



JENNINGS & FULTON
LAW FIRM



June 22, 2022

Sent Via U.S. Certified Mail & E-mail:

Craig Newby, Esq.
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Counsel for Nevada Secretary of State Barbara Cegavske

RE: Demand to Not Certify 2022 Primary Election

Individuals Who Have Submitted an Election Integrity Violation Reports and Complaints:

- Robert [Redacted]
- Dinah [Redacted]
- Larry [Redacted]
- Susan [Redacted]
- Jeri [Redacted]
- Linda [Redacted]
- Anonymous
- Aaron [Redacted]
- Pamela [Redacted]
- Tammy [Redacted]
- Valerie [Redacted]
- Tracey [Redacted]
- Lester [Redacted]
- Mary [Redacted]
- Michael [Redacted]
- Melodie [Redacted]
- Robert [Redacted]

Dear Craig,

Please be advised that my firm represents the above-listed individuals (“Clients”) regarding the 2022 Primary Election. While the parties in *Beadles v. Cegavske, et al.*, Case No. CV22-00661 (“Observation Matter”), submitted a Stipulation and Order for Dismissal Without Prejudice, my Clients have submitted several Election Integrity Violation Reports (“Reports”) and additional complaints to the Washoe County Registrar of Voters that have neither been cured nor addressed. Additionally, as outlined in further detail below, several issues outside of

voter observation have taken place warranting Secretary Cegavske to not certify the Primary Election.

As you are aware, I also represent several Clark County voters who have also sent correspondence to Registrar Gloria and to Secretary Cegavske requesting the Primary Election not to be certified. My Washoe County and Clark County Clients request Secretary Cegavske review both correspondence regarding all known issues with the Primary Election to be considered collective given the totality of the circumstances in her decision whether or not to certify the Primary Election.

NRS 293.190 provides that not later than 15 days after the primary election at which candidates are nominated for any public office:

1. The Secretary of State shall certify to each county clerk the name of each person nominated and the title of the office for which he or she is nominated for all candidates required to file declarations, certificates and acceptances of candidacies in the Office of the Secretary of State; and
2. Each county clerk shall certify to the Secretary of State the name of each person nominated and the title of the office for which he or she is nominated for all candidates required to file declarations, certificates and acceptances of candidacies in the office of the county clerk.

As you are aware, the Nevada Department of Motor Vehicles (“DMV”) has confirmed that individuals who completed a DMV driver’s license transaction but did not identify a political party had their voter registration changed to non-partisan and could only cast votes for non-partisan races. This amount totals approximately 44,000 voters warranting Secretary Cegavske to not certify the Primary Election. 44,000 votes are significant. Several primary race results alone based on the unofficial election results could hinge on this issue alone, specifically the GOP Primary for Governor. NRS 293.410(2) provides that an election may be contested upon any of the following grounds if: (1) Illegal or improper votes were cast and counted, (2) Legal and proper votes were not counted; or (3) A combination of the circumstances described in subparagraphs (1) and (2) occurred. Surely this occurred as 44,000 voters were unable to properly vote and have their vote count.

As outlined and represented in multiple Reports, my Clients and other observers have submitted reports, taken photographs and videos outlining that acting Registrar Carmen failed to maintain chain of custody of physical ballots, mail-in ballots, and thumb/USB drives. Additionally, my Clients received confirmation that election offices were staffed primarily with single-party employees, including out of state individuals, and often temporary employees. Moreover, with more ballots being received after election day without observation, there is simply no rational basis to certify the Primary Election.

Additionally, with missing ballots and ballot boxes being taken from and brought into facilities after hours, there is sufficient evidence not to certify the Primary Election. The purported 24/7 live stream of the voting process did not take place, either with issues regarding the stream itself or obstructed camera views. My Clients were also given conflicting information on EMS equipment not being connected to the internet. The Cybersecurity & Infrastructure Security Agency (“CISA”) cautions that when using the Dominion voting machines, to “[e]nsure that ImageCast X and the Election Management System (EMS) are not connected to any external (i.e., Internet accessible) networks.”¹ This is because such connection would present a breach of the integrity of the election process. However, during the Primary Election, the machines used were connected to the internet.

My Clients have been in contact with a Washoe County poll worker who can confirm that the Mi-Fi equipment connected all voting machines in Washoe County to the internet. After completing the hiring and training process, the employee received an Election Worker Manual (“EWM”) and trained in using the voting machines at the in-person training session. Multiple training materials reference Mi-Fi equipment as an integral part of the voting process from intake to machine voting. The USB hub included in all laptop bags contained critical election supplies from the ROV office. Instructions for setting up voting stations include directions for unpacking the Mi-Fi unit, using a surge protector for it, using a “PepLink router...to connect to the cellular services”, and using a USB hub to plug in all Poll Book accessories. The EWM contained instructions for using the **internet** to connect all Poll Books to the ROV voter databases.

Furthermore, it is estimated that tens of thousands of ballots were picked up from the Reno Vassar post office each day without proper verification and no chain of custody documented. The ROV utilized temporary workers who were clearly untrained, who identify as democrats. Numerous individuals who applied to work the Primary Election were rejected, there is not proper representation among ROV employees. Registrar Carmen also confirmed the tabulation of votes outside of the view of observers.

NRS 49.315 provides that every person has a privilege to refuse to disclose the tenor of his or her vote at a political election conducted by secret ballot unless the vote was cast illegally. The ROV unilaterally attempted to waive my Clients privilege and countless other voters. NRS 293.269935(2) also provides that the clerk shall develop a procedure to ensure that each mail ballot is kept secret. This did not take place. Non-adhesive strips were used on ballots. When envelopes are mailed, it identifies the political party of the voter, including the precinct, first and last name, voter identification number, bar code, and other identifiable information. A

¹ Vulnerabilities Affecting Dominion Voting Systems ImageCast X | CISA (last accessed June 22, 2022).

temporary employee of the ROV could simply discard or fail to verify signatures for a vote for a party they do not align with.

Regarding ballot and ballot box transportation, many of my Clients witnessed ballot transportation with only a single individual in vehicles, not a member of each party. My Clients have numerous photographs and videos confirming the same. There is no basis for accountability with only one (1) driver transporting ballots and ballot boxes. NRS 293B.335(1) requires at least two members of the election board shall deliver the sealed container to a receiving center or to the central counting place, as directed by the county clerk. If practicable, the members must be of different political parties. At least two members of the election board shall provide for the transportation or other disposition of all other supplies and election materials as directed by the county clerk. NRS 293B.335(2). Any member of the general public may observe the delivery of a sealed container to a receiving center or to the central counting place if he or she does not interfere with the delivery of the sealed container. This did not take place.

Additionally, dismantling of voter machines further warrants not certifying the election. Voters used the dismantled machines for several days before they were dismantled. No confirmation has been given on what happened to those votes and whether they were accepted or rejected. For Secretary Cegavske's convenience, my Clients have compiled Washoe County Primary Election data further demonstrating inconsistencies in the enclosed. Notably, the number of mail-in ballots on June 14, 2022 is drastically different between published turnout reports. Moreover, my Clients have identified a gap of approximately 22,000 registered voters in Washoe County on June 14, 2022. The turnout reports do not match the total votes cast with the unofficial results still changing.

As outlined in further detail below, there are clear voter observation, dismantling of machines, DMV administrative errors, and chain of ballot custody issues that warrant my Clients request for Secretary Cegavske to not certify the Primary Election. On June 13, 2022, my office sent the enclosed correspondence to Registrar Carmen regarding the Reports and complaints submitted by my Clients ("Observation Correspondence").

While my Clients are aware that the Court found that the Plaintiffs in the Observation Matter did not present sufficient evidence to grant the relief sought in the Motion for a Temporary Restraining Order, that Plaintiffs claims were not ripe, and were speculative², my Clients Reports outline that the Registrar of Voters has not permitted meaningful observation of the Primary Election in addition to the aforementioned.

²My Clients cite the Order as to form and content only, and do not concede any factual and legal positions disputing the contents of the Order.

However, since the submission of the June 13, 2022 Observation Correspondence, my Clients have submitted the below-referenced following complaints and Reports. For the sake of brevity, my Clients have omitted the Reports and complained outlined in the Observation Correspondence. While below is not an exhaustive summary of each and every Report and complaint, it summarizes key instances warranting the Primary Election to not be certified:

Observer	Complaint(s)/Report(s)
Robert [REDACTED]	<ul style="list-style-type: none"> • Identified the 44,000 voters who were unable to vote for partisan elections due to DMV administrative error. • Witnesses the ROV pick up tens of thousands of ballots from the Reno Vassar post office each day without proper verification and no chain of custody documented. • Voting machines entirely visible in the lobby at 1001 E. 9th Street for the public, press, employees, etc. to visibly see what votes were being cast.³ • The ROV utilizing temporary workers, who identify as democrats. Numerous individuals who applied were rejected, there is not proper representation among ROV employees. • Registrar Carmen confirmed tabulation of votes outside of the view of observers. • Informed the ROV is short staffed, yet many ready, willing, and abled individuals were not hired, specifically Mr. Beadles. • Non-existent adhesive strips on ballots. The issue is that when envelopes are mailed, it identifies the political party of the voter, including the precinct, first and last name, voter identification number, bar code, and other identifiable information.
Robert [REDACTED]	<ul style="list-style-type: none"> • Witnessed ballot transportation with only a single individual in vehicles, not a member of each party.
Susan [REDACTED]	<ul style="list-style-type: none"> • As a ballot runner, Ms. Vannes witnessed several election workers cutting the security bands off and dismantling all voting machines. When questioning what was occurring, Manager Nicole informed Ms. Vanness that the wrong voting machines were delivered that were only intended to be used on election day. • Observers instructed to leave observation areas, Ms. Carmen, a security guard remained with specialist Michael Mulreany while looking at the tabulation.

³Each voter has the right to receive and cast a ballot that accurately records the voter's preference in the selection of candidates. *See* NRS 293.2546. Further, Nevada law guarantees each voter privacy and independence in the act of voting, including, without limitation, confidentiality of the ballot of the voter. *See* NRS 293.2696. NRS 293B.255 requires that the booth in which a mechanical recording device is installed must be so constructed that the rear and sides of the booth in combination with the person of the voter hide the device from the view of persons other than the voter. This did not occur.

	<ul style="list-style-type: none"> • Boxes of ballots being placed in area that 24/7 livestream cannot capture.
Valerie [REDACTED]	<ul style="list-style-type: none"> • EMS equipment not connected to the internet. Ms. Carmen informed Ms. White that the EMS equipment is not connected to the internet while also informing Ms. White that the equipment cannot be hacked. Ms. White received inconsistent information on whether equipment was connected to the internet or not.
Tracey [REDACTED]	<ul style="list-style-type: none"> • Multiple polling place managers not permitted to work 2022 Primary Election. • ROV staffed trainees as polling place managers in violation of NRS 293.227.

NRS 293.394 provides that Secretary Cegavske was required to adopt regulations for conducting a risk-limiting audit of an election. Risk-limiting audit is defined as an audit protocol that makes use of statistical principles and methods and is designed **to limit the risk of certifying an incorrect election outcome**. *Id.* Approximately 50-60% of the Primary Election consists of mail-in ballots, however, my Clients have received confirmation that mail-in ballots are not audited prior to certification. The margin for error is significant with no audit of the mail-in ballots.

The ROV staffed trainees as polling place managers. NRS 293.227(2) states that the appointment of a trainee as set forth in NRS 293.2175 and 293C.222 may be used to determine the number of members on the election board, but under no circumstances may a trainee serve as chair of the election board. My Clients received confirmation that trainees, individuals who had never previously served on an election board at a polling location, were appointed as polling place managers during early voting and on election day.

As the Registrar of Voters failed to cure any complaints within the Reports, and the additional Reports and complaints since June 8, 2022, my Clients request that the 2022 Primary Election not be certified because of, including, but not limited to, the following issues:

- 1) 44,000 voters unable to vote for partisan elections due to DMV administrative error;
- 2) Voting machines being dismantled;
- 3) Failure to maintain chain of custody of physical ballots and thumb/USB drives;
- 4) Election offices were staffed primarily with single-party employees, including out of state individuals, and often temporary employees;
- 5) Ballots being received after election day without observation;
- 6) Tens of thousands of ballots were picked up from the Reno Vassar post office each day without proper verification and no chain of custody documented;
- 7) The ROV utilizing temporary workers who were clearly untrained, who identify as democrats;

- 8) Conflicting information on EMS equipment not being connected to the internet;
- 9) Numerous individuals who applied to work the Primary Election were rejected, there is not proper representation among ROV employees. Registrar Carmen confirmed tabulation of votes outside of the view of observers;
- 10) Non-adhesive strips used on ballots. When envelopes are mailed, it identifies the political party of the voter, including the precinct, first and last name, voter identification number, bar code, and other identifiable information. A temporary employee of the ROV could simply discard or fail to verify signatures for a vote for a party they do not align with⁴;
- 11) Observers not permitted to enter facilities upon opening⁵;
- 12) Voter turnout and data inconsistencies;
- 13) Failing to maintain 24/7 uninterrupted live stream of process, including ensure unobstructed camera views;
- 14) Observers were not permitted to observe trays being processed and put away/stored;
- 15) Sealed ballots were taken from an administrative office without being processed;
- 16) Observers were not permitted to view all rooms where counting, tabulation, auditing, etc.;
- 17) Security Guards placed at Observation Container (glass) in Processing Room to obstruct observation;
- 18) Observation areas without reasonable viewing proximity;
- 19) Observers not permitted to enter facilities upon opening;
- 20) Ballot processing, counting, and verification taken place prior to observers being permitted to enter the facility and observe;
- 21) Ballot runners paired with family members; and
- 22) Individual ballot runners.

Given the countless NRS and NAC 293 violations, the Primary Election cannot be certified. Please contact my office with any questions regarding this correspondence. Please confirm by June 24, 2022 that Secretary Cegavske will not certify the 2022 Primary Election at this time.

Sincerely,

/s/ Adam Fulton, Esq.

Adam Fulton, Esq.

⁴NRS 293.877 requires at least once each year, each county clerk and all members of his or her staff whose duties include administering an election must complete a training class on forensic signature verification that is approved by the Secretary of State.

⁵NRS 293.363 requires the counting procedure to be make public and continue without adjournment until completed. This did not occur.

Enclosed:
June 13, 2022 Correspondence to Registrar Spikula/Carmen
Washoe County 2022 Primary Election Data

With a copy sent to:

Herbert B. Kaplan, Esq.
Washoe County District Attorney
One South Sierra Street
Reno, Nevada 89501
hkaplan@da.washoecounty.gov
Counsel for Washoe County Registrar of Voters

Sent via e-mail to Washoe County Board of County Commissioners:

Vaughn Hartung – District 4
vhartung@washoecounty.gov

Alexis Hill – District 1
ahill@washoecounty.gov

Bob Lucey – District 2
blucey@washoecounty.us

Kitty Jung – District 3
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Jeanne Herman – District 5
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June 13, 2022

Sent Via U.S. Certified Mail & E-mail:

Herbert B. Kaplan, Esq.
Washoe County District Attorney
One South Sierra Street
Reno, Nevada 89501
hkaplan@da.washoecounty.gov
Counsel for Washoe County Registrar of Voters

RE: Individuals Who Have Submitted an Election Integrity Violation Reports and Complaints:

- Dinah [REDACTED]
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- Tammy [REDACTED]
- Valerie [REDACTED]
- Tracy [REDACTED]
- Lester [REDACTED]
- Mary [REDACTED]
- Michael [REDACTED]
- Melodie [REDACTED]

Dear Herb,

Please be advised that my firm represents the above-listed Washoe County, Nevada observers (“Clients”) of the 2022 Primary Election. While the parties in *Beadles v. Cegavske, et al.*, Case No. CV22-00661 (“Observation Matter”), submitted a Stipulation and Order for Dismissal Without Prejudice, my Clients have submitted several Election Integrity Violation Reports and complaints (“Reports”) and additional complaints to the Washoe County Registrar of Voters that have neither been cured nor addressed.

While my Clients are aware that the Court found that the Plaintiffs in the Observation Matter did not present sufficient evidence to grant the relief sought in the Motion for a Temporary

Restraining Order, that Plaintiffs claims were not ripe, and were speculative¹, my Clients Reports outline that the Registrar of Voters has not permitted meaningful observation of the Primary Election.

Meaningful Observation is defined as,

[a] person may observe the identification of voters who appear at a polling place to vote, the distribution of a ballot or voting machine card to a voter, the movement of a voter to a voting booth, the return of a ballot or voting machine card by a voter and the exiting of a polling place by a voter.

The term does not include allowing a person to: (1) View the personal information of a voter, a voter’s ballot or selections on a voting machine; or (2) Listen to any conversation between election board officers or between a voter and an election board officer. (c) “Vote center” means a polling place established by the county or city clerk, as applicable, pursuant to the provisions of NRS 293.3072 to 293.3075, inclusive, or 293C.3032 to 293C.3035, inclusive, as applicable, where any person entitled to vote by personal appearance in the county or city, as applicable, may do so on the day of the election.

See Adopted Regulation R098-21.² Observations of voting, “must not be located in an area that would allow an observer to infringe on the privacy and confidentiality of the ballot of the voter.” *Id.* R098-21 requires observers to “remain in an area designated by the county or city clerk without interfering with the processing and counting of ballots,” but the designated area must “allow for meaningful observation” and “must not be located in an area that would allow an observer to infringe on the privacy and confidentiality of the ballot of a voter.” *Id.* My Clients have complied with Adopted Regulation R098-21 during their observations.

However, my Clients have submitted the below-referenced Reports and complaints. While the below is not an exhaustive summary of each and every Report and complaint, it summarizes key instances where my Clients were denied observation:

Observer	Complaint(s)/Report(s)
Dinah [REDACTED] [REDACTED]	<ul style="list-style-type: none">Insufficient poll workers, lack of sufficient observation including unattended ballot boxes. Ballots deposited without dates and unscanned, creating a reconciliation problem. Due to lack of staffing, Ballot drop box was left untended until personnel could transition from intake to Dropbox (on opposite sides of room). Ballot clerk instructions (at the time) were to scan and date ballots prior to being deposited in Dropbox. Voters would

¹My Clients cite the Order as to form and content only, and do not concede any factual and legal positions disputing the contents of the Order.

²[2022 Regulations \(nvsos.gov\)](https://www.nvsos.gov) (last accessed June 9, 2022).

	<p>easily have been able to insert ballots into Dropbox without being scanned or dated while left untended by workers engaged at intake on opposite side of room.</p> <ul style="list-style-type: none"> • Qualified voter was not provided a proper sample ballot and there were no means whereby the voter could print the sample ballot at the center. Surrendered Ballots were only required to have "cancelled at office" written on envelope which was most common method to surrender ballot. (Ballot in envelope, not ballot itself). Most people surrendered intact, usually unopened ballots. These collected ballots were stacked in unsecured locations. Assistant Registrar of Voters, Ms. Heather Carmen directed intake clerks to call election manager to insert surrendered ballot in zip-lock bag labeled provisional ballots. Three (3) voters who requested access to sample ballots at the poll were unable to have that request fulfilled. • Ms. Carmen asked Ms. Anderson-Maher to leave the Registrar of Voters (ROV) Center on Saturday, May 28, 2022 without any basis whatsoever.
<p>Larry </p>	<ul style="list-style-type: none"> • On 6//2022, between 10 am and 2 pm at the South Valley Library Location, at 15650 Wedge Pkwy Reno, Nevada the following was observed: <ol style="list-style-type: none"> 1. 9:50 am. Early voting starts at 10:00am. Multiple voters were voting at 9:50am. 2. 9:55 am. Workers "accidentally" scanned a sample ballot and it went through the system and COUNTED as if it were a real ballot. Voter said he did not receive a mail in ballot and he was using a sample ballot. Workers said they corrected by calling the registrar's office. 3. 10:02 am. The card reader at desk 1 (nearest the door) stopped working. After multiple errors they continued to use the same machine to check mail in ballots. They said the issue was only with the card reader. 4. 10:19 am. Workers had a discussion about how they just learned that they must close screen after counting a mail in ballot otherwise the next person coming in might present a sample ballot, have it scanned and it would count as a real ballot. 5. 10:40 am. Workers said they called "the tech people in Reno" about card reader problem. Tech people said "it might have been because the antivirus system attacked the card reader." After that, workers uninstalled the card reader, reinstalled it and it worked. I don't have the time but at another point it appeared that another desk had a similar card reader malfunction, this card reader was also reinstalled and used.

	<p>6. 11:37 am. Voting booth 2 ran out of paper and paper was replaced.</p> <p>7. 12:09 pm. Voting booth 2 had another problem. Machine wouldn't print. Ballot was said to have not been cast and voter was moved to another machine.</p> <p>8. 12:14 pm. Workers called tech and were told they had to do a hard reset on booth 2 machine.</p> <p>9. 12:23 pm. Voting booth 2 machine gave paper jam error code but there was no paper jam.</p> <p>10. Workers finally put an "Out Of Order" sign on voting booth 2.</p>
Susan ██████████	<ul style="list-style-type: none"> On 5/27/2022 and during ballot runner training, observer was teamed up with another Republican volunteer. When Ms. VanNess asked Ms. Carmen whether this was a violation of the statute she just said "Just don't ask each other what political party you are in. We also have a husband & wife team working together. The problem we have is not enough workers signed up to be ballot runners so we have to pair people together this way." On 6/5/2022 at approximately 6:11 pm, at Parkway Athletic Club 9400 Double Diamond Pwy., observer noticed a ballot that had a label pasted on the envelope instead of the pre-printed envelope. When delivered to ROV, this ballot was not set aside, and was scanned by the ROV employees and put in stack to be processed.
Jeri ██████████	<ul style="list-style-type: none"> On 5/31/2022, Ms. Diorio requested a tour of the entire facility but was denied and not allowed to see Steps 3-6. When using the restroom a poll worker followed her into the restroom and waited outside the stall and requested that she leave her purse on the counter. Subsequently, Ms. Diorio was escorted and signed out as an observer. Also, on 5/31/2022, there were six (6) cop cars upon arrival in a cluster and not doing anything. Strange and intimidating. At 2:30 pm when the ballots were still being harvested and going through the 6 Steps. The cops were not doing anything prior and it was odd and intimidating to see
Linda ██████████	<ul style="list-style-type: none"> Registrar of Voters Office confirmed the misprinting of ballots and assured voter that it would not be that way for the General Election and also assured her that it was not just to Republicans but to Democrats as well.
Anonymous	<ul style="list-style-type: none"> Against procedure, a woman attempted to drop off her own and her husband's ballot. She was told that her husband must submit his own. Her ballot was scanned and dated and her husband, waiting outside in vehicle, returned to submit his own ballot. Observer believes this incident MAY have been repeated but the ballot box was only being intermittently attended.
Aaron ██████████	<ul style="list-style-type: none"> On 6/2/2022, at approximately 12:43 pm the Washoe County Live Broadcast went down completely. The live stream ceased for at least 15 minutes if not longer.

<p>Pamela ██████████</p>	<ul style="list-style-type: none"> On 5/18/2022, while attending an election worker training session, between the hours of 1 – 3 pm, at 9th St Washoe County Health Department, a male attendee was asking someone for a NV DL to test his scanner attached to pull booth. Several observers questioned why the individual didn't have one and he said he just moved here. The woman leading the training session said she was going to report it at the ROV office.
<p>Tammy ██████████</p>	<ul style="list-style-type: none"> Had opted out of Mail-in Ballot" <i>only</i> and did not receive mailed paper sample ballot.
<p>Valerie ██████████</p>	<ul style="list-style-type: none"> On 6/1/22 at approximately 7:20 pm observer attempted to enter the Washoe County Registrar of Voters Office located at 1001 E. Ninth St. Reno, NV. All doors were locked making entry into the building impossible. Voter knew processing was occurring inside the processing room as approximately 7 poll workers were inside the Central Processing Room doing work and voter could see it Live on the Washoe County Youtube channel. Voter was able to knock on the door loud enough to attract the attention of a janitor who came to the door and informed the voter the facility is closed. Voter demanded that an employee of the Registrar of Voter's Office or Processing Center come to the door. The Janitor returned with Heather Carmen. Voter informed Ms. Carmen that he wanted to observe ballot processing and was let into the building. When voter asked how one may get entry into the Central Processing Center if the doors are locked and no one was able to retrieve Ms. Carmen from her office or the Central Processing Center (CPC), Ms. Carmen stated she would give me her business card. Ms. Carmen gave voter her business card when they entered the ROV Lobby together. <i>Observers arriving after closing hours are prevented from accessing observation of the Ballot Processing.</i> The CPC is 50-100 yards away from the front door. No one in the ROV Office or the processing center can hear knocking on the building's entry doors. No signage indicating how to gain entry after business hours when ballot processing is actually taking place. Ms. Carmen has not given her business card to all Washoe County constituents. <ul style="list-style-type: none"> While the activities in the CPC include ballot inspection, verification, duplication, adjudication and counting, the glass cage and corner location of the Observer Containment does not allow for the meaningful discernment of what process is being conducted and observations are severely impeded. In order to ask a question of the election worker authorized to interact with observers, the observer must: (1) exit the containment to enter the building's main hallway; (2) walk approximately 70-90 ft. to reach the Registrar of Voter's public door leading to their public counter; (3) wait for an election worker to approach the public counter where the observer must ask to speak to an authorized election worker who can answer questions; (4) ask the authorized worker the question; (5) wait for an election worker to escort the observer back to the containment entrance and unlock the door so that the observer can enter. Recently, an observer was made to wait for

	<p>approximately 30 minutes before being escorted back to the observer containment. Other observers have experienced up to 15 minutes just to get a question answered because of the journey and this process and the hindered movement into the observer containment.</p> <ul style="list-style-type: none"> On 6/3/22, at approximately 3:15 PM, observer had been seated in glass enclosed container in the CPC at 1001 E. 9th St. Reno, NV for approximately 20 minutes when Ms. Heather Carmen, entered the locked Observation Container to notify the group of observers totaling 5 bodies that one Republican observer must leave as a Democrat wished to observe. At the time, there were 3 Republicans in the Observation Container and 1 Independent. The addition of the 1 Democrat resulted in 5 bodies in the Observation Container and one empty stool. Observer should not have been asked to leave as there was additional seating and one stool still available in the Observation Container. On 6/3/2022 at approximately 2:30 pm, after observer checked in at the Registrar of Voter’s public counter observer was escorted into the Observation Container at 1001 E. 9th St. Reno, NV. Observer sat on a stool in the Observation Container and less than 4 feet away was a security guard seated outside the of the Observation Container in the interior of the Processing Room. The security guard, turning his head less than 90 degrees often periodically looked at the observers in the glass enclosed Observation Container. When observer asked Ms. Carmen why security guard was seated so close to observers and stated that it was intimidating to her Ms. Carmen advised that she would check with Jamie Rodriguez about that. Observer has not received a response from Ms. Carmen to date and does not know if Ms. Rodriguez provided one but security guard is still being seated in the same vicinity each day of observation and according to other observers in the container. The security guard’s close proximity is intimidating and should be addressed. On 6/5/2022 at approximately 8:30 am observer called Ms. Carmen to ascertain why the 24/7 Live Broadcast camera focusing on the Tabulation Room was not live broadcasting anything. That camera’s image on the URL was completely black. When observer checked back at approximately 9 am, there was still no live broadcast on that camera.
Tracey [REDACTED]	<ul style="list-style-type: none"> On 6/3/2022 at approximately 3:30 pm, I observed a woman transporting several blue canvas bags through the front entrance of the office. The bags contain election documentation, surrendered ballots, VVPAT materials, voter signatures pages, daily balance statements etc. and should be handled with accountability as polling locations, in those two (2) employees not of the same political affiliation should be handling them. Additionally, on 6/2/2022 Ms. Thomas observed and had a conversation with Jamie Rodriguez, that pursuant to NRS 293.325(1)(b) two (2) employees are not in fact observing voter’s mail ballots match the signature of the voter. Live steam video, while a valuable service, does not really lend any “meaningful” observation when there are no signs to indicate what processes are occurring in each of the areas. There is no observation of the

	<p>change of custody of mail ballots or election materials from polling places. There is no explanation of batches of ballots delivered to different trays on shelves or ones that are just left unattended on various tables.</p>
<p>Lester ■■■ ■■■</p>	<ul style="list-style-type: none"> On 6/5/2022 at approximately 7:50 am, prospective observer, Mr. Cooper arrived at the Washoe County ROV Center and attempted to enter the building's foyer but all the doors were locked. Mr. Cooper's right to observe any and all activity from either the glass-enclosed observation area in the processing room or the counter area near the Tally Room was denied. Mr. Cooper was not permitted to sign in as an observer and take his place in either of these locations. Mr. Cooper sat across the front doors of the building and at approximately 8:06 am two (2) men approached the doors and entered utilizing a passkey. Mr. Cooper recognized one of the men as one of the men had opened the parking lot gates earlier and assumed they were opening the building. Mr. Cooper followed them through the doors towards the building's foyer but noticed that hall doors towards the ROV office were closed and he couldn't view the ROV Office. Mr. Cooper asked the men if the building was open and they said no. Mr. Cooper exited the building and waited until one of them retrieved him from the front of the building and said he could use the restroom and wait in the foyer until they opened. While waiting in the foyer alone, the two men accompanied by Judith Moldonado, Washoe County Election Specialist, walked by and Mr. Cooper informed her that he was there to observe the voting process to which she responded that the building is not opening until 10 am today. When inquiring if that would also be the start time and when they would open next Sunday, Ms. Moldonado stated that she believed it would be 8 am as there would be more votes to process. Mr. Cooper exited the foyer and they secured the doors behind him.
<p>Mary ■■■ ■■■</p>	<ul style="list-style-type: none"> On approximately 6/1/2022 between 7:30 - 9 pm, county employees in the Washoe County Processing Center were observed not wearing badges. In one instance, there was a person in the processing room that was escorting a maintenance person. Only two people in the room, one of which was an individual working on repairing a broken scanning machine and the other person was not wearing a badge. Valerie White reported the above incident to Ms. Carmen who instructed employees to wear badges. One employee did and then proceeded to hide their underneath their shirt. After Ms. Carmen left the room only 3 out of 7 employees were wearing badges.
<p>Michael ■■■ ■■■</p>	<ul style="list-style-type: none"> On approximately 6/1/2022, Mr. Boughton, voter, went to Raley's on Summit Ridge to vote and check in and upon verification of voter's identity poll worker placed sticker with voter's name in poll worker's book. When poll worker looked at his laptop he stated to Mr. Boughton that he had already voted but Mr. Boughton had not. Poll worker called someone and talked to them on the phone and when he hung up gave Mr. Boughton the card and he was able to cast his vote.
<p>Melodie ■■■ ■■■</p>	<ul style="list-style-type: none"> When voter was at ROV, her and her husband were told and that the Instructions they received were incorrect and reference to notation 3, where there should be a self-adhesive strip to remove and seal the ballot.

While the aforementioned are representative and not exclusive, it is clear that the Assistant Registrar, Heather Carmen is not permitting consistent meaningful voter observation.

Please confirm that the Registrar of Voters will cure all complaints within the Reports and:

- 1) Maintain 24/7 uninterrupted live stream of process, including ensure unobstructed camera views;
- 2) Observers be permitted to observe trays being processed and put away/stored;
- 3) No sealed ballots be taken from an administrative office without being processed;
- 4) Observers being permitting to view all rooms where counting, tabulation, auditing, etc. are taking place;
- 5) Cure close proximity of Security Guards to Observation Container (glass) located in Processing Room;
- 6) Observation areas will be provided in all areas within reasonable viewing proximity;
- 7) Observers are permitted to enter facilities upon opening;
- 8) Ballot processing, counting, verifying will not begin until observers are permitted to enter the facility and observe;
- 9) Ballot runners should not be paired with family members and should be from different political parties.

Please contact my office with any questions regarding this correspondence. My office is open to conducting a walk through to address any of the aforementioned to amicably resolve this matter.

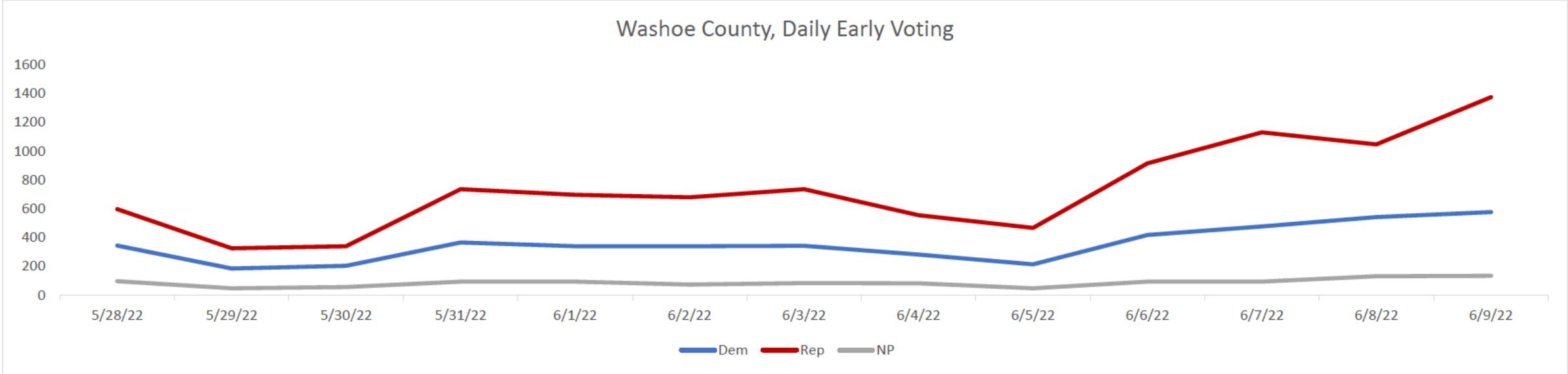
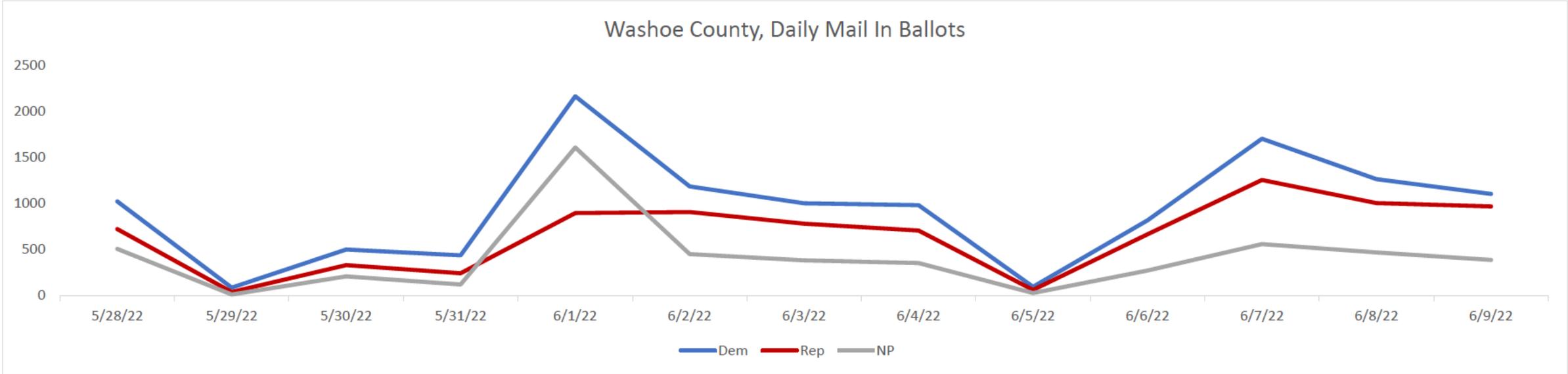
Sincerely,

/s/ Adam Fulton, Esq.
Adam Fulton, Esq.

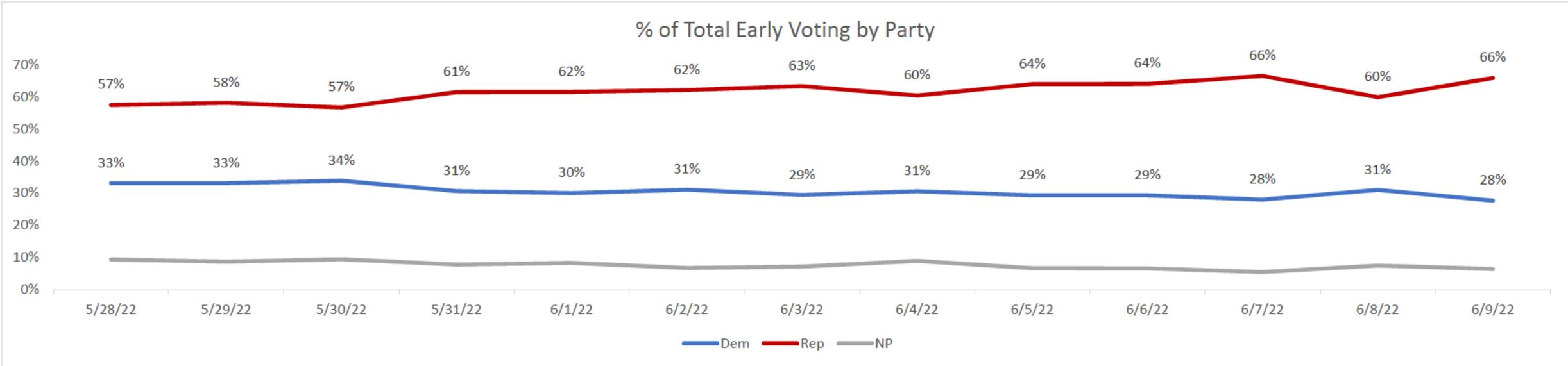
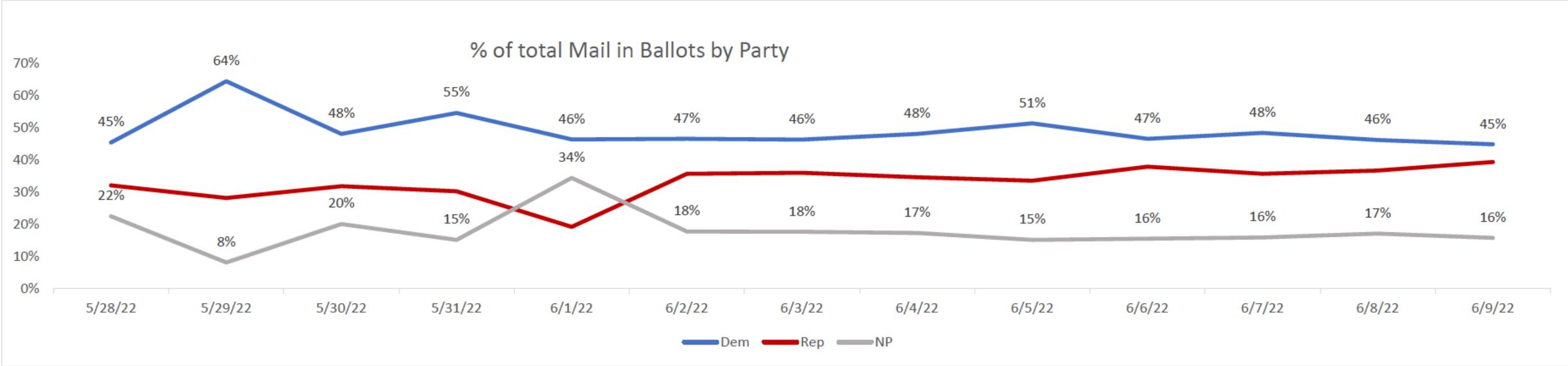
Primary 2022

Washoe County

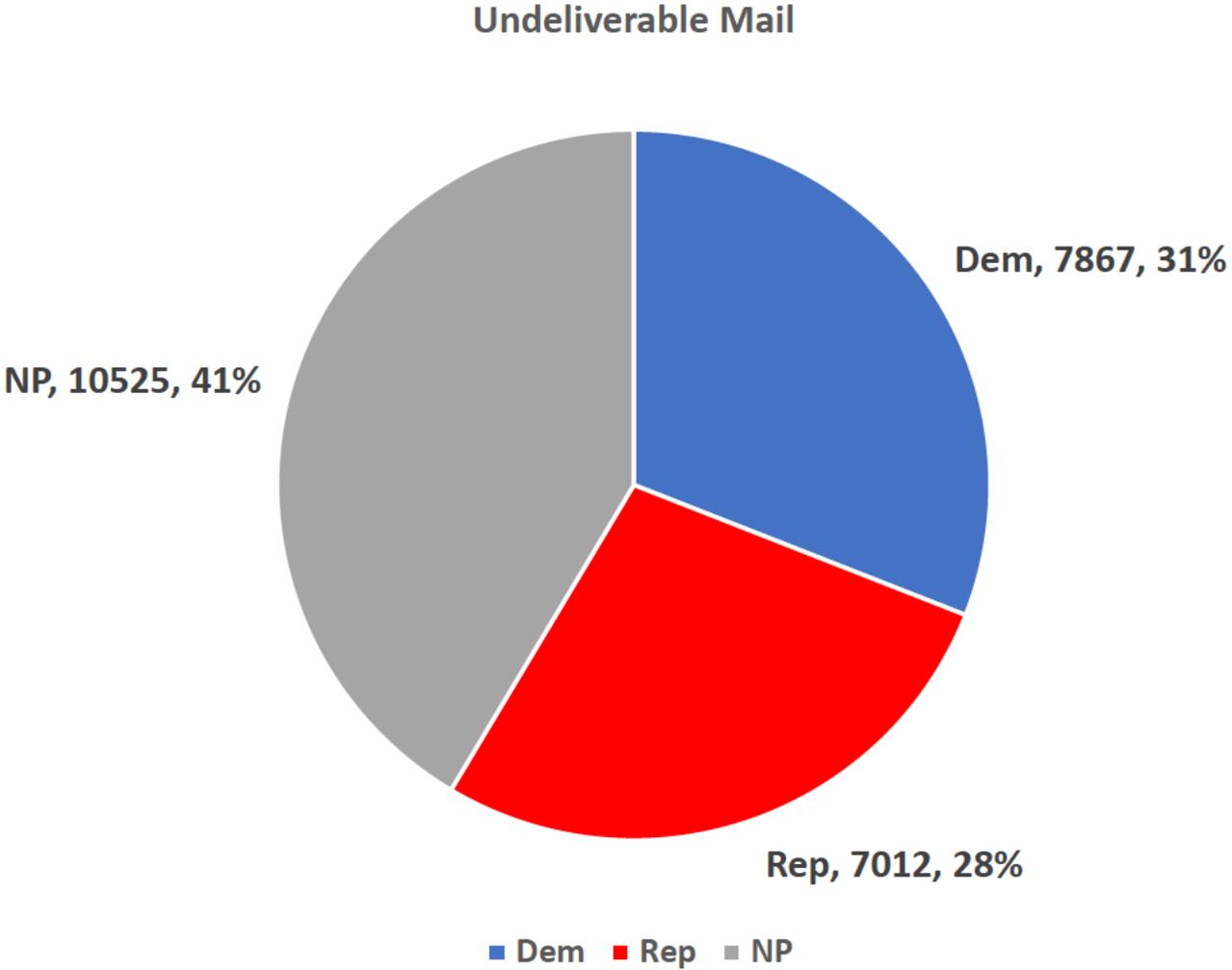
WC Primary 2022 | Daily votes by Party



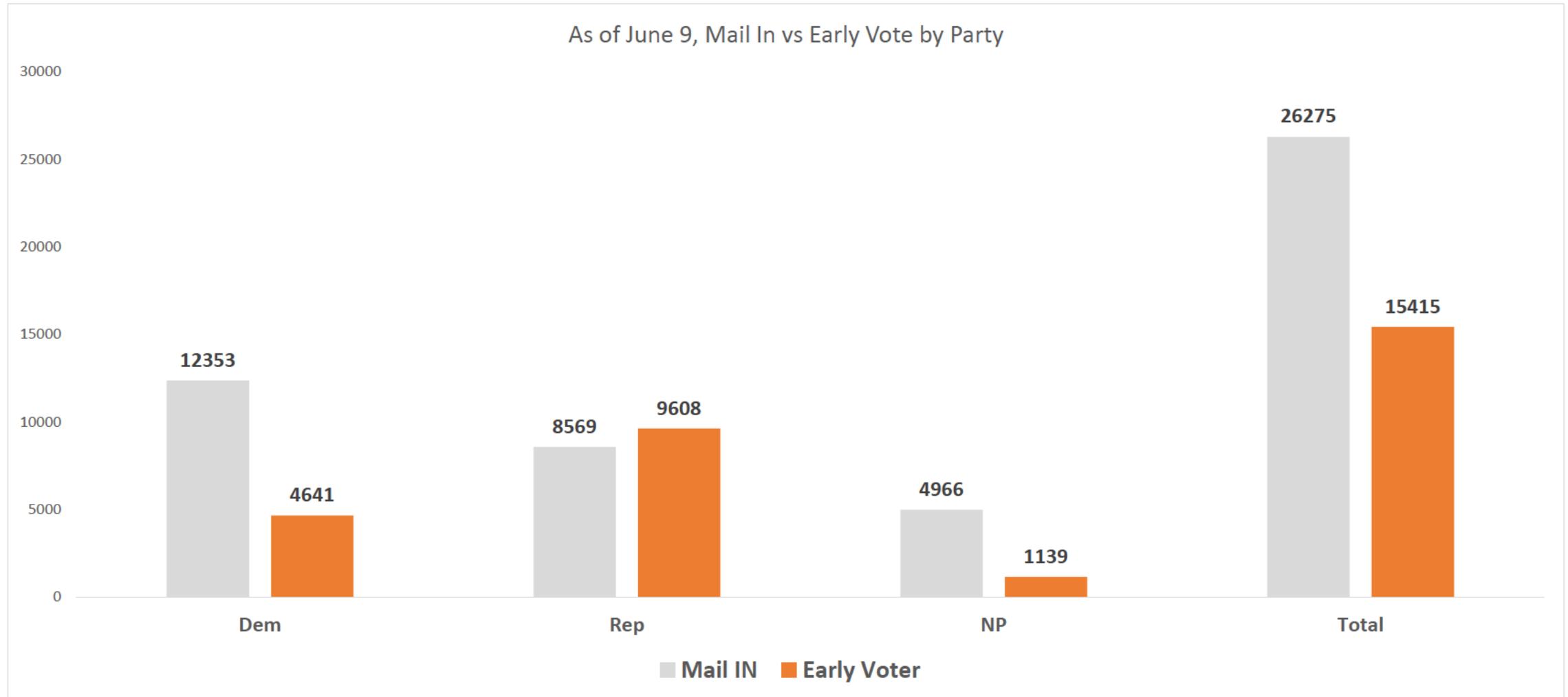
WC Primary 2022 | % of Total by Party



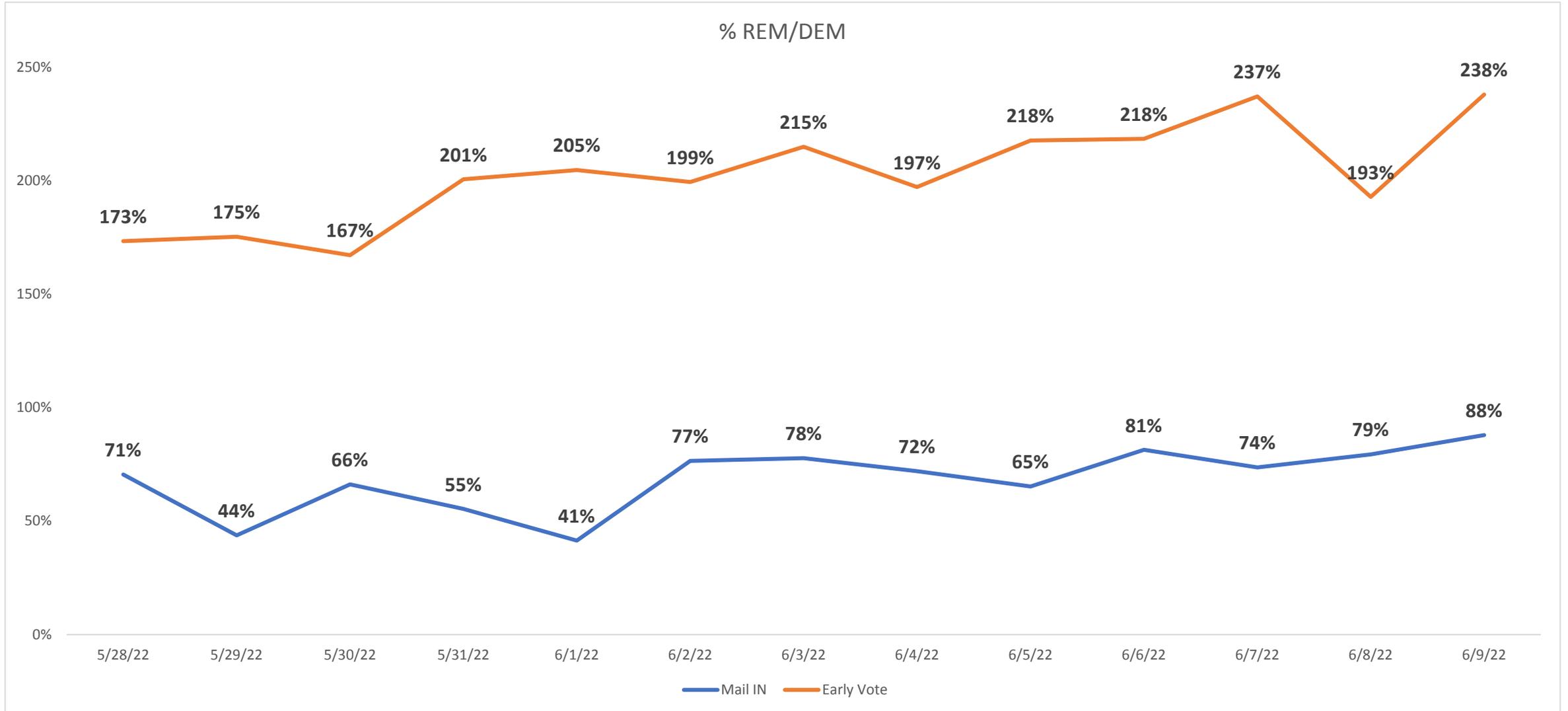
WC Primary 2022 | Undeliverable Mail



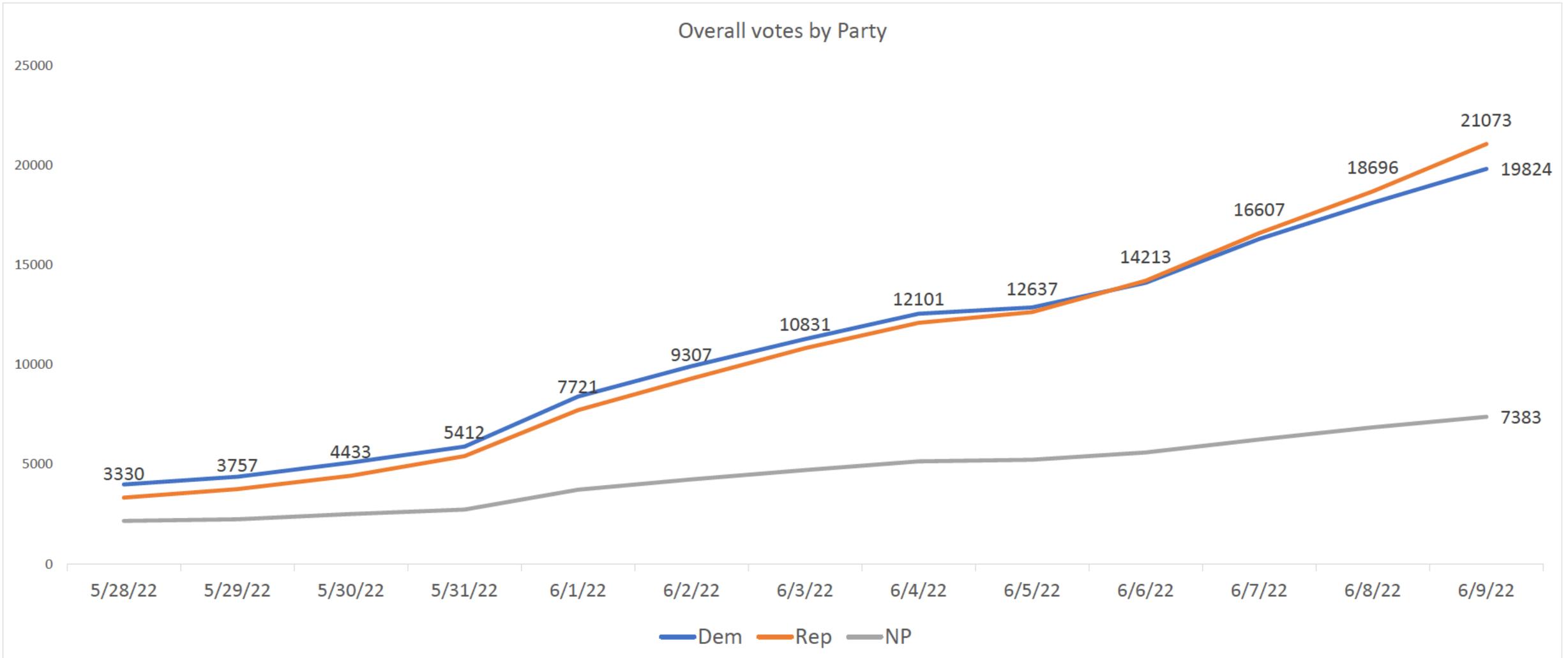
WC Primary 2022 | Overall vote by Reg Party and vote type



WC Primary 2022 | Rep to Dem Rate



WC Primary 2022 | Overall vote by Reg Party



WC Primary 2022 | Mail In Ballots Mismatch

June 3, 2022	1,002	779	383	2,164
June 4, 2022	980	705	352	2,037
June 5, 2022	95	62	28	185
June 6, 2022	817	665	272	1,754
June 7, 2022	1,702	1,254	559	3,515
June 8, 2022	1,263	1,003	468	2,734
June 9, 2022	1,102	968	388	2,458
June 10, 2022	1,617	1,336	431	3,384
June 11, 2022	976	771	286	2,031
June 12, 2022	18	4	2	24
June 13, 2022	1,197	1,074	408	2,679
June 14, 2022	4,146	4,675	1,419	10,240

- Number of Mail in Ballots is dramatically different between published turnout reports and published turnout lists published

Mail In	5/28/22	5/29/22	5/30/22	5/31/22	6/1/22	6/2/22	6/3/22	6/4/22	6/5/22	6/6/22	6/7/22	6/8/22	6/9/22	6/10/22	6/11/22	6/12/22	6/13/22	6/14/22	6/15/22	6/16/22	6/17/22	6/18/22
Dem	1022	87	500	437	2161	1185	1002	980	95	817	1702	1263	1102	1617	950	18	1197	4146				
Rep	721	38	331	242	894	907	779	705	62	665	1254	1003	968	1336	739	4	1074	4675				
NP	506	11	209	121	1606	451	383	352	28	272	559	468	388	431	279	2	408	1419				
Total	2249	135	1040	800	4661	2543	2164	2037	185	1754	3515	2734	2458	3384	1968	24	2679	10240				
PARTY	5/28/22	5/29/22	5/30/22	5/31/22	6/1/22	6/2/22	6/3/22	6/4/22	6/5/22	6/6/22	6/7/22	6/8/22	6/9/22	6/10/22	6/11/22	6/12/22	6/13/22	6/14/22	6/15/22	6/16/22	6/17/22	6/18/22
DEM	1,079	86	489	448	2,173	1,191	1,007	984	95	839	1,718	1,263	1,243	1,640	1,031	18	1,187	6,433	174	1	18	
REP	734	38	327	244	1,615	907	780	710	64	676	1,263	1,004	1,044	1,352	796	3	1,067	6,687	168	1	27	1
NP	356	8	171	101	723	355	287	272	23	221	427	382	334	346	231	2	296	1,834	75	0	8	0
Other	104	3	34	21	176	97	96	82	6	55	138	86	100	92	75		64	449	25		0	
Grand Total	2,273	135	1,021	814	4,687	2,550	2,170	2,048	188	1,791	3,546	2,735	2,721	3,430	2,133	23	2,614	15,403	442	2	53	1
	24	0	-19	14	26	7	6	11	3	37	31	1	263	46	165	-1	-65	5,163	442	2	53	1

WC Primary 2022 | Registered Voters mismatch

Party	Active Voters
Democratic	100,377
Republican	103,127
Nonpartisan	83,416
Other	25,307
Total	312,227

Registration Statistics updated 6/3/2022*

***Decrease in the number of active registered voters is due to current voter list maintenance activities**

- Number of Registered Voters on the Washoe ROV has been shown around 312K
- Number of registered voters in published turnout reports never matched 312K (see below)
- On Jan 14 there is a gap of 22K registered voters, where are the missing registered voters?

6/1/22 6/2/22 6/3/22 6/4/22 6/5/22 6/6/22 6/7/22 6/8/22 6/9/22 6/10/22 6/11/22 6/12/22 6/13/22 6/14/22 6/15/22 6/16/22 6/17/22 6/18/22 6/19/22
 308405 308419 308483 308484 308388 308633 308704 308801 308924 309186 308917 308817 308781 290740 290296 290640 290651 290236

WC Primary 2022 | Election Day Turnout report

Election Day - (updated Four Times a day - Cumulative Total)

Time	Democratic	Republican	Nonpartisan	Total
4:00 PM	2,933	8,832	1,056	12,821
2:00 PM	2,134	6,523	754	9,411
12:00 PM	1,402	4,580	504	6,487
10:00 AM	705	2371	248	3,324

Voted History List - (updated Four Times a day)

10:00 AM - [PDF](#)

12:00 PM - [PDF](#)

2:00 PM - [PDF](#)

4:00 PM - [PDF](#)

Closed Primary
WASHOE COUNTY
June 14, 2022
Unofficial Results

Elector Group	Counting Group	Voters Cast	Registered Voters	Turnout
NONPARTISAN	Election Day	1,827	108,705	1.68%
	Early Voting	1,303		1.20%
	Mail	9,428		8.67%
	Total	12,558		11.55%
DEMOCRATIC	Election Day	4,817	100,356	4.80%
	Early Voting	5,351		5.33%
	Mail	25,316		25.23%
	Total	35,484		35.36%
REPUBLICAN	Election Day	14,396	103,085	13.97%
	Early Voting	11,320		10.98%
	Mail	20,940		20.31%
	Total	46,656		45.26%
Total	Election Day	21,040	312,146	6.74%
	Early Voting	17,974		5.76%
	Mail	55,684		17.84%
	Total	94,698		30.34%

- Election Day report has not been published since June 14.
- Latest file at 4PM doesn't include corresponding 12821 records on file.
- Number of people on Turnout reports doesn't match with the record of 21040

WC Primary 2022 | Election Day Turnout report

June 14, 2022
Unofficial Results

Electors Group	Counting Group	Voters Cast	Registered Voters	Turnout
NONPARTISAN	Election Day	1,820	108,705	1.67%
	Early Voting	1,296		1.19%
	Mail	6,876		6.33%
	Total	9,992		9.19%
DEMOCRATIC	Election Day	4,786	100,356	4.77%
	Early Voting	5,326		5.31%
	Mail	17,813		17.75%
	Total	27,925		27.83%
REPUBLICAN	Election Day	14,333	103,085	13.90%
	Early Voting	11,258		10.92%
	Mail	13,762		13.35%
	Total	39,353		38.18%
Total	Election Day	20,939	312,146	6.71%
	Early Voting	17,880		5.73%
	Mail	38,451		12.32%
	Total	77,270		24.75%

Closed Primary
WASHOE COUNTY
June 14, 2022
Unofficial Results

Electors Group	Counting Group	Voters Cast	Registered Voters	Turnout
NONPARTISAN	Election Day	1,827	108,705	1.68%
	Early Voting	1,303		1.20%
	Mail	9,428		8.67%
	Total	12,558		11.55%
DEMOCRATIC	Election Day	4,817	100,356	4.80%
	Early Voting	5,351		5.33%
	Mail	25,316		25.23%
	Total	35,484		35.36%
REPUBLICAN	Election Day	14,396	103,085	13.97%
	Early Voting	11,320		10.98%
	Mail	20,940		20.31%
	Total	46,656		45.26%
Total	Election Day	21,040	312,146	6.74%
	Early Voting	17,974		5.76%
	Mail	55,684		17.84%
	Total	94,698		30.34%

- Number of Election Day votes is changing , why?
- Number of Early Voter votes is changing , why?