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

9 THE ELECTION INTEGRITY PROJECT  
OF NEVADA, A Nevada LLC; SHARRON  
10 ANGLE, an individual

11 Plaintiff,

12 v.

13 THE STATE OF NEVADA, on relation of  
14 BARBARA CEGAVSKE, in her official  
15 capacity as Nevada Secretary of State,

16 Defendants

CASE NO. A-20-820510-C  
DEPT. NO. 32

**EXPEDITED HEARING REQUESTED**

17 **APPLICATION FOR EMERGENCY PERMANENT INJUNCTION AND**  
18 **REQUEST FOR EXPEDITED HEARING**

19 COME NOW, the Plaintiffs Election Integrity Project of Nevada, LLC, and Sharron Angle,  
20 by and through their attorney, Joel F. Hansen, Esq., and move this honorable Court for an emergency  
21 permanent injunction, enjoining and commanding the Defendant Secretary of State from carrying  
22 forward the Secretary's and the State of Nevada's intent to certify the results of the presidential  
23 election of November 3, 2020. Furthermore, the entire general election was conducted under the  
24 provisions of an unconstitutional law, AB4, which has now resulted in the denial of equal protection  
25 to many voters in Nevada, as shown below.

26 ///

27 ///

1 **I. INTRODUCTION: FACTUAL, PROCEDURAL, & LEGAL BACKGROUND**

2 The Plaintiffs filed suit their Complaint for a Preliminary Injunction, Permanent Injunction,  
3 and Declaratory Relief on September 1, 2020. Then on September 3, 2020, the Plaintiffs filed an  
4 Application for Emergency Preliminary Injunction and Request for Expedited Hearing. Because the  
5 Court set the hearing on the Preliminary Injunction in the ordinary course, which might have made it  
6 moot by the time it was scheduled to be heard, Plaintiffs then filed, on Sept. 4, 2020, a Motion for a  
7 Temporary Restraining Order, in order to get an expedited hearing. On Sept. 16, 2020m Plaintiffs  
8 filed a Supplemental Brief in Support of the Application for Preliminary Injunction, with additional  
9 facts and arguments. In those four documents, together with their attachments, the Plaintiffs set  
10 forth the statement of jurisdiction, standing, parties, and their general allegations and facts regarding  
11 this matter, as well as their legal arguments and citations in support of their suit. All of the  
12 allegations set forth in the original complaint and in the subsequent documents mentioned are  
13 incorporated herein by reference as though fully set forth herein.  
14  
15

16 At the time of the hearing on the Preliminary Injunction, this Court found that was that the  
17 Plaintiffs had standing to bring the case. The case is now ripe for decision because the election has  
18 occurred and many unauthorized and illegal votes were submitted and counted, thus depriving the  
19 Plaintiff and all Nevada voters of their constitutional right to equal protection. The identity of the  
20 Plaintiff Election Integrity Project has been set forth in prior pleadings. Plaintiff Sharron Angle is a  
21 resident and citizen of Nevada who was properly registered to vote and who did vote in the Nevada  
22 general election held on Nov. 3, 2020. She, along with all legitimate Nevada voters, was deprived of  
23 the equal protection of her voting rights.  
24

25 Essentially, the Plaintiffs' Complaint was that the Court should strike down the recently  
26 enacted Nevada law, AB4. The Plaintiffs stated in Paragraph 9 of the Complaint that "the electoral  
27 process cannot function properly integrity and results in chaos. Simply, the people of Nevada must  
28

1 be able to trust that election results are the product of free and fair elections which are not  
2 determined by corruption and/or fraud accomplished by various practices of scrupulous persons to  
3 gain victory by any means necessary.”

4 The Complaint goes on to allege that AB4 falls far short of ensuring that this standard is met.  
5 In Paragraph 16 of the Complaint, the Plaintiffs allege that AB4 is unconstitutional because it  
6 violates Article 4, Section 21, of Nevada’s Constitution, which guarantees equal protection in  
7 numerous ways. Those ways were outlined in the Complaint, some of which will be set forth below.  
8 Essentially, the Complaint alleges that because of the very loose restrictions imposed by AB4 to  
9 prevent fraud, that fraud would become common and result in widespread illegal ballot casting and  
10 inaccurate vote counting in the upcoming general election.  
11

12 AB4 allows for multiple voting by using sample ballots or “found ballots” wherein various  
13 voters travel from one vote center to another rather than appearing at the precinct where the voter is  
14 registered. 1,289 persons had been identified by EIPN who registered twice in the state.  
15

16 Plaintiffs alleged examples of double voting, where one voter voted twice in an election.  
17 Plaintiffs allege that as many as 1,226 registrants would be mailed two ballots for November 2020.  
18 Paragraphs 26 – 49 outlined many additional methods and ways in which fraud could be and  
19 probably would be committed during the general election.  
20

21 As this Court knows, the Court denied the Plaintiffs’ request for a preliminary injunction,  
22 following which the Plaintiffs filed a Petition for Emergency Writ of Mandamus with the Nevada  
23 Supreme Court on September 25, 2020.

24 The Petition for Writ of Mandamus was denied by the Nevada Supreme Court on October 7,  
25 2020. In the Supreme Court’s Order denying the writ, the Supreme Court stated, “an action must be  
26 ripe for judicial review, meaning that it “presents an existing controversy, not merely the prospect of  
27  
28

1 the future problem.” Citing *Resnick v Nevada Gaming Commission* 104 Nev 60, 65-66, 752 P.2d  
2 229, 232 (1988).

3 The Supreme Court went on to say as follows:

4 The District Court determined that petitioners did not present a ripe controversy  
5 because the harm they alleged was largely hypothetical . . . .”

6 See pg. 4 of the Supreme Court’s Order.

7 The Supreme Court went onto observe that although petitioners argued that certain  
8 provisions of AB4 will make the voting system susceptible to illegitimate votes that would result in  
9 irreparable harm by diluting legitimate votes, they presented” no concrete evidence that such events  
10 will occur or that the Secretary of State’s maintenance of the voter rolls exacerbated any such  
11 problems.”

## 12 **II. ISSUES PRESENTED IN THE PRESENT APPLICATION**

13 1. Was the Nevada general election of 2020 fraught with fraud?

14 Answer: Yes. The evidence presented in the brief below shows that significant fraud  
15 occurred, in that numerous ballots were cast and/or counted illegally.  
16

17 2. What caused and/or allowed this widespread fraud to occur?

18 Answer: The newly enacted vote by mail law, AB 4, as explained below.

19 3. Since AB 4 caused and/or allowed such widespread fraud to occur, does that mean that it  
20 should be declared to be unconstitutional?  
21

22 Answer: Yes, because each fraudulent vote counted results in the dilution of the efficacy of  
23 all of the legal voters’ votes, which denies all legal voters, including the Plaintiffs, the equal  
24 protection of the laws.  
25

26 4. Since AB4 is unconstitutional, how does that affect the general election?

27 Answer: The general election must be declared void, because it was conducted pursuant to  
28 an unconstitutional law, which is void and of no effect ab initio (from the beginning).

1           5.     What remedy should the court give as a result?

2           The court should enter an injunction against the Defendant State of Nevada on relation of  
3 Secretary of State Cegavske preventing her from Certifying the results of the presidential election  
4 and enjoining the electors from casting their votes for president on Dec 12, 2020, and preventing any  
5 Nevada candidate from taking Office.  
6

7           6.     Should the Court order a special election to be held?

8           Answer: It should, because otherwise no one will have been elected. A new election must  
9 be held under the election laws existing before the enactment of AB4.

10       **III.    PLAINTIFF ANGLE AND ALL VOTERS IN THE STATE OF NEVADA HAVE HAD**  
11       **THEIR VOTES DILUTED BECAUSE OF FRAUD WHICH OCCURRED IN THE**  
12       **ELECTION**

13           The evidence which the Plaintiffs are now presenting to the court, and will present to the  
14 court is no longer hypothetical. The Plaintiffs have obtained clear and convincing evidence of fraud  
15 which occurred in the November 3, 2020 general election in Nevada. This evidence is set forth in  
16 the Declaration of Ellen Swenson, dated November 11, 2020, and attached hereto as **Exh. "1"** and in  
17 the "Findings Letter" when the Election Integrity Project of Nevada to Secretary of State Barbara  
18 Cegavske dated November 9, 2020 which is attached hereto as **Exh. "2"**. The Declaration and the  
19 Findings Letter show that 1,411 Californians who had been registered in Nevada who then moved to  
20 California and registered to vote in California then proceeded to vote in the November 3, 2020  
21 general election in Nevada. This is clear and convincing evidence of fraud, since a voter who was  
22 registered in California subsequent to being registered in Nevada cannot then proceed to vote in  
23 Nevada since this person is considered to be a resident of California by registering to vote in  
24 California. In order to vote in Nevada, a person must of have continuously resided in Nevada and in  
25 the county 30 days and in the precinct 10 days next preceding the day of the elections. NRS §  
26 293.495. See also NRS § 293.527.  
27  
28

1 The Declaration of Sharron Angle, the CEO of EIPNV, is attached hereto as **Exh “3”**. Her  
2 declaration shows beyond a doubt the fraud which occurred in the general election. Her declaration  
3 shows how the “Findings Report” was created, referring to all of the voters listed as active on the  
4 voter rolls in Nevada, but who had not voted since 2010 or before. From this, a list of 8027 voters  
5 names were developed who should have been moved to the inactive voter list. Mrs. Angle has now  
6 deployed over 200 Registration Roll Canvassers in Washoe and Clark County to go to the door of  
7 every person on the list. She trained them on how to conduct their canvassing. The goal was to  
8 collect an Incident Report that is also a declaration (See Exhibit F to her declaration) of eyewitness  
9 testimony for evidence purposes in court. This list was sent after the evidence was gathered from the  
10 Nevada voter registration rolls on November 6, 2020. We understand that there is more to be  
11 gathered as votes are recorded and compared to the original list of over 41,040 voters identified on  
12 the July 24,2020 Findings Report, after the evidence was gathered from the Nevada registration rolls  
13 on Nov 6, 2020. What is now being presented to the Court is the evidence which has been gathered  
14 so far, which will be analyzed and summarized and presented to the Court through the expert  
15 testimony of Ellen Swensen. Sharron Angle states this in her declaration at paragraph 12:

18 Based on the findings in the field from our Registration Roll Canvasser we have collected  
19 and submitted Incident Reports. We started canvassing on November 8, 2020 and have found  
20 that so far:

- 21 102 Persons don’t live at the address set forth in their voter registration form ( See Exhibit G)
- 22 6 “voters” are Deceased (See Exhibit H)
- 23 12 Six voters’ listed addresses that are actually abandoned property (See Exhibit I)
- 24 10 Twelve listed addresses that don’t exist (See Exhibit J)
- 25 50 Have moved away (See Exhibit K)
- 26 13 Miscellaneous problems (See Exhibit L)
- 27 59 Not enough information –person wouldn’t answer the door, gated community no  
28 admittance allowed, couldn’t find a neighbor to ask about the person. (See Exhibit M)
- 118 Name/address were verified but a report was submitted anyway (See Exhibit N)

In the past week we have completed the canvassing work in a portion of the zip codes in Washoe and Clark Counties. We are continuing to collect more Incident Reports. Our Registration Roll Canvassers continue to submit their findings.

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1 See **Exh. 3**. This shows the problems which have occurred under the “all mail in balloting”  
2 provisions of AB4. It shows the fraud that has occurred through non-existent voters, dead voters,  
3 voters who don’t live at the listed address voting, fake addresses, etc.

4  
5 In other words, what the Election Integrity Project of Nevada told the court in September was  
6 going to happen in the general election on account of the passage of AB4 has now happened because  
7 of the very loose and ineffective controls against the commission of fraud in the election, which  
8 were in place before the passage of AB4, have largely been removed by AB4, and in fact, have been  
9 encouraged by the provisions of AB4, and thus widespread fraud has occurred in the general election  
10 in Nevada. These out of state voters were mailed Nevada ballots even though they now lived in  
11 California, and they proceeded to vote those ballots fraudulently. This clearly illustrates the problem  
12 caused by the mass mailing of ballots to all voters—there is nothing to guarantee that all of the  
13 ballots mailed out will be received by voters who are legitimately and currently registered to vote.  
14

15 These volunteers are using the list of over 8,000 voters developed by Ellen Swensen  
16 investigating the casting of 8,000 votes by individuals identified in another declaration of Helen  
17 Swensen, expert analyst for EIPNv, dated September 30, 2020, which is attached as Exhibit 3 to  
18 Plaintiffs’ Application for Emergency Temporary Restraining Order, filed with the Court on  
19 September 4, 2020. In paragraph 18, Ellen Swensen stated that there were 41,040 Nevada  
20 registrants whose inactivity suggested that they have relocated or been deceased and may be eligible  
21 for inactivation or cancellation. Now, it has been determined that 8,000 of those persons actually  
22 voted in the November 3, 2020 general election. Currently, numerous volunteers are on the street  
23 investigating those votes and voters to see whether the addresses which they listed on their  
24 registration form were false or non-existent, whether they were duplicate registrants, whether they  
25 are identified as not living in the house which they claim to live in at the time they registered,  
26 whether they are deceased, and so on. In other words, EIPNv volunteers are out going to each of  
27  
28

1 these persons' alleged residences and finding out, face to face, whether they live there, or whether  
2 there even is such an address, and so on. Another declaration from Ellen Swensen will be filed with  
3 the Court forthwith, setting forth her method of identification of these 8,000 voters who should not  
4 have voted in the general election.  
5

6 The Declaration of Sharron Angle attached hereto as **Exh. "3"**, shows the current status of  
7 the investigation of fraud which is occurring as the drafting of this Application for Permanent  
8 Injunction is being prepared. More data will be gathered by the volunteers in the days to come.  
9 Those results will be presented to the court in supplements to this Application as soon as possible,  
10 probably within days of the filing of this application.  
11

12 So, it is now known that widespread fraud occurred in the general election in Nevada.  
13 1,411 persons who were registered to vote in California went ahead and voted in Nevada. Hundred  
14 and probably thousands of illegally cast ballots will soon be identified. These votes are fraudulent  
15 votes which should not have been counted and which should not be included in any canvas of the  
16 voting in Nevada. In short order, the Plaintiffs will present evidence of thousands of other votes  
17 which were cast fraudulently as set forth above.  
18

19 Plaintiffs cannot ferret out all of the instances of fraudulent voting in Nevada. But what  
20 these results show that AB4 created voting procedures in Nevada which have established system  
21 fraud due to the fact hundreds of thousands of ballot by mail ballots were mailed to all voters in  
22 Nevada, which led to ability of unscrupulous ballot harvesting or other means by which non-existent,  
23 not present and deceased voters ballots were cast in the general election. There is no way to know,  
24 under these circumstances, what the actual vote count should have been—when systemic fraud  
25 corrupts the whole election, the only remedy is for the Court to void this election and order that a  
26 new election be held.  
27

28 ///



1 **IV. AB4 CAUSED AND/OR ALLOWED WIDESPREAD FRAUD TO OCCUR**

2 The Court stated in the hearing on the application for preliminary injunction that it could not  
3 rule in favor of the Plaintiffs because there was no evidence of fraud. The Plaintiffs argued at that  
4 time that there was plenty of evidence from other states that fraud occurs when laws similar to AB4  
5 are in force mandating mass ballot by mail voting coupled with other provisions which destroy  
6 traditional safeguards against fraud. Evidence that 1,411 California residents/registered voters  
7 actually voted in Nevada in our general election. Each one of those ballots diluted the votes of the  
8 legitimate voters of Nevada because they were cast by persons which were voting illegally, under  
9 NRS § 293.495. Because of the requirement that all registered voters be mailed ballots, and these  
10 persons were still registered, they received ballots by mail, and then they voted illegally. Had the  
11 traditional in-person voting laws not been superseded by AB4, these people would have had to  
12 actually show up at the polls to vote. That would have been highly unlikely, since they were living  
13 in California. Had they not received the vote by mail ballots in the mail, undoubtedly forwarded to  
14 them, they would not have voted. Or the ballots were received at their prior address, and the ballot  
15 was voted by the new resident, or was somehow harvested and then voted. AB4 allows any of these  
16 scenarios to exist. But what we do know is that these California residents voted illegally, thus  
17 stealing votes from legitimate Nevada voters.  
18

19  
20  
21 Another of these provisions is the one which allows for ballot harvesting, which means that  
22 anyone can present numerous ballots at the polling centers gathered from any source whatsoever.  
23 See AB4 Sections 21, 40, 44, 70 and 75 of this bill which allow a voter to authorize *any person* to  
24 return an absent ballot, mailing ballot or mail ballot to the county or city clerk on behalf of the voter.  
25 See also other sections of AB4 cited in paragraph 41 of the Complaint. When this occurs, it is  
26 impossible to verify the legitimacy of the ballots. When these mail in ballots are received, nothing is  
27 known as to whether or how they were harvested, whether they were ever received or claimed by  
28

1 their intended recipient, whether the harvester obtained ballots which had never been properly  
2 delivered to a voter and voted himself, whether the harvester paid individuals to vote a certain way,  
3 whether the person allegedly submitting the ballot has passed away, and so forth *ad nauseum*.

4  
5 Currently, the Election Integrity Project is in process of finding out the answers to these  
6 questions and thus the instances of fraud which have occurred, such as persons who are passed away  
7 having voted, persons who do not live in the address listed, addresses listed on their application  
8 forms which actually do not exist, and so on. If those ballots were voted, of which 8,000 of the ones  
9 identified in Ellen Swensen’s original declaration were, then how did they get voted? We already  
10 know that 1,411 of the ballots received had been sent to California voters who proceeded to vote  
11 them in Nevada. Now, the investigators for EIPNV are gathering information which will show that  
12 many of the ballots mailed out by the registrar to dead persons, persons who did not live at that  
13 address, to addresses which do not exist, and so on. In other words, these ballots were not cast by  
14 legitimate voters—they were cast fraudulently by people living at the outdated or phony address or  
15 by ballot harvesters who somehow intercepted them, filled them out, and mailed them in.

17 **A. Experience in other states shows the evils of laws similar to AB4**

18 The following information and argument was presented to this Court in Plaintiffs’  
19 Supplemental Brief in Support of the Motion for Preliminary Injunction. Considering the fraud  
20 which has now occurred in Nevada, Plaintiffs’ believe that this information should again be  
21 presented to this Court as below:  
22

23 .....  
24 **THE VOTE BY MAIL PROCESS CREATES NUMEROUS OPPORTUNITIES  
25 FOR FRAUD<sup>1</sup>**

26 **A. Every Lawfully Cast Vote Accurately Counted**

27  
28 <sup>1</sup> The following section is quoted, mostly verbatim, from the Amici brief attached as Exh. 6, with sections not relevant to this case omitted.

1 The Motto of the Election Integrity Projects is “Every Lawfully Cast Vote Accurately  
2 Counted.” Ballot harvesting flouts that principle by facilitating unlawful voting through undue  
3 influence duplicative votes from out-of-date registrations, and other tactics discussed below.

4 Vote-by-mail or “absentee” voting, while becoming fashionable nationally as a method of voting, is  
5 particularly vulnerable to corruption such as vote manipulation, voter intimidation and fraud. What  
6 began decades ago as an ad hoc exemption for individual voters who would be absent from their  
7 locale on election day has ballooned into common practice or even the legal standard. And states  
8 vary in how they regulate this type of voting. Ballots are mailed to voters (sometimes without their  
9 request or knowledge) and are left in unsecured mailboxes. Once completed, these ballots can sit in  
10 mailboxes for hours before collection.  
11

12 The Court need look no further than the state of California-as the model for what occurs  
13 when most protections are removed. In 2018, lax voting protections, a failure to properly implement  
14 a new voter registration system and systematic failures to ensure accurate voter rolls led to  
15 widespread voter confusion and possible disenfranchisement.  
16

17 The vote-by-mail process contains opportunities for fraud that are not present in traditional  
18 voting. Again, ballots are sometimes delivered and left unsecured in mailboxes in high population  
19 density locales. Opportunities to illicitly collect and complete these ballots abound. Further,  
20 sophisticated entities can train and deploy operatives to visit these communities and collect ballots –  
21 and in the process – exert undue influence on vulnerable voters. Opportunities for fraud abound  
22 when individuals vote by mail ballot. *U.S. Elections: Report of the Commission on Federal Election*  
23 *Reform* 46 (2005) (“Carter – Baker Report”).<sup>2</sup> Voting occurs outside the strictly regulated confines  
24 of the precinct, where election officials guard against undue influence and electioneering, ensure  
25  
26

27 \_\_\_\_\_  
28 <sup>2</sup> Available at <https://www.legislationline.org/download/id/1472/file/3b50795b2d0374cbef5c29766256.pdf> (last visited May 20, 2020).

1 compliance with voting laws and maintain chain of custody of ballots. For these reasons, the  
2 absentee ballot process “remains the largest source of potential voter fraud.” *Id.* Fraud occurs in  
3 several ways. First, blank ballots mailed to wrong addresses or apartment buildings can be  
4 intercepted. *Id.* Second, voters are particularly susceptible to pressure or intimidation when voting at  
5 home or at a nursing home. *Id.* Finally, third-party organizations can operate illicit “vote buying  
6 schemes” that are “far more difficult to detect when citizens vote by mail.” *Id.*  
7

8 Even a study skeptical of the incidence of voter fraud generally acknowledge the dangers in  
9 vote-by mail. It notes that when fraud does occur, “absentee ballots are the method of choice.” *The*  
10 *American Voting Experience: Report and Recommendations of the Presidential Commission on*  
11 *Election Administration* 56 (2014).<sup>3</sup> Other factors contribute to voting system vulnerabilities.  
12 Millions of voters’ names appear on multiple state voter registration lists because states do not  
13 routinely share registration data. *Id.* at 28 (2014). In 2012, the Pew research foundation found that  
14 about 24 million (one in eight) voter registrations were no longer valid or contained significant  
15 inaccuracies with 1.8 million deceased individuals listed on voter rolls and 2.75 million names on  
16 registrations in more than one state. Pew Center on the States, *Inaccurate, Costly and Inefficient:*  
17 *Evidence that America’s Voter Registration System Needs an Upgrade* (February 2012).<sup>4</sup> Data  
18 analysis of Arizona’s voter rolls found, as of October 2019:  
19

20 - 2,289 deceased voters on the voter rolls.

21 - 315 double votes cast in 2018 across state lines.

22 - 85 double votes cast in 2018 across county lines.

23 - 3,277 double votes cast in 2016 by individuals with two active registrations at  
24

25  
26  
27 <sup>3</sup> Available at [https://elections.delaware.gov/pdfs/PCEA\\_rpt.pdf](https://elections.delaware.gov/pdfs/PCEA_rpt.pdf) (last visited May 20, 2020).

28 <sup>4</sup> Available at [https://www.pewtrusts.org/~media/legacy/uploadedfiles/pes\\_assets/2012/pewupgradingvoterregistrationpdf.pdf](https://www.pewtrusts.org/~media/legacy/uploadedfiles/pes_assets/2012/pewupgradingvoterregistrationpdf.pdf) (last visited May 22, 2020).

1 the same address.

2 - 3,077 double votes cast in 2018 by individuals with two active registrations  
3 at the same address.

4 - 884 voters using commercial addresses as their residence.

5  
6 (Public Interest Legal Foundation, Letter to Arizona Secretary of State, Katie Hobbs, May 26, 2020.)

7 Data from the U.S. Election Assistance Commission (EAC) for the November 2018 election  
8 show Arizona had 642,210 unaccounted-for vote-by-mail ballots, or 24% of all domestic absentee  
9 ballots mailed in the November 2018 election.<sup>5</sup> These registration errors make an already vulnerable  
10 voting system even more susceptible to fraud. Should ineligible individuals receive vote-by-mail  
11 ballots, harvesting groups can easily exploit the situation and commit wholesale voter fraud. Such  
12 exploitation has occurred in the past. In 2004, for example, 1,700 voters registered in both New York  
13 and California requested vote-by-mail ballots to be mailed to their home in the other state with no  
14 investigation. Carter-Baker Report at 12. Vote-by-mail ballots mailed to addresses of those who  
15 have moved or died are vulnerable to ballot harvesting.

16  
17 Unaccounted-for ballots are currency to harvesters. The Court itself has recognized the effect  
18 ballot harvesting can have on elections. *Crawford v. Marion County Election Bd.*, 553 U.S. 181,  
19 195-196 (2008) (noting that fraudulent voting in the 2003 Democratic primary for East Chicago  
20 Mayor – “perpetuated using absentee ballots” – demonstrated “that not only is the risk of voter fraud  
21 real but that it could affect the outcome of a close election”).

22  
23 **B. California serves as a warning of the dangers of unchecked and unregulated**  
24 **vote-by-mail voting.**

25 Consider the problems as extensively documented in California. In 2016, California amended  
26 its election laws to permit any individual to return the mail ballot of another with no limitation as to  
27

28 <sup>5</sup> Data obtained from Election Assistance Commission and tabulated by EIPCa. Data available at  
<https://www.eac.gov/research-and-data/studies-and-reports> (last visited May 22, 2020).

1 the number of ballots collected or relationship to the voter. 2016 Cal. Stat. AB-1921.<sup>6</sup> Ballot  
2 collectors can be paid by any source so long as compensation is not based on the number of ballots  
3 collected. Cal. Elec. Code § 3017(e)(1). Next, California’s Voter’s Choice Act (VCA) encouraged  
4 counties to shift to vote-by-mail. 2016 Cal. Stat. SB-450. Under the VCA, the state will  
5 automatically send each registered voter a ballot 28 days before the election. Voters can, in turn,  
6 return their ballot by mail, take the ballot to a drop-off location, or cast it in-person at a designated  
7 county vote center. *Id.* California’s liberal ballot-collection laws and its failure to both maintain  
8 accurate voter registration records and properly implement the VCA combined to create the perfect  
9 storm on election day 2018.<sup>7</sup> *Amici* has documented over 1,000 incidents of voters – mainly in  
10 southern California counties – forced to arrive at the polls in-person on election day in 2018 because  
11 they had not received their vote-by-mail ballots.  
12

13  
14 San Bernardino county admitted to *Amici* that it failed to send 1,129 ballots to its voters.  
15 California has never accounted for these missing vote-by-mail ballots and has since implemented a  
16 “Where’s My Ballot?” app to allow voters to track their vote-by-mail ballots.<sup>8</sup>

17 As expected, the lack of any significant regulation on the vote-by-mail process led to  
18 widespread “ballot harvesting” in California in 2018. Political operatives, “known as ‘ballot brokers’  
19 identify specific locations, such as large apartment complexes or nursing homes” to exploit the  
20 voting process. U.S. House of Representatives Committee on House Administration Republicans,  
21 *Political Weaponization of Ballot Harvesting in California 2* (May 14, 2020) (“Committee  
22

23  
24  
25 \_\_\_\_\_  
26 <sup>6</sup> This is identical to AB4 §19(2), the only difference being that the voter must be over 65, disabled,  
or illiterate. But there is no requirement that the voter or the harvester prove these limitations, thus  
leaving this procedure wide open for wholesale fraud.

27 <sup>7</sup> Similar failures in Nevada are documented in Plaintiffs’ previous Motions and in Exh. 6.

28 <sup>8</sup> Available at <https://www.sos.ca.gov/elections/ballot-status/wheres-my-ballot/> (last visited May 20,  
2020). In Clark County, over 500,000 ballots were unaccounted for in the 2020 primary election.  
See Declaration of Sharron Angle under §8 finding #10.

1 Report”).<sup>9</sup> After establishing relationships with individuals in these locations, ballot brokers would  
2 “encourage, and even assist, these unsuspecting voters in requesting a mail-in ballot; weeks later  
3 when the ballot arrives in the mail the same ballot brokers are there to assist the voter in filling out  
4 and delivering the ballot.” *Id.* As noted in the Committee Report, “[t]his behavior can result in undue  
5 influence in the voting process and destroys the secret ballot, a long-held essential principle of  
6 American elections intended to protect voters.” It continued, “These very scenarios are what anti-  
7 electioneering laws at polling locations are meant to protect against. A voter cannot wear a campaign  
8 button to a polling location, but a political operative can collect your ballot in your living room?” *Id.*

9  
10 In addition to the above, one more section from the Supplemental Brief is particularly  
11 germane in the present circumstances. It is the letter of Linda Paine of the Election Integrity Project  
12 of California:

13  
14 **Election Integrity Project of California Letter to Landmark Legal Foundation Provides  
15 Further Evidence of Voting Fraud Allowed By Ballot Harvesting**

16 Linda Paine’s letter of EIPCa to the Landmark Legal Foundation is attached was attached as  
17 Exh. 6 to Plaintiffs’ Supplemental Brief in Support of the Application for Preliminary Injunction,  
18 filed with the Court on 9-16-2020. It sets forth very specific information about the threats to  
19 election integrity from “ballot harvesting” allowed in California. Each statement in this letter is well  
20 documented by references attached to the back of the letter, which can be supplied to the Court upon  
21 request. In short, Linda Paine’s letter shows the following threats posed by ballot harvesting and  
22 possibilities for fraud inherent therein. (Vote by Mail Ballots are abbreviated as VBM throughout the  
23 letter.) The salient points are as follows:

- 24  
25 1. VBM ballots mailed to addresses of those who have moved or died can be easily  
26 accessed by harvesters for unlawful purposes.

27  
28 <sup>9</sup> Available at [https://www-cdn.law.stanford.edu/wp-content/  
uploads/2020/04/SLS\\_Signature\\_Verification\\_Report-5-15-20-FINAL.pdf](https://www-cdn.law.stanford.edu/wp-content/uploads/2020/04/SLS_Signature_Verification_Report-5-15-20-FINAL.pdf) (last visited May 22,  
2020). See also Declaration of Dawn Hansen, attached as Exh 7

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2. Duplicate registrations result in voters mailed more than one VBM ballot that harvesters can exploit. These “extra ballots can be exploited by harvesters since the voter is in the system as two different people and such double voting cannot easily be detected.
3. (#3 is omitted here because it deals with California’s Motor Voter law.)
4. High levels of suspected ballot harvesting were co-incident with high levels of “missing” VBMs in the November 2018 election. Thousands of ‘missing’ VBMs that were not voted may have given ‘harvested’ VBMs a higher percent of total VBMs countered and affected the final outcomes of several November 2018 races. This underscores the need to protect the chain of custody of all VBMs, not just those vulnerable to harvesting.
5. There is no effective deterrent in California preventing voter impersonation by harvesters signing stray or stolen VBM ballots California’s lack of clear and consistent signature verification standards invites VBM voter ballot tampering and possibly fraud.
6. Stray VBM ballots acquired by harvesters can be used to vote in person and avoid the signature match requirement. Because there is no voter ID, the harvester can simply surrender the blank VBM ballot and envelope and vote in person without proof the VBM is his.
7. There are no effective identification requirements for harvesters in California, so they cannot be monitored.

Final thoughts: secure elections are at the foundation of our republic. Elections determine those who represent “we the people” in government.

This letter from Linda Paine strikingly illustrates how legitimate ballots cast by properly registered voters, cast without the improper influence of unscrupulous political operatives, will be greatly diluted, thus resulting in the loss of equal protection for the lawful, legitimate votes cast by properly qualified and registered voters.

.....

Many of the abuses described above have now occurred in Nevada, the evidence of which has been presented to the Court herewith, and more will be presented in the coming days as it becomes available.

The dissent in the case of *Democratic Nat’l Comm. v. Hobbs* sets forth a compelling case against allowing unchecked voting by mail. It is attached hereto as **Exh. 4**. The heart of the dissenting opinion states:



1 I don't see how Arizona can be said to have violated the VRA when it followed  
2 bipartisan recommendations for **election** reform in an area the Carter-Baker  
3 Commission found to be fraught with the risk of voter **fraud**. Nothing could be more  
4 damaging to confidence in our **elections** than **fraud** at the ballot box. And there is  
5 evidence that there is voter **fraud** in the collecting of absentee ballots. As the Seventh  
6 Circuit described it: "Voting **fraud** is a serious problem in U.S. **elections** generally . .  
7 . . and it is facilitated by absentee voting. . . . [A]bsentee voting is to voting in person  
8 as a take-home exam is to a proctored one." *Griffin*, 385 F.3d at 1130-31; *see*  
9 *also Wrinn*, 440 A.2d at 270 ("[T]here is considerable room for **fraud** in absentee  
10 voting and . . . a failure to comply with the regulatory provision governing absentee  
11 voting increases the opportunity for **fraud**." (citation omitted)); *Qualkinbush v.*  
12 *Skubisz*, 357 Ill. App. 3d 594, 826 N.E.2d 1181, 1197, 292 Ill. Dec. 745 (Ill. App. Ct.  
13 2004) ("[T]he integrity of a vote is even more susceptible to influence and  
14 manipulation when done by absentee ballot."); Adam Liptak, *Error and Fraud at*  
15 *Issue as Absentee Voting Rises*, N.Y. Times (Oct. 6, 2012),  
16 <http://nyti.ms/QUberg> [\*\*192] (discussing a variety of problems in states).

Organized absentee ballot **fraud** of sufficient scope to corrupt an **election** is no  
doomsday hypothetical: it happened as recently as 2018 in North Carolina. In the  
state's Ninth Congressional District, over 282,000 voters cast ballots, either in person  
or absentee. *See* Brief of Dan McCready at 7, *In re Investigation*  
*of Election Irregularities Affecting Ctys. Within the 9th Cong. Dist.* (N.C. State Bd.  
of **Elections** Feb. 12, 2019) [hereinafter McCready Br.].

14 *Democratic Nat'l Comm. v. Hobbs*, 948 F.3d 989, 1069-1072, 2020 U.S. App. LEXIS 2470, \*188-  
15 196, 2020 WL 414448 (Dissenting opinion.)

16  
17 **V. SINCE AB 4 CAUSED AND/OR ALLOWED SUCH WIDESPREAD FRAUD TO**  
18 **OCCUR, IT MUST BE DECLARED UNCONSTITUTIONAL**

19 Section 21 of Article 4 of the Nevada Constitution provides that "all laws shall be general  
20 and of uniform operation throughout the State." This provision has been declared to be coextensive  
21 with the guarantees of the Equal Protection Clause of the Fourteenth Amendment to the United  
22 States Constitution. The standard for testing the validity of legislation under the equal protection  
23 clause of the state constitution is the same as the federal standard. *Barrett v. Baird*, 111 Nev. 1496,  
24 1499, 908 P.2d 689, 692, 1995 Nev. LEXIS 182, *Rico v. Rodriguez*, 121 Nev. 695, 702-03, 120 P.3d  
25 812, 817 (2005). Equal Protection requires equal access for all voters to elections.

26 The right to vote is protected in more than the initial allocation of the franchise. Equal  
27 protection applies as well to the manner of its exercise. Having once granted the right to vote  
28 on equal terms, the *State may not, by later arbitrary and disparate treatment, value one*  
*person's vote over that of another. It must be remembered that the right of suffrage can be*

1           ***denied by a debasement or dilution of the weight of a citizen's vote just as effectively as***  
2           ***by wholly prohibiting the free exercise of the franchise.***

3           *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), (Emphasis added.)

4           The U. S. Supreme Court also correctly observed in *Purcell v. Gonzalez*, 549 U.S. 1, 4  
5 (2006): “Voter fraud drives honest citizens out of the democratic process and breeds distrust of our  
6 government.” The Supreme Court of the United States has made this clear in case after case. *See*,  
7 *e.g.*, *Gray v. Sanders*, 372 U.S. 368, 380 (1963) (every vote must be “protected from the diluting  
8 effect of illegal ballots.”); *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008)  
9 (plurality op. of Stevens, J.) (“There is no question about the importance of the State’s interest in  
10 counting only the votes of eligible voters.”) *accord Reynolds v. Sims*, 377 U.S. 533, 554-55 & n.29  
11 (1964). Justice Souter observed that mail-in voting is “less reliable” than in-person voting.  
12 *Crawford*, 553 U.S. at 212, n.4 (Souter, J., dissenting) (“[E]lection officials routinely reject  
13 absentee ballots on suspicion of forgery.”); *id.* at 225 (“[A]bsentee-ballot fraud . . . is a documented  
14 problem in Indiana.”). *See also Veasey v. Abbott*, 830 F.3d 216, 239, 256 (5th Cir. 2016) (en banc)  
15 (“[M]ail-in ballot fraud is a significant threat” — so much so that “the potential and reality of fraud  
16 is much greater in the mail-in ballot context than with in-person voting.”). *See also id.* at 263  
17 (“[M]ail-in voting . . . is far more vulnerable to fraud.”); *id.* (recognizing “the far more prevalent  
18 issue of fraudulent absentee ballots”).

19           By removing restrictions designed to prohibit fraud in our elections, and by replacing them  
20 with vote by mail ballots which are open invitations for fraud, which invitation is often accepted and  
21 acted upon in various ways, as discussed above. Evidence that California registered voters voted in  
22 Nevada’s general election has been presented above. This was made possible by AB4’s mass vote  
23 by mail sending of ballots to all registered voters with proper verification and without providing any  
24 effective method for verifying the legitimacy of the ballot. More evidence of this fraud will be  
25 presented in the very near future to this court by the Plaintiffs. AB 4 is unconstitutional because it  
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1 allows and encourages the dilution of “the weight of a citizen’s vote just as effectively as by wholly  
2 prohibiting the free exercise of the franchise.”

3 **VI. THE GENERAL ELECTION MUST BE DECLARED VOID, BECAUSE IT WAS**  
4 **CONDUCTED PURSUANT TO AN UNCONSTITUTIONAL LAW WHICH**  
5 **COUNTENANCED, PERMITTED, AND EVEN ENOURAGED FRAUD**

6 In *McClendon v. Hodges*, a 2008 **election** case from the Kentucky Supreme Court that  
7 discussed the standards by which courts should determine whether to eliminate ballots or declare an  
8 entire **election void**. See 272 S.W.3d 188 (Ky. 2008). In *McClendon*, the Kentucky Supreme Court  
9 wrote:

10 Though Kentucky courts are reluctant to declare an **election void**, our case law has  
11 long established that this extreme remedy is nonetheless necessary when it is  
12 impossible to fairly discern a winner. The established rule is that where, after giving  
13 the evidence of fraud (or irregularities) its fullest effect, and fraudulent or illegal  
14 votes may be eliminated, and *the result of the election be fairly ascertained from*  
15 *votes which were regular or untainted*, the court should not go to the extreme of  
16 declaring the **election void**. Even when evidence of fraud is limited to only a portion  
17 of the electorate or to specific precincts, it may nonetheless be necessary to set aside  
18 the entire **election**.

19 *Id.* at 191-92 (citations and internal quotation marks omitted) (emphasis in original). *Warf v. Bd. of*  
20 *Elections*, 619 F.3d 553, 563, 2010 U.S. App. LEXIS 18231, \*24-25, 2010 FED App. 0279P (6th  
21 Cir.). In that case, the Kentucky Court had devised a remedy for the fraud that had occurred  
22 concerning the mail in ballots in the election. In affirming this decision, the Federal Court set forth  
23 this insightful discussion:

24 As for the Warf appellants' challenge to the remedy devised in this case, in each of  
25 the cases deciding challenges to incumbent county clerks' handling of absentee  
26 balloting, the Kentucky courts have permitted the voiding of all absentee  
27 ballots. See *Parrigin*, 457 S.W.2d at 508; *Arnett*, 425 S.W.2d at 553; *Crowe*, 305  
28 S.W.2d at 276. Indeed, it appears that in several other cases involving absentee ballot  
irregularities the Kentucky courts have determined that the voiding of absentee  
ballots was the appropriate remedy. See *Hale v. Goble*, 356 S.W.2d 33, 35 (Ky.  
1962); [\*563] *Kincer v. Holbrook*, 307 S.W.2d 922, 924 (Ky. 1957); *Pickard*, 243  
S.W.2d at 49-50. In *Kincer*, for example, the Kentucky Court of Appeals considered a  
county clerk's failure to properly lock the absentee ballot box and the fact that he had  
sole possession of all duplicate sets of keys for the ballot [\*\*24] box. 307 S.W.2d at  
923. The court noted that "[t]he meticulous system [created by the absentee voter  
law] recognizes that absentee voting is a risky method. Unless the statutory  
provisions be strictly followed, there is greater opportunity for persons of evil design

1 to corrupt the ballot." *Id.* at 924 (citation and internal quotation marks omitted). It  
2 then affirmed the trial court's decision to invalidate the absentee ballots. *Id.*

3 It is therefore evident that the Green Circuit Court's decision to void all absentee  
4 ballots cast in the election reasonably applied applicable Kentucky case law. The  
5 court appropriately looked to analogous state cases and applied the careful scrutiny to  
6 incumbent county clerks described therein. We therefore cannot conclude that Green  
7 Circuit Court's decision to void the absentee ballots in this case rises to a level of  
8 fundamental unfairness in violation of Due Process.

9 Other Courts have ruled in a similar fashion. Attached as **Exh. 5** is an article from the associated  
10 Press regarding a court ruling in New Jersey in which the judge ruled that a new election would be  
11 held due to voter fraud. Alex Mendez had won a special election on May 12 to fill the seat but  
12 claims of voter fraud were soon raised. An investigation was then launched after the U.S. Postal  
13 Service's law enforcement arm told the state attorney general's office about hundreds of mail-in  
14 ballots located in a mailbox in Paterson, along with more found in nearby Haledon. Ultimately, the  
15 Passaic County Board of Elections decided not to count 800 ballots cast in the race. A new election  
16 was ordered in a disputed North Carolina race as reported by Emery Dales in an article on Feb. 19,  
17 2019. The new election was ordered as a result of illegal ballot harvesting. Twitter  
18 at <http://twitter.com/emerydalesio> and <https://apnews.com/search/emery%20dalesio>. See also  
19 *Warf v. Bd. of Elections*, 619 F.3d 553, 562-563, 2010 U.S. App. LEXIS 18231, \*23-24, 2010 FED  
20 App. 0279P (6th Cir.), 13-14. See also *Emery v. Robertson County Election Com.*, 586 S.W.2d 103,  
21 105, 1979 Tenn. LEXIS 491 (The courts are authorized to void an election for fraud); *Wood v.*  
22 *Kirby*, 566 S.W.2d 751, 751, 1978 Ky. LEXIS 364 (The court held the election void because proper  
23 tabulation of votes could not be done with a reasonable degree of certainty. The court found fraud  
24 because of election officials failure to keep voting machines maintained which resulted in no ability  
25 to verify the results of the voting.); *In re Protest of Election Returns & Absentee Ballots in the*  
26 *November 4*, 707 So. 2d 1170, 1171, 1998 Fla. App. LEXIS 2408 (It makes no difference  
27 whether election fraud is committed by candidates, election officials, or third parties. The evil to be  
28

1 avoided is the same, irrespective of the source. As long as the fraud, from whatever source, is such  
2 that the true result of the election cannot be ascertained with reasonable certainty, the ballots affected  
3 should be invalidated.); *Larson v. Locken*, 262 N.W.2d 752, 756, 1978 S.D. LEXIS 150 (To permit  
4 the handling of ballots in a manner which circumvents the plain purpose of the law, would constitute  
5 an invitation to fraud. Therefore, in this election one cannot condone the above actions by declaring  
6 them minor irregularities, and the only way to remedy this situation is not only to invalidate the  
7 absentee ballots, but to affirm the trial court order requiring a new election.); *Shoaf v. Bringle*, 192  
8 Tenn. 695, 241 S.W.2d 832, 1951 Tenn. LEXIS 317 (sufficient evidence of fraud voids an election);  
9 *Fleming v. Anderson*, 187 Va. 788, 790, 48 S.E.2d 269, 270, 1948 Va. LEXIS 268 (Because of  
10 the fraud and irregularities, the election was void); *State ex rel. Whisonant v. Belue*, 138 S.C. 393,  
11 401, 136 S.E. 641, 644, 1926 S.C. LEXIS 230 (finding that the election was so permeated  
12 with fraud that it was absolutely void and mandating that a new election be held.); *Gonzalez v.*  
13 *Villarreal*, 251 S.W.3d 763, 2008 Tex. App. LEXIS 921 (counting of illegally cast votes rendered  
14 election void, new election ordered) and many, many other similar cases to numerous to mention  
15 here.

## 18 **VII. THIS COURT HAS THE AUTHORITY TO ORDER A NEW ELECTION**

19 The Nevada Supreme Court has long recognized that the Courts in Nevada have the authority  
20 to order a to order new election should the outcome of the first election be placed in doubt. *La Porta*  
21 *v. Broadbent*, 91 Nev. 27, 530 P.2d 1404, 1975 Nev. LEXIS 536. The weight of **authority** in this  
22 country is that the courts have general and original jurisdiction to inquire into the regularity and  
23 validity of elections. The court has the power to declare the election order void and order a  
24 new election. *Lynip v. Buckner*, 22 Nev. 426, 434, 41 P. 762, 763, 1895 Nev. LEXIS 23. This  
25 appears to be the only remedy available to Plaintiff Angle, because her vote and the votes of all  
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1 legitimate voters in Nevada were unconstitutionally diluted due to the enactment of AB4, which  
2 allowed, encourage, countenanced, and even promoted fraud in the general election.

### 3 CONCLUSION

4 At the time of Plaintiffs' Application for a Preliminary Injunction, this court felt that it could  
5 not grant the Motion for Preliminary Injunction because the evidence at that time was speculative.  
6 The evidence is no longer speculative because the Plaintiffs have proof positive that numerous  
7 ballots cast in this election were fraudulent. In turn, this proves that AB4 opened the door for  
8 widespread fraud that caused the dilution of all of the ballots cast by legitimate voters. It has been  
9 abundantly shown above that AB4, and similar laws in the various states of the Union, countenance,  
10 permit, and even encourage fraud. These laws do this in the various ways illustrated above.  
11 Plaintiffs have shown, and will continue to show, that fraud was committed in this election. It is not  
12 possible to prove fraud in every single precinct in the State--this would be an impossible task. What  
13 the Plaintiffs have shown is a sampling of the fraud among over 8,000 voters, 1,411 of whom voted  
14 illegally in Nevada after moving to California and many others who did not live in the home listed  
15 on their voter registration, or the address was false, or the voter has passed away, etc.. Extensive  
16 evidence has been presented to this Court of extensive fraud.

17 Thus, irreparable harm will result to the Plaintiffs and to all voters in the State of Nevada if  
18 the Secretary of State and the State of Nevada are allowed to certify the election as being valid, since  
19 the AB4 procedure according to which the election was carried out, which allowed and even  
20 encouraged widespread fraud to occur, thus diluted the votes of every Nevadan who voted legally in  
21 the election. It was thoroughly explained in the prior pleadings of the Plaintiffs why this dilution of  
22 their votes violated the equal protection clause of the State of Nevada and of the Constitution of the  
23 State of Nevada, Section 21 of Article 4, which is coextensive with the guarantees of the equal  
24 protection clause of the Fourteenth Amendment. And it has been thoroughly explained again, above.  
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1 AB4 is unconstitutional and in turn, the election carried out under the auspices of AB4 and pursuant  
2 to its provisions was unconstitutionally conducted and thus must be declared void and unlawful on  
3 account of the constitutionality of AB4 and the systemic fraud which it produced.  
4

5 The court should enter an injunction against the Defendant State of Nevada on relation of  
6 Secretary of State Cegavske preventing her from Certifying the results of the general election,  
7 including the presidential election, enjoining the electors from casting their votes for president on  
8 Dec 12, 2020, and also preventing any Nevada candidate from taking Office, because the election  
9 was carried out pursuant to the requirements of AB4, which is an unconstitutional law, as it deprives  
10 all legitimate voters in Nevada of their right of equal protection. The Court should order the  
11 Defendants to carry out a new election under the law which existed before the enactment of AB4.  
12

13 DATED this 16th day of November 2020.

14 Respectfully submitted,  
15 HANSEN & HANSEN, LLC

16 BY: */s/ Joel F. Hansen, Esq*  
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18 Nevada Bar No. 1876  
19 9030 W. Cheyenne Ave. #210  
20 Las Vegas, NV 89129  
21 *Attorney for Plaintiff*  
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5 (b), I hereby certify that on this 16th day of November 2020, I served a  
3 copy of the foregoing APPLICATION FOR EMERGENCY PERMANENT INJUNCTION AND  
REQUEST FOR EXPEDITED HEARING as follows:

- 4  Electronic Service - via the Court’s electronic service system; and/or  
5  U.S. Mail – By depositing a true copy thereof in the U.S. mail, first class postage  
6 prepaid and addressed as listed below; and/or  
7  Facsimile – By facsimile transmission pursuant to EDCR 7.26 to the facsimile  
8 number(s) shown below and in the confirmation sheet filed herewith. Consent  
9 to service under NRCP 5(b)(2)(D) shall be assumed unless an objection to  
10 service by facsimile transmission is made in writing and sent to the sender via  
11 facsimile within 24 hours of receipt of this Certificate of Service; and/or  
12 x Email - delivery to the address listed below.

11 Gregory L. Zunino, Esq. 100 N. Carson St. 12 Carson City, NV 89701 (775) 722-1831 13 <a href="mailto:GZunino@ag.nv.gov">GZunino@ag.nv.gov</a> <i>Attorney for Defendant</i>	Marc E. Elias, Esq. Courtney A. Elgart, Esq. PERKINS COIE LLP 700 Thirteenth Street NW, Suite 800 Washington, D.C. 20005-3960 <a href="mailto:melias@perkinscoie.com">melias@perkinscoie.com</a> <a href="mailto:celgart@perkinscoie.com">celgart@perkinscoie.com</a>
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23  
24 /s/ Lisa M. Sabin  
An Employee of Hansen & Hansen, LLC



**EXHIBIT 1**

**EXHIBIT 1**

**EXHIBIT 1**

1  
2  
3 DECLARATION OF ELLEN SWENSEN REGARDING SUSPECTED CROSS-STATE  
4 VOTING IN NEVADA GENERAL ELECTION

5 I, ELLEN SWENSEN, declare as follows.

- 6 1. To the degree applicable, I make this Declaration regarding suspected voting  
7 in Nevada's November 3, 2020 general election by 1,411 persons who appear  
8 have resided in California for more than 30 days prior to the election. I have  
9 personal knowledge of the facts in this declaration except as to those stated on  
10 information and belief and as to those I am informed and believe them to be  
11 true. If called as a witness, I could and would competently testify to the  
12 matters stated.
- 13 2. I am a co-founder of Election Integrity Project, Inc. (EIP) and served as Chief  
14 Analyst for EIP and continued as Chief Analyst for Election Integrity Project  
15 California, Inc. (EIPCa) and for Election Integrity Project Nevada, LLC  
16 (EIPNv).
- 17 3. The allegations in this matter were based on data analysis conducted by EIPNv  
18 under my direction. This declaration only pertains to my work on the EIPNv  
19 Findings Report provided to the Nevada Secretary of State (NSOS) on  
20 November 9, 2020. A similar Findings Report, based on California data, was  
21 provided to the California Secretary of State (CSOS) on November 9, 2020.
- 22 4. EIPNv is wholly owned by its sole member Election Integrity Project  
23 California, Inc., a tax exempt, public benefit, non-profit 501(c)(3) non-partisan  
24 corporation.
- 25 5. I hold a B.S. in Business Administration from the University of California  
26 Berkeley.
- 27 6. From 1985 to 1991 I was employed by BASES, where I was promoted to  
28 Director of the West Coast office. [BASES (Booze Allen Sales Estimating

1 System) is an algorithmic simulated test market model developed by Booz  
2 Allen. I am informed and believe it is one of the largest and most respected  
3 consulting firms in the US. BASES was a division of Burke, Inc. one of the  
4 country's oldest and largest market research corporations. I am informed and  
5 believe BASES is now a division of Nielsen corporation.]

- 6 7. At BASES I performed predictive modeling to estimate first-year sales of new  
7 products for Fortune 100 companies. I presented our research findings, sales  
8 estimates, and marketing recommendations to clients at the CEO level. From  
9 1991 to 1995 I served in product management and profitably managed flagship  
10 brands at Dreyer's Ice Cream and Power Wheels (Mattel).
- 11 8. From 1995 to 1998, I was employed by the Center for Culinary Development  
12 ("CCD"), a leading consulting firm serving restaurants and food manufacturers  
13 in the development and marketing of food products and lines.
- 14 9. At CCD I consulted with numerous companies, including Kraft-Nabisco,  
15 McDonald's, Burger King and Quaker Oats, to assist in the development of  
16 successful new food products. I presented my work at CCD to clients at the  
17 CEO level.
- 18 10. After retirement from CCD, I returned to CCD to freelance as a copywriter,  
19 which involved naming, describing, and positioning new food products in  
20 early development.
- 21 11. After attending a lecture on voter fraud, I developed an interest in election  
22 integrity and served as volunteer poll watcher for the 2010 general election.
- 23 12. I have been EIP/EIPCa's Chief Analyst since the company's data analysis  
24 group (DAG) was formed in 2012. I led DAG and coordinated the  
25 development of proprietary data queries since. The latter allow EIPCa to  
26 conduct reliable, meaningful analyses of data relating to voter registration and  
27 voter participation in elections.
- 28 13. I have served as EIPNV's Chief Analyst since 2020.

1 14. I have been interviewed on at least twenty occasions by print and broadcast  
2 news organizations on the subject of California election integrity.

3 15. In discharge of its overall institutional mission, EIPNV requested the Nevada  
4 statewide voter registration records from the NSOS. The statewide voter  
5 information was obtained through an agreement between EIPNV and the  
6 NSOS.

7 16. The data received was then analyzed to produce a "Findings Report". These  
8 findings were then presented to the NSOS on November 9, 2020. The Findings  
9 Report set forth EIPNV's statistical analysis of Nevada's voter registration  
10 rolls, which detailed a list of Nevada registered voters who appear to have  
11 been later registered to vote in California for more than 30 days prior to  
12 November 3, 2020 but who voted in Nevada's general election. I analyzed and  
13 developed the November 9, 2020 EIPNV-generated Findings Report.

14 17. EIPNV's allegations in this matter were based on an analysis I conducted using  
15 the Nevada statewide voter registration and voting information files as of  
16 November 6, 2020 and the California statewide voter registration and voting  
17 information files as of August 18, 2020. I am informed and believe the Nevada  
18 and California voter registration and voting information files to be accurate.

19 18. Under my direction, the programmer assigned to EIPNV (EIPNV programmer)  
20 used Microsoft MySQL to arrive at an Microsoft Excel spreadsheet  
21 (spreadsheet) listing all active-status Nevada registrants who have a vote  
22 indicated in the Nevada state database for the Nevada November 3, 2020  
23 election and also match an active-status California registrant on first name, last  
24 name and birthdate. "Vote" means there is a code in their Nevada voting  
25 history for November 3, 2020 of BR (absent ballot received), EV (early voted),  
26 PP (polling place voted on Election Day) or PV (provisional vote). The code of  
27 MB was not included in the analysis. I am informed and believe MB currently  
28

1 (until the election is certified) indicates a ballot was mailed to the voter but  
2 was not yet marked as returned when the Nevada data was acquired.

3 19. The spreadsheet listed, in addition to the names and birthdates, the Nevada  
4 registration ID number, the California registration ID number, and voter  
5 registration dates in both states. It also included a score for each registrant  
6 indicating how “rare” the combined first and last names are in the Nevada  
7 voter registration database, with lowest scores representing the most rare  
8 occurrences and highest scores representing the most common occurrences. A  
9 name with a low rarity score (meaning exceedingly rare) has increased  
10 probability that the matched records belong to the same individual. Rare,  
11 matching names that additionally match on birthdates are considered by EIPNV  
12 to be high confidence matches.

13 20. I reviewed the spreadsheet and removed registrants whose Nevada voter  
14 registration dates were more recent than their California registration dates,  
15 indicating they likely now reside in Nevada and their votes are not in dispute.  
16 The remaining Nevada registrants have a California voter registration date  
17 later than their Nevada voter registration, indicating they now reside in  
18 California. These California voter registration dates are all prior to August 18,  
19 2020 and are all more than 30 days prior to the November 3, 2020 general  
20 election.

21 21. I next reviewed the remaining Nevada registrations by comparing the middle  
22 names in the Nevada records to the middle names in the California records.  
23 These comparisons were not done by the EIPNV programmer since some  
24 records have blank middle names and some use initials for middle names. I  
25 removed registrants whose middle names were mismatches, either by first  
26 initials or full middle names.

27 22. I next reviewed the remaining Nevada registrants and gave a rating to each of  
28 “1” if the name rarity score indicated exceedingly rare and a rating of “3” to

1 those with scores indicating lower name rarity. I retained and rated as “3”  
2 some matches with less rare names that have what I judged to be rare middle  
3 names, based on my experience and personal knowledge from analyzing large  
4 voter databases. The most common names (such as John Smith) were removed  
5 since they could be coincidences even if their common middle names and  
6 birthdates matched. This resulted in 868 registrants rated 1, who I labeled  
7 “Likely cross-state voters” (Finding #1) and 543 registrants rated 3, who I  
8 labeled “Possible cross state voters” (Finding #2). This totaled 1,411 likely or  
9 possible cross-state voters.

10 23. I next reviewed the California voter registration records for the 1,411  
11 registrants and identified 151 who have a Nevada mailing address in their  
12 California registration record and an additional 153 who have a Nevada phone  
13 number prefix of 702 or 775 in their California registration record. This further  
14 indicates these 304 Californians have an association with the state of Nevada.

15 24. Next, I converted the final spreadsheet described above into a Findings Report  
16 Excel file and added a sheet to the file with a written description of each  
17 finding contained in the file. I named this file *EIPNV Findings Report\_CA*  
18 *residents suspected of voting in NV 201103*.

19 25. I next drafted a letter, addressed to the NSOS, to accompany and summarize  
20 the Findings. The letter was reviewed and edited by EIPCa President Linda  
21 Paine and EIPNV Executive Council member Sharron Angle. The final letter  
22 was signed by Sharron Angle and EIPCa President Linda Paine was copied,  
23 along with CSOS Alex Padilla, EIPNV’s attorney and six U.S. attorneys, one  
24 from Nevada and five from districts in California.

25 26. On November 9, 2020 I emailed the signed letter to the NSOS using her email  
26 address. I also emailed it to Jacob Roberts, NSOS HAVA Program Officer II,  
27 who was copied on the letter.

28 27. After emailing the letter, I encrypted and zipped the final Excel EIPNV

1 Findings Report using Winzip. I then copied the encrypted file into Dropbox  
2 and created a Dropbox link that I emailed to Jacob Roberts, who had told me  
3 he was the correct person to receive and review EIPNV Findings Reports.

4 28. Mr. Roberts phoned me on November 10, and I provided him the encryption  
5 password.

6 29. Also, on November 9, I sent the corresponding California registration records  
7 in a Findings Report using the same method as described in Paragraph 24. I  
8 named this file *EIPCa Findings Report\_CA residents suspected of voting in*  
9 *NV 201103*.

10 30. The file was accompanied by a letter I emailed to CSOS Alex Padilla. The  
11 letter was developed as described in Paragraph 25 and signed by EIPCa  
12 President Linda Paine. Copied were EIPCa's attorney, Sharron Angle of  
13 EIPNV and the same U.S. Attorneys.

14 31. After emailing the letter to the CSOS, I encrypted and zipped the final Excel  
15 EIPCa Findings Report using Winzip. I then copied the encrypted file into  
16 Dropbox and created a Dropbox link that I emailed to Sam Burgess, who I had  
17 been directed by the CSOS office was the correct person to receive and review  
18 EIPCa Findings Reports.

19 32. Mr. Burgess phoned me on November 10, and I provided him the encryption  
20 password.

21 33. I then emailed a note on November 10 to Mr. Roberts at the NSOS and Mr.  
22 Burgess at CSOS, introducing them to each other and asking them to share the  
23 files with each other so they could compare records and investigate EIPNV's  
24 reported findings. Mr. Roberts emailed me back the same day, indicating he  
25 had shared Mr. Burgess' contact information with appropriate recipients  
26 within the NSOS office.

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I declare under penalty of perjury under the laws of the state of Nevada the foregoing is true and correct to the best of my knowledge and belief.



Ellen Swensen

Executed on November 11, 2020 at Rancho Mirage, CA.



**EXHIBIT 2**

**EXHIBIT 2**

**EXHIBIT 2**



*Election Integrity Project*® *Nevada LLC*  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED

VIA EMAIL

November 9, 2020

Hon. Barbara K. Cegavske  
Nevada Secretary of State  
101 N. Carson Street, Suite 3  
Carson City, NV 89701  
[nvelect@sos.nv.gov](mailto:nvelect@sos.nv.gov)

**Re: Suspected Cross State Voting in November 3, 2020 California/Nevada Election**

Dear Secretary Cegavske,

As you know, Election Integrity Project, Nevada LLC (EIPNV) is an organization dedicated to promoting the integrity of - and confidence in - Nevada elections. It is wholly owned by its sole Member Election Integrity Project California, Inc., a tax exempt, public benefit, non-profit 501(c)(3), non-partisan corporation.

EIPNV and EIPCa qualified for and accessed the Nevada’s voter registration and voting history data extracts as of November 6, 2020 and compared them to the California state voter registration file of August 18, 2020. Based on this analysis, EIPNV is submitting its findings described in this letter and contained in an encrypted Excel report transmitted today to your HAVA Program Officer II Jacob Roberts.

**Findings #1 and #2: Suspected Cross-State Voting**

EIPNV has identified a total of **1,411** Active-status Nevada registrants who closely match a current Active California registrant on first name, middle name, last name, and date of birth. As of November 6, Nevada’s official voting histories show that **these registrants voted in the Nevada election despite their apparent residency in California**. It is being determined whether they also voted in California.

All have rare or semi-rare names in the voter database, increasing the probability that the matches are indeed the same individual registered in both states. Common names, which might be coincidences (e.g., John Smith), are excluded. These registrants’ California voter registration dates are later than their Nevada registration dates, indicating all 1,411 now reside in California. All have California registration dates more than 30 days prior to the November 3 election, indicating they are likely ineligible to vote in Nevada<sup>1</sup>.

<sup>1</sup> **NRS 293.485 Qualifications to vote: Citizenship; age; residence; registration.**

1. Every citizen of the United States, 18 years of age or over, who has continuously resided in this State and in the county 30 days and in the precinct 10 days next preceding the day of the next succeeding:

- (a) Primary election;
- (b) Primary city election;
- (c) General election; or
- (d) General city election,

↪ and who has registered in the manner provided in this chapter, is entitled to vote at that election

Hon. Barbara K. Cegavske

November 9, 2020

Page 2 of 2

304 of the 1,411 Californians have a Nevada mailing address and/or Nevada phone number in their California voter registration records, further confirming their association with Nevada.

This report only shows Nevada voter registration data. EIPNV is sending the matching California registrations to California Secretary of State Alex Padilla. It respectfully requests that you work with his office to investigate this matter and immediately take corrective actions should EIPNV's findings be confirmed.

Meanwhile, please contact EIPNV/EIPCa Chief Analyst Ellen Swensen at 925-286-1116 or [ellenswensen@eip-ca.com](mailto:ellenswensen@eip-ca.com) for any data questions.

Respectfully,  
Election Integrity Project Nevada, LLC



Sharron Angle  
EIPNV Executive Council  
(775) 846-2980; [angle@iglide.net](mailto:angle@iglide.net)

Cc: Jacob Roberts, HAVA Program Officer II\*  
Hon. Alex Padilla, California Secretary of State  
Jamie Mickelson, Assistant U.S. Attorney, District of Nevada Election Officer  
Kevin Khasigian, Assistant U.S. Attorney, Eastern Div. of California Election Officer  
Christopher P. Tenorio, Assistant U.S. Attorney, Southern District of California Election Officer  
Lindsey Greer Dotson, Assistant U.S. Attorney, Central District of California Election Officer  
Thomas Fredrick Rybarczyk, Assistant U.S. Attorney, Central District of California Election Officer  
David L. Anderson, U.S. Attorney, Northern District of California  
Joel F. Hansen, Esq., Hansen & Hansen Lawyers LLC  
Linda Paine, President, Election Integrity Project, California Inc.

\*transmitted encrypted Excel Findings Report. File name:  
*EIPNV Findings Report CA residents suspected of voting in NV 201103*

**EXHIBIT 3**

**EXHIBIT 3**

**EXHIBIT 3**

DECLARATION OF SHARRON ANGLE REGARDING COLLECTION OF INCIDENT REPORTS FROM ACTIVE VOTERS WHO HAVE NOT VOTED SINCE 2020 OR PRIOR SUSPECTED OF BEING DEAD, MOVED AWAY, OR FICTITIOUS

I, Plaintiff Sharron Angle, am a resident and citizen of Nevada and I was properly registered to vote and I did vote in the Nevada general election held on Nov. 3, 2020. I personally know that my vote was illegally and unconstitutionally diluted by numerous fraudulent ballots cast in that election. declare as follows.

1. To the degree applicable, I make this Declaration regarding suspected illegal voting in Nevada's November 3, 2020 general election by over 8,000 persons who appear have not voted since 2010 or prior or never voted since they registered to vote in 2010 or prior yet voted in the 2020 general election. I have personal knowledge of the facts in this declaration and believe them to be true. If called as a witness, I could and would competently testify to the matters stated.
2. I am a -founder of Election Integrity Project, Nevada (EIPNV) and serve as Executive Council Member of Election Integrity Project Nevada, LLC (EIPNV)
3. The allegations in this matter are based on Incident Reports gathered by Registration Roll Canvassers for EIPNV (See Exhibit A) under my direction.
4. EIPNV is wholly owned by its sole member Election Integrity Project California, Inc., a tax exempt, public benefit, non-profit 501(c)(3) non-partisan corporation.
5. I hold a B.A. in Art from the University of Nevada, Reno.
6. From 1994 to 1998 I served as a Trustee on the Nye County School Board. In 1998 I was elected to the Nevada State Legislature and served until 2006. I ran for U.S. Senate in 2010 and lost the general election to incumbent Harry Reid by 40,140 votes.
7. I have written three books since 2011, Right Angle: One woman's journey to restore the Constitution; The Right Angle for America; and Defying Diagnosis: Choosing faith over facts. I edited Stolen Choices: a documentary on the election integrity crisis.
8. I have been interviewed on at least twenty occasions by print and broadcast news organizations on the subject of election integrity.
9. In discharge of its overall institutional mission, EIPNV requested the Nevada statewide voter registration records from the NSOS. The statewide voter information was obtained through an agreement between EIPNV and the NSOS.
10. The data received was then analyzed to produce a "Findings Report". These findings were then presented to the NSOS on July 24, 2020 (See Exhibit B "Findings Report"). The Findings Report set forth EIPNV's statistical analysis of Nevada's voter registration rolls, which detailed a list of Nevada registered voters who were listed as active voters but have not voted since 2010 or prior or were registered to vote in 2010 or prior and have never voted.
11. Based on the data above a list of 8027 delayed activations who voted(See Exhibit C ), EIPNV trained and deployed over 200 Registration Roll Canvassers in Washoe and Clark County to go to the door of every person on the list. EIPNV trained them using a power point over Zoom (See Exhibit D) and then mailed a hard copy of that power point to use as a manual (See Exhibit E) during their canvassing. The goal was to collect an Incident Report that is also a declaration (See Exhibit F) of eyewitness testimony for evidence purposes in court. This list was sent after the evidence was gathered from the Nevada voter registration rolls on November 6, 2020. We feel that there is more to be gathered as votes are

recorded and compared to the original list of over 41,040 voters identified on the July 24,2020 Findings Report after what our Registration Roll Canvassers have found in their field investigation going to the door.

12. Based on the findings in the field from our Registration Roll Canvasser we have collected and submitted Incident Reports. We started canvassing on November 8, 2020 and have found that so far:

102 Person doesn't live at the address ( See Exhibit G) According to our findings, the ballot was voted but we found that the person who was mailed the ballot doesn't live there so the ballot was voted illegally.

22 Abandoned property (See Exhibit H) According to our findings, the ballot was voted but we found that the no one was living at this property, or that the property was uninhabitable. At one location a person on the street (homeless people are indicated by NO FIXED RESIDENCE instead of an address) Our canvasser interviewed those near the building and confirmed that no one lived there. The ballot was voted illegally.

50 Moved away (See Exhibit I) According to our findings, the ballot was voted but our canvassers found that the person who was mailed the ballot doesn't live there and had moved away from that location. Our canvassers asked where the person had moved in most cases. This person was known but because they had moved away and no longer were in residence, the ballot was voted illegally

13 Misc (See Exhibit J) According to our findings, the ballot was voted but our canvassers found circumstances such as the address was a business and therefore ballot was voted illegally.

59 Not enough information –person wouldn't answer the door, gated community no admittance allowed, couldn't find a neighbor to ask about the person.

118 Name/address were verified but a report was submitted anyway This category makes up about 812 of the names on our list or 10%. Those are the code MB. They are valuable as an indicator that the person has not voted since 2010 or before and most of them said that they didn't vote in this election either. We submit that if they aren't voting they should be purged from the list as the law instructs, at least moved to the inactive list.

In the past week we have completed the canvassing work in a portion of the zip codes in Washoe and Clark Counties. We are continuing to collect more Incident Reports. Our Registration Roll Canvassers continue to submit their findings.

13. The spreadsheet (Listed Exhibit C), includes the names and birthdates, the Nevada registration ID number, the addresses, date last voted, and Secretary of State voter code.

14. Each Registration Roll Canvasser kept a journal of every visit they made, every Incident Report was photographed and the originals were delivered to Attorney Joel Hansen at Hansen and Hansen LLC 9030 W. Cheyenne #210 Las Vegas, NV 89129

I declare under penalty of perjury under the laws of the state of Nevada the foregoing is true and correct to the best of my knowledge and belief. I swear before God and under penalty of perjury, that the statements I have made in this affidavit are true.



DATE: November 16, 2020

Sharron Angle, Nevada Voter and Citizen

EXHIBIT A

EXHIBIT A

EXHIBIT A

EXHIBIT A:



**REGISTRATION ROLL CANVASSER**

**SHARRON ANGLE**

**PO Box 33058 Reno, NV 98533 775-787-6017 EIPNV.com**



**EXHIBIT B**

**EXHIBIT B**

**EXHIBIT B**



*Election Integrity Project® Nevada LLC*  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED

VIA EMAIL

July 24, 2020

Hon. Barbara K. Cegavske  
Nevada Secretary of State  
101 N. Carson Street, Suite 3  
Carson City, NV 89701  
[nvelect@sos.nv.gov](mailto:nvelect@sos.nv.gov)

**Re: 1) Notice of Violation of National Voter Registration Act of 1993 (NVRA)  
2) Nevada Statewide Voter Registration Information- July 18, 2020 extract  
3) EIPNV Findings #1-10**

Dear Secretary Cegavske,

Election Integrity Project, Nevada LLC (EIPNV) is an organization dedicated to promoting the integrity of—and confidence in—Nevada elections. It is wholly owned by its sole Member Election Integrity Project California, Inc., a tax exempt, public benefit, non-profit 501(c)(3), non-partisan corporation. EIPNV appreciates the opportunity to participate in the implementation of the federal mandate that Nevada comply with NVRA's Section 8 and HAVA for current and accurate voter registration list maintenance.

EIPNV has qualified and accessed the state's voter registration and voting history data extracts as of July 18, 2020.

Based upon an analysis of the Nevada voter registration extracts, EIPNV is submitting its findings described in this letter and contained in an encrypted Excel report transmitted today to your HAVA Program Officer II Jacob Roberts.

Pursuant to 52 U.S.C. § 205010(b), it appears the state of Nevada may not be in compliance in several respects with the requirements of Section 8 of the National Voter Registration Act of 1993 (NVRA). This federal statute requires election officials to make a reasonable effort to maintain voter registration lists that are free of dead registrants and registrants who have moved to other jurisdictions, and to systematically remove the names of other ineligible registrants [52 U.S.C. §§ 20507(a)(3), (4)(A)-(B), 20507(c)(1)(A)-(B)]. Federal law also requires that list maintenance be "conducted in a manner that...duplicate names are eliminated from the computerized list" of registrants [52 U.S.C. § 21083(a)(2)(B)(iii)]. Finally, federal list maintenance requirements include the mailing of notices and subsequent lawful actions to inactivate or cancel registrations that are no longer eligible [52 U.S.C. § 20507(d)(2)].

CA Office: 27943 Seco Canyon Rd. #521, Santa Clarita, California 91350  
Phone: 661-313-5251

Email: [EIPCaCorp@EIP-Ca.com](mailto:EIPCaCorp@EIP-Ca.com)

NV Office: PO Box 33058, Reno, NV 89533  
Website: <https://www.EIP-Ca.com>

**Finding #1: Delayed Inactivations**

EIPNV has identified **41,040** Nevada registrant whose records show no indications of registration updates or federal voting activity since November 2, 2010 or prior. Since these registrants have likely relocated or died, they may be eligible for inactivation or cancellation yet they remain in “Active” status. Voting histories indicate **3,331** have not voted in 16 or more years and **22,151** have records indicating they have NEVER voted since registering to vote a decade or more ago. Clark County has 38,103 of the potential delayed inactivations, more than 3% of its Active registrations.

**Finding #2: “Delayed Inactivations” to be Mailed Ballots for November 2020**

Should Nevada mail ballots to all Active-status registrants for the November 2020 election, as many as **41,050--** who may instead be eligible for inactivation or cancellation—will be mailed ballots, including 38,103 in Clark County.

**Finding #3: Delayed Cancellations**

There are **18,290** registrants who were previously inactivated by a county or the state yet remain on the voter list despite no indications of registration updates or voting activity since November 2, 2010 or prior. These registrations may be eligible for cancellation under federal law and Nevada state law [NRS 293.530]. **9,049** have records indicating they have NEVER voted since registering to vote a decade or more ago. Clark County has 14,327 of the suspected delayed cancellations and Washoe County has 1,673.

For this finding EIPNV assumes that (quoting from your May 29, 2020 press release) “...in order for a registered voter to be designated as inactive, a piece of election mail sent to the voter must have been returned as undeliverable and the voter must have failed to respond to a mailer asking the voter to confirm their voter registration information...”, and that “...If an inactive registered voter fails to vote in two federal election cycles (i.e., four years) and the inactive registered voter has no other voter activity during this time, their voter registration in Nevada is cancelled.”

**Finding #4: “Delayed Cancellations” to be Mailed Ballots for November 2020**

Should Clark County mail ballots to all Inactive-status registrants for the November 2020 election, as it did for the June 2020 primary, as many as **14,327** registrants-- who may instead be eligible for cancellation—will be mailed ballots.

**Finding #5: Registrants Aged 105 or Older and Likely Deceased**

Notwithstanding the legal requirement to maintain voter registration lists that are free of dead registrants, there are **74** registrants whose birthdates indicate they are 105+ years old and likely deceased.

**Finding #6: Registrants Aged 105+ to be Mailed Ballots for November 2020**

Should Nevada mail ballots to all Active registrants for the November 2020 election, **63** registrants aged 105+ and likely deceased will be mailed ballots. This includes 40 of Active status and 23 additional Inactive status registrants aged 105+ should Clark County mail ballots to Inactive registrants as it did for the June 2020 primary.

**Finding #7: Missing Information**

There are **1,657** registrants who are missing a birthdate, appear to be missing a legal name, or have a non-alpha character in their names. The Nevada voter registration affidavit requires registrants to list their names as they appear on their Nevada driver license, state ID card or Social Security card, but a majority of the 1,657 have what appear to be “nickname” initials in place of their legal first names. Such missing information hinders the state’s ability to confirm these registrants’ eligibility and to match with death, NCOA and other records required for list maintenance.

**Finding # 8: Duplicated Voter Registrations**

Notwithstanding the legal obligations to eliminate duplicate names from the list, EIPNV has identified **1,289** persons who appear to be registered twice in the state. Each occurrence has the same/similar name and same/similar birthdate at the same address or differing addresses in the state. This includes persons who appear to be registered under both maiden and married last names. Matching phone numbers provide additional evidence for suspected duplicates at differing addresses. Duplicated registrants can easily vote more than once in an election, undetected.

**Finding #9: Suspected Double Voting**

There are **9** suspected duplicated registrants whose voting histories, if they are confirmed as duplicates, show they voted twice in an election. Five appear to have voted twice in the June 2020 primary. They each had two Active registrations and were mailed two ballots. *EIPNV’s analysis of potential double voting excluded 12 counties which currently have incorrect voting histories for the June 2020 election.*

**Finding # 10: Registrants to be Mailed Two Ballots for November 2020**

Should Nevada not correct the registrations it confirms as duplicated, as many as **1,226 registrants will be mailed two ballots for the November 2020 election**. This includes 849 who each appear to have two Active registrations and (should Clark County include Inactives in its mailed ballot plans) 377 additional registrants in Clark County who have one or both registrations as Inactive status. Persons sent more than one ballot can easily vote both ballots undetected.

Barbara K. Cegavske  
July 24, 2020  
Page 4 of 4

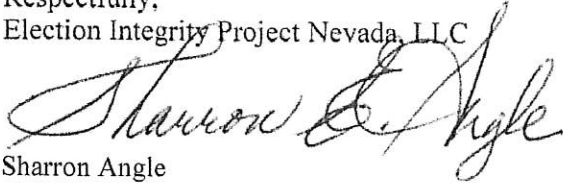
NOTICE: Given the nature of these findings, EIPNV is required to inform you that this letter serves as your statutory notice pursuant to 52 U.S.C. § 20510(b) of violations of Section 8 of the NVRA, 52 U.S.C. § 20507. We look forward to your response within 20 calendar days.

EIPNV offers its findings to you for investigation and confirmation. We respectfully request your office work with Nevada 's counties to immediately act under federal law on registrations it confirms as requiring inactivation, duplicates that require correction, and cancellation of those it confirms as ineligible including those deceased or relocated.

In the role of citizen oversight, EIPNV appreciates the opportunity to participate in the implementation of the federal mandate that Nevada comply with NVRA's section 8 for current and accurate voter registration list maintenance. For EIPNV to be optimally effective, we propose a meeting in your Carson City offices (or via Zoom) where we can discuss our findings and offer assistance in clearing up the list anomalies we have identified. Let me know as soon as possible when we could meet.

Meanwhile, please contact Chief Analyst Ellen Swensen at 925-286-1116 or [ellenswensen@eip-ca.com](mailto:ellenswensen@eip-ca.com) for any data questions.

Respectfully,  
Election Integrity Project Nevada, LLC



Sharron Angle  
EIPNV Executive Council  
(775) 846-2980; [angle@iglide.net](mailto:angle@iglide.net)

Cc: Jacob Roberts, HAVA Program Officer II\*  
Joel F. Hansen, Esq., Hansen & Hansen Lawyers LLC  
Linda Paine, President, Election Integrity Project, California Inc.

\*transmitted encrypted Excel Findings Report. File name: *EIPNV\_20200718\_Findings Report\_20200724*

EXHIBIT C

EXHIBIT C

EXHIBIT C

BR	Absent ballot received (converted to MB after election if counted)
EV	Early voted
FW	Federal Writein
MB	Stands for Ballot Mailed to Voter until 2 weeks after election, when election is certified. Then, MB means Mail Ballot Counted
PP	Polling Place vote on Election Day
PV	Provisional vote. Counted last
BR, BR	a dup who double voted
PV, PV	same
EV, EV	same

**NOTE: Voting history for 11/3/20 based on Voter ID number only.**

**NOTE: See Dropbox information given in footnote 1 to Angle's Declaration**

EXHIBIT D

EXHIBIT D

EXHIBIT D





*Election Integrity Project*® Nevada LLC  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
(EIPNV)



# **VOTER EVIDENCE TRAINING**

## **November 2020**

### **Evidence Collection Canvassing**

The information available in these materials is for general purposes only and not to be relied upon as legal advice.

For legal advice consult an attorney.

**APPLICATION  
CONFIDENTIALITY  
&  
NON-DISCLOSURE**



*Election Integrity Project*® Nevada LLC  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
(EIPNV)

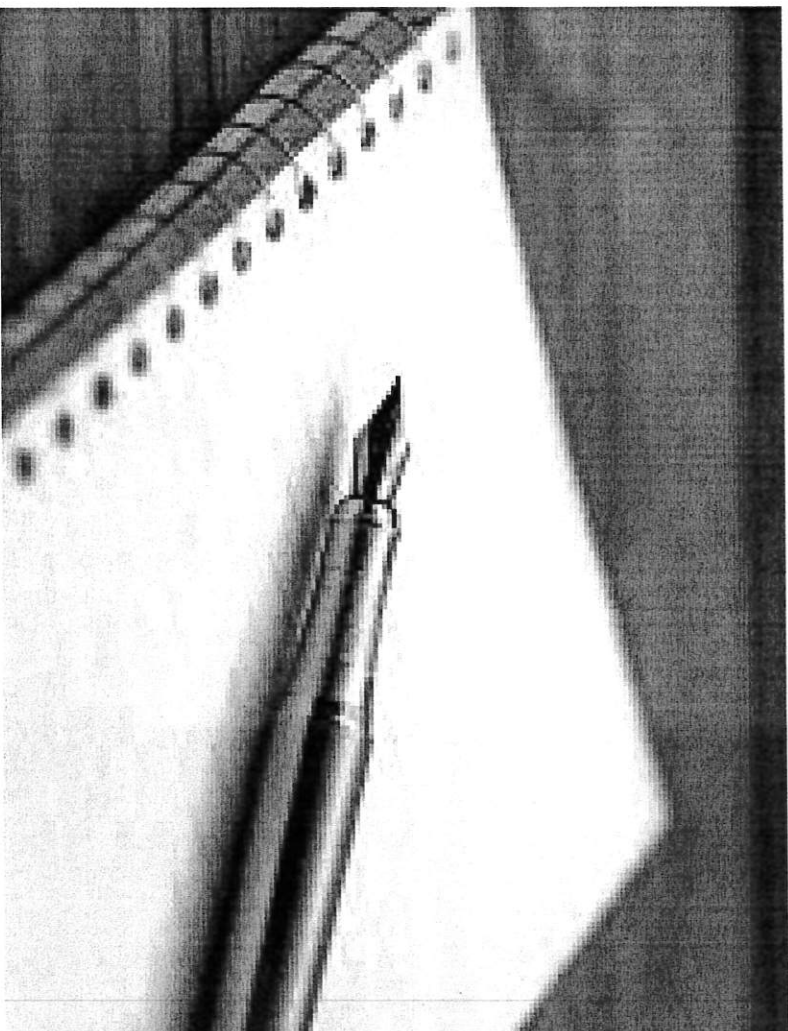


- Election Integrity Project Nevada (EIPNV) is a non-profit non-partisan LLC wholly owned by Election Integrity Project California (EIPCa) a 501(c)3.
- EIPNV.com website, facebook, e-mail [angle@reagan.com](mailto:angle@reagan.com) text 7758462980

1. Based on Election Integrity Project Nevada (EIPNV) findings, you will be collecting evidence using the Citizen Incident Report .

2. You will be canvassing certain addresses to determine if registered voters who voted in the 2020 general election reside there.

# Your Observation Journal



**3. Always remain pleasant and courteous. “Speak softly” but remember we have attorneys, and we must provide them with the documentation to wield the “big stick”.**

**4. Incident Reports - Declaration**

## Election Integrity Project *Nevada* Citizen Incident Statement Instructions

### How Do I Complete the Reports?

1. Fully complete the **Incident Report form**.
2. Print legibly or type on a separate piece of paper and staple it to the form.
3. Report facts **ONLY** - not your opinions, your judgment, or your emotions!
4. Quotes – be sure to use quotation marks when quoting what someone said.
5. Complete the Declaration at the bottom of the Report.
6. Sign Your Name in blue ink where indicated at the bottom of the page

**1. After speaking to the person at the door or finding other evidence that the voter is absent, Mail the Incident Report to: Election Integrity Project® Nevada - Nevada Office PO Box 33058 Reno, NV 89533**

**2. Mail copy of Incident Report and actual ballot envelopes addressed to the wrong person, misprinted ballot materials, duplicates, and other to: Hansen and Hansen LLC (EIPNV attorney Joel Hansen) 9030 W. Cheyenne #210 Las Vegas, NV 89129**

**If possible, please use certified mail to ensure it arrives to the attorney.**

**3. Make a copy of each Incident Report and Witness Statements for your records.**

## EIPNV Citizen Incident Statement

Declaration of \_\_\_\_\_

Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to ***Election Integrity Project Nevada***, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.



**Date of Incident:** \_\_\_\_\_

**Name:**

\_\_\_\_\_ **Phone:** \_\_\_\_\_

**Address:**

\_\_\_\_\_

Street

City

State

**Email Address:** \_\_\_\_\_

**Location of Incident:** (include suite or apartment number)

\_\_\_\_\_

Street

**Description of Incident:** Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.

**Examples: 1)** This person is related to me or a friend but lives in another city, state, etc. **2)** This person died and then state the date **3)** I received ballot information for a person that does not live at my address. **4)** I don't know this person. If quoting what someone said, use quotation marks around their specific words. (**Continue on back or attach another sheet.**)

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I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on \_\_\_\_\_ at \_\_\_\_\_, Nevada

Date

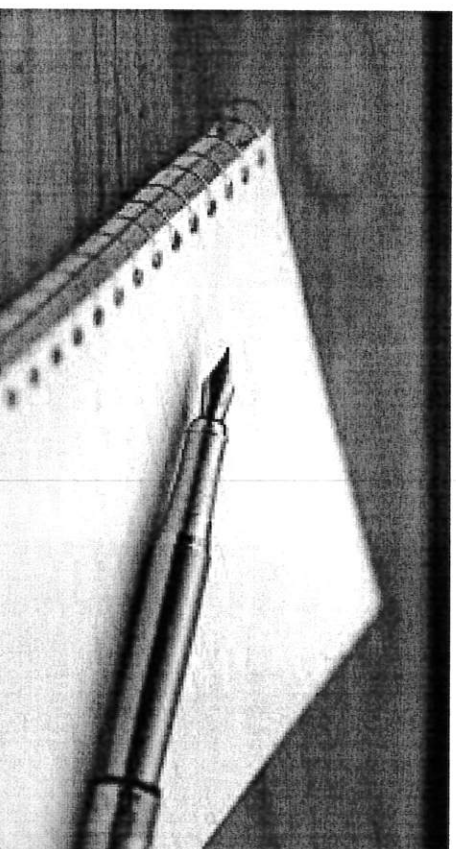
City

Signature \_\_\_\_\_ (sign in Blue ink) Date \_\_\_\_\_

**Please print your complete name at the top and sign at the bottom**

## **GENERAL INSTRUCTIONS FOR CANVASSING YOUR LIST**

- 1. Prepare your journal with date and time before going to the door. Be sure to take an incident report, prepare to take a picture if necessary. Then knock on the door or ring the doorbell wait a minute before ringing again. Don't be obnoxious. If no one is home ask a neighbor about the person you are looking for.**
- 2. Introduce yourself: Hi, I'm your name and I'm looking for [state the name of the person on your list]. Wait for the person to tell you about that person. (If they are that person simply say, "Thank you. I'm with EIPNV just making sure that we have the correct information on everyone listed on the voter registration rolls." Smile, enter it in your journal, and go to the next address.) For any other answers do an incident report. If they have a question or concern outside of this answer, call me at 7758462980.**
- 3. Please carefully save ALL notes. When you have observed for the final time, snail mail your notes and Incident Reports, to Sharron Angle EIPNV, PO Box 33058 Reno, NV 89533 Please include an incident report declaration about your journal.**



# GENERAL PREPARATION AND PROCEDURES

1. Wear comfortable but “professional” clothing, since you will be represent EIPNv. You may be standing most of the time, so wear comfortable shoes. Please wear the badge at all times.
2. Bring the training document, a clipboard, incident report forms, blue pen, and paper to take notes along with your journal.
3. Bring a cell phone. Cameras and recording devices can be helpful in documenting critical information.
4. Take a snack and a drink.
5. If you feel more comfortable, take another EIPNv observer with you.

# Q & A

# **FINAL WORDS OF ENCOURAGEMENT**

- Defending the integrity of the election requires consistent oversight. The cost of freedom is constant vigilance.
- Please volunteer to gather as much evidence as possible, and educate your friends, neighbors and family that they are needed too.
- We will conduct more trainings for those who missed this one. Plenty of time for continued recruiting.
- **ALWAYS** be pleasant and courteous, even when it's difficult. **OBSERVE, DOCUMENT** and **REPORT**. Let the attorneys fight the battles.

EXHIBIT E

EXHIBIT E

EXHIBIT E





*Election Integrity Project*® Nevada LLC  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
(EIPNV)



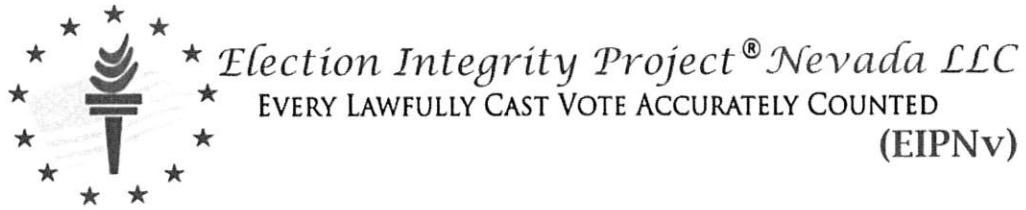
# **VOTER EVIDENCE TRAINING**

## **November 2020**

### **Evidence Collection Canvassing**

The information available in these materials is for general purposes only  
and not to be relied upon as legal advice.

For legal advice consult an attorney.



**Election Integrity Project *Nevada*, Inc.**  
**(EIPNV)**

**Effective 8/25/2020**

**Application for:**  
**Corporate Organizational Positions**

**Contents of this packet:**

**EIPNV Application**

**EIPNV Applicant Checklist**

**EIPNV Equal Opportunity Statement**



*Election Integrity Project*<sup>®</sup> *Nevada LLC*  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
(EIPNV)

## **Election Integrity Project<sup>®</sup> Nevada, Inc.**

### **Application**

#### **Our Mission**

The ***Election Integrity Project<sup>®</sup> Nevada (EIPNV)*** is a nonpartisan group of U.S. citizen volunteers seeking to fulfill our duty to actively participate in the governing of our state/country, a government of, by, and for the people, by helping to defend the integrity of that part of our Republic through which citizens exercise our most fundamental right ~ **the right to choose our representatives by fair and honest elections.**

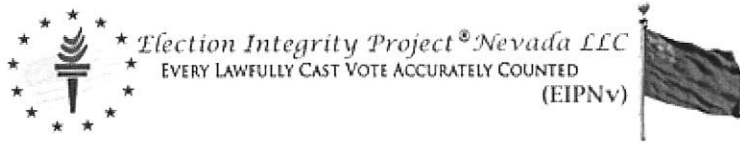
It is the policy of EIPNV to provide equal opportunity to all personnel and applicants. No person working within EIPNV is to be discriminated against in employment and/or volunteer status because of race, color, sex, age, religion, national origin, or disability.

This policy applies to all terms, conditions, and privileges of employment and/or volunteer status including, but not limited to hiring, training, placement, employee/volunteer development, transfer, compensation (if applicable), and termination.

Questions or concerns regarding Equal Opportunity issues should be addressed with the County Coordinator who will forward them to EIPNV Board of Directors.

**Please retain this Page for your records**

**EQUAL OPPORTUNITY  
ORGANIZATION**



- Election Integrity Project Nevada (EIPNV) is a non-profit non-partisan LLC wholly owned by Election Integrity Project California (EIPCa) a 501(c)3.
- EIPNV.com website, facebook, e-mail [angle@reagan.com](mailto:angle@reagan.com) text 7758462980

1. Based on Election Integrity Project Nevada (EIPNV) findings, you will be collecting evidence using the Citizen Incident Report .

2. You will be canvassing certain addresses to determine if registered voters who voted in the 2020 general election reside there.

## Your Observation Journal



3. Always remain pleasant and courteous. “Speak softly” but remember we have attorneys, and we must provide them with the documentation to wield the “big stick”.
4. Incident Reports - Declaration

Election Integrity Project *Nevada* Citizen Incident Statement Instructions

### How Do I Complete the Reports?

1. Fully complete the **Incident Report form**.
2. Print legibly or type on a separate piece of paper and staple it to the form.
3. Report facts **ONLY** - not your opinions, your judgment, or your emotions!
4. Quotes – be sure to use quotation marks when quoting what someone said.
5. Complete the Declaration at the bottom of the Report.
6. Sign Your Name in blue ink where indicated at the bottom of the page

**1. After speaking to the person at the door or finding other evidence that the voter is absent, Mail the Incident Report to:** Election Integrity Project®*Nevada* - Nevada Office PO Box 33058 Reno, NV 89533

**2. Mail copy of Incident Report and actual ballot envelopes addressed to the wrong person, misprinted ballot materials, duplicates, and other to:** Hansen and Hansen LLC (EIPNV attorney Joel Hansen) 9030 W. Cheyenne #210 Las Vegas, NV 89129

**If possible, please use certified mail to ensure it arrives to the attorney.**

**3. Make a copy of each Incident Report and Witness Statements for your records.**

#### GENERAL INSTRUCTIONS FOR CANVASSING YOUR LIST

1. Prepare your journal with date and time before going to the door. Be sure to take an incident report, prepare to take a picture if necessary. Then knock on the door or ring the doorbell wait a minute before ringing again. Don't be obnoxious. If no one is home ask a neighbor about the person you are looking for.
2. Introduce yourself: Hi, I'm your name and I'm looking for [state the name of the person on your list]. Wait for the person to tell you about that person. (If they are that person simply say, "Thank you. I'm with EIPNV just making sure that we have the correct information on everyone listed on the voter registration rolls." Smile, enter it in your journal, and go to the next address.) For any other answers do an incident report.
3. Please carefully save ALL notes. When you have observed for the final time, snail mail your notes and Incident Reports, to Sharron Angle EIPNV, PO Box 33058 Reno, NV 89533 Please include an incident report declaration about your journal.





## EIPNV Citizen Incident Statement

**Declaration of** \_\_\_\_\_

**Print Your Complete Name**

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to **Election Integrity Project Nevada**, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

**Date of Incident:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**Address:** \_\_\_\_\_  
Street City State

**Email Address:** \_\_\_\_\_

**Location of Incident:** (include suite or apartment number)

\_\_\_\_\_  
Street City State

**Description of Incident: Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.**

Examples: **1)** This person is related to me or a friend but lives in another city, state, etc. **2)** This person died and then state the date **3)** I received ballot information for a person that does not live at my address. **4)** I don't know this person. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet.)

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on \_\_\_\_\_ at \_\_\_\_\_, Nevada

Signature \_\_\_\_\_ (sign in Blue ink) Date \_\_\_\_\_  
Date City

**Please print your complete name at the top and sign at the bottom:**

## **GENERAL PREPARATION AND PROCEDURES**

1. Wear comfortable but “professional” clothing, since you will be represent EIPNv. You may be standing most of the time, so wear comfortable shoes. Please wear the badge at all times.
2. Bring the training document, a clipboard, incident report forms, blue pen, and paper to take notes along with your journal.
3. Bring a cell phone. Cameras and recording devices can be helpful in documenting critical information.
4. Take a snack and a drink.
5. If you feel more comfortable, take another EIPNv observer with you.

## **FINAL WORDS OF ENCOURAGEMENT**

- **Defending the integrity of the election requires consistent oversight. The cost of freedom is constant vigilance.**
- **Please volunteer to gather as much evidence as possible, and educate your friends, neighbors and family that they are needed too.**
- **We will conduct more trainings for those who missed this one. Plenty of time for continued recruiting.**
- **ALWAYS be pleasant and courteous, even when it’s difficult. OBSERVE, DOCUMENT and REPORT. Let the attorneys fight the battles.**



EXHIBIT F

EXHIBIT F

EXHIBIT F



## EIPNV Citizen Incident Statement

**Declaration of** \_\_\_\_\_  
**Print Your Complete Name**

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to **Election Integrity Project Nevada**, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

**Date of Incident:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**Address:** \_\_\_\_\_  
Street City State

**Email Address:** \_\_\_\_\_

**Location of Incident:** (include suite or apartment number)

\_\_\_\_\_  
Street City State

**Description of Incident: Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.**

Examples: **1)** This person is related to me or a friend but lives in another city, state, etc. **2)** This person died and then state the date **3)** I received ballot information for a person that does not live at my address. **4)** I don't know this person. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on \_\_\_\_\_ at \_\_\_\_\_, Nevada  
Date City

Signature \_\_\_\_\_ (sign in Blue ink) Date \_\_\_\_\_

**Please print your complete name at the top and sign at the bottom:**

EXHIBIT G

EXHIBIT G

EXHIBIT G



Election Integrity Project® Nevada LLC  
 EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
 (EIPNV)



## EIPNV Citizen Incident Statement

Declaration of Willie Herst  
 Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to **Election Integrity Project Nevada**, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11-14-2020

Name: Willie Herst Phone: \_\_\_\_\_

Address: 6324 Thistlewood Ct, SPARKS NV 89436  
 Street City State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)

6324 Thistlewood Ct, SPARKS NV 89436  
 Street City State

**Description of Incident:** Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.

1. **Examples:** 1) My registration was changed without my knowledge or permission. 2) I was made to vote at a table with other voters instead of a private booth. Mail to EIPNV PO Box 33058 Reno, NV 89533 3) I received ballot information for a person that does not live at my address. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet. Mail copy of Incident Report and actual ballot envelopes addressed to the wrong person, misprinted ballot materials, duplicates, and other materials to: Hansen and Hansen LLC (EIPCa attorney) 9030 W. Cheyenne #210 Las Vegas, NV 89129

Tina Michelle ENARD DOES NOT live at this address for over 1 year. I moved to this address last year. 2:00 pm.

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on 11-14-20 at SPARKS, Nevada  
 Date City

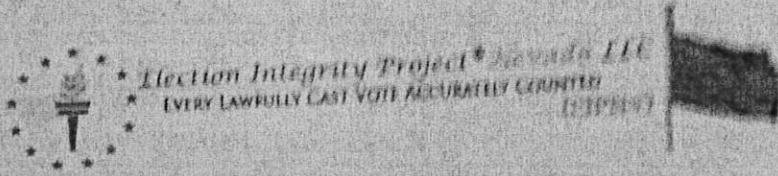
Signature Willie Herst (sign in Blue ink) Date 11-14-2020

Please print your complete name at the top and sign:

EXHIBIT H

EXHIBIT H

EXHIBIT H



### EIPNV Citizen Incident Statement

Declaration of Igal Gutkin  
Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to **Election Integrity Project Nevada**, we review your documented account and share it with **Legislators** Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11/12/2020

Name: Heather Ruth Medina

Phone: \_\_\_\_\_

Address: 120 Linden St  
Street

reno  
City

NV  
State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)

120 Lindlor St  
Street

reno  
City

NV  
State

**Description of Incident:** Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.

- 1. **Examples:** 1) My registration was changed without my knowledge or permission. 2) I was made to vote at a table with other voters instead of a private booth. Mail to EIPNV PO Box 35258 Reno, NV 89533 3) I received ballot information for a person that does not live at my address. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet. Mail copy of Incident Report and actual ballot envelopes addressed to the wrong person, misprinted ballot materials, duplicates, and other materials to: [info@electionintegrityproject.com](mailto:info@electionintegrityproject.com) or EIPC attorney 9900 W Chryenne #210 Las Vegas, NV 89129

There is no residence at the 120 Linden  
This is a bussiness Building.  
A company named "BridgeLink" is located  
at the address. It was closed at the time.

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on 11/12/2020 at reno, Nevada  
Date City

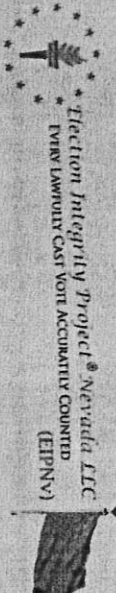
Signature Igal Gutkin (sign in Blue ink) Date 11/12/2020

Please print your complete name at the top and sign:

EXHIBIT I

EXHIBIT I

EXHIBIT I



### EIPNV Citizen Incident Statement

Declaration of Patricia J. Neese  
Print Your Complete Name

*Notes:* This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of. Once submitted to *Election Integrity Project Nevada*, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11/14/20

Name: IRVINE GUARDAS Phone: \_\_\_\_\_

Address: 777 Golfers Pass, Indian Village N.V.  
Street City State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)  
777 Golfers Pass Indian Village N.V.  
Street City State

Description of Incident: Describe the incident in detail using facts rather than opinions, judgment, or emotions.

Examples: 1) This person is related to me or a friend but lives in another city, state, etc. 2) This person died and then state the date 3) I received ballot information for a person that does not live at my address. 4) I don't know this person. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet.)

I Spoke To Son Keith. He Told Me His Mother Sister lives in AZ. The home in Indian Village is sold to "Shawn Barry Home". His live plate # AZ QNS9380 BNU

a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

executed on 11/14/20 at Indian Village Nevada  
Date City

Signature Patricia J. Neese (sign in Blue ink) Date 11/14/20  
I have printed my complete name at the top and sign at the bottom:



EXHIBIT J

EXHIBIT J

EXHIBIT J



Election Integrity Project Nevada LLC  
 EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
 (EIPNV)



### EIPNV Citizen Incident Statement

Declaration of Igal Gutkin  
 Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to **Election Integrity Project Nevada**, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11/12/2020

Name: Heather Ruth Medina Phone: \_\_\_\_\_

Address: 120 Linden St Reno NV  
 Street City State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)  
120 Linden St Reno NV  
 Street City State

**Description of Incident:** Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.

- 1. **Examples:** 1) My registration was changed without my knowledge or permission. 2) I was made to vote at a table with other voters instead of a private booth. *Mail to EIPNV PO Box 33058 Reno, NV 89533* 3) I received ballot information for a person that does not live at my address. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet. Mail copy of Incident Report and actual ballot envelopes addressed to the wrong person, misprinted ballot materials, duplicates, and other materials to: *Landmark Legal Foundation, LLC (EIPCA attorney), 9030 W. Cheyenne #210 Las Vegas, NV 89129*)

There is no residence at the 120 Linden  
This is a bussiness Building.  
A company named "BridgeLink" is located  
at the address. It was closed at the time.

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on 11/12/2020 at Reno, Nevada  
 Date City

Signature Igal Gutkin (sign in Blue ink) Date 11/12/2020

Please print your complete name at the top and sign:

EXHIBIT K

EXHIBIT K

EXHIBIT K



Election Integrity Project® Nevada LLC  
 EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
 (EIPNV)



### EIPNV Citizen Incident Statement

Declaration of Alfred C. Gutierrez  
 Print Your Complete Name

Note: This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to Election Integrity Project Nevada, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 15 Nov 2020

Name: Donald Thiel Phone: \_\_\_\_\_  
 Address: 1555 Victorian Ave Sparks NV  
 Street City State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)  
1555 Sparks NV  
 Street City State

Description of Incident: Describe the incident in detail using facts rather than opinions, judgment, or emotions.

Examples: 1) This person is related to me or a friend but lives in another city, state, etc. 2) This person died and then state the date 3) I received ballot information for a person that does not live at address. 4) I don't know this person. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet.)

Moved in 2016. Possibly past away.  
Seen A Front Desk Manager since 2011, AND MR.  
Thiel has been gone from this hotel since Feb,  
2016

I am a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Declared on 15 Nov 2020 at Sparks, Nevada  
 Date City

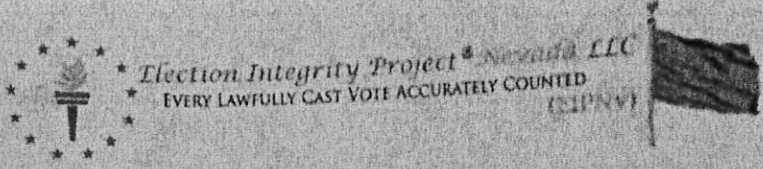
Signature [Signature] (sign in Blue ink) Date 15 Nov 2020

Please print your complete name at the top and sign at the bottom:

EXHIBIT L

EXHIBIT L

EXHIBIT L



### EIPNV Citizen Incident Statement

Declaration of Isaiah Gutkin  
Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

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We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11/12/2020

Name: Heather Ruth Medina Phone: \_\_\_\_\_  
Address: 120 Linden St Reno NV  
Street City State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)  
120 Lindler St Reno NV  
Street City State

Description of Incident: Describe the incident **in detail** using facts rather than opinions, judgment, or emotions.

- 1. **Examples:** 1) My registration was changed without my knowledge or permission. 2) I was made to vote at a table with other voters instead of a private booth. Mail to EIPNV PO Box 93058 Reno, NV 89533 3) I received ballot information for a person that does not live at my address. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet. Mail copy of Incident Report and actual ballot envelopes addressed to the wrong person, misprinted ballot materials, duplicates, and other materials to: Hansen and Hansen LLC (EIPCa attorney) 9030 W Cheyenne #210 Las Vegas, NV 89129

There is no residence at the 120 Linden  
This is a bussiness Building.  
A company named "BridgeLink" is located  
at the address. It was closed at the time.

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on 11/12/2020 at Reno, Nevada  
Date City

Signature Isaiah Gutkin (sign in Blue ink) Date 11/12/2020

Please print your complete name at the top and sign:

EXHIBIT M

EXHIBIT M

EXHIBIT M



Election Integrity Project® Nevada LLC  
 EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
 (EIPNV)



### EIPNV Citizen Incident Statement

Declaration of PATRICIA VINCENT  
 Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

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We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11/14/20  
 Name: SHOI PHOEBE LIN Phone: \_\_\_\_\_  
 Address: 400 FAIRVIEW #195  
Street City State

Email Address: \_\_\_\_\_

Location of Incident: (include suite or apartment number)  
400 FAIRVIEW #195 INCLINE VILLAGE NV  
Street City State

**Description of Incident: Describe the incident in detail using facts rather than opinions, judgment, or emotions.**

Examples: 1) This person is related to me or a friend but lives in another city, state, etc. 2) This person died and then state the date 3) I received ballot information for a person that does not live at my address. 4) I don't know this person. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet.)

CONDO, B.HIRE BRUSH, NO ANSWER, LOCK BOX ON DOOR  
SPOKE TO NEIGHBOR BUT DIDN'T WANT TO GIVE NAME, UNIT  
USED AS VACATION RENTAL. I FOUND THE IN BEAVERTON OR.

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on 11-14-20 at Incline Village, Nevada  
Date City

Signature [Signature] (sign in Blue ink) Date 11/14/20

**Please print your complete name at the top and sign at the bottom:**



EXHIBIT N

EXHIBIT N

EXHIBIT N



Election Integrity Project® Nevada LLC  
 EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED  
 (EIPNV)



### EIPNV Citizen Incident Statement

Declaration of Erin Lange  
 Print Your Complete Name

**Note:** This document provides Nevada citizens an opportunity to document first-hand accounts of incidents of potential fraud or corruption they either witnessed or were a victim of.

Once submitted to **Election Integrity Project Nevada**, we review your documented account and share it with Landmark Legal Foundation and Hansen and Hansen LLC for review.

We are working together with citizen groups and candidate volunteers in a non-partisan effort to provide eye-witness documentation to attorneys at the state and federal level with the goal of taking appropriate action. Please take a few minutes to carefully and accurately describe what you saw or what happened to you.

Date of Incident: 11-15-20

Name: Erin Lange

Phone: 775-203-1921

Address: 1305 #13 Pyramidway Sparks NV 89431  
 Street City State

Email Address: erin

Location of Incident: (include suite or apartment number)  
1305 #13 Pyramidway Sparks NV 89431 NV  
 Street City State

Description of Incident: Describe the incident *in detail* using facts rather than opinions, judgment, or emotions.

Examples: 1) This person is related to me or a friend but lives in another city, state, etc. 2) This person died and then state the date 3) I received ballot information for a person that does not live at my address. 4) I don't know this person. If quoting what someone said, use quotation marks around their specific words. (Continue on back or attach another sheet.)

I received a ballot by mail. I did not use it. I did NOT VOTE

I, a lawful [list time of residence] resident of the state of Nevada, testify to the truth of this statement and beg the Nevada Courts to consider to defend them from harm and stress our Nevada citizens who fear to come to you.

I swear before God and under penalty of perjury, that the statements I have made in this Declaration are true.

Executed on 11-15-20 at Sparks, Nevada  
 Date City

Signature Erin Lange (sign in Blue ink) Date 11-15-20

**Please print your complete name at the top and sign at the bottom:**

**EXHIBIT 4**

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Even more striking than the number of other states with similar provision is that H.B. 2023 follows precisely the recommendation [\*\*189] of the bi-partisan Carter-Baker Commission on Federal **Election** Reform. The Carter-Baker Commission found:

Absentee ballots remain the largest source of potential voter **fraud**. . . . Absentee balloting is vulnerable to abuse in several ways: . . . Citizens who vote at [\*1070] home, at nursing homes, at the workplace, or in church are more susceptible to pressure, overt and subtle, or to intimidation. Vote buying schemes are far more difficult to detect when citizens vote by mail. States therefore should reduce the risks of **fraud** and abuse in absentee voting by prohibiting "third-party" organizations, candidates, and political party activists from handling absentee ballots.

Comm'n on Fed. **Elections** Reform, *Building Confidence in U.S. Elections* 46 (2005) ("*Building Confidence*") (footnote omitted). The Carter-Baker Commission recommended that "States . . . should reduce the risks of **fraud** and abuse in absentee voting by prohibiting 'third-party' organizations, candidates, and political party activists from handling absentee ballots." *Id.* It made a formal recommendation:

State and local jurisdictions should prohibit a person from handling absentee ballots other than the voter, an acknowledged family [\*\*190] member, the U.S. Postal Service or other legitimate shipper, or **election** officials. The practice in some states of allowing candidates or party workers to pick up and deliver absentee ballots should be eliminated.

*Id.* at 47 (Recommendation 5.2.1).

The Carter-Baker Commission recommended that states limit the persons, other than the voter, who handle or collect absentee ballots to three classes of persons: (1) family members, (2) employees of the U.S. Postal Service or another recognized shipper, and (3) **election** officials. H.B. 2013 allows two classes of persons to collect absentee ballots: (1) **election** officials and (2) employees of the U.S. Postal Service "or any other person who is allowed by law to transmit United States mail." Ariz. Rev. Stat. § 16-1005(H). H.B. 2023 also provides that the prior restriction on collection of ballots does not apply to "[a] family member, household member or caregiver of the voter." *Id.* § 16-1005(I)(2). With respect to **election** officials and mail delivery workers, Arizona tracks exactly the recommendation from the Commission. With respect to family, however, Arizona's provision is *more generous* than the Carter-Baker Commission's recommendation. Whereas the Commission recommended that only family members be permitted to handle [\*\*191] a voter's absentee ballot, Arizona expanded the class of absentee ballot handlers to "household member[s]" and "caregiver[s]."

I don't see how Arizona can be said to have violated the VRA when it followed bipartisan recommendations for **election** reform in an area the Carter-Baker Commission found to be fraught with the risk of voter **fraud**. Nothing could be more damaging to confidence in our **elections** than **fraud** at the ballot box. And there is evidence that there is voter **fraud** in the collecting of absentee ballots. As the Seventh Circuit described it: "Voting **fraud** is a serious problem in U.S. **elections** generally . . . and it is facilitated by absentee voting. . . . [A]bsentee voting is to voting in person as a take-home exam is to a proctored one." *Griffin*, 385 F.3d at 1130-31; *see also Wrinn*, 440 A.2d at 270 ("[T]here is considerable room for **fraud** in absentee voting and . . . a failure to comply with the regulatory provision governing absentee voting increases the opportunity for **fraud**." (citation omitted)); *Qualkinbush v. Skubisz*, 357 Ill. App. 3d 594, 826 N.E.2d 1181, 1197, 292 Ill. Dec. 745 (Ill. App. Ct. 2004) ("[T]he integrity of a vote is even more susceptible to influence and manipulation when done by absentee ballot."); Adam Liptak, *Error and Fraud at Issue as Absentee Voting Rises*, N.Y. Times (Oct. 6, 2012), <http://nyti.ms/QUbcrg> [\*\*192] (discussing a variety of problems in states).

[\*1071] Organized absentee ballot **fraud** of sufficient scope to corrupt an **election** is no doomsday hypothetical: it happened as recently as 2018 in North Carolina. In the state's Ninth Congressional District, over 282,000 voters cast ballots, either in person or absentee. *See* Brief of Dan McCready at 7, *In re Investigation of Election Irregularities Affecting Ctys. Within the 9th Cong. Dist.* (N.C. State Bd. of **Elections** Feb. 12, 2019) [hereinafter McCready Br.]. North Carolina permits "[a]ny qualified voter" in the state to vote by absentee ballot. N.C. Gen. Stat. § 163A-1295. However, like Arizona, the state adheres to the Commission's recommendations and restricts the categories of persons who may

collect a voter's absentee ballot. It is a Class I felony in North Carolina for "any person except the voter's near relative or the voter's verifiable legal guardian to assist the voter to vote an absentee ballot." *Id.* § 163A-1298.

In last year's **election** in the Ninth Congressional District, evidence suggested that a political activist hired by the Republican nominee paid employees to collect absentee ballots—possibly more than 1,000—from voters in violation of § 163A-1298. *See* Indictment, *State v. Dowless*, No. 19CRS001934 [\*\*193] (N.C. Super. Ct. July 30, 2019); McCready Br. at app. 2-3. An employee of the suspected activist testified that she personally collected about three dozen ballots. *See* Transcript of Evidentiary Hearing at 150, *In re Investigation of Election Irregularities Affecting Ctys. Within the 9th Cong. Dist.* (N.C. State Bd. of **Elections** Feb. 18, 2019). She also helped fill in about five or ten incomplete, unsealed ballots in favor of Republican candidates. *Id.* at 67, 99, 152-53. The ballots were kept at the activist's home and office for days or longer before they were turned in. *Id.* at 69. A voter testified that she turned over her blank ballot to the activist's employees in an unsealed envelope, trusting that the activist would make a good decision for her. *Id.* at 207-08, 214-15. This coordinated ballot **fraud** led the state Board of **Elections** to invalidate the results of the **election**, which had been decided by only 905 votes—fewer than the amount of suspected fraudulent ballots. Order at 10, 44-45, *In re Investigation of Election Irregularities Affecting Ctys. Within the 9th Cong. Dist.* (N.C. State Bd. of **Elections** Mar. 13, 2019). The residents of the district—some 778,447 Americans—were thus unrepresented in the House of Representatives for [\*\*194] the better part of a year. Perhaps the more devastating injury will be the damage this episode does to North Carolinians' confidence in their **election** system.

The majority acknowledges that the Democratic Party disproportionately benefits from get-out-the-vote efforts by collecting mail-in ballots. *See, e.g.,* Maj. Op. at 83 (quoting *Reagan*, 329 F. Supp. 3d at 870). Further, the majority acknowledges that Democratic activists have often led such collection efforts. *Id.* Yet the experience of North Carolina with Republican activists shows starkly the inherent danger to allowing political operatives to conduct collections of mail-in ballots. Arizona is well within its right to look at the perils endured by its sister states and [\*1072] enact prophylactic measures to curtail any similar schemes. By prohibiting overtly political operatives and activists from playing a role in the ballot-collection process, Arizona mitigates this risk. And the State's well-acknowledged past sins should not prevent it from using every available avenue to keep safe the public's trust in the integrity of electoral outcomes.

Indeed, Arizona does not have to wait until it has proof positive that its **elections** have been tainted by absentee ballot **fraud** [\*\*195] before it may enact neutral rules. "Legislatures . . . should be permitted to respond to potential deficiencies in the electoral process with foresight rather than reactively." *Munro v. Socialist Workers Party*, 479 U.S. 189, 195, 107 S. Ct. 533, 93 L. Ed. 2d 499 (1986). In *Crawford*, the Supreme **Court** quoted with approval the Carter-Baker Commission: There is no evidence of extensive **fraud** in U.S. **elections** or of multiple voting, but both occur, and it could affect the outcome of a close **election**. The electoral system cannot inspire public confidence if no safeguards exist to deter or detect **fraud** or to confirm the identity of voters.

*Crawford*, 553 U.S. at 194 (quoting *Building Confidence* at 18) (footnote omitted).

The majority today holds that, as a matter of federal law, Arizona may not enforce a neutrally drawn statute recommended by a bi-partisan commission criminalizing the very conduct that produced a fraudulent outcome in a race for Congress less than a year ago. When the Voting Rights Act requires **courts** to consider the "totality of the circumstances," it is a poor understanding of the Act that would strike common time, place, and manner restrictions designed to build confidence in the very voting system that it now leaves vulnerable.

### III

As citizens of a democratic republic, we understand intuitively that we have a legal [\*\*196] right and a moral duty to cast a ballot in free **elections**. The states have long had the power to fashion the rules by which its citizens vote for their national, state, and local officials. Once we consider that "totality of the circumstances" must take account of long-held, widely adopted measures, we must

conclude that Arizona's time, place, and manner rules are well within our American democratic-republican tradition. Nothing in the Voting Rights Act makes "evenhanded restrictions that protect the integrity and reliability of the electoral process' . . . invidious." *Crawford*, 553 U.S. at 189-90 (quoting *Anderson*, 460 U.S. at 788 n.9).

Democratic Nat'l Comm. v. Hobbs, 948 F.3d 989, 1069-1072, 2020 U.S. App. LEXIS 2470, \*188-196, 2020 WL 414448

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**EXHIBIT 5**

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# New election ordered in race marred by voter fraud charges

August 19, 2020

PATERSON, N.J. (AP) — A judge has ruled that a new election will be held in November for a disputed Paterson City Council seat, just weeks after the race's apparent winner and a sitting councilman were charged with voter fraud.

State Superior Court Judge Ernest Caposela issued his ruling Wednesday.

Alex Mendez had won a special election on May 12 to fill the seat, but claims of voter fraud were soon raised. An investigation was then launched after the U.S. Postal Service's law enforcement arm told the state attorney general's office about hundreds of mail-in ballots located in a mailbox in Paterson, along with more found in nearby Haledon.

## ADVERTISEMENT

Ultimately, the Passaic County Board of Elections decided not to count 800 ballots cast in the race.

Voter fraud charges were brought in June against Mendez, Paterson Council Vice President Michael Jackson and two other men: Shelim Khalique, of Wayne, and Abu Rayzen, of Prospect Park. An attorney for Councilman William McKoy, who had been defeated by Mendez, then successfully sought an injunction that barred Mendez from being sworn into office.

All four defendants have maintained their innocence.

President Donald Trump has cited the disputed race as a case study in what could happen in an election conducted mostly by mail. His re-election campaign sued New Jersey on Tuesday in a bid to stop the state's plans to conduct the November general election mostly by mail.

<https://apnews.com/article/ced07318e9fb6a95c5f6cab606de1df8>



# New election ordered in disputed North Carolina House race

By EMERY P. DALESIO February 21, 2019

RALEIGH, N.C. (AP) — North Carolina's elections board Thursday ordered a new election in the nation's last undecided congressional race after the Republican candidate conceded his lead was tainted by evidence of ballot-tampering by political operatives working for him.

The State Board of Elections voted 5-0 in favor of a do-over in the mostly rural 9th Congressional District but did not immediately set a date.

In moving to order a new election, board chairman Bob Cordle cited "the corruption, the absolute mess with the absentee ballots."

The board action came after GOP candidate Mark Harris, in a surprising turn, dropped his bid to be declared the winner and instead called for a new election. He reversed course on the fourth day of a board hearing at which investigators and witnesses detailed evidence of ballot fraud by operatives on his payroll.

"Through the testimony I've listened to over the past three days, I believe a new election should be called," Harris said. "It's become clear to me that the public's confidence in the 9th District seat general election has been undermined to an extent that a new election is warranted."

At the same time, Harris denied any knowledge of the illegal practices allegedly used by those working on his behalf.

Harris left the hearing room without answering questions. It was not immediately clear whether he intends to run in a new election.

The Democrat in the race, Dan McCready, hailed the board decision as "a great step forward for democracy in North Carolina."

"From the moment the first vote was stolen in North Carolina, from the moment the first voice was silenced by election fraud, the people have deserved justice," McCready, the Harvard-educated founder of a solar energy company, said in a statement.

The decision could leave the congressional seat empty for months, perhaps until the fall, board attorney Josh Lawson said. New primaries will be held in addition to a new general election, with the dates set by the elections board.

Harris' reversal and the board's subsequent decision averted the possibility of a drawn-out court battle, had either candidate disagreed with the outcome of the hearing. The move also spared the new Democratic leadership of the House from having to intervene under its constitutional power to decide who can be seated as a member.

Harris led McCready by 905 votes out of about 280,000 cast last fall in a district that includes part of Charlotte and extends eastward through several counties along the southern edge of the state. But the state refused to certify the outcome as allegations surfaced that Harris political operative Leslie McCrae Dowless may have tampered with mail-in absentee ballots.

According to testimony and other findings detailed at the hearing, Dowless conducted an illegal "ballot harvesting" operation: He and his assistants gathered up absentee ballots from voters by offering to put them in the mail.

Dowless' workers in rural Bladen County testified that they were directed to collect blank or incomplete ballots, forge signatures on them and even fill in votes for local candidates.

It is generally against the law in North Carolina for anyone other than the voter or a family member to handle someone's completed ballot.

Follow Emery P. Dalesio on Twitter at <http://twitter.com/emerydalesio> . His work can be found at <https://apnews.com/search/emery%20dalesio> .