

1 **WRTM**
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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,

11 Plaintiffs,

12 vs.

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

17 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

18 **PETITION FOR WRIT OF MANDAMUS**

19 **AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**
20 **PURSUANT TO NRS 293.465 AND NRS 30.030**
21 **(Immediate Hearing Requested)**

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

1 the Nevada Revised Statutes as amended including AB4 provisions.

2 **NATURE OF THE ACTION**

- 3 2. This is an action pursuant to NRS 293.465 for declaratory and injunctive relief pursuant to
4 NRS 34.150 through 34.350 for writ of mandate enforcing the ministerial non-discretionary
5 duty of the Clark County Commissioners to order a new election pursuant to NRS 293.465.
6 The act of the Registrar of Voters sending unsolicited ballots to both active and inactive
7 voters list resulted in overflowing precincts with ballots. This act satisfies the requirements
8 or any other cause in the statute and is supported by case law with regards to flooding
9 precincts. The Clark County Commission must order a new election under the statute.
10
11 3. The Nevada State Legislature delayed changes to the voting scheme whereby making it
12 impossible for Clark County Registrar of Voter to comply with Federal mandates resulting in
13 a decision to send mail in ballots to all active voters and large numbers of what should have
14 been inactive voters. Approximately one-third of votes coming from addresses that were
15 returned as undeliverable¹ in the 2020 Primary do not reside at the stated addresses.
16
17 4. This results in ballots being sent to voting districts of persons no longer qualified to vote on
18 that elector as they do not reside in that voting district. Persons voting in districts to which
19 they have no interest wrongfully floods the precinct with voters that do not qualify to vote for
20 those electors.
21
22 5. This resulted in the flooding of precincts with ballots for persons no longer residing in the
23 district to which their ballot was printed and specific to certain offices.

24 **PARTIES**

25
26 _____
27 ¹ The Public Interest Legal Foundation's statistics for Clark County included 1,325,934 Total Mail Ballots
28 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
- 10 8. Respondent CLARK COUNTY, a political subdivision of the State of Nevada, CLARK
11 COUNTY BOARD OF COMMISSIONERS is a political subdivision of Clark County and a
12 county legislative body who is under a mandate to order a new election based on NRS
13 293.465.

14
15 **NRS 293.465 Loss or destruction of ballots, or other cause, preventing election in precinct or**
16 **district; new election.** If an election is prevented in any precinct or district by reason of the loss or
17 destruction of the ballots intended for that precinct, or any other cause, the appropriate election officers in
18 that precinct or district shall make an affidavit setting forth that fact and transmit it to the appropriate board
of county commissioners. Upon receipt of the affidavit and upon the application of any candidate for any
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)

19 **FACTS**

- 20 9. Section 23 of AB4 that amended Chapter 293 of the Nevada Revised Statutes also requires
21 the clerk (a person) or employee (a person) as mandatory “shall” check the signature used for
22 the mail ballot.
- 23 Sec. 23.
- 24 1. Except as otherwise provided in NRS 293D.200, for any affected election, when a
25 mail ballot is returned by or on behalf of a voter to the county or city clerk,
26 as applicable, and a record of its return is made in the mail ballot record for
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

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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.

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current Nevada Revised Statutes.

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

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

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

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

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

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

1 19. Secretary of State Barbara Cegavske takes issue with the number of seats for observation and
2 says nothing about the Agilis mail ballot processing system, as Clark County Registrar of
3 Voters Joseph P. Gloria failed to disclose or indicate in that letter that the Agillis mail ballot
4 processing system was being used in conjunction with its software ability for signature
5 verification, which is something that is NOT permitted under the Nevada Revised Statutes,
6 as amended by AB4 as these require is a person to review the ballot signatures.
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8 20. The use of the Agilis mail ballot processing system by Clark County Registrar of Voters
9 Joseph P. Gloria for signature verification violates the voter election laws. Furthermore,
10 Clark County Registrar of Voters Joseph P. Gloria’s actions compromised the integrity of the
11 voting procedures in Nevada and the counting of the ballots cast by the voters.
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13 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
14 used in this State unless it meets or exceeds the standards for voting systems established by the United States
15 Election Assistance Commission. (Added to NRS by 1993, 2199; A 2003, 2186; 2005, 1438; 2019, 3394)

16 22. To compound error on top of error, The Clark County Election Department lowered the
17 factory settings on its signature verification machine, as reported by Victor Joecks in an
18 article titled “County lowers ‘confidence level’ for ballot signatures”,
19 [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/)
20 [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 EXHIBIT 4.**

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

23 24. The Clark County Registrar of Voters is used a defective signature matching computer system
24 which violates the express requirements of AB4.⁴ Section 23 of AB4 states that, with
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27 ⁴ This machine is only being used in Clark County and a similar device is not being used in any other county in
28 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).

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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 un 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-
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 **SEE EXHIBIT 4.**

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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
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- 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_d
- 4 [d_vote_using_mail-in_ballots.html](https://www.realclearpolitics.com/video/2020/11/12/tucker_carlson_yes_dead_people_d) **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.**
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- 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.**
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- 23 36. Additionally, the tabulation and ballot counting process is called into question as to the
- 24 procedures concerning ballot secrecy when it comes to verifying the rejected ballots.
- 25 Specifically, if the staff member reviewing the ballots does not agree with how the
- 26 individual voted, this knowledge may become an incentive for the staff member to
- 27 invalidate the ballot, risking voter disenfranchisement. See Declaration of Fred Kraus
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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**.

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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**.

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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**.

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

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?
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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.
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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**),
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- 1 there were also voters who were identified on the log as having resided at that address that
2 did not. **SEE EXHIBIT 13.**
- 3 44. A result of the actions of Registrar of Voters Joseph Gloria, ballots mailed to the Active List
4 in the General 2020 election included those that were returned in the Primary election as
5 undeliverable and should have been moved to inactive status in Commission District C.
6
- 7 45. A similar canvass of persons residing at the addresses in Commission District C shows
8 similar results as to the Senate District 6 results. Persons who live at those addresses did not
9 receive ballots mailed to the voter in question. See Declarations attached as **EXHIBIT 14.**
- 10 46. With the number of votes in the Commission District C race being decided and is within 10
11 votes, the extra 34 votes that were cast twice by voters using both the mail in and early
12 voting methods cannot be counted. This invalidates 68 votes, and due to ballot secrecy, a
13 new election in the Commission District C is required.
14
- 15 47. The flooding of ballots that should not have been mailed coupled with the Agilis mail ballot
16 processing machine being utilized for signature verification that is not permitted calls the
17 integrity of the election and the results into question.
- 18 48. This flooding of ballots and Joseph Gloria's improper identification of voters from active to
19 inactive voting list and the use of an unauthorized machine for signature verifications
20 resulted in the voting irregularities throughout the entire county.
21
- 22 49. The inbound Ballot Process created as a part of the Cybersecurity and Infrastructure Security
23 Agency (CISA) Elections Infrastructure Government Coordinating Council and Sector
24 Coordinating Council's Joint COVID Working Group requires Clark County Registrar of
25 Voters Joseph P. Gloria is required to store the ballots, ballot envelopes and miscellaneous
26 contents that arrive, such as the secrecy sleeves. Nothing should be thrown away until after
27 the period to challenge the election is passed. **SEE EXHIBIT 15.** Therefore these ballots
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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

1 rematched up with any degree of certainty to ensure a fair and impartial election.
2 58. The loss of these ballots constitute malfeasance or at a minimum a declaration or
3 demarcation of those ballots being declared lost or destroyed for the purposes of being able
4 to now be verified by a person as required under the Nevada Revised Statutes amended or
5 including AB4 provisions relating to same.
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7 **Count Two: Declaratory and Injunctive Relief**

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

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

16 61. NRS 30.040 permits any person whose rights are affected by a statute “may have determined
17 any question of construction or validity arising under the instrument, statute, ordinance,
18 contract or franchise and obtain a declaration of rights, status or other legal relations
19 thereunder.”
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21 62. On Monday, November 16, 2020, the Clark County Commissioners were scheduled to
22 canvass the return. Plaintiff petitioned the Board of County Commissioners for a revote
23 based on voter irregularities, as testified to by Clark County Registrar of Voters Joseph P.
24 Gloria. That request was denied by the Board of County Commissioners.
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26 63. As a result of discrepancies and irregularities in the election process and processing of the
27 mail ballots, the Board of County Commissioners did not certify County Commission
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District C, but did certify Senate District 6. Senate District 6 is a subset of Commission District C and lies directly within the boundaries within County Commission District C.

64. The discrepancies in the election process presented to the Clark County Commissioners by Registrar of Voters Joseph P. Gloria were different discrepancies (or irregularities) and additional than those identified by Plaintiffs. This did not include the irregularities that were based on ballots that were run through an electronic signature machine and not verified by a person as required under the Nevada Revised Statutes amended or including AB4 provisions.

65. This Court should issue an order declaring the Agilis mail ballot processing machine and its software for signature verification is not permitted use for comparison of signatures on ballots based on the plain language of the Nevada Revised Statutes amended or including AB4 provisions.

66. This Court should issue an order declaring those signatures as read or verified by the Agilis mail ballot processing machine and its software for signature verification as invalid, and require a person to perform signature verification of those votes as required in the Nevada Revised Statutes as amended or including AB4 provisions.

67. This Court should issue an order requiring Clark County Registrar of Voters Joseph P. Gloria to provide a list of all voters with their addresses whose signatures were verified by the Agilis mail ballot processing machine and its software for signature verification and a list of all voters with their addresses whose signatures were submitted but rejected by the Agilis mail ballot processing machine and its software for signature verification.

68. As the Clark County Registrar of Voters Joseph P. Gloria has separated the ballots from the envelopes to be fed into and or read by the Agilis mail ballot processing machine and its software for signature verification, this Court must otherwise declare those ballots as lost or destroyed.

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

3 WHEREFORE, Petitioner pray;

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

16 Dated this 16th day of November, 2020.

17 CRAIG MUELLER & ASSOCIATES

18
19
20
21 By: 
22 CRAIG A. MUELLER, ESQ.
23 Nevada Bar Number 4703
24 723 South 7th Street
25 Las Vegas, Nevada 89101
26
27
28

EXHIBIT 1

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.

#

[Return to full list >>](#)

EXHIBIT 2

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

EXHIBIT 3

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". The signature is fluid and cursive, with a prominent loop at the end.

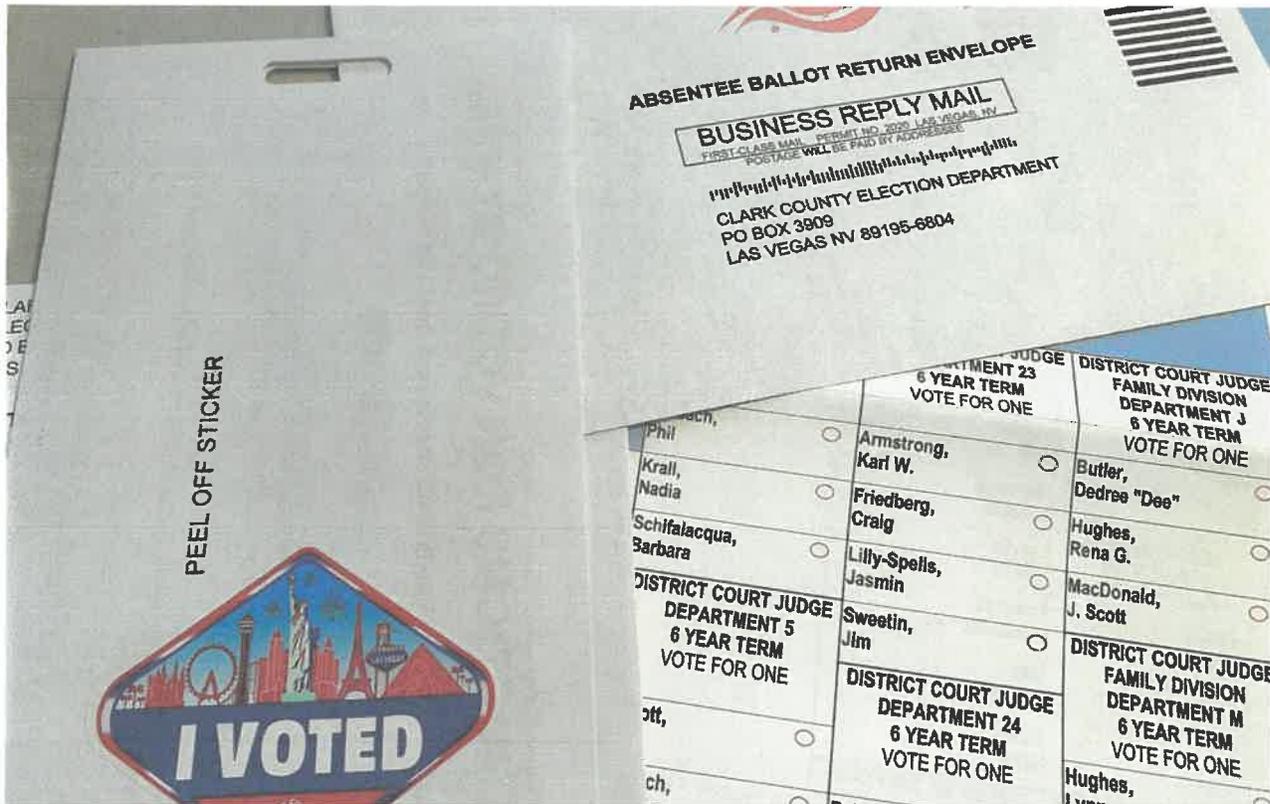
Joseph P. Gloria
Registrar of Voters

Enclosures

EXHIBIT 4

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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Like 277K

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.

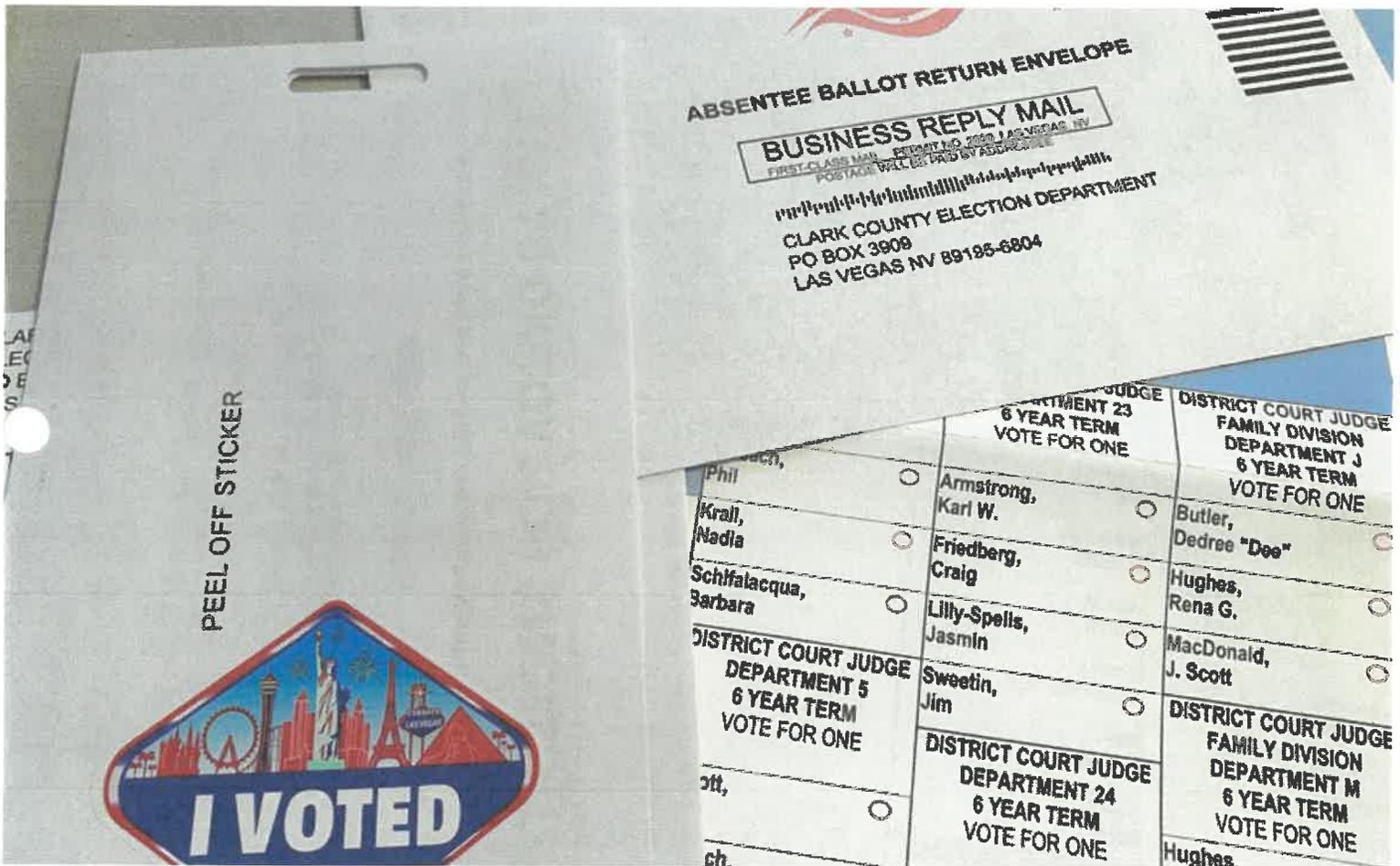
Victor Joecks' column appears in the Opinion section each Sunday, Wednesday and Friday. Listen to him discuss his columns each Monday at 3 p.m. with Kevin Wall on AM 670 KMZQ Right Talk. Contact him at vjoecks@reviewjournal.com or 702-383-4698. Follow [@victorjoecks](https://twitter.com/victorjoecks)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

0

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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/>)

(#) (#) (#) (#)

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. He explained why voter fraud matters, even when it doesn't swing races on the broadcast of his show. [Recommended Video](#)



Recommended

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 American 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.

Related Videos

EXHIBIT 5

EXHIBIT 5

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

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 to 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.

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

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

8 14. On Wednesday, October 21, 2020 I returned to the Clark County facility located at
9 965 Trade Dr., North Las Vegas, NV 89030 to observe mail ballot processing.

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

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

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

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

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-3616

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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

EXHIBIT 6

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.

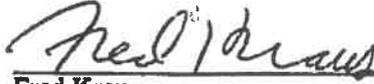

Fred Kraus

EXHIBIT 7

EXHIBIT 7

1 **AFFIDAVIT OF KANOA IKEDA-FLYNN**

2
3 STATE OF NEVADA)
4 COUNTY OF CLARK) ss:
5

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

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

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

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

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

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

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

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

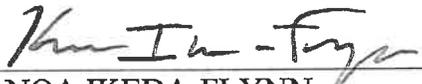
24 8. While working, I observed a significant number of signatures on mail-in ballots
25 that I believe did not match the name and should have been reviewed. When I asked the
26
27
28

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.

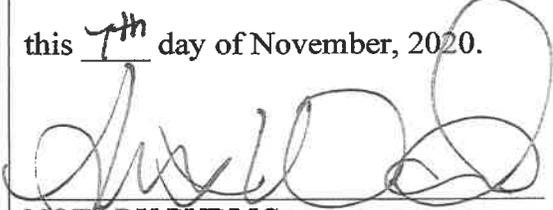
9 FURTHER YOUR AFFIANY SAYETH NAUGHT.

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.

18
19 

20 NOTARY PUBLIC
21 In and for said County and State



EXHIBIT 8

EXHIBIT 8

1110696	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	BOVD, TODNEE LATANYA	3702	4021 DALE EVANS DR	4021 DALE EVANS DR	4	37	6
1296868	GAMBRELL, GAIL MARGURIT	3812	3760 1301 N RAINBOW BLVD APT 56	1301 N RAINBOW BLVD APT	1	34	6
1296628	JACK, CRISTAL	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, LYNDIA 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
1536886	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	ARRIGA, MARCO A III	3762	6708 1224 MERIDIAN BAY DR	1224 MERIDIAN BAY DR	1	34	6
1760577	STOUISENBERGER, SHANE C.	3366	7645 8824 ROZETTA CT	8824 ROZETTA CT	4	34	6
1791247	TIJUNG, 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, MARIAM	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 3825 RUSSET FALLS ST	3825 RUSSET FALLS ST	4	37	6
2068591	ELLEN, SHELBY LEA	2710	2710 4516 BRITANNY VILLAGE CT	4516 BRITANNY VILLAGE CT	4	37	6
2077693	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, DANICE	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	1	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, JILIANA ALESSANDI	3766	3726 7805 WEDLOCK LN	7805 WEDLOCK LN	4	37	6
2474966	SAYER, JULIET ELZABETH	3361	3361 124 WORTHEN CIR	124 WORTHEN CIR	1	34	6
2537856	FORREST, MARREZE DASHON	3760	3760 4141 HARDWICK CT	4141 HARDWICK CT	4	37	6
308355	STUBBLEFIELD, RUBEN RIV	3773	3773 7200 PIRATES COVE RD APT 21	7200 PIRATES COVE RD APT	1	34	6
3193501	TALLERICO, JAMES SAMI	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 AVI	4	37	6
538364	MAYNARD, MEGAN TANVA	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

EXHIBIT 9

EXHIBIT 10

EXHIBIT 10

EXHIBIT 11

EXHIBIT 11

EXHIBIT 12

EXHIBIT 12



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 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:  Date: 11/8/20

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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 forgoing is true and correct

Signed: Alex Tarkanian Date: 11/10/20

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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 Tusca 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

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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 (Chung Bell). A gentle man answered and identified himself as NICHOLAS GRAUER, 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 GRAUER 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 forgoing is true and correct.

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

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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:  Date: 11/10/20

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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:  Date: 11/8/20

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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 tthe 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 identifie
ourselves and told them that we were verifying whether Marian Moore lived at
2209 Tall Pine Drive. The man identified himself as Chris Chadiy 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:  Date: 11/10/2020

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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 Estalilla 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, leasing
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

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EXHIBIT 13

EXHIBIT 13

2230441	GARROW, COLLEEN NICOLE	3811 3811 6501	VEGAS DR UNIT 1074	6501	VEGAS DR UNIT 1074	1	34	6 C	1	2 C	Same
2234772	KAHN, RYAN ANTHONY	3707 3707 10602	PENNANT AVE	10602	PENNANT AVE	4	36	19 C	4	13 E	Same
2254408	MOORE, MARIAN L	3842 3842 2209	TALL PINE DR	2209	TALL PINE DR	4	34	6 C	4	2 C	Same
2255733	COCOMAZZI, MERCEDITA MARIA	3706 3706 7825	TARBERTS COTTAGE ST	7825	TARBERTS COTTAGE ST	4	36	19 C	4	13 E	Same
2257617	PACHECO, DANICE	3385 3385 10001	SUMMER OAK LN UNIT 102	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	8709	RED BROOK DR UNIT 104	4	34	6 C	4	7 E	Same
2277855	HAYS, JELIZA ANN	3719 3719 3501	SHADY TIMBER ST APT 2087	3501	SHADY TIMBER ST APT 2087	4	4	18 C	4	7 E	Same
2273895	ESTALLA, ALLEN LOPEZ	3361 3361 8201	DISTANT STAR CT	8201	DISTANT STAR CT	4	34	6 C	4	7 E	Same
2280181	RILEY, REBEKAH	3762 3762 1032	BIRD SPRINGS DR	1032	BIRD SPRINGS DR	1	34	6 C	1	7 E	Same
2289230	FALSEY, NICHOLAS GERARD	3721 3721 3929	PRESCOTT PINES ST UNIT 102	3929	PRESCOTT PINES ST UNIT 102	4	34	3 C	4	2 C	Same
2286412	THEWIS, DANIEL JOHN	3523 3523 5920	MICHELLI CREST WAY	5920	MICHELLI CREST WAY	4	4	18 C	4	13 E	Same
2286725	BONDARD, PAMELA LOUISE	3707 3707 10626	PENNANT AVE	10626	PENNANT AVE	4	36	19 C	4	13 E	Same
2304630	GONZALES, DANIEL FRANCISCO	3855 3855 2701	N DECATUR BLVD APT 2092	2701	N DECATUR BLVD APT 2092	4	3	3 C	4	2 C	Same
2318884	ANDERSON, ASPEN HOPE	3800 3800 2009	BLOOMFIELD CT	2009	BLOOMFIELD CT	4	34	6 C	4	7 E	Same
2365982	NIEMWAN, JOHNNIE BENNIE	3435 3435 8404	ORCHARD RIDGE AVE	8404	ORCHARD RIDGE AVE	4	37	6 C	4	7 E	Same
2367391	HUNG, PHYRE	3395 3395 7916	BRIDGE GATE DR	7916	BRIDGE GATE DR	4	34	6 C	4	7 E	Same
2374540	COHAN, MARIANNE	3386 3386 11120	PINE GREENS CT	11120	PINE GREENS CT	3	2	8 C	3	7 E	Same
2378542	COHAN, LANI	3386 3386 11120	PINE GREENS CT	11120	PINE GREENS CT	3	2	8 C	3	7 E	Same
2391254	MORENO, MELISSA AMANDA	3370 3382 1525	IRON SPRINGS DR	1525	IRON SPRINGS DR	3	2	8 C	3	7 E	Same
2392295	LOZOVY, ERIK	3613 3613 9009	CAREFUL CANVAS AVE	9009	CAREFUL CANVAS AVE	4	4	18 C	4	13 E	Same
2398191	PERKINS, TARINA KAY	3734 6726 12256	MONTURA ROSA PL	12256	MONTURA ROSA PL	3	2	8 C	3	13 E	Same
2404000	UYONG, AIVSSA	3391 2087 1609	ROYAL CANYON DR	1609	ROYAL CANYON DR	4	34	6 C	4	7 E	Same
2422354	MARTINEZ, DENNIS ANTHONY	3414 6738 2569	IRON CREST LN	2569	IRON CREST LN	3	37	6 C	3	13 E	Same
2422407	MARTINEZ, RAMONA LYDIA	3414 6738 2569	IRON CREST LN	2569	IRON CREST LN	3	37	6 C	3	13 E	Same
2422701	MALONE, RONALD C	3364 3364 1012	GRANGER FARM WAY	1012	GRANGER FARM WAY	3	37	6 C	3	13 E	Same
2429816	SMITH, SARAH MARIE	3749 1327 3125	N BUFFALO DR APT 2078	3125	N BUFFALO DR APT 2078	4	2	8 C	3	7 E	Same
2451358	MURRAY, GAIL LUCILLE	3608 3608 5945	N JENSEN ST	5945	N JENSEN ST	4	37	6 C	4	7 E	Same
2451363	MURRAY, RONALD JACKSON	3608 3608 5945	N JENSEN ST	5945	N JENSEN ST	4	4	18 C	4	13 E	Same
2451855	PICACHE, JULIANA ALESSANDRA	3766 3726 7805	WEDLOCK LN	7805	WEDLOCK LN	4	4	18 C	4	13 E	Same
2473051	WALZEL, ROBERT MORRIS	3364 3364 9172	TUDOR PARK PL	9172	TUDOR PARK PL	4	37	6 C	4	7 E	Same
2479666	SAVER, JULIET ELIZABETH	3361 3361 124	WORTHEN CIR	124	WORTHEN CIR	3	2	8 C	3	7 E	Same
2506792	SOVERANI, JACQUILINE E	3854 3854 5701	PASEO MONTANA	5701	PASEO MONTANA	1	34	6 C	1	7 E	Same
2524512	ROSE, JOSEPH ROBERT HENRY	3465 3465 7428	SILENT SAGE DR	7428	SILENT SAGE DR	4	3	3 C	4	2 C	Same
2537856	FORREST, MARKEZE DASHON	3760 3760 4141	HARDWICK CT	4141	HARDWICK CT	4	4	18 C	4	13 E	Same
2538669	PARKER, GABRIEL THOMAS	3576 2600 11368	RANCHO PORTENA AVE	11368	RANCHO PORTENA AVE	4	37	6 C	4	7 E	Same
2540151	NOREIKA, ALEXIS MICHELLE	3786 3786 3621	WILD WILLOW ST	3621	WILD WILLOW ST	3	2	8 C	3	13 E	Same
2597340	MARTIN, JESSICA ANNE	3726 3726 10337	WILLIAM FORTYE AVE	10337	WILLIAM FORTYE AVE	4	4	18 C	4	7 E	Same

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

Does not live there

EXHIBIT 14

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 ^{over} and does not
live at address anymore. Although,
his mail address and "address is located
here".

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

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CITIZEN OUTREACH FOUNDATION
Putting the Public Back in Public Policy

Ballot Integrity Task Force

INCIDENT REPORT/DECLARATION

Investigator Name: Chance Bonaventura

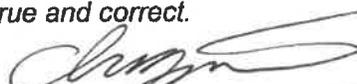
Incident Date/Time: November 10, 2020 11:50

Voter's Name: Amanda Marcella Voter ID#: 1726107

Voter's Address: 9225 Longhorn Falls Ct.
89149

Report: talked 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

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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 Cook Voter ID#: 1889175

Voter's Address: 6840 Antler ct.

Report: Talked to mom, Susie 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 forgoing is true and correct.

Signed:  Date: Nov. 10, 2020

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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

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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 Indson 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 forgoing is true and correct.

Signed: 

Date: Nov. 10, 2020

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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

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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

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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 2:49 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:  Date: Nov. 10, 2020

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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 forgoing is true and correct.

Signed:  Date: Nov. 10, 2020

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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 man 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 none 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 forgoing 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 forgoing 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 Faisey 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 Faisey 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:  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 Mata St. 89108

Report: Knocked on the door and rung the
"Ring" door bell. Current resident, Ronde (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 recieved 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

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:

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- 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