARRIE DENISE	3747	8405 SHORE BREEZE DR	8405 SHORE BREEZE DR	4	37	6
1154944	WILGAR, JENNIFER LACE	3760	2600 DREAM DAY ST	4060 DREAM DAY ST	4	37	6
1221822	BOYD, TODNEE LATANYA	3702	4021 DALE EVANS DR	4021 DALE EVANS DR	4	37	6
129686	GAMBRELL, GAIL MARGURIT	3812	3760 1301 N RAINBOW BLVD APT 56	1301 N RAINBOW BLVD APT	1	34	6
1296828	JACK, CRYSTAL	3760	3760 7216 NOOK CREST CT	7216 NOOK CREST CT	4	37	6
1340027	CARLIS, MARLA Y	3366	7645 8824 ROZETTA CT	8824 ROZETTA CT	4	34	6
1373724	LOOS, LYNDA R	3385	3385 2005 ARBOR FOREST ST	2005 ARBOR FOREST ST	4	37	6
1515746	THOMPSON, MELIKA LA'SHA	3754	3841 2208 TOSCA ST APT 201	2208 TOSCA ST APT 201	4	34	6
1536846	No answer 2x	3363	3363 1009 DOMINUS LN UNIT 102	1009 DOMINUS LN UNIT 102	3	34	6
1577857	WHITE, WILLIE MAE	3431	3431 3412 WAYWARD CT	3412 WAYWARD CT	4	37	6
1723985	PAWLUK-NORRIGA, ELIAS AL	3766	3766 7717 CRENSHAW WAY	7717 CRENSHAW WAY	4	37	6
1748957	MORENO, LAURA JULISSA	3435	5593 3724 CACTUS WHEEL CT	3724 CACTUS WHEEL CT	4	37	6
1755858	ARRIAGA, MARCO A III	3762	6708 1224 MERIDIAN BAY DR	1224 MERIDIAN BAY DR	1	34	6
1760577	STOUTSENBARGER, SHANE C	3366	7645 8824 ROZETTA CT	8824 ROZETTA CT	4	34	6
1791247	TUING, MARY ROSE	3762	3762 929 ROCKVIEW DR APT 201	929 ROCKVIEW DR APT 201	1	34	6
1799668	EVANGELISTA, FLORENCE T	3762	3762 929 ROCKVIEW DR APT 201	929 ROCKVIEW DR APT 201	1	34	6
1827471	ARMSTRONG, MARIAH	3762	3762 8025 CHERISH AVE	8025 CHERISH AVE	1	34	6
1885912	ADKINSON, BENNETT ALEXA	3800	3800 9501 MOUNTAINAIR AVE	9501 MOUNTAINAIR AVE	4	34	6
1885927	ADKINSON, LEAH CHRISTINE	3800	3800 9501 MOUNTAINAIR AVE	9501 MOUNTAINAIR AVE	4	34	6
1901534	MILCHAYLOV, YAVOR OLEG	3780	3780 9101 TEAL LAKE CT	9101 TEAL LAKE CT	4	37	6
1925632	ARMENDARIZ, LUIS RICARDO	3864	1327 8209 CHARLES TURK DR	8209 CHARLES TURK DR	1	34	6
2000333	NORRIS, MIDORI	3728	6655 2110 SPRING WATER DR	2110 SPRING WATER DR	3	37	6
203087	MUELLER, RANDALL HOWAR	3217	3780 8825 RUSSET FALLS ST	8825 RUSSET FALLS ST	4	37	6
2068591	ELLEN, SHELBY LEA	2710	2710 4516 BRITTANY VILLAGE CT	4516 BRITTANY VILLAGE CT	4	37	6
2072693	FRIESEN, KATHLEEN LOUISE	3361	3361 7700 TOMICH AVE	7700 TOMICH AVE	1	34	6
2125549	LANDRETH, JOHN ORIN	3761	3761 1401 SEWARD ST UNIT 204	1401 SEWARD ST UNIT 204	1	34	6
2149059	FORNOS, JORGE ARIEL	3864	3864 8445 STAPLETON AVE	8445 STAPLETON AVE	1	34	6
2230441	GARROW, COLLEEN NICOLE	3811	3811 6501 VEGAS DR UNIT 1074	6501 VEGAS DR UNIT 1074	1	34	6
2254408	MOORE, MARIAN L	3842	3842 2209 TALL PINE DR	2209 TALL PINE DR	4	34	6
2257617	PACHECO, DANCE	3385	3385 10001 SUMMER OAK LN UNIT	10001 SUMMER OAK LN UNIT	4	37	6
2270246	PULLEY, DAVID ANDREW	3739	3739 8709 RED BROOK DR UNIT 104	8709 RED BROOK DR UNIT	4	34	6
2273895	ESTALLULA, ALLEN LOPEZ	3361	3361 8201 DISTANT STAR CT	8201 DISTANT STAR CT	1	34	6
2280181	RILEY, REBEKAH	3762	3762 1032 BIRD SPRINGS DR	1032 BIRD SPRINGS DR	4	34	6
2310884	ANDERSON, ASPEN HOPE	3800	3800 2009 BLOOMFIELD CT	2009 BLOOMFIELD CT	4	34	6
2365982	NEWMAN, JOHNNIE BENNIE	3435	3435 8404 ORCHARD RIDGE AVE	8404 ORCHARD RIDGE AVE	4	37	6
2367391	HUNG, PHYRE	3395	3395 7916 BRIDGE GATE DR	7916 BRIDGE GATE DR	4	34	6
2404000	VUONG, ALYSSA	3391	2037 1609 ROYAL CANYON DR	1609 ROYAL CANYON DR	4	34	6
2422354	MARTINEZ, DENNIS ANTHON	3414	6738 2569 IRON CREST LN	2569 IRON CREST LN	3	37	6
2422407	MARTINEZ, RAMONA LYDIA	3414	6738 2569 IRON CREST LN	2569 IRON CREST LN	3	37	6
2429816	SMITH, SARAH MARIE	3749	1327 3125 N BUFFALO DR APT 2078	3125 N BUFFALO DR APT 20	4	37	6
2451855	PICACHE, JULIANA ALESSANDI	3766	3726 7805 WEDLOCK LN	7805 WEDLOCK LN	4	37	6
2474966	SAYER, JULIET ELIZABETH	3361	3361 124 WORTHEN CIR	124 WORTHEN CIR	1	34	6
2537856	FORREST, MARKEZE DASHON	3760	3760 4141 HARDWICK CT	4141 HARDWICK CT	4	37	6
308355	STUBBLEFIELD, REUBEN ROW	3773	3773 7200 PIRATES COVE RD APT 21	7200 PIRATES COVE RD APT	1	34	6
319350	TALLERICO, JAMES SAM	3773	3773 209 PERSIMMON CT	209 PERSIMMON CT	1	34	6
415791	MORGAN, JAMES	3702	3702 4005 MIRA LN	4005 MIRA LN	4	37	6
527280	TORRES, ABEL TRINIDAD	3430	3430 8445 WANDERING SUN AVE	8445 WANDERING SUN AVE	4	37	6
538364	MAYNARD, MEGAN TANYA	3757	3757 4221 N BONITA VISTA ST	4221 N BONITA VISTA ST	4	37	6
577527	BATALONA, LORRAINE THERI	3807	3807 9333 SUN ROSE AVE	9333 SUN ROSE AVE	4	37	6
601158	CROSBY, GEORGE ROBERT	3036	3036 2604 DESERT BUTTE DR	2604 DESERT BUTTE DR	4	37	6
621465	CROSBY, SARA HARRISON	3036	3036 2604 DESERT BUTTE DR	2604 DESERT BUTTE DR	4	37	6
659378	MAYO, BETH JANET	3431	3431 7809 HONORS CT	7809 HONORS CT	4	37	6
702330	WICKENNA, STEVEN MICHAEL	3366	3366 1817 GLENVIEW DR	1817 GLENVIEW DR	4	34	6
917749	HUSTON, JOHN DAVID	3739	3739 1613 CARDINAL BLUFF DR UNIT	1613 CARDINAL BLUFF DR	4	34	6
989362	BRYANT, JR	3431	3431 7825 INDIAN CLOUD AVE	7825 INDIAN CLOUD AVE	4	37	6

EXHIBIT 9

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EXHIBIT 9

[illegible]

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 10

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 10

[illegible]

EXHIBIT 11

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 11

[illegible]

EXHIBIT 12

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT 12

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Frank Santora

Incident Date/Time: November 8, 2020 @ 5:00 p.m.

Voter's Name: Leah Christine Ramey Adkinson Voter ID#: 1885937/ Prec. 3800

Voter's Address: 9501 Mountainair Ave., Las Vegas, NV

Report: On November 8, 2020, Susanne Spinnelli, my colleague, and I knocked on the
described above. A woman came to the door and she identified herself as Rochelle
Wickliffe. We asked to speak to either Bennett Alexander Adkinson or Leah
Christine Ramey Adkinson. Mrs. Wickliffe replied that the Adkinsons no longer
live at this residence as they moved to China in June 2020. She indicated that she
started living at this residence in June 2020. She stated that she did not receive
any ballot addressed to the Adkinsons.

Attached is a picture of the residence described above.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045), the forgoing is true and correct.*

Signed: 

Date: 11/09/2020

** NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.*



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Raymond J. Serrano
Incident Date/Time: 11/8/20, 1:30 pm
Voter's Name: Carrie Pontillo Voter ID#: 1110696
Voter's Address: 8405 Shore Breeze Dr.

Report: At the time listed above, I knocked
on this door. The tenant of this residence
answered the door, and I identified myself.
I asked the gentleman if he was
familiar with the name, "Carrie Pontillo"
He said that was his landlord who
lives in Northern CA. He was unsure if
she had voted or not. He is not sure
whether she had received a ballot or
not.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045), the foregoing is true and correct.*

Signed: [Signature] Date: 11/8/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Alex Tarkanian
Incident Date/Time: 11/8/20
Voter's Name: JR Bryant Voter ID#: 989362
Voter's Address: 7825 Indian Cloud ave

Report: I introduced myself at the door to the person who answered. When I asked if JR Bryant lived at the residence the man said yes. I told them that the election commission claimed that he had voted by mail and the ballot was delivered to this address. He then said that they did not vote by mail. Before I could continue the man at the door told me to have a good day and went back inside. The man was not specific if he and everyone in the house voted in person or dropped off their ballot.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*) the foregoing is true and correct

Signed: Alex Tarkanian Date: 11/10/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form:



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Raymond J. Serrano

Incident Date/Time: 11/10/20, 3:15pm

Voter's Name: Melika La'Shay Thompson Voter ID#: 1515746

Voter's Address: 2208 Tuscany St, Apt 201
Las Vegas, NV

Report: At the time listed above, I knocked
on the door of the address listed above.
A gentleman who was leasing the apartment
answered the door, and I asked if he
was familiar with Ms. Thompson. He said he
did not know her, had never heard her
name, and to his knowledge never lived
there.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 11/10/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: FRANK SANTORA

Incident Date/Time: NOVEMBER 9, 2020 @ 3:30 PM

Voter's Name: Tanya Meagan Maynard Voter ID#: _____

Voter's Address: 4221 N. BONITA VISTA ST.
LAS VEGAS NV

Report: ON NOVEMBER 10, 2020 Susamme
Spinelli and I knocked on the door
(ring bell). A gentle man answered
and identified himself as Nicholas
GRAVER, we asked for Tanya Meagan
MAYNARD and he said she did not live
here, He has owned the house, He
indicated he is the owner and has
lived there for 1 year and two months.
Mr GRAVER stated that he did not
receive any ballot addressed to MAYNARD.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 11/12/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Raymond J. Serrano

Incident Date/Time: 11/8/20, 2:30p

Voter's Name: Elias Pawluk-Nobriga Voter ID#: 1723985

Voter's Address: 7717 Cronshaw Way
Las Vegas, NV

Report: At around 2:30 pm I knocked on the
door at this address. A gentleman answered the
door, and I introduced myself. I asked him
if he was familiar with the voter who
appeared on the list, "Elias Pawluk-Nobriga."
The gentleman said nobody by that name
lives at that address, nor has ever lived
there to his knowledge. He was not
familiar with the name at all.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 11/10/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Raymond J. Serrano

Incident Date/Time: 11/8/20, 2pm

Voter's Name: Todnee Boyd Voter ID#: 1221922

Voter's Address: 4021 Dale Evans Dr.
Las Vegas, NV

Report: I knocked on this door at approximately
2pm on 11/8/20. Upon exiting my car, a child
aged about 8-10 greeted me in the driveway.
I asked the child whether the name on my
list lived at that address, she replied with,
"Not anymore." I then spoke to the child's
mother and presumed head of the household
who told me, "She doesn't live here anymore,
and we all voted." This individual was very
dismissive and was not interested in speaking
to me.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 11/8/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Pauline Lee
Incident Date/Time: November 9, 2020 @ approximately 2:15 pm
Voter's Name: Marian L. Moore Voter ID#: 2254408/ Prec. 3842
Voter's Address: 2209 Tall Pine Drive, Las Vegas, NV

Report: David Gibbs and I approached the doorway of 2209 Tall Pine Drive, a condominium
in Las Vegas, Nevada. Right outside of the front door on the street, a man and
a woman were working on a car trying to jimmy/ unlock the door of a car.
They both looked at us and the woman told us she had locked her car key inside
the car. They were using a wire hanger to try to open the car door. The man
noticed that we were about to approach the door and asked what we wanted. We identified
ourselves and told them that we were verifying whether Marian Moore lived at
2209 Tall Pine Drive. The man identified himself as Chris Chady and told us that
he and his mother lived at 2209 Tall Pine Drive and have been there for about 4 months.
When we asked whether he received a ballot for Marian Moore, he said that he
does not recall ever receiving a ballot for this person. He told us he voted in person
for the General Election.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045), the foregoing is true and correct.*

Signed: Pauline Lee

Date: 11/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form:



CITIZEN OUTREACH FOUNDATION

Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Raymond J. Serrano

Incident Date/Time: 11/9/20, 2:06 pm

Voter's Name: Allen Estrella Voter ID#: 2273995

Voter's Address: 8201 Distant Star Ct.
Las Vegas, NV

Report: I knocked on this door at about
2:06 pm on 11/9/20. The man who
answered the door was a tenant, living
from the individual whose name is on the
list. He told me his landlord does not
live there, and he never received his
landlord's ballot in the mail. He was not
sure whether or not his landlord voted.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 11/9/20

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.

EXHIBIT 13

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EXHIBIT 13

INUMB	VOTER NAME	NEW OLD	New Address	Old Address	CD	Assembly	Senate	Commission	Education	Regent	School	Same	Notes
67662	CARTER, CHARLES EDWARD	3802	3802 1401 N MICHAEL WAY UNIT 227	1401 N MICHAEL WAY UNIT 227	1	3	3	C		1	2	C	Same
73703	KEYES, GREGORY ODIN	3535	3535 14285 FORDS WAY	14285 FORDS WAY	4	36	19	C		4	13	E	Same
129686	GAMBRELL, GAIL MARGURITE	3812	3760 1301 N RAINBOW BLVD APT 56	1301 N RAINBOW BLVD APT 56	1	34	6	C		1	2	C	Same
143821	HICKMANN, THOMAS SCOT	3787	3787 3429 BALDOYLE LN	3429 BALDOYLE LN	4	4	18	C		3	7	E	Same
152696	HEALEY, DAVID TROY	3746	3734 CONFIDENTIAL	CONFIDENTIAL	3	2	8	C		4	13	E	Same
203087	MUELLER, RANDALL HOWARD	3217	3780 3825 RUSSET FALLS ST	3825 RUSSET FALLS ST	4	37	6	C		4	7	E	Same
254640	POST, CELESTE A	3723	3723 10765 HUNTER MOUNTAIN AVE	10765 HUNTER MOUNTAIN AVE	4	4	18	C		4	13	E	Same
262988	ROBINSON, CARL LEWIS	3465	3465 7241 INDIAN CREEK LN UNIT 201	7241 INDIAN CREEK LN UNIT 201	4	4	18	C		4	13	E	Same
263678	REBER, MARILYN	3605	2731 890 MACFARLAND AVE	890 MACFARLAND AVE	4	36	19	C		4	8	E	Same
319350	TALLERICO, JAMES SAM	3773	3773 7200 PIRATES COVE RD APT 2108	7200 PIRATES COVE RD APT 2108	1	34	6	C		1	7	E	Same
415791	MORGAN, JAMES	3702	3702 4005 MIRA LN	4005 MIRA LN	4	37	6	C		4	2	C	Same
429826	ONIVEROZ, VALERIE JEAN	3374	6728 650 S TOWN CENTER DR APT 1095	650 S TOWN CENTER DR APT 1095	3	2	8	C		3	7	E	Same
439892	SOUKUP, STEVEN PAUL	3465	3465 4909 PORTRAITS PL	4909 PORTRAITS PL	4	4	18	C		4	13	E	Same
527111	SOUKUP, LORI LYNN	3465	3465 4909 PORTRAITS PL	4909 PORTRAITS PL	4	4	18	C		4	13	E	Same
527280	TORRES, ABEL TRINIDAD	3430	3430 8445 WANDERING SUN AVE	8445 WANDERING SUN AVE	4	37	6	C		4	7	E	Same
538864	MAYNARD, MEGAN TANYA	3757	3757 4221 N BONITA VISTA ST	4221 N BONITA VISTA ST	4	37	6	C		4	7	E	Same
577527	BATALONA, LORRAINE THERESA	3807	3807 9333 SUN ROSE AVE	9333 SUN ROSE AVE	4	37	6	C		4	7	E	Same
601158	CROSBY, GEORGE ROBERT	3036	3036 2804 DESERT BUTTE DR	2804 DESERT BUTTE DR	4	37	6	C		4	7	E	Same
621465	CROSBY, SARA HARRISON	3036	3036 2804 DESERT BUTTE DR	2804 DESERT BUTTE DR	4	37	6	C		4	7	E	Same
628064	JACKSON, STEPHANIE	3720	3841 3540 N HUAPAI WAY UNIT 2001	3540 N HUAPAI WAY UNIT 2001	4	4	18	C		4	7	E	Same
659378	MAYO, BETH JANET	3431	3431 7809 HONORS CT	7809 HONORS CT	4	37	6	C		4	7	E	Same
660608	ROBERTS, MICHAEL KEVIN	3803	3803 1224 SMITH ST	1224 SMITH ST	1	3	3	C		1	2	C	Same
702330	MCKENNA, STEVEN MICHAEL	3366	3366 1817 GLENVIEW DR	1817 GLENVIEW DR	4	34	6	C		4	7	E	Same
727519	TUCKER, ANGELA SEBRINA	3855	3855 2701 N DECATUR BLVD APT 2090	2701 N DECATUR BLVD APT 2090	4	3	3	C		4	2	C	Same
901794	PIROTTI, MICHAEL LOUIS JR	3382	3382 10509 JEREMY POINTE AVE	10509 JEREMY POINTE AVE	3	2	8	C		3	7	E	Same
917749	HUSTON, JOHN DAVID	3739	3739 1613 CARDINAL BLUFF DR UNIT 103	1613 CARDINAL BLUFF DR UNIT 103	4	34	6	C		4	7	E	Same
935561	YOUNG, ROBERT FREDIE	3841	3841 6245 EUGENE AVE	6245 EUGENE AVE	4	3	3	C		4	2	C	Same
989382	BRYANT, JR	3431	3431 7825 INDIAN CLOUD AVE	7825 INDIAN CLOUD AVE	4	37	6	C		4	7	E	Same
1041377	CEASARIO, GLEN ALLEN	3723	3723 10765 HUNTER MOUNTAIN AVE	10765 HUNTER MOUNTAIN AVE	4	4	18	C		4	13	E	Same
1101686	PONTILLO, CARRIE DENISE	3747	3747 8405 SHORE BREEZE DR	8405 SHORE BREEZE DR	4	37	6	C		4	7	E	Same
1149503	JOHNSON, ASHLEY ROSE	3834	3834 5625 AUBORN AVE	5625 AUBORN AVE	4	3	3	C		4	2	C	Same
1154944	WILGAR, JENNIFER LACE	3760	2600 4060 DREAM DAY ST	4060 DREAM DAY ST	4	37	6	C		4	7	E	Same
1165918	HERRMANN, JEREMY WAYNE	3719	3719 3501 SHADY TIMBER ST APT 1071	3501 SHADY TIMBER ST APT 1071	4	4	18	C		4	7	E	Same
1221822	BOYO, TODNEE LATANYA	3702	3702 4021 DALE EVANS DR	4021 DALE EVANS DR	4	37	6	C		4	2	C	Same
1230883	LEWIS, HAROLD ROSCOE	3364	5047 367 HOLLINS HALL ST	367 HOLLINS HALL ST	3	2	8	C		3	7	E	Same
1240971	SCHWYDER, ARIEL L	3843	4582 CONFIDENTIAL	CONFIDENTIAL	4	3	3	C		4	2	C	Same
1287376	BARTIETS, NADINE LEE	3364	3364 9101 ALTA DR UNIT 1206	9101 ALTA DR UNIT 1206	3	2	8	C		3	7	E	Same
1288694	LOVE, RONALD RAY	3540	3540 CONFIDENTIAL	CONFIDENTIAL	4	36	19	C		4	8	E	Same
1298628	JACK, CRYSTAL	3760	3760 7216 NOOK CREST CT	7216 NOOK CREST CT	4	37	6	C		4	7	E	Same
1304464	LOMBARDO, NATALIE MARIE	3709	3709 10761 ARUSHA AVE	10761 ARUSHA AVE	4	36	19	C		4	13	E	Same
1312665	VAN HOUTEN, GEORGE P	3726	3726 3975 N HUAPAI WAY UNIT 276	3975 N HUAPAI WAY UNIT 276	4	4	18	C		4	7	E	Same
1325507	MARTEL, CHARRA GOMEZ	3772	3431 CONFIDENTIAL	CONFIDENTIAL	1	34	6	C		1	7	E	Same
1332351	HAYNES, JENNIFER L	3547	3547 9426 QUIET VALLEY AVE	9426 QUIET VALLEY AVE	4	4	18	C		4	13	E	Same
1336005	PIERCE, KYLE MICHAEL	3588	3547 10726 COMULTE AVE	10726 COMULTE AVE	4	36	19	C		4	13	E	Same
1340027	CARUS, MARLA Y	3366	7645 8824 ROZETTA CT	8824 ROZETTA CT	4	34	6	C		4	7	E	Same
1352965	SCHWYDER, KYLE ANTHONY	3843	4582 CONFIDENTIAL	CONFIDENTIAL	4	3	3	C		4	2	C	Same
1373724	LOOS, LYNDAR	3385	3385 2005 ARBOR FOREST ST	2005 ARBOR FOREST ST	4	37	6	C		4	7	E	Same
1395035	RATHELE, BERT JEFF	3787	3787 9508 MULOONA CT	9508 MULOONA CT	4	4	18	C		4	7	E	Same
1414064	SAMPSON, CARLOS H	3855	3855 2636 LA MATA ST	2636 LA MATA ST	4	3	3	C		4	2	C	Same
1515746	THOMPSON, MELIKA LA'SHAY	3754	3841 2208 TOSCA ST APT 201	2208 TOSCA ST APT 201	4	34	6	C		4	7	E	Same
15259931	RICKETS, SYDNEY CLARE	3726	6604 3825 ORMOND BEACH ST UNIT 201	3825 ORMOND BEACH ST UNIT 201	4	4	18	C		4	7	E	Same
1536846	MCCOLLY, CARMEN GARCIA	3363	3363 1009 DOMINUS LN UNIT 102	1009 DOMINUS LN UNIT 102	3	34	6	C		3	7	E	Same
1557644	WONG, KENT	3587	3587 6650 COLORADO SPRUCE ST	6650 COLORADO SPRUCE ST	4	4	18	C		4	13	E	Same
1562989	PAYNE, BRIAN DAVID	3547	3547 9368 BROWNSTONE LEDGE AVE	9368 BROWNSTONE LEDGE AVE	4	4	18	C		4	13	E	Same
1566688	FLAMMETTA, NICOLE JEAN	3610	3610 5600 WINDY GORGE ST	5600 WINDY GORGE ST	4	4	18	C		4	13	E	Same
1577857	WHITE, WILLIE MAE	3431	3431 3412 WAYWARD CT	3412 WAYWARD CT	4	37	6	C		4	7	E	Same
1623073	MAUPIN, MEAGHAN NICOLE	3417	3416 10585 MOULTRIE AVE	10585 MOULTRIE AVE	4	4	18	C		4	13	E	Same
1663717	ALFORD, LANI	3613	3613 7644 VIVID VAIL ST	7644 VIVID VAIL ST	4	4	18	C		4	13	E	Same

1671621	JOSEPH, BRIAN LLEWELYN	3774	6693	725 S HUALAPAI WAY UNIT 1021	725 S HUALAPAI WAY UNIT 1021	3	2	8 C	3	7 E	Same
1692789	HERNANDEZ, DANIEL ANTONIO	3722	6601	3948 COCONUT CT	3948 COCONUT CT	4	3	3 C	4	2 C	Same
1704273	DAVIS PARRIS, VALARIE LENISE	3854	3762	3050 N JONES BLVD APT 2047	3050 N JONES BLVD APT 2047	4	3	3 C	4	2 C	Same
1719915	WHITESIDE, TYLER E	3606	3606	7100 GRAND MONTECITO PKWY APT 4011	7100 GRAND MONTECITO PKWY APT 4011	4	4	18 C	4	13 E	Same
1723208	WELLS, MARCUS	3729	3729	CONFIDENTIAL	CONFIDENTIAL	4	36	19 C	4	13 E	Same
1723985	PAWLUK-NOBRIGA, ELIAS ALEXANDER	3766	3766	7717 CRENSHAW WAY	7717 CRENSHAW WAY	4	37	6 C	4	7 E	Same
1726107	MARCELLA, AMANDA MAE	3547	3547	9225 LONGHORN FALLS CT	9225 LONGHORN FALLS CT	4	4	18 C	4	13 E	Same
1748957	MOKENSO, LAURIA LUISA	3435	5593	3724 CACTUS WHEEL CT	3724 CACTUS WHEEL CT	4	37	6 C	4	7 E	Same
1755858	ARRAGA, MARCO A III	3762	6708	1224 MERIDIAN BAY DR	1224 MERIDIAN BAY DR	1	34	6 C	1	7 E	Same
1760577	STOUTSENBARGER, SHANE CARLIS	3366	7645	8824 ROZETTA CT	8824 ROZETTA CT	4	34	6 C	4	7 E	Same
1791247	TUING, MARY ROSE	3762	3762	929 ROCKVIEW DR APT 201	929 ROCKVIEW DR APT 201	1	34	6 C	1	7 E	Same
1799668	EVANGELISTA, FLORENCE T	3762	3762	929 ROCKVIEW DR APT 201	929 ROCKVIEW DR APT 201	1	34	6 C	1	7 E	Same
1818290	BOSCO, CHRISTINA MARIE	3708	3708	10151 W DORRELL LN UNIT 1099	10151 W DORRELL LN UNIT 1099	4	4	18 C	4	13 E	Same
1827471	ARMSTRONG, MARIAH	3762	3762	8025 CHERISH AVE	8025 CHERISH AVE	1	34	6 C	1	7 E	Same
1880472	PHILIPS, TAYLOR SHENEA	3834	3834	2321 N JONES BLVD UNIT 4	2321 N JONES BLVD UNIT 4	4	3	3 C	4	2 C	Same
1885912	ADKINSON, BENNETT ALEXANDER	3800	3800	9501 MOUNTAINAIR AVE	9501 MOUNTAINAIR AVE	4	34	6 C	4	7 E	Same
1885937	ADKINSON, LEAH CHRISTINE RAMSEY	3800	3800	9501 MOUNTAINAIR AVE	9501 MOUNTAINAIR AVE	4	34	6 C	4	7 E	Same
1889125	COOK, LANDON JERAMIAH	3518	3518	6840 ANTILER CT	6840 ANTILER CT	4	36	19 C	4	13 E	Same
1893337	IPOLITO, JOSEPH	3465	3465	5477 PAINTED MIRAGE RD	5477 PAINTED MIRAGE RD	4	4	18 C	4	13 E	Same
1893389	IPOLITO, SUSAN CARLYE	3465	3465	5477 PAINTED MIRAGE RD	5477 PAINTED MIRAGE RD	4	4	18 C	4	13 E	Same
1896482	LITTLE, AUSTIN JAMES	3743	3743	2901 DEXURY ST	2901 DEXURY ST	4	3	3 C	4	2 C	Same
1899854	PACHECO, IRABIDA	3834	3834	2121 N JONES BLVD UNIT 215	2121 N JONES BLVD UNIT 215	4	3	3 C	4	2 C	Same
1901534	MIHAYLOV, YAVOR OLEG	3780	3780	9101 TEAL LAKE CT	9101 TEAL LAKE CT	4	37	6 C	4	7 E	Same
1905547	MEHREZ, JULIA	3786	3786	3713 SHAMAGOLDEN ST	3713 SHAMAGOLDEN ST	4	4	18 C	4	7 E	Same
1910299	GREENE, LISA MICHELLE	3613	3613	7605 TIFFANY LAMP CT	7605 TIFFANY LAMP CT	4	4	18 C	4	13 E	Same
1912055	HINKLE, JUWALUN ELIZA	3388	6644	11028 PINE KNOLLS CT	11028 PINE KNOLLS CT	3	2	8 C	3	7 E	Same
1921924	MARTIN, AMES WESLEY	3726	3726	10337 WILLIAM FORTYE AVE	10337 WILLIAM FORTYE AVE	4	4	18 C	4	7 E	Same
1925632	ARMENDARIZ, LUIS RICARDO II	3864	1327	8209 CHARLES TURK DR	8209 CHARLES TURK DR	1	34	6 C	1	7 E	Same
1928667	FICKERT, KEVIN ERIC	3588	3588	7552 ABBY VIEW ST	7552 ABBY VIEW ST	4	36	19 C	4	13 E	Same
1937822	HARTOUNIAN, ARIN	3613	3613	9104 SILK THREADS AVE	9104 SILK THREADS AVE	4	4	18 C	4	13 E	Same
1939012	NIELSEN, ALICIA MONIQUE	3724	3752	CONFIDENTIAL	CONFIDENTIAL	4	37	6 C	4	7 E	Same
1960395	ORDONEZ, ROSSANA C	3719	3841	3525 MOUNTAIN PARK ST	3525 MOUNTAIN PARK ST	4	4	18 C	4	7 E	Same
1963020	LEUNG, ALEC SU YIN	3374	1643	725 S HUALAPAI WAY UNIT 1061	725 S HUALAPAI WAY UNIT 1061	4	2	8 C	3	7 E	Same
1993014	CLAYTON, MELISSA ALLYN	3613	3613	7601 REVEAL CT	7601 REVEAL CT	4	4	18 C	4	13 E	Same
1993255	GRACIA, VALERIE E	3795	3801	5316 SUGARFOOT AVE	5316 SUGARFOOT AVE	1	3	3 C	1	2 C	Same
2000333	NORRIS, MIDORI	3728	6655	2110 SPRING WATER DR	2110 SPRING WATER DR	3	37	6 C	3	7 E	Same
2004615	TAYLOR, JEFFREY WAYNE	3364	3364	9424 QUEEN CHARLOTTE DR	9424 QUEEN CHARLOTTE DR	3	2	8 C	3	7 E	Same
2005681	ASDOUBRIAN, JON DWIGHT	3721	3721	3816 OLD ORCHARD CT	3816 OLD ORCHARD CT	4	3	3 C	4	2 C	Same
2010298	LAPRO, FREDRICK JOHN	3417	3417	3474 DESERT CLIFF ST UNIT 104	3474 DESERT CLIFF ST UNIT 104	4	4	18 C	4	13 E	Same
2027042	JONES, SHANNON EYETTE	3416	3416	10550 W ALEXANDER RD UNIT 2226	10550 W ALEXANDER RD UNIT 2226	4	4	18 C	4	13 E	Same
2031517	PULIZZANO, NICOLE	3709	3709	10734 LEATHERSTOCKING AVE	10734 LEATHERSTOCKING AVE	4	36	19 C	4	13 E	Same
2060762	FINLEY, SCOTT BLANE	3716	2483	8129 SHAD BUSH AVE	8129 SHAD BUSH AVE	4	4	18 C	4	13 E	Same
2072693	FRIESEN, KATHLEEN LOUISE	3361	3361	7700 TOMICH AVE	7700 TOMICH AVE	1	34	6 C	1	7 E	Same
2080718	UOSEF, MARY ANN	3730	7522	7865 PRONGHORN CT	7865 PRONGHORN CT	4	4	18 C	4	13 E	Same
2085130	PATOCKA, JAMES FRANK	3364	3364	9104 KINGS TOWN AVE	9104 KINGS TOWN AVE	4	2	8 C	3	7 E	Same
2086608	KREGER, SCOTT CHRISTOPHER	3364	3364	908 PONT CHARTRAIN DR	908 PONT CHARTRAIN DR	3	2	8 C	3	7 E	Same
2101577	WELLS, MARCUS D'ANDRE	3729	3729	10238 TIMBERLINE PEAK AVE	10238 TIMBERLINE PEAK AVE	4	36	19 C	4	13 E	Same
2125549	LANDRETH, JOHN ORIN	3761	3761	1403 SEWARD ST UNIT 204	1403 SEWARD ST UNIT 204	1	34	6 C	1	7 E	Same
2127249	WELLS, TONICA CHIMENE	3729	3729	10238 TIMBERLINE PEAK AVE	10238 TIMBERLINE PEAK AVE	4	36	19 C	4	13 E	Same
2137457	REAL, FARRIN PAIGE	3726	3726	10436 CHRISMAN AVE	10436 CHRISMAN AVE	4	4	18 C	4	7 E	Same
2149059	FORDOS, JORGE ARIEL	3864	3864	8445 STAPLETON AVE	8445 STAPLETON AVE	4	34	6 C	4	7 E	Same
2150234	ANGELONI, AMIANA MICHELLE	3607	2672	7545 OSO BLANCA RD APT 2111	7545 OSO BLANCA RD APT 2111	4	4	18 C	4	13 E	Same
2170257	JACKSON, IAN THOMAS	3547	3547	9351 BRONZE RIVER AVE	9351 BRONZE RIVER AVE	4	4	18 C	4	13 E	Same
2176282	WARD, BREAVN K	3546	2456	8250 N GRAND CANYON DR UNIT 1035	8250 N GRAND CANYON DR UNIT 1035	4	4	18 C	4	13 E	Same
2183767	AVINA, ANNA	3844	3844	5616 DEODAR DR	5616 DEODAR DR	4	3	3 C	4	2 C	Same
2192080	COTTNER, BILLY JOSEPH	3729	3729	10229 MAYFLOWER BAY AVE	10229 MAYFLOWER BAY AVE	4	36	19 C	4	13 E	Same
2192280	SUMMERLIN, LINDSEY MICHAEL	3708	3708	10151 W DORRELL LN UNIT 3132	10151 W DORRELL LN UNIT 3132	4	4	18 C	4	13 E	Same
2194468	COTTNER, SHERRY ANN	3729	3729	10229 MAYFLOWER BAY AVE	10229 MAYFLOWER BAY AVE	4	36	19 C	4	13 E	Same
2208120	BENSON, MEGAN MARIE	3417	3417	10719 MEDFORD OAKS CT	10719 MEDFORD OAKS CT	4	4	18 C	4	13 E	Same
2227296	PERKINS, DANIEL KEITH	3370	3370	10329 HUNTERS MEADOW AVE	10329 HUNTERS MEADOW AVE	3	2	8 C	3	7 E	Same

2230441	GARROW, COLLEEN NICOLE	3611	3611	6501	VEGAS DR UNIT 1074	1	34	6 C	1	2 C	Same	
2234772	KAHN, RYAN ANTHONY	3707	3707	10602	PENNANT AVE	4	36	19 C	4	13 E	Same	
2254408	MOORE, MARIAN L	3842	3842	2209	TALL PINE DR	4	34	6 C	4	2 C	Same	
2255733	COCOMAZZI, MERCEDITA MARIA	3706	3706	7825	TARBERTS COTTAGE ST	4	36	19 C	4	13 E	Same	
2257617	PACHECO, DANICE	3385	3385	10001	SUMMER OAK LN UNIT 102	4	37	6 C	4	7 E	Same	
2270246	PULLEY, DAVID ANDREW	3739	3739	8709	RED BROOK DR UNIT 104	4	34	6 C	4	7 E	Same	
2272765	HAYS, JELIZA ANN	3719	3719	3501	SHADY TIMBER ST APT 2087	4	4	18 C	4	7 E	Same	Does not live there
2273895	ESTALLA, ALLEN LOPEZ	3361	3361	8201	DISTANT STAR CT	1	34	6 C	1	7 E	Same	
2280181	RILEY, REBEKAH	3762	3762	1032	BIRD SPRINGS DR	4	34	6 C	4	7 E	Same	
2283230	FALSEY, NICHOLAS GERARD	3721	3721	3929	PRESCOTT PINES ST UNIT 102	4	3	3 C	4	2 C	Same	Does not live there
2286412	THEWIS, DANIEL JOHN	3532	3532	5920	MICHELLI CREST WAY	4	4	18 C	4	13 E	Same	
2286725	BONDAN, PAMELA LOUISE	3707	3707	10626	PENNANT AVE	4	36	19 C	4	13 E	Same	
2304630	GONZALES, DANIEL FRANCISCO	3855	3855	2701	N DECATUR BLVD APT 2092	4	3	6 C	4	2 C	Same	Refused to answer
2310884	ANDERSON, ASPEN HOPE	3800	3800	2009	BLOOMFIELD CT	4	34	6 C	4	7 E	Same	
2316592	NEWMAN, JOHNNIE BENNIE	3395	3395	8404	ORCHARD RIDGE AVE	4	37	6 C	4	7 E	Same	
23167391	HUNG, PHYRE	3386	3386	11120	PINE GREENS CT	4	34	6 C	4	7 E	Same	
2374540	COHAN, MARIANNE	3386	3386	11120	PINE GREENS CT	3	2	8 C	3	7 E	Same	
2374542	COHAN, LANI	3370	3382	1525	IRON SPRINGS DR	3	2	8 C	3	7 E	Same	
2391254	MORENO, MELISSA AMANDA	3613	3613	9009	CAREFUL CANVAS AVE	4	4	18 C	4	13 E	Same	Does not live there
2392295	LOZOYA, ERIK	3734	6726	12256	MONTURA ROSA PL	3	34	6 C	4	7 E	Same	
2398191	PERKINS, TARINA KAY	3391	2087	1609	ROYAL CANYON DR	4	34	6 C	4	7 E	Same	
2404000	VUONG, ALYSSA	3414	6738	2569	IRON CREST LN	3	37	6 C	3	13 E	Same	
2422354	MARTINEZ, DENNIS ANTHONY	3414	6738	2569	IRON CREST LN	4	34	6 C	4	7 E	Same	
2422407	MARTINEZ, RAMONA LYDIA	3414	6738	2569	IRON CREST LN	3	37	6 C	3	13 E	Same	
2422701	MAIONE, RONALD C	3364	3364	1012	GRANGER FARM WAY	4	37	6 C	4	7 E	Same	
2429816	SMITH, SARAH MARIE	3749	1327	3125	N BUFFALO DR APT 2078	4	4	18 C	4	13 E	Same	
2451358	MURRAY, GAIL LUCILLE	3608	3608	5945	N JENSEN ST	4	4	18 C	4	13 E	Same	
2451363	MURRAY, RONALD JACKSON	3608	3608	5945	N JENSEN ST	4	4	18 C	4	13 E	Same	
2451855	PICACHE, JULIANA ALESSANDRA	3766	3726	7805	WEDLOCK LN	4	37	6 C	4	7 E	Same	
2473051	WALZEL, ROBERT MORRIS	3364	3364	9172	TUDOR PARK PL	3	2	8 C	3	7 E	Same	
2474966	SAYER, JULETT ELIZABETH	3854	3854	5701	PASEO MONTANA	4	34	6 C	4	7 E	Same	
2506792	SOVERANU, JACQUILINE E	3854	3854	5701	PASEO MONTANA	4	34	6 C	4	7 E	Same	
2524512	ROSE, JOSEPH ROBERT HENRY	3465	3465	7428	SILENT SAGE DR	4	4	18 C	4	13 E	Same	
2537856	FORREST, MARKEZE DASHON	3760	3760	4141	HARDWICK CT	4	37	6 C	4	7 E	Same	
2538669	PARKER, GABRIEL THOMAS	3576	2600	11368	RANCHO PORTENA AVE	4	2	8 C	3	13 E	Same	
2540151	NORENA, ALEXIS MICHELLE	3786	3786	3621	WILD WILLOW ST	4	4	18 C	4	7 E	Same	
2597340	MARTIN, JESSICA ANNE	3726	3726	10337	WILLIAM FORTYE AVE	4	4	18 C	4	7 E	Same	

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EXHIBIT 14

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EXHIBIT 14



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: Nov. 10, 2020 11:34
Voter's Name: Ian Jackson Voter ID#: 2170257
Voter's Address: 9351 Bronze River Ave
89149

Report: Talked with dad, did not get
name. Stated Ian Jackson is
in the military and does not
live at address anymore. Although,
his real address and "address is located
here".

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: 

Date: Nov. 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: November 10, 2020 11:50
Voter's Name: Amanda Marcella Voter ID#: 1726107
Voter's Address: 9225 Longhorn Falls Ct.
89149

Report: Spoke with Brianna Elkins,
never heard of Amanda Marcella.
She does not live at address.
Has lived at house since
March 2019.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: 

Date: Nov. 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: November 10, 2020 12:05
Voter's Name: London Cooke Voter ID#: 1889125
Voter's Address: 6840 Antler ct.

Report: Talked to mom, Susan London
doesn't live there anymore. Has
been in school (college) since September

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed:  Date: Nov. 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION

Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: Nov. 10, 2020 12:32pm
Voter's Name: Nicole Fiammetta Voter ID#: 1566688
Voter's Address: 5600 Wendy Gage St.
89149

Report: Talked with mom through door,
did not open. Said her daughter
Nicole did not live there anymore.
would not disclose for how long
and when she moved out.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: 

Date: Nov. 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: November 10, 2020 1:04 pm
Voter's Name: Carl Robinson Voter ID#: 262988
Voter's Address: 7241 Indian Creek LN Unit 201
89149

Report: Talked with gate guard who called
the household. Resident who answered
stated that Robinson, Carl does
not live there anymore. Gate guard
said I had to turn around.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed:  Date: Nov. 12, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: Nov. 10, 2020 2:41 pm
Voter's Name: Erik Lozoya Voter ID#: 2392295
Voter's Address: 9009 Careful Canvas Ave
89149

Report: Talked with tall African American
gentleman. Stated that Erik Lozoya
has not lived there for over a year
and a half. Asked for name and recorded
Statement. was refused

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the
forgoing is true and correct.

Signed: 

Date: Nov. 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter
whose existence or truth may be established by an affidavit or other sworn declaration may be
established with the same effect by an unsworn declaration of its existence or truth signed by the
declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: Nov. 10, 2020 2:12pm
Voter's Name: Melissa Clayton Voter ID#: 1993014
Voter's Address: 7601 Reveal Ct.
89149

Report: Talked to Myra myra about
Melissa clayton. She stated that
She does not live there anymore.
Has been living there for 2 years and
Melissa has been gone for about 2 years
as well.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed:  Date: Nov 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: Nov. 10, 2020 2:44 pm
Voter's Name: Lisa Greene Voter ID#: 1910299
Voter's Address: 7605 Tiffany Lane Ct.
84149

Report: talked with Cornell Jones. Accepted
recording. Stated he has lived at
address for 2 years and never heard
of Lisa Greene. She does not live
there

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: Nov. 19, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura
Incident Date/Time: November 10, 2020 9:51
Voter's Name: Jeliza Hays Voter ID#: 2272765
Voter's Address: 3501 Shady Timber St
Apt 2087 89129
Report: talked with Alex O'Leary
and asked if Jeliza Hays was
available. She stated that she doesn't
know her and she doesn't live at that
address. Received permission to
record

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: Nov. 10, 2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION

Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Angelo Nelson

Incident Date/Time: November 10, 2020

Voter's Name: Shannon Jones Voter ID#: 2027042

Voter's Address: 10550 W. Alexander rd. unit 2087

Report: Rang doorbell, Gentleman answered. I then
asked if Shannon Jones lived there he
said no. & I have the wrong house. Then I
walked away.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 10/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Angelo Nelson
Incident Date/Time: 10/10/2020 3:43pm
Voter's Name: Pamela Bondan Voter ID#: 2286725
Voter's Address: 10626 Pennant ave.

Report: Rang door bell, a men answered
I explained what I was doing. I then asked
if Pamela was available he said no
what do you need or want to ask her
I then asked if he knew that she
voted in person or mail. He said
it was rare of my business

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045), the foregoing is true and correct.*

Signed: [Signature] Date: 10/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Angelo Nelson
Incident Date/Time: 10/10/2020 2:15 pm
Voter's Name: Kevin Fickert Voter ID#: _____
Voter's Address: 7552 Abbey view st

Report: Rang door bell a man answered
I asked are you Kevin he declined. I then
asked if Kevin was available to talk
the man then said theres no Kevin
here. Ive lived here for about 1 yr +. I said
it appears Kevin is on the list. He said
no hes not here. I thanked him for his
time & left.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 10/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Angelo Nelson

Incident Date/Time: 10/10/2020 2:05pm

Voter's Name: N/A^m Nicole Voter ID#: 2031517

Voter's Address: 10734 Leatherstocking Ave.

Report: I asked the Gentleman who answered
the door if a Nicole lived there, he said
no & that could be the previous renters. The
man said they had be renting about 6 months

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 10/10/2020

* NRS 53.048 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Trevin Lange
Incident Date/Time: November 10, 2020 4:15
Voter's Name: Nicholas Falsey Voter ID#: 2283230
Voter's Address: 3929 Prescott Pines St.
Unit 102

Report: Knocked and current resident
answered the door. I asked her if
Nicholas Falsey was available at which
she said she didn't know him. I asked
how long she had lived there. She said
since June.
I asked if she would be comfortable giving
me a recorded statement but she declined.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed: [Signature] Date: 11/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Trevin Lange
Incident Date/Time: November 10, 2020 12:49
Voter's Name: Carlos Sampson Voter ID#: 1414064
Voter's Address: 2636 La Mesa St. 89108

Report: Knocked on the door and rung the
"Ring" door bell. Current resident, Ronda (did
not give me last name), answered the door.
I stated I was from "Citizen Outreach"
and asked if Carlos Sampson was available.
She stated she had never heard of him. I
asked how long she had lived there in
which she replied, "one year".
I asked for consent to record her, she
gave consent. I recorded her statement, and
left.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045), the foregoing is true and correct.*

Signed:  Date: 11/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.



CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name:

Trevin Lange

Incident Date/Time:

November 10, 2020 / 12:05

Voter's Name:

Angela Tucker

Voter ID#:

727519

Voter's Address:

2701 N. Decatur BLVD Apt. 2090

Report:

knocked on the door, current resident Elizabeth Hayden answered. I asked if Angela Tucker was available. She stated that she did know who she was ~~at~~ but ~~she~~ had received mail for her in the past. I asked how long she had lived in the apartment at which her response was around the end of March.

I declare, under penalty of perjury under the laws of the state of Nevada (NRS 53.045*), the foregoing is true and correct.

Signed:

Date:

11/10/2020

* NRS 53.045 Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under perjury, and dated, in substantially the following form.

EXHIBIT 15

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EXHIBIT 15

This document is one in a series created as part of the Cybersecurity and Infrastructure Security Agency (CISA) Elections Infrastructure Government Coordinating Council and Sector Coordinating Council's Joint COVID Working Group. These documents provide guidance for state, local, tribal, and territorial election officials on how to administer and secure election infrastructure in light of the COVID-19 epidemic.

Inbound Ballot Process

Overview

The inbound ballot process covers everything that takes place from the time ballots are brought back to the counting facility by ballot collection teams or delivered by USPS, until the ballots are permanently sealed in storage containers for the retention period. This includes ballot receiving, ballot verification, ballot preparation, ballot scanning, ballot tabulation, and post-election audits.

Although state laws vary on how soon before the election each part of the process can begin, there are some advanced considerations regarding purchasing equipment and building procedures. One of the most important components of the inbound ballot process is having a system to track ballots as they move from one processing area to another to account for any changes in the overall quantity.

This guide outlines considerations for a typical inbound ballot process in a high-volume mail ballot environment.

General Considerations

One of the most challenging aspects of creating a plan for processing inbound ballots is estimating how many mail ballots will be returned and when so you can staff accordingly. It is reasonable to assume that the majority will be returned on Election Day and more precisely, on election night.

A few simple steps can improve your planning model for how many people you will need to train and hire:

1. Document each action conducted in each stage of ballot processing.
2. Conduct a dress rehearsal. Have staff walk through each stage of the process using an adequate sample of test envelopes and test ballots.
3. Conduct time studies. Knowing how long it takes 1,000 ballots (for example) to get through each stage of the process will help you make better decisions about how to staff and where to shift your resources (people) when processing at peak demand.

4. Cross-train Signature Verifiers, Ballot Scanners, and Adjudication teams where possible. These are the critical skill stages and are areas where bottlenecks can be expected to occur. Cross-training staff enables shifting resources as necessary to mitigate or avoid these bottlenecks.

If your state does not require it already, partisan affiliation could play a role in hiring poll workers and temporary staff. This means creating bipartisan teams as often as possible, including using unaffiliated workers, to create an even representation of your electorate.

When calculating the amount of space, you need, the more you can get the better. Having space to physically separate process areas helps you have greater control of and security for the process. It also helps avoid trays of ballots being inadvertently moved to the wrong processing station. **Necessary space includes room to store ballots, ballot envelopes, and miscellaneous contents that arrive. Nothing should be thrown away until after the period to challenge the election has passed.**

Finally, social distancing should also be a factor when you think about space requirements. Creating space not just between processes, but between the people performing each process, provides a safer working environment. For counties or jurisdictions with limited office space, consider alternate locations such as a voting equipment storage warehouse or a school that has closed. Always be certain that physical security remains a top priority.

What equipment and supplies will you need to purchase?

Each ballot processing area should have unique equipment and supplies to facilitate that stage of the process. One general goal should be creating a plan that keeps ballots and ballot envelopes organized as they are moved through each stage of processing. This can be done by ordering colored mail trays, one for each stage, or by using large colored mail tray labels. In addition to purchasing **mail trays** you will need:

- ☐ Mail tray carts or mail cages on wheels
 - ☐ Carts that can be locked and sealed (in lieu of secure storage rooms)
 - ☐ Signs that can be attached to carts showing contents and status
 - ☐ Folding tables and chairs (can be rented)
 - ☐ Ballot storage containers (post-scanning)
 - ☐ Colored vests or lanyards to designate who is working in what area (if vests are worn by temporary workers, you have to consider laundering the vests while lanyards are easier and cheaper (as long as the lanyard itself is not caught or tangled in the work process).
 - ☐ Large signs designating each processing area along with visual charts displaying the steps in each individual processing stage
- Understand all relevant dates and deadlines by working with vendors and USPS. Highlight whether any of your dates have/will change owing to "emergency procedures."

Timeline: These purchases should be made as soon as you have a good estimate of the volume of ballots to be processed. Ideally, supplies should be on hand by the time you conduct training and practice exercises—typically 30 to 90 days before the election.

What is the best way to provide transparency and accommodate poll watchers or others who want to view inbound ballot processing?

Establishing a formal observation area for poll watchers is helpful. If no area is set aside for them, consider using tape to delineate “areas” on the floor. This ensures poll watchers can observe without interfering with operations. In addition, consider:

- ☐ Publishing the [steps of each process](#) or providing a [ballot lifecycle chart](#).
- ☐ Posting signs visible from the “watcher” area to designate each processing area.
- ☐ Using different color-coded lanyards, badges, or vests to designate poll watcher as well as the workers in each individual processing area.
- ☐ Assigning a member of staff to answer questions or stop a process if a watcher has concerns or wants to issue a challenge.
- ☐ Setting a schedule for performance of each stage of the process so observers can plan for watching the stages important to them (especially important if not all stages are performed every day).
- ☐ Live streaming ballot processing (e.g., via Facebook Live, Twitter, Instagram Live, YouTube mobile).

What if you need to purchase ballot sorting equipment or a large number of central count scanners and your jurisdiction’s RFP process is 4-5 months? Is there a way you can bypass those procurement requirements to get the equipment you need now?

Work with your Purchasing Department to determine whether your state participates in a cooperative purchasing alliance or you can take advantage of a [cooperative contract](#). A similar option would be the [GSA Cooperative Purchasing Program](#). Check whether your vendor is an approved industry partner in this program.

Some other considerations to improve the process include:

- ☐ Detail all current contracts in a single place, listing the existing terms.
- ☐ Hold meetings now with your government partners—procurement, finance, legal—that can help you modify existing contracts and also help you negotiate new contracts quickly.
- ☐ Move quickly to define the new or changed specifications, such as new ballot storage racks or additional ballots that must be scanned centrally. Working through this document should guide you on the path to identifying new gaps.

- ☐ Within the confines of your procurement requirements, begin work with your vendors as soon as possible.

Timeline: Anticipate you will have problems with procurement—supply chain issues may impact availability. The decision to expand mail ballot voting must be made sooner rather than later to ensure your ability to purchase or rent the necessary equipment. Problems will be vendor and equipment specific but typically you should start 140 days before the election.

Are there options to share ballot envelope sorting equipment and central count scanners?

The ability to procure and install equipment and/or the cost of that equipment might be a reason to consider partnering with a nearby election authority or creating a state or regional processing center. This type of arrangement can also benefit those jurisdictions that are limited in the amount of staffing and space available. Such an arrangement places all inbound processes in one shared location.

That said, in addition to the legal issues, there are some logistical issues associated with “sharing” equipment that should be considered. These include:

- ☐ How will equipment be programmed to account for different ballot designs and different elections?
- ☐ How will chain of custody be maintained for ballot packets as they are transferred to and from a shared facility?
- ☐ When will each party to the sharing agreement get to use the equipment?
- ☐ Who is responsible for equipment security and maintenance?
- ☐ How will ballots be sorted by county for permanent retention

How do you plan to transfer and track ballots?

It is important to have a plan for tracking the transfer of ballots as they move through each stage of the Inbound process. Your plan starts with designating where each stage will take place. Having a separate room that can be secured by badge or key access is ideal. If not, delineate a section of your office or warehouse for each of the stages described below.

Some considerations as you begin planning include:

- ☐ Create a system for batching envelopes and ballots and attempt to keep the quantities uniform.
- ☐ Create a ballot tracking form that stays with a batch of ballots throughout each stage of the process from the time ballots are checked in and placed in batches until they are scanned into the voting system. This form should include a section representing each stage of the process where the total number of envelopes or ballots is verified and the names of those verifying the piece count are recorded.

- ☐ Consider color coding—the trays, the carts, the room sign, etc. The color of the tray, etc. indicates the stage in the process in which that particular batch resides.
- ☐ Always require each section of the ballot tracking form to be signed off by two people.
- ☐ Assign leads or managers to consistently review ballot tracking forms, chain of custody forms, and other ballot accounting documents.
- ☐ Conduct an audit of the process to ensure compliance.

Ballot Receiving

The ballot receiving process starts when mail ballots are delivered to the central processing facility. These can be ballots delivered directly by USPS, but more likely they will be ballots picked up from drop boxes and USPS facilities by your ballot collection teams. In addition to voted ballots, you will also receive undelivered ballots from USPS. These ballots should be processed according to state law and securely stored as part of the official election records.

What are the steps in the ballot receiving process?

1. Ballot collection bags and boxes are checked in, and security seals are confirmed before opening the collection bags and boxes.
2. Chain of custody forms are completed.
3. Ballots need to be securely transferred from mail bags and portable ballot boxes to mail trays.
4. At some point before or after the transfer of envelopes to mail trays, ballots in their box or tray are weighed for an approximate piece count and the data recorded for each ballot drop-off location and/or USPS.
 - a. Alternative: Hand-count the quantity of envelopes if not using a scale or to test accuracy of the scale.
5. Ballot boxes should be inspected to ensure they are empty before being prepared to go back out again

How much space will you need?

Ballot collection teams have unique space requirements during ballot receiving. They will be arriving to the central processing facility with their vehicles full of ballot boxes. Thinking about a secure (and socially distanced) way to transfer those ballot boxes from their vehicles to your processing area should be the first thing to consider when thinking about space. Some unique approaches have been passing the box through a window (like a drive-through) or backing the vehicle into the warehouse space before unloading. Whatever your constraints are, think about problems such as inclement weather and the distance that will need to be traveled (those boxes or bags can be heavy).

Next, consider establishing an area that will allow you to set up multiple folding tables with plenty of space between them. Ballot collection teams will need space for their ballot box and

multiple mail trays to which they will transfer the ballots. This is most efficient if you have room for several people at a time to move the contents of the ballot boxes to trays and weigh them for a piece count during the process.

Also consider that you will most likely be receiving ballot packets returned undelivered by the post office. These will need to be checked in at some point so you can go through the normal list maintenance process for these voters. You will also need a place to store them.

How many people will you need?

Generally, your ballot collection teams can handle the transfer of envelopes from the ballot collection boxes into the mail trays without any additional assistance. On Election Night, when the volume of ballots coming in is greater and more frequent (assuming you do multiple pickup runs throughout Election Day, which is recommended), it is helpful to temporarily move workers assigned to other “stages” to help. This also means you will need extra space.

What equipment and supplies do you need for ballot receiving?

Due to the physical nature of this process, there is little equipment to purchase. Most of the work is done by temporary workers and staff. In addition to purchasing mail trays, carts, and folding tables, you will need a digital postal scale to estimate the piece count of the number of ballots that have been returned from what location. Ideally, find a floor scale or one that has the display on an extended arm.

Ballot Verification

The steps listed here can be performed manually or by mail ballot sorting equipment. The ballot verification process is one where sorting equipment can dramatically decrease the processing time and number of people you will need to staff this stage of the Inbound Ballot process.

What are the steps in the ballot verification process?

If it may not be possible to find a full-service vendor or even a reliable fulfillment center in a short period of time:

1. Sealed returned ballot envelopes are date and time stamped.
2. Ballots belonging to another jurisdiction are sorted out to be forwarded to the appropriate counties for processing.
3. Information from the ballot return envelope is recorded in the voter registration database.
 - a. This can be accomplished using manual data entry but is more efficient if a barcode with the voter ID from the voter registration is included on the ballot return envelope for scanning.
 - b. This process ensures the voter is credited for voting and prevents them from submitting another mail ballot or voting in person.

4. Ballots are grouped into batches, and a ballot tracking form is assigned to the batch.
5. Where required by law, signatures on sealed ballot return envelopes are captured and reviewed by bipartisan teams either manually or using automated equipment (see the *Signature Verification and Curing* document for more details.)
 - a. Voter records are updated to indicate whether the signature was accepted or rejected.
 - b. Ballot envelopes are sorted by signatures accepted and rejected.
 - c. Rejected ballots are moved to the Signature Cure process if allowed by state law.
6. Accepted return envelopes are sliced open, grouped into a uniform batch size, and moved to Ballot Preparation.
 - a. The predetermined batch size will be used throughout the rest of the Inbound Ballot process.
 - b. Determine the batch size by considering: 1) the maximum number of ballots the ballot scanner tray can hold, and 2) how many ballots the average person can comfortably handle. Note: 100–200 ballots per batch is a good size for ballots being scanned on central count scanners.

How much space and how many people will you need?

The biggest determining factor here is whether you use a mail ballot sorter or rely entirely on a manual process. A mail ballot sorter's space footprint depends on the size and model but will require fewer people.

For a manual verification process, you will need to consider making room for an envelope slicer (recommended) along with workstations connected to the voter registration database for each person who will be processing batches of returned envelopes.

To estimate how many people you will need and how many workstations, consider the time for conducting signature verification (see above and the *Signature Verification and Curing* document for more details), as well as the time to sort out ballots that belong to another jurisdiction, sort your jurisdiction's ballots into predetermined batch sizes, and put the accepted ballots through the slicer. This is an area where time studies on test ballots will help you make a better estimate of the number of people and space needed.

What equipment and supplies do you need for ballot verification?

On-demand printing can help with space requirements and some storage protocols. However, it also introduces a potential single point of failure. Consider the following:

- ☐ Mail ballot sorter—this will date stamp ballots as they are scanned.
- ☐ Storage racks to hold mail trays with ballot envelopes.
- ☐ Mail trays to store ballots as they are sorted.
- ☐ Tracking sheets, or a computer dedicated to tracking batches.
- ☐ Envelope slicer (if not performed by the ballot sorter).

If you do NOT plan to purchase a mail ballot sorter, you should consider purchasing the following in addition to the other items listed above:

- ☐ Automatic date/time stamp.
- ☐ Bar code wands.
- ☐ Workstations connected to the voter registration database

Ballot Preparation

What are the steps in the ballot preparation process?

1. Verify envelope quantity on ballot tracking form.
2. Remove the ballot from the envelope (and any inner envelope or secrecy sleeve if used) in a way that prevents the Ballot Preparation team from seeing the voter's identity.
3. Remove any stray stubs left on the ballot.
4. Prepare the ballot for scanning by flattening/backbending the folds so the ballot lays flat.
5. Perform a piece count on the extracted ballots and ensure it matches the envelope count for that batch (note any discrepancies on the ballot tracking form such as an empty envelope or two ballots in one envelope).
6. Place the ballots in a mail tray.
7. Complete ballot tracking forms.
8. Securely transfer ballots to Ballot Scanning.
9. Run a zip tie through the envelopes to ensure they are empty (not ballots left in envelope) and place them in storage.
10. Place secrecy sleeves, stubs, etc. in temporary storage. Nothing should be thrown out from Inbound Ballot Processing until the date for challenging an election has passed.

How much space and how many people will you need?

Unless you are using a vacuum extraction system to automate the process of removing ballots from return envelopes, this process requires the most space of any stage in the Inbound Ballot Process. Normally, bipartisan teams of two would perform this process on a single banquet-size folding table with two chairs. With the need for social distancing, you will most likely need to arrange workers one to a table--requiring even more space.

Batches of 100 envelopes with ballots in an inner secrecy sleeve can be extracted manually, flattened, stub removed, and a piece count determined in about 20 minutes by one team. Therefore, it is very important to run time studies in a practice environment.

If you have space to set up extra tables and chairs, you should do it even if you do not plan to hire enough people to fill all of the seats. This is an easy job to learn and is prone to be a bottleneck in the process. When that happens, having the space and tables to bring all hands-on deck will help speed up the process.

What equipment and supplies do you need for ballot preparation?

In addition to purchasing or renting folding tables and chairs to accommodate your Ballot Preparation teams, you will need:

- ☐ Transfer case or mail trays.
- ☐ Rubber fingers or finger moistener (if ballot quantities are being verified manually).
- ☐ Paper scanner or scale (to automate piece count).
- ☐ Vacuum extraction system.
- ☐ If ballots will not be immediately transferred to Ballot Scanning, consider a secure ballot storage area or locking cart.

Ballot Scanning

It is important to note that the act of scanning is not the act of tabulating. Just like precinct scanners used for in-person voting, central scanners read the marks on ballots indicating a voter's choice for each contest. Ballot scanning in a central environment is simply another step in the Inbound Ballot process. Election officials do not aggregate and report results until after the polls are closed.

In addition to physically scanning batches of ballots, ballot scanning often involves separate but parallel functions of ballot duplication and ballot adjudication.

What are the steps in the ballot scanning process?

1. Verify ballot quantity on ballot tracking forms.
2. Scan ballots using central count scanners or precinct scanners.
3. Verify and record total ballot quantity scanned using information from the voting equipment.
4. Duplicate ballots that are damaged or have identifying marks (reasons for duplication will vary by state).
5. Perform adjudication for voter intent as necessary (will be done electronically or by duplicating ballots).
6. Complete the necessary labels and logs to account for batch numbers, quantities, and seal storage containers.
7. Securely transfer scanned ballots for storage.

How much space and how many people will you need?

These resources will ultimately depend on whether you use central count scanners or precinct scanners. Also, in some states the ballot duplication and ballot adjudication process must be witnessed or performed by the canvassing board which will require additional space and staffing considerations not addressed here.

- ☐ Central count scanners will take less space and fewer key operators.
- ☐ Precinct scanners will take more space and more operators, especially considering social distancing rules.

What equipment and supplies will you need for ballot scanning?

- ☐ Ballot scanners (central count or precinct count models)
- ☐ Ballot marking devices (optional to assist with duplication)
- ☐ Building infrastructure and power requirements are important to meet the needs of the scanning equipment. This is especially true when you have extra scanners (central or precinct scanners) consolidated in a small area.
- ☐ Large work surfaces (tables or desks) are needed to accommodate a central scanner and the incoming tray of unscanned ballots, along with the transfer case or storage box for the scanned ballots.

What are the tradeoffs between purchasing central count scanners and using existing precinct scanners?

Central count scanners offer the advantage of speed and scalability. They have the advantage of requiring fewer people to operate them. Fewer scanners also means greater control of the transfer of ballots from preparation to scanning and the additional processes such as duplication and adjudication that may occur during scanning. The lower per minute speed of precinct scanners means you will need more of them to do the same job as a central count scanner. The more machines you use, the more people you need, along with more space for social distancing.

The space and power requirements for a large number of precinct scanners running in a single location should not be discounted. More equipment and people spread out over a larger area also means a greater threat surface; more area that needs to be secure; and more area and devices that need to be sanitized and accessible to poll watchers—all with solid workflows and controls to ensure ballots are accounted for. Precinct scanners may also limit you to printing ballots by precinct only and not by ballot style, which can slow down the ballot receiving process. It is imperative that you consult with your voting equipment vendor as you build your Inbound Ballot processing plan.

Ballot Duplication

Ballot duplication is the process for replacing damaged or improperly marked ballots (i.e. the voting system cannot read the ballot) with a new ballot that preserves the voter's intent. When expanding voting by mail, you need to think about making the duplication process more efficient. More hand-marked paper ballots means more opportunity for damaged ballots, either damaged by the voter or by USPS processing, or ballots requiring duplication because of identifying marks. Some things to consider:

- ☐ Will you be using preprinted blank ballots or a ballot on demand (BOD) system?
 - ☐ If using a BOD, are you planning for the necessary ballot stock and toner?
- ☐ Have you created duplication logs and ballot labels (for original ballot) with pre-filled control numbers?
- ☐ Have you considered using an ink stamp to create a template for adding the control number and initials on the duplicated ballot?

There are systems that can help automate the duplication process. These were developed mainly to assist with duplicating UOCAVA ballots returned electronically but their use should be considered as duplication needs increase. These systems include using a ballot marking device to create a scannable ballot or QR codes coupled with BOD systems. Some voting systems also have an inline system that could be leveraged.

Ballot Adjudication

An increased quantity of hand-marked paper ballots will generate a need for ballot adjudication teams. If your current voting system supports electronic adjudication, then you already have this covered. Scaling up may simply involve hiring and training additional teams to perform this function. You may also need to procure more workstations to accommodate the teams. If you use a manual adjudication process, the ballot duplication considerations listed above are vital to think about.

Statewide voter intent guidelines are an important element in the adjudication process, whether it is manual or electronic. Having a large chart with examples posted near the adjudication stations increases transparency and reinforces what was covered in training. You can find links to voter intent training from Washington and Colorado in the Additional Resources section.

Post-Election Audits

Because vote-by-mail creates an auditable paper record post-election auditing of these ballots is an important step in the process. When all of your ballots are scanned centrally, and you include the practice of logging and labeling each scanned batch, much of the work has been done to allow you to perform a ballot comparison, risk-limiting audit (RLA) if that is allowed by your state law and practical for your operation. For more information please see [Knowing It's Right Part 2: Risk-Limiting Audit Implementation Workbook](#) (pp. 21–23) which walks you through the steps of preparing for and conducting a ballot comparison RLA.

Security Considerations

Your physical and cyber security plans will continue to play an important role in the integrity of your election. As your physical footprint expands, so does your risk. Going back to those plans

and reevaluating best practices is even more critical if you plan to move your Inbound Ballot processing to different buildings or use additional rooms in your current facility.

For a full list of CISA services see the [CISA Election Infrastructure Security Resources Guide](#). To request services from CISA, email CISAServiceDesk@cisa.dhs.gov. Each of CISA's services is provided at no cost to election jurisdictions and their private sector partners. Also, the Election Infrastructure Information Sharing and Analysis Center (EI-ISAC) has resources, guides, and tools available to election officials for protecting election infrastructure. Some of CISA services and security best practices include:

- ☐ Invite your regional Cybersecurity and Infrastructure Security Agency (CISA) Physical Security Advisor (PSA) for an [Assist Visit](#).
- ☐ Work with your PSA after the visit to fill out the [Infrastructure Survey Tool](#) (IST) to identify and document the overall security and resilience of the facility.
- ☐ If inbound processing equipment does not need to be internet connected, or if internet connection is not necessary for the processing of election material, physically and logically disconnect it.
- ☐ Obtain outside cybersecurity assessments, such as CISA vulnerability scanning and remote penetration testing.
- ☐ Develop a vulnerability disclosure program (VDP). This allows well-intentioned cybersecurity researchers to find and disclose vulnerabilities privately to an election official, giving the election official time to implement upgrades and patches before disclosing the information publicly.
- ☐ Using security best practices for web and network connected election systems, including two-factor authentication (2FA) for employees and voters.
- ☐ Encrypting traffic using HTTPS, or if you use a file server, ensure it uses SFTP.
- ☐ Placing voter portals on a government TLD, preferably .gov.

Additional Resources

- ☐ [Oregon VBM Procedures Manual](#)—Created by the Oregon SOS
- ☐ [Determination of Voter Intent for Colorado Elections](#)—sample voter intent guide from Colorado Secretary of State
- ☐ [Voter Intent](#): Statewide Standards on What is a Vote—sample voter intent guide from Washington Secretary of State
- ☐ [Best Practices for Ballot Accounting & Reconciliation](#)—best practices from the Brennan Center on paper handling and reconciliation
- ☐ [Voting Outside the Polling Place: Absentee, All-Mail and other Voting at Home Options](#)—NCSL webpage dedicated to absentee voting and all-mail voting