



**OFFICE OF THE
SECRETARY OF STATE**

April 21, 2021

NevadaGOP.org
press@nevadagop.org

via Email

Re: Elections Integrity Violation Reports

On March 4, 2021, members of the Nevada GOP (“NVGOP”) delivered four boxes to the Capitol building in Carson City. After applying security protocols, the Capitol Police delivered the four boxes to the Office of the Secretary of State. Over the following weeks, the elections staff inventoried and labeled the boxes and their contents and investigated the accompanying allegations of voter fraud. This consumed more than 125 hours of staff time.

Although the NVGOP’s initial reports indicated that there were 122,918 records to support the accompanying allegations, the agency inventory identified 3,963 unique Elections Integrity Violation Reports (EIVRs). The larger figure provided by the NVGOP encompasses the individual line items on the spreadsheets that accompanied each of the EIVRs. Ultimately 3,963 unique EIVRs were counted along with 3 business cards and 1 USB drive. Our investigation into these documents revealed that some incidents were already under investigation. These involved discrete, readily verifiable events. However, most of the complaints related to voter registration records that the NVGOP deemed to be inaccurate or suspicious for a variety of reasons.

For example, the EIVRs contained the following allegations among others: 1) that 16,953 voters were registered at commercial addresses or fictitious addresses; 2) that 2,479 voters apparently relocated to another state or foreign country during the 30-day period preceding the November 3 election; 3) that 42,284 voters cast more than one ballot in the November 3 election; and 4) that 1,506 votes were cast in the names of persons who are deceased. Our investigation revealed that these allegations and others are based largely upon an incomplete assessment of voter registration records and lack of information concerning the processes by which these records are compiled and maintained.

And while the NVGOP raises policy concerns about the integrity of mail-in voting, automatic voter registration, and same-day voter registration, these concerns do not amount to evidentiary support for the contention that the 2020 general election was plagued by widespread voter fraud. The details of that investigation are explained in the attachment to this letter.

If you have any questions, please contact the Elections Division at (775) 684-5705 or NVElect@sos.nv.gov.

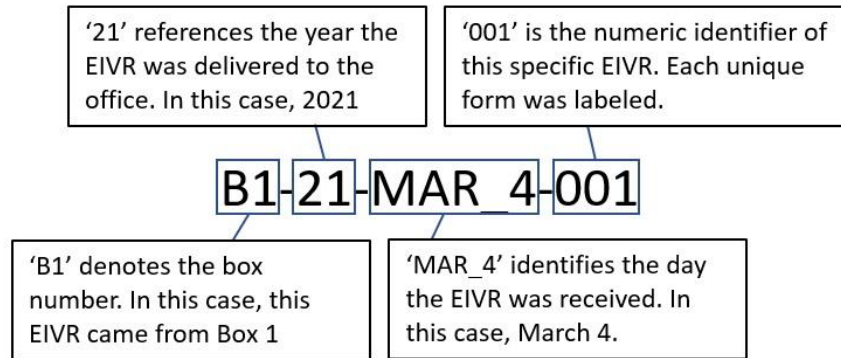
Regards,

Barbara K. Cegavske
Secretary of State

By: Mark Wlaschin
Mark Wlaschin, Deputy Secretary for Elections

Detailed Summary:

Upon receipt of the four boxes of information on March 4, 2021, the contents were first inventoried and labeled in order to ensure that each received appropriate attention. The following labeling system was employed for every Elections Integrity Violation Report (EIVR):



Once labeled, the EIVRs were investigated according to the nature of the allegation. Some EIVRs alleged issues with voter list maintenance; others alleged voter fraud or non-compliance with federal or state laws. Each EIVR was researched individually which involved coordination between employees of the Office of the Secretary of State, county elections officials, and applicable law enforcement agencies. The allegations in each EIVR were addressed as follows:

B1-21-MAR 4-001: This EIVR identified 16 individuals on the Statewide Voter Registration List (SVRL) that have no first name listed and a last name identified as the word: 'Resident'. We ran a separate set of queries on the Statewide Voter Registration List (SVRL) to identify any additional individuals with a similar set of values including, for example, a first name of 'Resident'. A total of 57 registered voters were identified that had either no first name and a last name of 'Resident' or that lacked a first name in the SVRL. Of the 57 individuals, 22 had vote history from the 2020 general election. The investigation revealed that these symbols and the use of the name 'Resident' were placeholders used by county officials when the handwritten documents provided by registering voters were illegible. These placeholders enabled the clerks to rapidly identify the voters who needed to be contacted so that they could follow up and request additional information. This information was provided to the county clerks in order to facilitate further list maintenance and to affect the correction of the records. The individuals with vote history whose records were identified as lacking a first or last name in the Statewide Voter Registration List (SVRL) had complete records on the applicable county voter registration list.

B1-21-MAR 4-002: This EIVR alleged that members of the Nevada Native Vote Project violated 18 U.S.C. § 597 and NRS 293.700. This alleged violation is currently under investigation by law enforcement.

B1-21-MAR 4-003: This EIVR alleged that 3,987 individuals who may not be citizens cast a ballot during the 2020 general election. This concern was originally communicated to the office on December 1, 2020 and, even though the NVGOP did not provide data or evidence until March 4, 2021, the Secretary of State took the following actions:

The Elections Deputy requested from the Nevada Department of Motor Vehicles (DMV) a spreadsheet of individuals who presented an immigration document while obtaining a drivers' license over the last 5 years, specifically including 'Date of Birth', 'Last 4 SSN', and 'Drivers' License numbers' along with all other publicly available information for all individuals in an encrypted email or spreadsheet. The requested information was provided to the Office of the Secretary of State by the DMV via an encrypted server on December 2, 2020. The list included a total of 110,163 individuals. Of that total, 5,320 were identified as active registered voters. This represents less than 5% of all documented immigrants who obtained drivers' licenses and identification cards from the DMV. Based on the Statewide Voter Registration List, we determined that 4,057 of those active registered voters had a vote history from the 2020 general election.

Public records show that 40,676 documented immigrants were naturalized between 2015 and 2019. On average, almost three years had passed between the date of each registered voter's DMV transaction and the November 3 election. Given the large number of naturalizations that occur on an annual basis in Nevada, the data suggests that many voters were likely naturalized between the date of the DMV transaction and the election. Alternatively, it is possible that some voters had already been naturalized as the date of the DMV transaction but were still in possession of their immigration documents. Regardless, there is no federal data base that can be accessed for the purpose of evaluating bulk data relative to current immigration status. Furthermore, the U.S. Supreme Court, as well as U.S. Courts of Appeal in the Ninth Circuit and elsewhere, have ruled that election officials cannot lawfully require documentary proof of citizenship as a condition of voter registration. Nevada law is consistent with federal law in this regard.

Therefore, as federal and state law currently stands, a person's affirmation is sufficient to establish U.S. citizenship for purposes of voter registration. Without specific evidence to establish that identified individuals were foreign nationals when they voted in the November 3 election, there is nothing further that can be investigated. In summary, the generalized information acquired from DMV cannot serve as a basis for an investigation into alleged voter fraud.

B1-21-MAR 4-004: This EIVR alleged voter fraud from 2,479 Nevada voters. The allegation relates to individuals who filed permanent change of address notifications with the US Post Office (USPS), but were still shown as being mailed ballots during the 2020 election. The EIVR alleged that all 2,479 of these voters requested a change of address more than the 30-day days before the election, suggesting that they did not meet the voter residency requirement identified in NRS 293.485:

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.
2. This section does not exclude the registration of eligible persons whose 18th birthday or the date of whose completion of the required residence occurs on or before the next succeeding:
 - (a) Primary election;

- (b) Primary city election;
- (c) General election;
- (d) General city election; or
- (e) Any other election.

(Added to NRS by [1960, 271](#); A [1961, 295](#); [1967, 851](#); [1971, 1267](#); [1973, 27](#); [1987, 355](#); [1995, 2630](#))

There are several reasons that an individual may have requested a change of address through the USPS while retaining their original Nevada voter registration address. An individual may have moved out of state temporarily, purchased a second home or apartment, or simply chosen to have their non-elections mail forwarded to a different location. Many of the individuals on this list moved to cities and towns adjacent to military bases, likely on military orders, or to “college towns” potentially to continue their education. While 1,892 of the 2,479 individuals on the list do have vote history from the 2020 general election, it is probable that many of these voters were Nevada residents during the 30-day period preceding the election. In fact, it is equally probable that many of these voters continue to claim Nevada as their permanent residence even though they are temporarily located outside of the state. Additionally, pursuant to 52 U.S.C. § 10502 and NRS 298.250, a voter need not meet a durational residency requirement of state law when voting for the office of the President and Vice President. Given these considerations, it is not cost-effective to expend additional resources to verify the Nevada-residency status of each of the 1,892 voters in question who cast their votes by mail. Although this particular complaint highlights the ways in which mail-in voting can make it easier for people to skirt durational residency requirements, it does not warrant further investigation absent particularized allegations and detailed evidence of voter fraud.

B1-21-MAR 4-005: This EIVR identified 1,506 Nevada voters who allegedly voted by mail in the 2020 general election, but who were also allegedly listed as deceased by the Social Security Administration (SSA) Master Death File, Consumer Data Vendors, Public Obituary Data Matches, and Credit Bureau Deceased Data Information. We contacted the Office of Vital Statistics on March 18, 2021 to validate that the alleged dates of death were accurate to see if the individuals were deceased. The Office of Vital Statistics reported that only 10 of the 1,506 records were identified as being deceased according to their records. This immediately raised questions about the quality of the information that spurred this allegation. The Office of Vital Statistics receives their information directly from sources who have first-hand knowledge of an individual dying. When a person dies, a funeral home will create the record. Once the record is created they work with a medical certifier, physician, coroner, etc. to ensure the information is accurate. When the record is completed, Vital Statistics Registrars review it for completeness and accuracy. If it is in order, they register the record and a death certificate can be provided relating to that record. Vital Statistics then sends data to the Social Security Administration, National Center for Health Statistics (Part of the CDC), and other various state agencies including the Office of the Secretary of State. The Office of Vital Statistics does not work with the Credit Bureau and the only consumer agency they liaise with is Consumer Product Safety. Of the 1,506 individuals identified, 1,473 of them did have vote history from the 2020 general election, but only 10 appeared questionable. The cases regarding these 10 individuals were referred for investigation by appropriate law enforcement.

B1-21-MAR 4-006: This EIVR claimed to provide a list of 42,284 individuals who allegedly voted twice during the 2020 general election. More accurately, this list alleges that 21,142 individuals may have voted twice during the 2020 general election (21,142 x 2 votes each = 42,284 allegations). First, we compared the list to our Statewide Voter Registration List to confirm how many had actually cast a ballot during the 2020 general election. Through this process we identified that 2,828 of the “double voters” cast one ballot during the 2020 general election. This indicates that the issue may have merely been a duplicate registration or other data entry error. The information on these 2,828 individuals has been provided to the county clerks in order to confirm that the error has been addressed.

For the remaining 18,314 alleged double voters, we started by comparing them to the Multiple Votes Cast report. The Multiple Votes Cast report is a special query that is conducted after each election. This query examines all Nevada voter histories to determine who has cast more than one ballot during an election. This report is possible because every single ballot that is counted is attributed to an individual in their voter history, thus eliminating the possibility of “ballot box stuffing” where additional registered voters are improperly created and then illegal ballots are cast. The Multiple Votes Cast report identifies those records of voters whose vote history needed to be reconciled by the county clerks. Immediately following the 2020 general election, the office identified 1,778 voter records that required reconciliation by the clerks and registrars. Of these 1,778 voter records, only 10 were identified as warranting further investigation and have been already referred to appropriate law enforcement.

To confirm the validity of the allegations of this EIVR, we compared the 1,778 voter records and determined that none of these voters were listed on the spreadsheet delivered to the Office of the Secretary of State on March 4, 2021. This is due to the high level of detail in the Personally Identifiable Information that the Office of the Secretary of State uses (and that is not publicly accessible) to identify duplicates and the immediate nature of their reconciliation.

Regarding the remainder of the alleged “double voters,” there is a significantly lower chance that the alleged violation occurred due to the nature of the data comparison. While the first lines of data identified individuals who had matching birthdates, addresses, and similar names (e.g., Edward vs. Edwin), the remaining 18,314 pairs of individuals have distinct differences in their names, addresses, birthdates, and other information suggesting that they are not the same person. For example, many of the individuals seem to have been matched on such minimal information as “birth year” and “street address” so there are a number of alleged “double voters” who merely live on the same street as someone else born in the same year. As such, these additional 18,314 allegations did not warrant further investigation.

B2-21-MAR 4-001: This EIVR called into question the legitimacy of registrations updated by Federal Post Card Applications (FPCA). The [FPCA form](#) is intended for use by absent Uniformed Service members, their families, and citizens residing outside the United States. It is used to register to vote, request an absentee ballot, and update voter contact information. This EIVR attempts to call into question all 352 individual records in Clark County that were created or updated using an FPCA form. Of note, 345 of the 352 individuals listed have vote history from the 2020 general election. This EIVR states:

During post-election investigation [sic], a number of Nevada voters used the Federal Post Card system to update their voter registration. While the vast majority of these are likely legitimate military changes, some were flagged **as their age put them in a group that could not be active-duty military** [emphasis added]. Given these flagged issues, it calls all registrants via this method into question. It is requested that the Secretary of State investigate this list, determine which voters used this for intra/inter county registration changes (which should not be FPC updates), and why these were processed at all if they were not an active-duty military/overseas change of address.

While the EIVR states that some of the individuals on this list were of “...an age that could not be active duty military”, there is no age limitation on citizens who chose to live overseas. Additionally, as the form itself states [here](#), the FPCA is intended for contact information adjustments. This would include an update from a service member whose spouse moves from one Nevada county to another while their loved one is forward deployed as part of our nation’s defense. As such, there is no discernable information in this complaint nor the accompanying spreadsheet that identifies an improper use of the FPCA form or indicated anything worthy of investigation.

B2-21-MAR 4-002: This EIVR alleged that 8,842 Nevada voters have a commercial address on file as their registration address. The information provided in the attached spreadsheet did not have a specific date indicating when it was captured. This is important because of the continuous nature of voter list maintenance. Many of the records on this sheet could have been corrected or removed by county clerks after this document was created. Of note, 8,356 of the 8,842 voters identified on the spreadsheet have a confirmed vote history from the 2020 general election. More importantly, under NRS 293.507, a voter may register to vote using a commercial address if the applicant resides there:

NRS 293.507 Applications: Forms; distribution; contents; requirements regarding identification and residence; use of affidavits and identification numbers under certain circumstances; regulations.

1. The Secretary of State shall prescribe:
 - (a) Standard forms for applications to preregister or register to vote;
 - (b) Special forms for preregistration and registration to be used in a county where registrations are performed and records of registration are kept by computer; and
 - (c) A standard form for the affidavit described in subsection 5.
2. The county clerks shall provide forms for applications to preregister or register to vote to field registrars in the form and number prescribed by the Secretary of State.
3. Each form for an application to preregister or register to vote must include a:
 - (a) Unique control number assigned by the Secretary of State; and
 - (b) Receipt which:
 - (1) Includes a space for a person assisting an applicant in completing the form to enter the person’s name; and
 - (2) May be retained by the applicant upon completion of the form.
4. The form for an application to preregister or register to vote must include:
 - (a) A line for use by the applicant to enter:
 - (1) The number indicated on the applicant’s current and valid driver’s license issued by the Department of Motor Vehicles, if the applicant has such a driver’s license;
 - (2) The last four digits of the applicant’s social security number, if the applicant does not have a driver’s license issued by the Department of Motor Vehicles and does have a social security number; or
 - (3) The number issued to the applicant pursuant to subsection 5, if the applicant does not have a current and valid driver’s license issued by the Department of Motor Vehicles or a social security number.
 - (b) A line on which to enter the address at which the applicant actually resides, as set forth in [NRS 293.486](#).

(c) A notice that the applicant may not list a business as the address required pursuant to paragraph (b) unless the applicant actually resides there.

(d) A line on which to enter an address at which the applicant may receive mail, including, without limitation, a post office box or general delivery.

5. If an applicant does not have the identification set forth in subparagraph (1) or (2) of paragraph (a) of subsection 4, the applicant shall sign an affidavit stating that he or she does not have a current and valid driver's license issued by the Department of Motor Vehicles or a social security number. Upon receipt of the affidavit, the county clerk shall issue an identification number to the applicant which must be the same number as the unique identifier assigned to the applicant for purposes of the statewide voter registration list.

6. The Secretary of State shall adopt regulations to carry out the provisions of subsections 3, 4 and 5.

(Added to NRS by [1960, 273](#); [A 1975, 942](#); [1985, 561](#); [1993, 2191](#); [1995, 2271](#); [1999, 947](#); [2001, 2596](#), [2952](#); [2003, 2179](#); [2005, 1437](#); [2007, 2602](#); [2017, 3854](#))

Additionally, while it is not legal to use a commercial address when registering to vote, this alone is not indicative of fraud, but more often reflects a lack of awareness of the qualified prohibition against using a commercial address. It may also reflect a "key punch" error by the voter. In these cases, the respective clerk or registrar would contact the voter, explain NRS 293.507, and would allow the voter to correct or update their voter registration.

To investigate this allegation against the 8,842 registered voters, we conducted a statistical analysis of the information provided, as the office is not staffed to conduct in-person investigations of 8,842 individual addresses spread across Nevada. The statistical sampling was designed to achieve a 95% certainly level $\pm 5\%$ and reviewed every 24th record for a total of 369 records. Of the 369 records reviewed, each address was entered into an internet search engine and the location reviewed producing the following results:

- 137 are apartment complexes (37%),
- 75 are RV or mobile home parks (20%),
- 36 are hotels with long term rental options (10%),
- 34 are commercial addresses with an attached living space or home-based businesses (9%),
- 18 are houses (5%),
- 11 are rehabilitation facilities (3%),
- 11 are student dorms (3%),
- 11 are retirement communities (3%),
- 9 are assisted living facilities (2%),
- 8 are shelters for women or families (2%),
- 4 are veterans homes (1%),
- 4 are a church or monastery (1%), and
- 2 are medical facilities (<1%).

There were 9 addresses that are possible commercial addresses without an attached living space (2%). This information has been provided to the appropriate clerks and registrars for reconciliation.

B2-21-MAR 4-003: This EIVR alleged that 8,111 Nevada voters registered to vote using a non-existent address. This allegation cites a report by Mr. Jesse Kamzol. Judge Russell of the First Judicial Court of Nevada commented on the information provided by Mr. Kamzol in his 'Order Granting Motion To Dismiss Statement Of Contest' dated December 4, 2020, in which he said:

ii. **Jesse Kamzol**

62. Contestants offered Mr. Kamzol to opine that significant illegal voting occurred in Nevada during the 2020 General Election, based on his analysis of various commercially available databases of voters.

63. The Court questions Mr. Kamzol's methodology because he had little to no information about or supervision over the origins of his data, the manner in which it had been matched, and what the rate of false positives would be. Additionally, there was little or no verification of his numbers. Kamzol Dep. 58:6-11 , 58:15-17, 59:22-24.

Mr. Kamzol's report includes the following accusation:

I reviewed the Washoe County and Clark County voter database files and found 8,111 voters who voted in Nevada but whose registered addresses are physically non-existent, as in, these are vacant lots, apartment numbers that do not exist, and house address numbers that do not exist.

I found 8,111 voters who did not have a Nevada mailing address meeting the postal requirements of a zip+4 location. Of those, 3,262 voted in Nevada by mail, and 4,849 voted in person.

Using CASS (Coding Accuracy Support System) standard marketing software, and utilizing standard address hygiene processing, primarily CASS (Coding Accuracy Support System) marketing software, I was able to identify voters that voted from addresses that the US Postal Service deems mail not reaching its intended recipient because the address is: incorrect, incomplete, illegible, or undeliverable.

4,287 people registered to vote at a non-existent Nevada address voted by mail in Nevada. I believe the correct universe may be larger than what I reviewed given the fact that Clark County refuses to produce its complete list of addresses where ballots were mailed this election cycle.

Regarding the last paragraph, we have confirmed that the Office of the Clark County Registrar will provide the complete list of addresses where mail-in ballots were sent during every election cycle upon request and that it also posts it on its website. The Office of the Secretary of State is now also in possession of this list and can provide it upon request.

The overall nature of this complaint relates to the CASS program used by the USPS. The CASS system does not include every residence across Nevada because it includes only those addresses that have street delivery by the USPS. The CASS system is so limited because **its purpose is to ensure successful street delivery**. According to <https://postalpro.usps.com/certifications/cass>:

Secretary of State. In response to the report, the Clark County Registrar's office sent a mail verification to the voters listed in that report. If the voters did not respond within 33 days (allowing 3 days for mailing and 30 days for a response), then the voters' registrations were changed from "active" to "inactive". On August 5, 2020, the Clark County Registrar's office inactivated the 81,971 voters who did not respond to the mail verification. On August 6, 2020, the Elections Deputy and staff realized that the 90 day "blackout period" (where voter registration list maintenance was prohibited pursuant to the National Voter Registration Act) had begun on August 5, 2020. Recognizing that the voters were inactivated after the blackout period began, and that AB4 prescribed that all active registered voters be sent a mail-in ballot, the Elections Deputy coordinated with the Clark County Registrar of Voters to reactivate all 81,971 voters to ensure they received a mail-in ballot.

It is important to note that the 81,971 voters were not going to be removed from the voter rolls by the intended list maintenance action. Instead, their status was changed from "active" to "inactive" and then returned to active status after the timeline error was discovered. All the voters who were affected by this error were mailed a ballot as prescribed by AB4. Of the 81,971 voters who were changed back to "active," 8,462 have vote history from the 2020 general election. There are any number of reasons why these persons may have a vote history despite having previously been flagged for address verification. For example, they may have updated their addresses via internet or same-day registration, or their addresses may have been correct all along. Further, those persons with a vote history represent a mere 10% of the total. This is consistent with ordinary experience: inactive voters are legally eligible to vote and approximately 32,000 inactive voters cast a ballot in the 2018 primary or general election; a total of approximately 13 percent of all "inactive voters." Because the percentage of persons with vote history is not a statistically significant deviation from the norm, this allegation does not warrant further investigation.

B2-21-MAR 4-005: This EIVR alleged that some Clark County election workers were directed to accept out-of-state drivers' licenses and identification cards when processing ballots with a "ID required" flags. The EIVR lists 31,643 Nevadans and states that it lists:

...the entire flagged list of ID required voters that voted by mail and requests the Secretary of State verify if Nevada identification documents were used to satisfy the requirement for ballots cast by mail. While this may seem excessive, the information revealed by whistleblowers reveals that the potential contamination by at least 1 vote which was counted despite not meeting Nevada legal requirements.

The crux of this concern, that the Clark County Registrar's office allowed out-of-state ID to be used to complete the voter registration process, is not indicative of voter fraud given the circumstances surrounding the November 3 election. In this regard, the Department of Motor Vehicles did not offer the normal range of services in the months and weeks before the election due to the pandemic. Consequently, many new Nevada residents were unable to obtain Nevada drivers' licenses and identification cards prior to November 3. When similar claims were raised during the 2020 general election, the issues were discussed with the Registrar who discussed these and other concerns with his staff and ensured that the poll workers and others understood the proper procedures for ID verification.

Further, pursuant to NRS 298.259, a new resident to Nevada is not required to meet Nevada's 30-day durational residency requirement to vote in Nevada for the office of President and Vice President. Additionally, the redacted affidavits included with this EIVR were some of the many that Judge Russell reviewed and described in his 'Order Granting Motion To Dismiss Statement Of Contest' dated December 4, 2020 in which he said:

57. Much of Contestants' evidence consists of non-deposition evidence in the form of witness declarations. These declarations fall outside the scope of the contest statute, which provides that election contests "shall be tried and submitted so far as may be possible upon depositions and written or oral argument as the court may order." NRS 293.415. The reason for this is to allow for the cross-examination of the deponent under oath.

58. *These declarations also constitute hearsay, as they are out-of-court statements offered in evidence to prove the truth of the matters asserted. See NRS 51.035, 51.065; Cramer v. State, 126 Nev. 388,392,240 P.3d 8, 11 (2010) ("An affidavit is generally inadmissible hearsay.").* Most of these declarations were self-serving statements of little or no evidentiary value. [emphasis added]

59. The Court nonetheless considers the totality of the evidence provided by Contestants in reaching and ruling upon the merits of their claims.

This EIVR does not merit further investigation because the allegations are not indicative of voter fraud.

B2-21-MAR 4-006: This complaint is a standalone and redacted affidavit. This redacted affidavit was written by an individual claiming to be a licensed attorney in Pennsylvania who served as an election observer from the early voting period through Election Day. This anonymous person alleged malfeasance by the Clark County Registrar of Voters and his staff. The complaints in this affidavit relate to such issues as "ineffective meaningful observation" and procedural issues that have all been discussed with the Clark County Registrar and other clerks. This affidavit was one of the many that Judge Russell reviewed and described in his 'Order Granting Motion To Dismiss Statement Of Contest' dated December 4, 2020 (referenced above). Although they were previously reviewed in a judicial setting, the issues identified in this and other affidavits were closely reviewed for their prospective value. In fact, these and similar issues were raised and discussed during the month of November 2020. Some of the subjects covered will be incorporated into future discussions about possible amendments to regulations and procedures. The goal is to alleviate concerns about process, procedure, and public observation in future elections cycles.

B3-21-MAR 4-001 through B3-21-MAR 4-2116 and B4-21-MAR 4-001 through B4-21-MAR 4-1834 :

These 3,950 EIVRs were the same complaint, but each document had a different voter record printed on it. Further research revealed that these 3,950 EIVRs were all related to a single spreadsheet provided on the USB drive. The USB drive that was included with the four boxes on March 4, 2021 contained a full list which identified 15,170 individuals, but only 3,950 had a printed EIVR associated with it.

Every document claimed that it identified an individual who had an out of state mailing address. Specifically, every one of the EIVRs alleged:

...this complaint addresses a Nevada voter that has an out of state address on file as their mailing address, but has a Nevada registration address. These are voters that returned a mail in ballot in the 2020 election. These were raised in the attached complaints. Please investigate to confirm residency and if each of this [sic] is, in fact, a valid Nevada voter.

Of the full list of 15,170 individuals listed on the spreadsheet, 14,771 had vote history from the 2020 general election. As discussed above, there are reasons why a Nevada-registered voter may permanently or temporarily live out of state, including to attend college or to satisfy military orders. This request to verify the Nevada residency of more than 15,000 individuals is unreasonable, as it is not likely to lead to the discovery of evidence of a crime or a violation of Nevada election law.

B4-21-MAR 4-1835: This complaint is not an EIVR, but is simply the print-out of the full report and allegations by Mr. Kamzol. Mr. Kamzol's report was described earlier in 'B2-21-MAR_4-003. His allegations have been addressed in the paragraphs above.