
From: Jesse Law <jlaw@donaldtrump.com>
Sent: Thursday, June 4, 2020 9:10 AM
To: Joseph Gloria (Election)
Subject: Ballot tallying

Joe,

I wanted to reach out regarding the ballot processing/tallying. From what I understand, your offices are beginning to tally ballots today? I am surprised by this as all along we were operating under guidance that tallying would be Tuesday at 7. Are we mistaken?

If you have time, could you give me a call to discuss?

Jesse Law

Election Day Operations, Trump 2020

7027151401

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Thursday, June 4, 2020 10:23 AM
To: Joseph Gloria (Election)
Subject: Observer times this weekend

Joe,

I have some individuals who are seeking to observe the processing of the ballots this weekend. What are the times that they can attend to your operation for Saturday/Sunday/Monday?

Jesse

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Monday, August 10, 2020 1:41 PM
To: Joseph Gloria (Election)
Cc: Emmit Lamb; Lorena Portillo
Subject: Re: [EXTERNAL]RE: Data Request,

Thank you, both.
Jesse

From: Joseph Gloria (Election)
Sent: Monday, August 10, 2020 1:40 PM
To: Jesse Law
Cc: Emmit Lamb; Lorena Portillo
Subject: [EXTERNAL]RE: Data Request,

There will be a charge for the listing, but Emmit will be coordinating the work to produce the data from his staff and administration will need to produce an estimate for the cost to produce.

Emmit, please let me know when you can have this data made available for pickup, or if it can be sent electronically to Mr. Law. Also, let Admin know how many names are on the listing so they can generate the cost.

Joe P. Gloria, MPA, CERA
Registrar of Voters
Clark County Election Department
965 Trade Dr.
North Las Vegas, NV 89030
jpg@clarkcountynv.gov
702.455.2944 (Office)
702.455.2793 (Fax)

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Monday, August 10, 2020 12:45 PM
To: Joseph Gloria (Election) <JPG@ClarkCountyNV.gov>
Cc: Emmit Lamb <egl@ClarkCountyNV.gov>
Subject: Data Request,

Joe, I hope you are doing well. I know your offices are all fully engaged in preparing for the general, and I thank you for your dedication to the voting public. \

Given the directive from the NVSOS for the Clark County Election Department to reinstate voters who had been made inactive due to their ballots coming back as "undeliverable" in the primary, we wanted to request the data file of the 80,000 voters who have now been made active again. Could we obtain this list? Do I need to work directly with Emmit Lamb?

Thanks again,
Jesse Law
7027151401
Trump 2020

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Thursday, August 13, 2020 11:56 AM
To: Christine Casten-Tang
Cc: Joseph Gloria (Election);Election Administration;Emmit Lamb
Subject: Re: [EXTERNAL]Data Request - Jesse Law

Thank you! Will be over to your offices shortly.

From: Christine Casten-Tang <Christine.Casten-Tang@ClarkCountyNV.gov>
Sent: Thursday, August 13, 2020 11:46 AM
To: Jesse Law <jlaw@donaldtrump.com>
Cc: Joseph Gloria (Election) <JPG@ClarkCountyNV.gov>; Election Administration <ElectionAdministration@ClarkCountyNV.gov>; Emmit Lamb <egl@ClarkCountyNV.gov>
Subject: [EXTERNAL]Data Request - Jesse Law

Good morning Mr. Law. Your request has been completed and ready for pick up. Your total amount due is \$130.00 (including download fee). Election Department only accepts cash or check (To: Clark County Election Department) and pick up location will be at 965 Trade Dr., Suite A North Las Vegas, NV 89030.

If you have any question, please contact 702.455.2944.

Thank you.

Christine Casten-Tang
Clark County Election Department
965 Trade Dr., Suite A
North Las Vegas, NV 89030
Ph 702-455-2944 ext. 0072

"Keep Calm and Take It Easy."



CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Tuesday, August 18, 2020 1:30 PM
To: Joseph Gloria (Election)
Subject: Re: [EXTERNAL]RE: General Election Planning,

Joe, Thinking about when your offices will send local ballots. Do you have an idea of when you will know the date(s) you will send?

Jesse Law

From: Joseph Gloria (Election)
Sent: Monday, August 17, 2020 12:43 PM
To: Jesse Law
Subject: [EXTERNAL]RE: General Election Planning,

The ED schedule is not finalized yet, but hope to have it available tomorrow afternoon. I will send the EV schedule at the same time.

Overseas ballots will go out 45 days prior to ED.
Out of state ballots will go out 40 days prior to ED.
Local ballots will go out 20 days prior to ED.

These are deadlines, if we are ready to send they will go out earlier, but not later than the deadline.

Joe P. Gloria, MPA, CERA
Registrar of Voters
Clark County Election Department
965 Trade Dr.
North Las Vegas, NV 89030
jpg@clarkcountynv.gov
702.455.2944 (Office)
702.455.2793 (Fax)

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Thursday, August 13, 2020 1:24 PM
To: Joseph Gloria (Election) <JPG@ClarkCountyNV.gov>
Subject: General Election Planning,

Joe,

I wondered at what stage you are with identified early voting and election day sites ? Is there a list you can provide or do you have a targeted date in which they will be made available?

I also wondered what your offices were planning for the date to mail ballots? I imagine that you will stagger the ballots to not overload the USPS similar to the primary?

Thank you for your efforts.

Jesse Law

Trump 2020

7027151401

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Wednesday, September 9, 2020 4:28 PM
To: Joseph Gloria (Election)
Subject: Re: [EXTERNAL]RE: Question for ballots and envelopes

Thank you!
Jesse

From: Joseph Gloria (Election)
Sent: Wednesday, September 9, 2020 2:29 PM
To: Jesse Law
Subject: [EXTERNAL]RE: Question for ballots and envelopes

Jesse,
Those ballots will be securely stored for destruction at a later time.

The party markings will not be on the return envelope for the general. It is a statutory requirement for the primary.

Joe P. Gloria, MPA, CERA
Registrar of Voters
Clark County Election Department
965 Trade Dr.
North Las Vegas, NV 89030
jpg@clarkcountynv.gov
702.455.2944 (Office)
702.455.2793 (Fax)

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Friday, September 4, 2020 10:09 AM
To: Joseph Gloria (Election) <JPG@ClarkCountyNV.gov>
Subject: Question for ballots and envelopes

Joe, I hope you and your offices are doing well in your preparation.

I had a couple of questions that popped up that I do not know how to answer. We have voters that will want to return their mail in ballot when they vote in person, and they are wondering if the ballot is destroyed on site or stored securely to be destroyed later?

Also, I wanted to follow up on a discussion we had a couple of months ago. We discussed the party markings on the outside of the envelope that were utilized during the primary. Were those party markings removed from the return-mail envelope?

Sincerely,
Jesse Law
7027151401

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.

From: Shana Weir <sweir@weirlawgroup.com>
Sent: Friday, October 23, 2020 3:14 PM
To: Joseph Gloria (Election)
Cc: Jesse Law
Subject: Public Records Request
Attachments: FOIA 102320 final.pdf

Mr. Gloria,

Please see attached public records request.

Thank you.



Shana D. Weir, Esq.
6220 Stevenson Way
Las Vegas, NV 89120
702-499-0333

CONFIDENTIALITY NOTICE: This message may contain information that is attorney-client privileged, attorney work product or otherwise confidential. If you are not an intended recipient, use and disclosure of this message are prohibited. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

October 23, 2020

Via email to: JPG@ClarkCountyNV.gov
Clark County Election Department
965 Trade Drive, Ste. A
North Las Vegas, NV 89030

RE: Public records request

Dear Mr. Gloria,

This firm represents Donald J. Trump for President, Inc. Pursuant to NRS § 239 *et seq.*, please consider this our request for the following pertaining to the 2020 election:

1. Image files, documents, records, and information showing (1) each voter's signature on envelopes containing mail ballots and/or absentee ballots returned by voters to the Clark County Election Department in the November 3, 2020 general election and (2) the images of signatures of voters who have cast a mail ballot and/or an absentee ballot in the November 3, 2020 general election on record with the Clark County Election Department, the Registrar's office, the Counting Board, and/or any other affiliated entity against which signatures on envelopes containing mail ballots and/or absentee ballots are verified.
2. Documents, records, and information sufficient to identify the number of absentee ballots and/or mail ballots cast in the November 3, 2020 general election that were accompanied by an envelope that (a) did not contain the voter's signature, or (b) contained a signature that the Recorder's Office determined does not match the signature on file in the voter's registration record.
3. For every ballot within the scope of Request 2, all documents, records, and information necessary to show whether the absentee ballot and/or mail ballot was ultimately approved for tabulation.
4. Documents, images, records, and information identifying all absentee ballots and/or mail ballots cast in the November 3, 2020 general election that were accompanied by an envelope that was initially rejected by the Agilis Ballot Packing Sorting System used by the Clark County Election Department.
5. Documents and information sufficient to identify the number of mail ballots cast in the November 3, 2020 general election that the Registrar's Office and/or Counting Board determined were not eligible for processing and/or tabulation for a reason other than a missing or mismatched signature on the accompanying envelope.

6. For every early ballot that is within the scope of Request No. 5, documents and information sufficient to identify:
 - a. The name and voter ID number of the voter who ostensibly cast the ballot;
 - b. The reason(s) the early ballot was determined to be legally insufficient or otherwise ineligible for tabulation and/or processing;
 - c. The date(s) on which the County Recorder's Office attempted to contact the voter and the result of the contact attempt(s); and
 - d. Whether the early ballot was subsequently accepted for processing and/or tabulation.
7. Documents and information sufficient to identify the number of provisional ballots and conditional provisional ballots cast in the November 3, 2020 general election.
8. For every provisional ballot or conditional provisional ballot that is within the scope of Request No. 7, documents and information sufficient to identify:
 - a. The name and voter ID number of the voter who ostensibly cast the ballot;
 - b. The reason(s) the voter was required to cast a provisional ballot or conditional provisional ballot;
 - c. Any contact or communications between the voter and the County Recorder's Office in connection with the provisional ballot or conditional provisional ballot; and
 - d. Whether the conditional provisional ballot or provisional ballot was subsequently accepted for processing and/or tabulation.

We request that responsive documents and information be produced promptly and on a rolling basis as they become available. This request will terminate on November 30, 2020. The Nevada Open Records Act requires a response within five business days. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I might expect responses or the ability to have the attached questions answered.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$100. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the local processes and procedures in Clark County, as well as further ensure the right of the citizens of Nevada to a free and fair election. This information is not being sought for commercial purposes.

In the event you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information.

November 5, 2020

Via Email

Mary-Anne Miller, Esquire
500 S. Grand Central Parkway
Las Vegas, NV 89106
Anne.Miller@clarkcountyda.com

Re: **Mail Ballots Received from Thousands of Ineligible Voters**

Dear Ms. Miller

This firm, in conjunction with Harvey & Binnall, PLLC represents Donald J. Trump for President, Inc. As you know we have been concerned for months about improper ballots being cast in the 2020 general election. Yet, Joseph Gloria has yet to take any reasonably basic and fundamental steps to ensure that mail ballots are free from fraud and abuse. His inaction has had and continues to have material adverse consequences on our election security; we have confirmed that thousands of votes have been cast improperly. Indeed, we have initially identified 3,062 voters who moved from Nevada before the election but still cast ballots in this election. We have verified this by cross-referencing the list of general election voters with publicly available change of address records. For instance, demographic experts agree that the National Change of Address database only captures about one-third of relocations. Consequently, this number will likely grow by 6,000 voters, at a minimum. As you know, voter fraud is a serious crime, under federal and state law and these fraudulent ballots call into question the legitimacy and integrity of the entire Nevada general election. This is a direct result of Mr. Gloria's lax procedures for authenticating voter identity and his negligent maintenance of voter rolls.

Had Mr. Gloria's office used proper and generally accepted procedures to authenticate these ballots and clean the voter rolls on the front end, then these illegal votes would never have permeated into the voter pool, diluting the votes of honest Nevadans. That is why it is imperative that he take immediate action to clean the voter rolls and purge them of all ineligible voters, including those that have moved from Nevada and those that have died. Moreover, he should immediately cease authenticating and separating mail ballots until the rolls are cured and take all possible measures to cull improper ballots from the 2020 general election voter pool.

We have enclosed the change of address information for the voters we have already identified. Please take care to ensure that this data is not improperly disseminated. also promptly respond by explaining what steps Mr. Gloria will take to ensure that no further ballots from ineligible voters will be tabulated. The time critical nature of this request is self-evident.

Sincerely,
Weir Law Group, LLC

/s/ Shana D. Weir

Shana D. Weir
Jesse R. Binnall

cc: Hon. William Barr
Hon. Christopher Wray
Hon. Nicholas A. Trutanich

Should you have any questions, please do not hesitate to contact me.

Very truly yours,
Weir Law Group, LLC

/s/ Shana D. Weir

Shana D. Weir, Esq.

From: Shana Weir <sweir@weirlawgroup.com>
Sent: Friday, November 6, 2020 12:02 PM
To: Joseph Gloria (Election)
Cc: Jesse Law
Subject: Public records request
Attachments: Gloria 110620.pdf

Mr. Gloria,

Please see attached public records request.



Shana D. Weir, Esq.
6220 Stevenson Way
Las Vegas, NV 89120
702-499-0333

CONFIDENTIALITY NOTICE: This message may contain information that is attorney-client privileged, attorney work product or otherwise confidential. If you are not an intended recipient, use and disclosure of this message are prohibited. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.



November 6, 2020

Via Email

Mary-Anne Miller, Esquire
o/b/o Joseph Gloria and the Clark County Election Department
500 S. Grand Central Parkway
Las Vegas, Nevada 89106
Mary-Anne.Miller@clarkcountynvda.com

RE: Provisional ballots

Dear Ms. Miller:

As you know, this firm, in conjunction with Harvey & Binnall, PLLC represents Donald J. Trump for President, Inc. We are informed that the Clark County Clerk has been counting and including ballots received after 7 pm on election day as regular ballots instead of provisional ballots. If the clerk has been treating such ballots as regular ballots, we demand that he immediately stop releasing vote totals to the public; that he take whatever steps necessary to remove these ballots from vote totals; and that he segregate these ballots and treat them appropriately as provisional ballots.

Please advise us by 11:00 am today 1) whether the clerk has been treating ballots received after 7 pm on election day as regular ballots and 2) if so, whether he will immediately stop releasing totals to the public, remove these ballots from your vote totals, and 3) that he will treat these ballots as provisional ballots.

Thank you for your immediate attention to this matter.

Very truly yours,
Weir Law Group, LLC

/s/ Shana D. Weir

Shana D. Weir
Jesse R. Binnall

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Writ of Mandamus

COURT MINUTES

November 02, 2020

A-20-823821-W Nevada Republican Central Committee dba Nevada Republican Party,
Plaintiff(s)
vs.
Clark County, Defendant(s)

November 02, 2020 3:20 PM **Minute Order: Application for Order Compelling
Disclosure of Public Records Pursuant to NRS
239.011/Petition for Writ of Mandamus**

HEARD BY: Gonzalez, Elizabeth

COURTROOM: Chambers

COURT CLERK: Dulce Romea

PARTIES None. Minute order only - no hearing held.

PRESENT:

JOURNAL ENTRIES

- The Court, having taken evidence and heard argument related to the Petition for Writ of Mandamus related to the three public records requests made by the Petitioner pursuant to NRS 239.010, **GRANTS** the Petition **IN PART**:

Petitioners' request for public records seeking records that did not exist at the time of the submission of the request claiming it is being made on a "rolling basis" is not appropriate. To the extent that request is for information not in existence at the time of the request, the public records request as made, is premature. As such the Court addresses only those records in existence at the time the three requests for public records were made.

In accordance with NRS 239.0113, Respondent has demonstrated by a preponderance of the evidence that valid security concerns relate to information about employees/contractors. Accordingly the names, work schedules and other personal identifiers are deemed confidential at this time.

In accordance with NRS 239.0113, Respondent has demonstrated by a preponderance of the evidence that valid security concerns relate to information about transportation of ballots. Accordingly this information will remain confidential.

Respondent has demonstrated by a preponderance of the evidence that due to the public health

emergency, there has been a large increase in mail-in ballots and an increased difficulty in recruiting staff to assist with the responsibilities of the Election Department during a general election, which restrict the ability of Respondent to comply with these public records requests prior to the canvass deadline. These factors establish good cause for an extension of the statutory period for compliance with these public records requests.

With respect to the October 16, 2020 request (Exhibit 1), due to the security concerns, the documents related to the composition and scheduling of the bipartisan counting board and ambassadors in existence as of October 16, 2020 will be produced by November 20, 2020. Respondent's security concerns related to the identities of these individuals will be significantly reduced after the canvass. In addition to the information previously provided in response to subpart 4, Respondent is to provide responsive public records through October 16, 2020 for the remaining subparts in that request by November 20, 2020.

With respect to the October 19, 2020 public records request (Exhibit 2), as to subpart 1, policy and procedures in existence at the time of the request (except for k); any call script or instruction given to employees referenced in subpart 2; identification of individuals and shifts worked through October 19, 2020 related to subpart 3; all reports identified in subpart 7 through October 19, 2020; all reports identified in 10 through October 19, 2020 not publicly available on the respondent's website; and, all records related to 11, 12 and 13 through October 19, 2020 will be produced. As a result of the time constraints, this information will be produced by November 20, 2020. Respondent's security concerns related to the identities of individuals who contact voters will be significantly reduced after the canvass. The items related to security of the transportation of ballots and interaction with law enforcement are security concerns will exist for future elections and are found to be confidential. The items related to communications with individual voters is also confidential although that information may be produced in a redacted form following the canvass deadline.

With respect to the October 23, 2020 public records request (Exhibit 3), for those mail-in ballots or absentee ballots returned to the Election Department by October 23, 2020, Respondent to identify the number that did not contain a signature, the number that the signature did not match those records available for examination under AB4, and the number of the preceding ballots that were ultimately approved for tabulation. To the extent that any of the public records existed on October 23, 2020, the number of provisional ballots and conditional provisional ballots cast will be produced.

Any subpart of any of the public records requests not specifically identified is denied.

Currently Respondent makes much of the information requested available on its website. Respondent is not required to duplicate information already available on its website. The Court notes the Respondent's willingness to provide information as soon as it is possible given the canvass deadline and demands on the limited staff in the Election Department. Petitioners' counsel and Respondent's counsel are encouraged to communicate related to any dispute related to this ruling

prior to resetting this matter before the court. A status check regarding compliance is set on the Court's chambers calendar on November 20, 2020. Counsel may submit a status report requesting any further involvement of the Court on this issue at that time. Mr. Lee to prepare the order and submit for approval to Ms. Miller.

From: Joseph Gloria (Election)
Sent: Sunday, November 8, 2020 2:26 PM
To: Jesse Law
Cc: Shana Weir;Mary-Anne Miller;Dan Kulin
Subject: RE: Tabulation Computer

Mr. Law,

In response to your recent inquiry related to tabulation hardware. All computers involved in the tabulation of ballots are hardwired into a stand alone network supported in the same room where we tabulate.

The laptop you are referring to is not wired into any network and is only used to track the mail ballot counts to ensure what was sent from Greystone is what is received in tabulation. No tabulation is done on those laptops. No chain of custody was broken on any tabulation equipment.

Joe P. Gloria, MPA, CERA
Registrar of Voters
Clark County Election Department
965 Trade Dr.
North Las Vegas, NV 89030
jpg@clarkcountynv.gov
702.455.2944 (Office)
702.455.2793 (Fax)

From: Jesse Law <jlaw@donaldtrump.com>
Sent: Sunday, November 8, 2020 1:00 PM
To: Joseph Gloria (Election) <JPG@ClarkCountyNV.gov>
Cc: Shana Weir <sweir@weirlawgroup.com>
Subject: Tabulation Computer

Mr. Gloria,

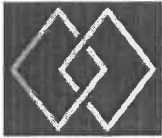
We understand that the primary desktop computer responsible for the tabulation of votes has gone missing and is replaced with a laptop, and now the chain of custody has been violated. Please immediately advise us of where the computer is, why was it moved and what the chain of custody is.

When your staff was asked through the ambassadors and directly to the Chief of IT, they were either ignored or told to email any questions they have. This is clearly an urgent matter, and your staff is deliberately stonewalling our citizen observers. Please reply immediately.

Jesse Law
Nevada Director of Election Day Operations
Donald J Trump for President, Inc
7027151401

CONFIDENTIALITY NOTICE: This message (including any attachments) may contain confidential, proprietary, privileged, and/or private information. This information is intended to be for the use of the individual(s) designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution, or other use of this message or any attachments by an

individual or entity other than the intended recipient is prohibited. Copyright and any other intellectual property rights are the sole property of Donald J. Trump for President, Inc.



November 13, 2020

VIA E-MAIL: JPG@CLARKCOUNTYNV.GOV

Clark County Election Department
965 Trade Drive, Ste. A
North Las Vegas, NV 89030

Re: Updated request for public records

Dear Mr. Gloria:

Pursuant to Nevada's Open Records Act in NRS § 239 et seq., and in consideration of the November 2, 2020 Minute Order ("Minute Order") as well as the November 13, 2020 final order ("Final Order") of the Honorable Judge Elizabeth Gonzalez in Case No. A-20,823821-W, please consider this correspondence as an updated request for the public records identified below pertaining to the 2020 election:

1. With respect to the October 16, 2020 request identified in the Minute Order and ¶3 of the Final Order (true and correct copies of which are attached hereto for your convenience), the Court ordered that responsive public records through October 16, 2020 be provided by November 20, 2020. More specifically, the following five (5) categories of items were ordered to be provided:

1.1 First and last names of voters who are registered as Republicans that are members of the counting board, including the dates and times of their shifts; and shift locations;

1.2 First and last names of voters who are registered as Democrats who are members of the counting board, including the dates and times of their shifts; and shift locations;

1.3 First and last names of voters registered as Independents who are members of the counting board, including the dates and times of their shifts; and shift locations;

1.4 Political composition of the counting board for each shift (7:30 a.m. to 1:00 p.m.; and 1:00 p.m. to 7:30 p.m.) for each day starting Thursday, October 15, 2020 and ending November 12, 2020.

1.5 First and last names of the ambassadors that poll watchers and members of the general public can interface and interact with during ballot processing, along with dates and times of their shifts; and shift locations.

This updated request seeks these same categories of records as ordered by the Court but for the time period from October 17, 2020 through today's date. This request includes all applicable subparts.

2. With respect to the October 19, 2020 request identified in the Minute Order and ¶4 of the Final Order, the Court ordered the following records in existence as of October 19, 2020 to be produced on or before November 20, 2020:

- a. For subpart 1 a. through j., all policies and procedures in existence at the time of the request;
- b. any and all call scripts or instructions given to any employees, agents, or officials as identified in subpart 2;
- c. The identification of individuals and shifts worked through October 19, 2020 as identified in subpart 3;
- d. All reports through October 19, 2020, as identified in subpart 7;
- e. All reports through October 19, 2020, not publically available on the Respondent's website; as identified in subpart 10; and
- f. All records, through October 19, 2020, set forth in subparts 11, 12, and 13.

This updated request seeks these same categories of records as ordered by the Court but for the time period from October 20, 2020 through today's date. This request includes all applicable subparts.

3. With respect to the October 23, 2020 request identified in the Minute Order and ¶5 of the Final Order, the Court ordered that the following regarding mail-in ballots or absentee ballots returned to the Election Department by October 23, 2020 be identified on or before November 20, 2020:

- a. For subparts 2 and 3, those mail-in ballots or absentee ballots returned to the Election Department by October 23, 2020, Respondent shall identify:
 - i) the number that did not contain a signature;
 - ii) the number that the signature did not match those records available for examination under AB4; and
 - iii) the number of the preceding ballots that were ultimately approved for tabulation.
- b. For subpart 7, the number of provisional ballots and conditional provisional ballots cast shall be produced, to the extent that such records existed on October 23, 2020.

This updated request seeks the same categories of records as ordered by the Court but for the time period from October 24, 2020 through today's date. This request includes all applicable subparts.

4. Subpart 1 of the October 23, 2020 request does not appear to be adequately addressed in either the Court's Minute Order or Final Order. Consequently, please allow this request to serve as a separate request and/or clarification of the public records being requested. For each and every mail ballot and/or absentee ballot received back by the Clark County Election Department or affiliate pertaining to the November 3, 2020 general election, please provide the following:

- a. Image files or copies of the voter's signature on the envelope containing his/her ballot along with the corresponding image files or copies of the voter's signature on file used for comparison purposes ("signature comparison").
- b. All records detailing whether each mail ballot and/or absentee ballot was accepted or rejected by the Agilis Ballot Packing Sorting System and the stated reason for any rejection.
- c. All records detailing whether each mail ballot and/or absentee ballot was accepted or rejected after an in-person comparison or any other method of signature review and the stated reason for any rejection.
- d. All records detailing whether each mail ballot and/or absentee ballot was ultimately approved for tabulation and the basis for approval.

In the event there are any fees for searching or copying these records, please inform me if the cost will exceed \$100. However, I would like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the local process and procedures in Clark County and further ensure the right of citizens of Nevada to a free and fair election. This information is not being sought for commercial purposes. Partial records will be accepted in the event that all records cannot be provided at the same time.

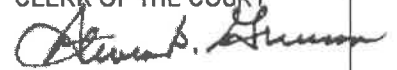
As you know, the Nevada Open Records Act requires a response within five (5) business days. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I should expect responses. This will help avoid unnecessary legal expenses by further involving the courts with compliance.

In the event you deny any part of this request, please cite each specific exemption you feel justifies the refusal to release the requested information.

Very truly yours,
Weir Law Group, LLC

/s/ Shana D. Weir

Shana D. Weir, Esq.



1 **ORDR**
2 DAVID S. LEE, ESQ.
3 Nevada Bar No.: 6033
4 CHARLENE N. RENWICK, ESQ.
5 Nevada Bar No.: 10165
6 LEE, LANDRUM & CARLSON, APC
7 7575 Vegas Drive, Suite 150
8 Las Vegas, Nevada 89128
9 Phone: (702) 880-9750
10 Fax: (702) 314-1210
11 dlee@lee-lawfirm.com
12 crenwick@lee-lawfirm.com

13 Attorneys for Petitioners
14 NEVADA REPUBLICAN CENTRAL COMMITTEE
15 d/b/a NEVADA REPUBLICAN PARTY;
16 REPUBLICAN NATIONAL COMMITTEE; AND
17 DONALD J. TRUMP FOR PRESIDENT, INC.

18 **DISTRICT COURT**

19 **CLARK COUNTY OF NEVADA**

20 NEVADA REPUBLICAN CENTRAL
21 COMMITTEE d/b/a NEVADA
22 REPUBLICAN PARTY; REPUBLICAN
23 NATIONAL COMMITTEE; and DONALD
24 J. TRUMP FOR PRESIDENT, INC.

25 Petitioners,

26 vs.

27 CLARK COUNTY, a governmental entity;
28 and JOSEPH GLORIA, in his capacity as a
Registrar of Voters for Clark County,

Respondents.

CASE NO.: A-20-823821-W

DEPT. NO.: XI

**ORDER, GRANTING IN PART AND
DENYING IN PART PETITIONERS'
APPLICATION FOR ORDER
COMPELLING DISCLOSURE OF
PUBLIC RECORDS PURSUANT TO
NRS 239.011/PETITION FOR WRIT OF
MANDAMUS**

Hearing Date: November 2, 2020

Hearing Time: 1:00 p.m.

29 This matter having come for hearing on the 2nd day of November, 2020 at 1:00 p.m., the
30 Honorable Elizabeth Gonzalez presiding, David S. Lee, Esq. and Charlene N. Renwick, Esq.
31 appearing on behalf of Petitioners and Mary-Ann Miller, Esq. appearing on behalf of
32 Respondents. Petitioners having filed an Application for Order Compelling Disclosure of Public
33 Records Pursuant to NRS 239.011/Petition for Writ of Mandamus, the Court having reviewed the
34 filed brief, authority submitted and arguments presented by the parties during the hearing, the
35 Court hereby finds as follows:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I.

PETITIONERS' REQUESTS

1. On October 16, 2020, Petitioners requested information pertaining to the composition and scheduling of the bipartisan counting board and ambassadors, which Respondents were not willing to provide prior to the November 3, 2020 election due to safety concerns; however, Respondents are willing to provide the names of these individuals, their respective schedules and the breakdowns of these election workers, after the election canvass deadline of November 16, 2020.
2. On October 19, 2020, Petitioners requested various records related to the policies and procedures employed by Respondents with respect to handling and processing ballots, which Respondents contend is a substantial amount of information that the Clark County Election Department cannot provide until after the election canvass deadline, due to employee manpower restraints. After the November 16, 2020 canvass deadline, Respondents are prepared to provide the information requested in the following subparts of the October 19, 2020 Request: 1 a through j; and 2 through 13, subject to redaction of any confidential information.
3. On October 23, 2020, Petitioners requested information pertaining to ballots cast in the 2020 general election, and at that time, Respondents contend that they did not have all the records for everyone who cast a ballot in the November 3, 2020 election, and that Respondents expected to receive ballots through November 12, 2020. Notwithstanding the same, Respondents' response to each request is as follows: Request No. 1) while the Respondents are able to provide the requested information after the election canvass deadline of November 16, 2020, Respondents need to research and confirm with the Secretary of State that they are permitted to provide the requested information; Requests No. 2 and 3) this information will be available after the election canvass concludes, and can be made available at that time and a report can be put together for Request 3;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Request No. 4) a report can be prepared after November 12, 2020 to identify which ballots were rejected by the Agilis machine; Request No. 5) this information can be made available after the election canvass deadline; Request No. 6) further clarification is needed from Petitioners as to what is being requested; Request No. 7) this information can be provided after Respondents confer with the Secretary of State, and after the Secretary receives reports from the 17 counties to determine which ballots should be denied as a result of voters registered in two locations; Request No. 8) this information will take an extended period to gather, so it will not be available immediately after the canvass deadline, but can be provided later.

II.
COURT'S FINDINGS

1. In accordance with NRS 239.0113, Respondent has demonstrated by a preponderance of the evidence that valid security concerns exist with respect to information requested about employees and/or contractors, and the transportation of ballots. Accordingly, the names, work schedules and other personal identifiers for such individuals, and information about the transportation of ballots is deemed confidential at this time.
2. Respondent has demonstrated by a preponderance of the evidence that due to the COVID-19 public health emergency, it has had difficulty in recruiting staff to assist with the responsibilities of the Election Department during a general election, and this has restricted the Respondents' ability comply with Petitioners' public records requests, prior to the canvass deadline of November 16, 2020. These factors establish good cause for an extension of the statutory period for compliance with Petitioners' public records requests.
3. With respect to the Petitioners' October 16, 2020 request, due to security concerns, the documents related to the composition and scheduling of the bipartisan counting board and ambassadors in existence as of October 16, 2020 will be produced by

1 November 20, 2020. Respondent's security concerns related to the identities of
2 these individuals will be significantly reduced after the election canvass is
3 completed. As such, in addition to the information previously provided in response
4 to subpart 4 of Petitioners' October 16, 2020 Request, Respondent is to provide
5 responsive public records for the remaining subparts said request by November 20,
6 2020.

7 4. With respect to Petitioners' October 19, 2020 public records request, Respondents'
8 security concerns related to the identities of individuals who contact voters will be
9 significantly reduced after the canvass. Further, the Court finds that Petitioners'
10 requests related to security of the transportation of ballots and interaction with law
11 enforcement are security concerns that will exist for future elections and are found
12 to be confidential. The requests related to communications with individual voters
13 is also confidential, however, that information shall be produced in a redacted form
14 following the canvass deadline. As such, the following information requested in
15 Petitioners' October 19, 2020 Request, shall be produced by Respondents by
16 November 20, 2020:

- 17 a. For subparts 1 a. through j., all policies and procedures in existence at the
18 time of the request;
- 19 b. Any and all call script or instructions given to any employees, agents, or
20 officials as identified in subpart 2;
- 21 c. The identification of individuals and shifts worked through October 19,
22 2020 as identified in subpart 3;
- 23 d. All reports through October 19, 2020, as identified in subpart 7;
- 24 e. All reports through October 19, 2020, not publicly available on the
25 Respondents' website, as identified in subpart 10; and
- 26 f. All records, through October 19, 2020, set forth in subparts 11, 12 and 13.

27 5. With respect to the Petitioners' October 23, 2020 Public Records Request,
28 Respondents shall produce the following information by November 20, 2020:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

a. For subparts 2 and 3, those mail-in ballots or absentee ballots returned to the Election Department by October 23, 2020, Respondent shall identify: i) the number that did not contain a signature; ii) the number that the signature did not match those records available for examination under AB4; and iii) the number of the preceding ballots that were ultimately approved for tabulation; and

b. For subpart 7, the number of provisional ballots and conditional provisional ballots cast shall be produced, to the extent that such records existed on October 23, 2020.

6. Respondent is not required to duplicate information already available on its website.

7. Any other request made by Petitioners in their October 16, 19 and 23, 2020 Public Records Requests that is not specifically identified above, is hereby denied; and

8. Counsel for Petitioners and Respondents shall meet and confer on the production of the requested information, and any dispute related thereto prior to resetting this matter before the Court.

Based on the foregoing findings, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Petitioners' Application for Order Compelling Disclosure of Public Records Pursuant to NRS 239.011/ Petition for Writ of Mandamus is GRANTED IN PART AND DENIED IN PART as set forth above.

DATED this 12th day of November, 2020.


DISTRICT COURT JUDGE

LEE, LANDRUM & CARLSON, APC
7575 VEGAS DRIVE, SUITE 150
LAS VEGAS, NV 89128
(702) 880-9750

1 Approved as to Form:

2 **STEVEN B. WOLFSON**
3 **DISTRICT ATTORNEY**

4
5 By: /s/ Mary-Anne Miller
6 MARY-ANNE MILLER, ESQ.
7 Nevada Bar No.: 001419
8 500 South Grand Central Pkwy., Suite 5075
9 Las Vegas, Nevada 89155
10 Attorneys for Respondents

11 Submitted by:

12 **LEE, LANDRUM & CARLSON, APC**

13 By: /s/ Charlene N. Renwick
14 DAVID S. LEE, ESQ.
15 Nevada Bar No. 6033
16 CHARLENE N. RENWICK, ESQ.
17 Nevada Bar No.: 10165
18 7575 Vegas Drive, Suite 150
19 Las Vegas, Nevada 89128
20 Attorneys for Petitioners
21
22
23
24
25
26
27
28

Lisa Logsdon

From: Charlene Renwick <crenwick@lee-lawfirm.com>
Sent: Friday, November 20, 2020 8:05 AM
To: Mary-Anne Miller
Cc: David Lee
Subject: Production of Public Records Requests
Attachments: M. Miller 11.20.20 (document production).pdf

CAUTION: This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your DA account credentials.**

Good Morning, Ms. Miller.

Please see the attached correspondence.

CHARLENE N. RENWICK
ASSOCIATE



ARIZONA + CALIFORNIA + FLORIDA + NEVADA + UTAH

7575 VEGAS DRIVE, SUITE 150
LAS VEGAS, NEVADA 89128

Direct 725 216 7405

O 702.880.9750 F 702.314.1210

www.LEE-LAWFIRM.com

CONFIDENTIALITY NOTICE: This e-mail message and the information it contains are intended to be privileged and confidential communications protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you have received this e-mail message in error, please notify the sender by e-mail at crenwick@lee-lawfirm.com and permanently delete this message.



DAVID S. LEE
PARTNER
DLEE@LEE-LAWFIRM.COM

November 20, 2020

VIA EMAIL

Mary-Ann Miller, Esq.
County Counsel
Office of the District Attorney
200 Lewis Ave.
November 20, 2020
Las Vegas, NV 89101
Mary-Anne.Miller@clarkcountyda.com

Re: Production of Records in Response to Petitioners' October 16, 19, and 23, 2020 Public Records Requests

Our Clients: Nevada Republican Central Committee D/B/A Nevada Republican Party; Republican National Committee; and Donald J. Trump for President, Inc.

Dear Ms. Miller,

As you will recall from the November 2, 2020 evidentiary hearing in this matter, and the testimony of Mr. Joseph Gloria, it is our understanding that Clark County and the Registrar of Voters ("Respondents") will be producing virtually all of the information requested by our clients in their October 16, 19 and 23, 2020 Public Records Requests, on November 20, 2020.

Of note, Mr. Gloria testified that records identifying the number of absentee ballots and/or mail ballots cast in the November 3, 2020 general election that were accompanied by an envelope that (a) did not contain the voter's signature, or (b) contained a signature that the Registrar/Clark County Election Department determined does not match the signature on file in the voter's registration record, would be produced after conclusion of the election canvass, along with records necessary to show whether the absentee ballot and/or mail ballot was ultimately approved for tabulation. As such, we request confirmation from Respondents that this information will be produced to Petitioners by November 20, 2020.

Further, based on Mr. Gloria's testimony, it is our understanding that the following information will also be produced by Respondents by November 20, 2020:

- October 16, 2020 Requests 1 through 5: Respondents will provide the names of these individuals, their respective schedules and the breakdowns of these election workers;
- October 19, 2020 Requests 1 a through j, and 2 through 13: Respondents will provide this requested information, subject to redaction of any confidential information; and
- October 23, 2020: Requests Nos. 1 through 3) this information will be provided, along with a report for Request 3; Request No. 4) a report will be prepared to identify which

ballots were rejected by the Agilis machine; Request No. 5 and 6) this information will be provided; Request No. 8) this information will be provided after November 20, 2020, however, no estimated date has been provided yet.

With respect to Request No. 6 in Petitioners' October 23, 2020, the information sought is records related to the transport of ballots to or from any Clark County Election Department facility that would demonstrate the dates and times (departure time from one facility and arrival time at destination facility) that ballots were transported, and who transported the ballots. If further clarification is needed for this Request, please advise. Also, for Request No. 8, please provide an estimated date for production of the requested records.

Further, it is our understanding that you are preparing an estimate of copy fees and program fees related to production of the above, and will provide our office with the same. If you have a different understanding of the information that is to be produced, please contact the undersigned immediately so that the parties can schedule a meet and confer conference as ordered by the Court.

Sincerely,

LEE, LANDRUM & CARLSON, APC

/s/ David S. Lee, Esq.