

Case No. CV1603028
Department No. 2

FILED
2016 MAR 16 PM 2:33
NICHOLE BALDWIN
WHITE PINE COUNTY CLERK
BY [Signature]
DEPUTY

IN THE SEVENTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WHITE PINE

MICHAEL KNEESE

JEAN KNEESE

JED PEELER,

PETITIONERS

vs.

WHITE PINE COUNTY CLERK

RESPONDENT

PETITION UNDER NRS 293.391

1. The Petitioners are residents of the City of Ely and White Pine County and, at all times relevant here, were registered voters in the jurisdiction.
2. The Petitioners each voted in the 2014 White Pine County Republican Primary ("Primary").
3. The Petitioners seek permission to inspect certain Congressional District Four ("CD4") sealed election records of the 2014 White Pine Republican Party Primary.
4. For reasons stated in the attached AFFIDAVITS (Exhibits 1 and 2), the Petitioners each and independently believe that the official results reported for the Primary were not accurate.
5. On information and belief, the Petitioners allege that there was a malfunctioning of some unknown cause of the voting machinery used.
6. Petitioners aver that they have no interest in contesting the primary or general election winner. Nor do they seek any information pertaining to the identity of any voter and their ballot. Petitioner's purpose is limited to identifying any system malfunction or illegal tampering.

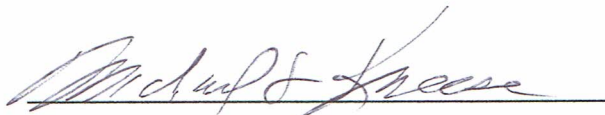
7. The Petitioners seek an Order of this Court pursuant to NRS 293.391(5). Specifically, Petitioners seek to inspect the ballots cast under the supervision of and in cooperation with the White Pine County Clerk.

8. NRS 293.410(2) (f) confers jurisdiction over this Petition where "there was a possible malfunction of any voting or counting device."

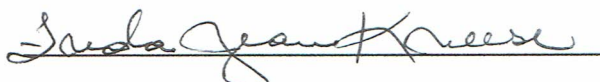
RELIEF SOUGHT

Wherefore, the Petitioners seek an Order from this Court allowing said inspection of the records of the 2014 White Pine County Republican Primary.

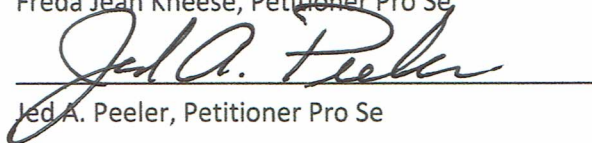
Dated this 15th day of March 2016.



Michael F. Kneese, Petitioner Pro Se



Freda Jean Kneese, Petitioner Pro Se



Jed A. Peeler, Petitioner Pro Se


VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Michael F. Kneese, under penalties of perjury, being first duly sworn, deposes and says:

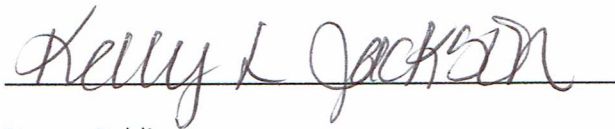
That he is a Petitioner in the above action; that he has read the foregoing PETITION UNDER NRS 293.391 and knows the contents thereof; that the same is true of his own knowledge, except as for those matters stated as upon information and belief, and as to those matters, he believes them to be true.



Michael F. Kneese

Subscribed and Sworn before me

This 13th day of March 2016



Notary Public




VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Freda Jean Kneese, under penalties of perjury, being first duly sworn, deposes and says:

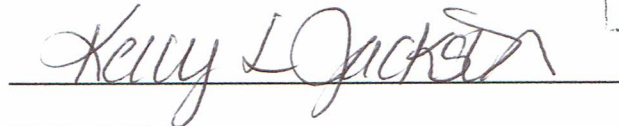
That she is a Petitioner in the above action; that she has read the foregoing PETITION UNDER NRS 293.391 and knows the contents thereof; that the same is true of her own knowledge, except as for those matters stated as upon information and belief, and as to those matters, she believes them to be true.



Freda Jean Kneese

Subscribed and Sworn before me

This 13th day of March 2016



Notary Public

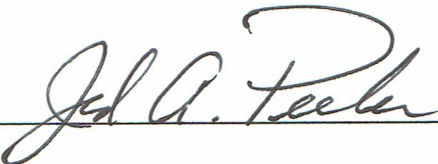
VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Jed A. Peeler, under penalties of perjury, being first duly sworn, deposes and says:

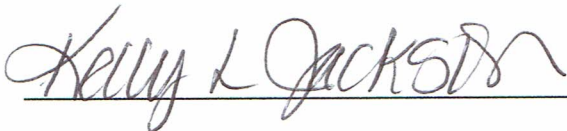
That he is a Petitioner in the above action; that he has read the foregoing PETITION UNDER NRS 293.391 and knows the contents thereof; that the same is true of his own knowledge, except as for those matters stated as upon information and belief, and as to those matters, he believes them to be true.



Jed A. Peeler

Subscribed and Sworn before me

This 13th day of March 2016



Notary Public



I will fix the spacing following your examples.

Need three affidavits, clear and brief.

Case No. _____

Department No. _____

IN THE SEVENTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WHITE PINE

MICHAEL KNEESE

JEAN KNEESE

JED PEELER,

PETITIONERS

vs.

WHITE PINE COUNTY CLERK

RESPONDENT

AFFIDAVIT IN SUPPORT OF PETITION UNDER NRS 293.391

I, the below signed affiant, state as follows in support of my petition under NRS 203.391:

1. I am a resident of White Pine County, a registered voter in the County reflecting my choice of party as Republican, and did vote in the 2014 Republican Primary election.
2. I believe that an improper number of votes were reported for Mike Monroe in the official results of the primary election.
3. The reported number of total votes in the Primary election ballots was 764. The reported number of votes for Mike Monroe was 259.
4. These results seem inaccurate to me based on pre-ballot polling and post-ballot investigations.
5. Pre-ballot (polling or sampling in the report)
6. Post ballot (phone survey or sampling in the report)

7. For these reasons, I believe there was a failure of the voting machine to accurately records votes actually cast and that, given such an apparent mechanical failure, the Nevada Revised Statute permits application for inspection of the ballots cast, and I seek that from the Court.

VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Michael F. Kneese, under penalties of perjury, being first duly sworn, deposes and says:

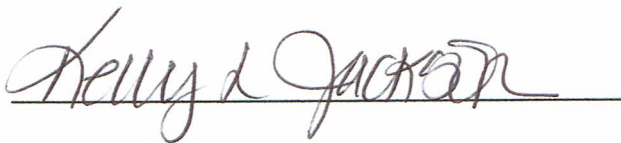
That he is a Petitioner in the above action; that he has read the foregoing PETITION UNDER NRS 293.391 and knows the contents thereof; that the same is true of his own knowledge, except as for those matters stated as upon information and belief, and as to those matters, he believes them to be true.



Michael F. Kneese

Subscribed and Sworn before me

This 16th day of March, 2016



VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Freda Jean Kneese, under penalties of perjury, being first duly sworn, deposes and says:

That she is a Petitioner in the above action; that she has read the foregoing PETITION UNDER NRS 293.391 and knows the contents thereof; that the same is true of her own knowledge, except as for those matters stated as upon information and belief, and as to those matters, she believes them to be true.

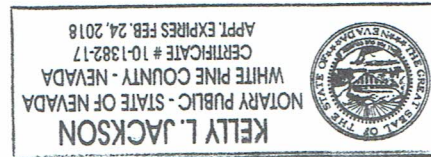
Freda Jean Kneese

Freda Jean Kneese

Subscribed and Sworn before me

This 16th day of March, 2016

Kelly L Jackson



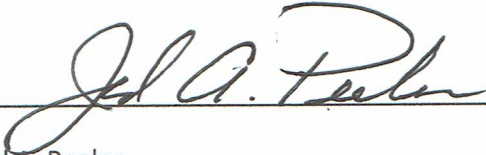
VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Jed A. Peeler, under penalties of perjury, being first duly sworn, deposes and says:

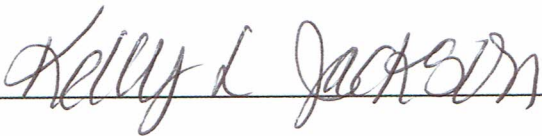
That he is a Petitioner in the above action; that he has read the foregoing PETITION UNDER NRS 293.391 and knows the contents thereof; that the same is true of his own knowledge, except as for those matters stated as upon information and belief, and as to those matters, he believes them to be true.



Jed A. Peeler

Subscribed and Sworn before me

This 14 day of March, 2016





Case No. _____

Department No. _____

IN THE SEVENTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WHITE PINE

MICHAEL F. KNEESE

FREDA JEAN KNEESE

JED A. PEELER,

PETITIONERS

CERTIFICATE OF SERVICE

Vs.

WHITE PINE COUNTY CLERK

RESPONDENT

I certify that I am a party to this action and that on this 16 day of March 2016, I served a copy of the attached PETITION UNDER NRS 293.391 on the following as noted below.

Nichole Baldwin, White Pine County Clerk, by hand delivery to her office at 501 Clark Street, Ely, Nevada,

Michael Wheable, White Pine County District Attorney, by hand delivery to his office at 501 Clark Street, Ely, Nevada, and

Barbara Cegavske, Nevada Secretary of State, by USPS Certified mail, to 101. N Carson Street, Suite 3, Carson City, NV 89701.



Freda Jean Kneese, Petitioner Pro Se

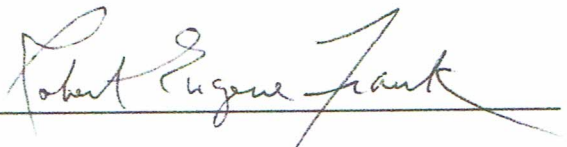
VERIFICATION

STATE OF NEVADA

COUNTY OF WHITE PINE

Colonel Robert Eugene Frank, USAF (Ret.) under penalties of perjury, being first duly sworn, deposes and says:

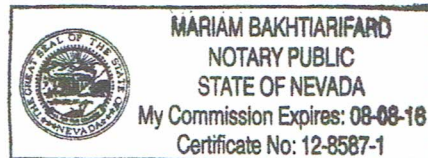
That he is the Chairman of the Citizen Task Force for Voter Rights (CTFVR) organization, who under the direction of the foregoing PETITION members researched, prepared and provided technical and document services support to the Petitioners; that he and his CTFVR organization members have prepared all of the Exhibits attached, knows the contents thereof, and believes them to be true.



Colonel Robert Eugene Frank, USAF (Ret.)
2374 Sandstone Cliffs Drive, Henderson, NV 89044

Subscribed and Sworn before me

This 14 day of March, 2016



Notary Public