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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
RENO DIVISION**

JEANNETTE PORRAZZO,

Plaintiff,

v.

WORLD PROPERTIES, INC.; ST. JAMES'S VILLAGE, INC.; WASHOE COUNTY; CLARA ANDRIOLA, MARILUZ GARCIA, and ALEXIS HILL, in their official capacities as Washoe County Commissioners; JENNIFER L. CARR, in her official capacity as Administrator of the Nevada Division of Environmental Protection; JOE CACIOPPO, in his official capacity as Nevada State Engineer and Administrator of the Nevada Division of Water Resources; and DOES I-100,

Defendants.

Case No. 3:26-cv-00006-ART-CLB

**FIRST AMENDED
COMPLAINT FOR DECLARATORY,
INJUNCTIVE, AND INDIVIDUAL
RELIEF**

- 1. 42 U.S.C. Section 1983**
- 2. Prospective official-capacity relief**
- 3. Nevada private nuisance**

**JURY TRIAL DEMANDED ON
TRIABLE ISSUES**

Plaintiff Jeannette Porrazzo, appearing pro se and only on her own behalf, alleges as follows:

INTRODUCTION

- 1. This First Amended Complaint is filed in response to the Court's March 20, 2026 Order. The Court construed this case as an individual action, held that the original complaint did not adequately allege Plaintiff's own injury, and granted leave to amend because amendment was not futile. (ECF No. 20 at 3-5, 7.)**

2. Plaintiff sues only for herself. She does not represent a class, the Stop Sierra Reflections for Good Coalition, any coalition member, any neighbor, any Tribe, or any other person or entity. Her role as coalition founder and leader appears only as background explaining her own good-faith petitioning and motivation. (Ex. S-1, source PDF pp. 1, 4-5, Sections I, V.)
3. Plaintiff is a Native American descendant and considers herself a conservationist and preservationist. Those are personal identity facts, not assertions of tribal enrollment, tribal citizenship, authority to speak for a Tribe, professional credentials, representative standing, or a separate protected-class claim. (Ex. S-1, source PDF p. 1, Section I.)
4. Plaintiff's family home has been in Washoe Valley since approximately 1980 and remains her permanent address. She has a personal financial investment and expected inheritance interest in the family property and intends to continue using, occupying, returning to, and enjoying the home and surrounding valley. (Ex. S-1, source PDF pp. 1-2, Sections I-II.)
5. The challenged Sierra Reflections project is a proposed 940-lot subdivision on approximately 759.7 acres. Official County records describe approximately 3.6 million cubic yards of excavation, 625,000 cubic yards of fill, water use greater than 625 acre-feet per year, sewage use greater than 187,500 gallons per day, and more than 6,250 average daily trips. (Ex. G-1, source PDF p. 1; Ex. G-2, source PDF pp. 1-2.)
6. The applicant's September 2025 Draft Remedial Action Plan reports mercury, arsenic, and lead impacts in portions of the project site and proposes excavation, relocation, beneficial reuse, and capping of impacted soil. The plan states that portions of the site, including Steamboat Creek and the former mill location, lie within the Carson River Mercury Superfund Site. (Ex. E-12, source PDF pp. 5-12 (RAP pp. 1-8), Sections 1.0-6.5.)

7. Plaintiff does not allege that every acre is uniformly contaminated, that project well depth alone proves drawdown, that the unbuilt project caused her existing medical result, that the military-proximity evidence proves a covered foreign transaction, or that general scientific literature proves project-specific causation. She alleges defined pathways requiring evidence, safeguards, and preventive review before irreversible implementation. (Ex. S-1, source PDF pp. 3-6, Sections III-VII.)
8. Plaintiff seeks a tailored remedy directed to mass grading, impacted-soil handling, creek-crossing work, project groundwater production, and related implementation until final protective plans and project-specific safeguards are complete, reviewable, and enforceable. She does not seek adjudication of tribal title, compulsory transfer of privately owned or State land, a statewide class remedy, or an order requiring filtration systems for nonparties. Washoe stewardship of conserved land remains a desired voluntary settlement outcome only if the Tribe and every legally necessary owner and governmental actor consent.
9. The amended pleading preserves the original action's central transaction: decades of County entitlements and extensions culminating in the current Sierra Reflections approval, the project's documented contamination and water demands, and Plaintiff's request to prevent individualized harm to her home, groundwater-related interests, health, finances, and use of Washoe Valley.

JURISDICTION AND VENUE

10. This Court has federal-question jurisdiction under 28 U.S.C. Sections 1331 and 1343 because Counts I and II arise under 42 U.S.C. Section 1983 and the Fourteenth Amendment. Section 1983 supplies a cause of action against a person acting under color of state law who causes the deprivation of a federal right. *West v. Atkins*, 487 U.S. 42, 48 (1988).

11. The Court has supplemental jurisdiction over the Nevada-law claim in Count III under 28 U.S.C. Section 1367(a) because it forms part of the same case or controversy.
12. The Declaratory Judgment Act, 28 U.S.C. Sections 2201-2202, supplies a remedy for an otherwise justiciable controversy; it is not pleaded as an independent source of jurisdiction.
13. Venue is proper under 28 U.S.C. Section 1391(b) because the challenged governmental decision and the land, water, proposed project, and threatened injuries are in Washoe County, Nevada, within this District.
14. Jennifer L. Carr and Joe Cacioppo are sued only in their current official capacities and only for prospective relief concerning an alleged ongoing or threatened federal constitutional violation within their present enforcement authority. Plaintiff seeks no damages from them, no retrospective award payable by the State, and no order compelling compliance with state law as such. See *Ex parte Young*, 209 U.S. 123, 159-60 (1908); *Verizon Md. Inc. v. Public Serv. Comm'n of Md.*, 535 U.S. 635, 645 (2002).
15. The State of Nevada and its agencies are not separately named as defendants. Plaintiff acknowledges that an official-capacity label does not itself overcome sovereign immunity; that a present enforcement connection and an ongoing federal violation must be pleaded and proved; and that a federal court may not order state officials to comply with state law merely by invoking supplemental jurisdiction. *Pennhurst State Sch. & Hosp. v. Halderman*, 465 U.S. 89, 106, 121 (1984).
16. This FAC does not plead a citizen-suit cause under NRS 41.540-.570. No NRS 41.540 written notice preceded commencement of this action on January 2, 2026. Plaintiff preserves any properly noticed claim for a procedurally proper later action or amendment but does not ask this Court to disregard the statute's notice language.

PARTIES

- 17.** Plaintiff Jeannette Porrazzo is an individual whose permanent home address is in Washoe Valley. She has longstanding personal, financial, recreational, aesthetic, health, and water-related connections to the family property and affected valley. (Ex. S-1, source PDF pp. 1-4, Sections I-IV.)
- 18.** Defendant World Properties, Inc. is identified in official County records as the applicant, appellant, and owner of the approximately 759.7-acre Sierra Reflections project site. (Ex. G-1, source PDF pp. 1-2; Ex. G-2, source PDF pp. 1-2, 17.)
- 19.** Defendant St. James's Village, Inc. was added by the Court on Plaintiff's motion. (ECF Nos. 9, 20 at 7.) On information and belief, it owns or controls parcels or infrastructure interests adjoining or functionally connected to the project. It is liable only to the extent evidence proves its own control, authorization, or participation in conduct giving rise to a viable claim.
- 20.** Defendant Washoe County is a Nevada political subdivision. It acted through successive Boards, Planning Commissioners, planners, and departments in the documented project history and through its current Board as final decisionmaker on World Properties' appeal. Plaintiff seeks to attribute official final decisions and institutional conduct to the County, not to impose liability on every person who once worked for it.
- 21.** Defendant Clara Andriola is sued only in her official capacity as a current Washoe County Commissioner responsible for implementation and prospective relief concerning the Board's March 10, 2026 approval. Plaintiff alleges that she voted to reverse the Planning Commission's denial.
- 22.** Defendant Mariluz Garcia is sued only in her official capacity as a current Washoe County Commissioner responsible for implementation and prospective relief concerning the Board's March 10, 2026 approval. Plaintiff alleges that she voted to reverse the Planning Commission's denial.

23. Defendant Alexis Hill is sued only in her official capacity as a current Washoe County Commissioner responsible for implementation and prospective relief concerning the Board's March 10, 2026 approval. Plaintiff alleges that she voted to reverse the Planning Commission's denial.
24. The official-capacity claims against Andriola, Garcia, and Hill are prospective and coextensive with the claim against Washoe County. Plaintiff seeks no damages from them individually and pleads no claim based solely on legislative speech or a vote protected by absolute legislative immunity.
25. Defendant Jennifer L. Carr is sued only in her official capacity as the current Administrator of the Nevada Division of Environmental Protection (NDEP). The Draft RAP identifies NDEP direction regarding site action levels and states that, per discussion with NDEP, no additional mercury-soil sampling would be required for well installation under the RAP. NDEP also has an implementation role in Carson River Mercury Superfund Site institutional controls. (Ex. E-12, source PDF pp. 9, 12 (RAP pp. 5, 8), Sections 5.0, 6.4; Ex. E-78, source PDF pp. 17, 24, 26, 39-40.)
26. Defendant Joe Cacioppo is sued only in his official capacity as the current Nevada State Engineer and Administrator of the Nevada Division of Water Resources (NDWR). The administrative record states that a proposed interbasin transfer would require State Engineer approval and records the applicant's representation that the State Engineer would not approve project wells if other wells would be affected. (Ex. G-31, source PDF pp. 14, 18.)
27. DOES I-100 are presently unknown persons or entities that may directly own, control, authorize, design, finance, grade, excavate, transport impacted soil, construct project infrastructure, install or operate project wells, or conduct other implementation acts alleged here. Plaintiff will seek leave to substitute a true name only after evidence identifies a proper party and viable claim.

28. The Doe designations do not include Linda or Lynda Bell, Terry Bell, Commissioners Michael Clark or Jeanne Herman, any Planning Commissioner who voted to deny Sierra Reflections, any coalition member, or any official whom authenticated records show consistently opposed the project. Those persons are nonparties and potential witnesses.
29. Former County commissioners, planners, employees, and advisory participants are not named merely because they previously held office. Their documented official acts may supply notice, history, policy, final-decision, or causation evidence against Washoe County, but a former official cannot be sued in an official capacity and no personal claim is pleaded without a specific timely, non-immune act tied to a viable cause of action.

THE COURT'S ORDER AND THE LIMITED SCOPE OF THIS FAC

30. The original complaint attempted to invoke injuries and rights belonging to proposed classes, a Tribe, coalition members, neighbors, and other persons. The Court held that a pro se plaintiff cannot represent others and that the original pleading did not allege how Plaintiff individually would be harmed. (ECF No. 20 at 3-5.)
31. The Court noted that Plaintiff's objection described her as a long-term Washoe Valley resident and property owner relying on groundwater, but those allegations were not in the original complaint. The Court granted leave to amend because amendment was not futile. (ECF No. 20 at 4-5.)
32. This FAC therefore alleges Plaintiff's own injury, traceability, and redressability; removes class, organizational, purported tribal-representation, and third-party claims; narrows the defendant groups; and retains the original Sierra Reflections approval, contamination, water, fire, health, and preventive-relief transaction.
33. This FAC does not plead standalone causes under NAGPRA, ARPA, NEPA, CERCLA, RCRA, the Clean Water Act, the Endangered Species Act, the Indian

Nonintercourse Act, or 31 C.F.R. Part 802. Those authorities and records are used only for context where relevant unless all elements, jurisdictional facts, and pre-suit requirements are later established.

34. Plaintiff relies on personal knowledge where stated, official records, the applicant's Draft RAP, and reasonable inferences. Technical causation must be established through authenticated records and qualified evidence. Plaintiff does not present herself as a hydrologist, toxicologist, physician, geologist, archaeologist, appraiser, meteorologist, fire engineer, or military-security expert. (Ex. S-1, source PDF p. 6, Section VII.)
35. Plaintiff's coalition leadership and public participation are background only. No anti-SLAPP claim is pleaded. Plaintiff does not waive any defense or protection that may apply to truthful or good-faith petitioning under the First Amendment or NRS 41.635-.670.

EIGHT-PILLAR FACTUAL ALLEGATIONS

PILLAR S - STANDING AND INDIVIDUAL INJURY

36. Plaintiff's connection to Washoe Valley predates this litigation by decades. Her family home has been there since approximately 1980, remains her permanent address, and is tied to her personal financial investment and expected inheritance. (Ex. S-1, source PDF pp. 1-2, Section I.)
37. Temporary absences for work, medical care, travel, or other personal reasons do not reflect abandonment. Plaintiff intends to continue living in, returning to, occupying, and using the home and surrounding valley. (Ex. S-1, source PDF pp. 1-2, Sections I-II.)
38. Plaintiff regularly travels through, observes, uses, and enjoys Washoe Valley and areas associated with Sierra Reflections and St. James's Village, including rural open space, scenic views, habitat, waterways, quiet, roads, and safe access. (Ex. S-1, source PDF p. 2, Section II.)

39. Large-scale grading, contaminated-soil disturbance, dust, traffic, habitat loss, groundwater impairment, and permanent conversion of rural open space would diminish Plaintiff's own use and enjoyment even if others suffer similar harm. (Ex. S-1, source PDF p. 2, Section II.)
40. Groundwater and domestic-well reliability are essential to the habitability and value of rural homes in the area. Plaintiff personally depends upon and has a concrete interest in the groundwater resources supporting the family property. (Ex. S-1, source PDF pp. 2-3, Section III.)
41. If project pumping materially impairs the family property, Plaintiff faces loss of dependable household water, well-deepening or replacement expense, treatment or alternate-water costs, diminished use, and loss of family equity. A later damages award would not fully restore continuity and security of the home. (Ex. S-1, source PDF p. 3, Section III.)
42. Medical testing in or about May and June 2026 reported arsenic in Plaintiff's blood. She does not allege that an unbuilt project caused that result. The result makes prevention of additional or mobilized exposure personally significant. (Ex. S-1, source PDF p. 4, Section IV.)
43. Plaintiff formed the Stop Sierra Reflections for Good Coalition because she feared harm to her own home, water-related interests, health, finances, and use of the affected environment. Her title explains her conduct but is not the source of her standing. (Ex. S-1, source PDF pp. 4-5, Section V.)
44. The January 6, March 10, and June 16, 2026 decisions moved the project materially closer to implementation. Plaintiff has not been provided a complete, independently reviewable package of baseline domestic-well data, final project pumping specifications, aquifer testing, drawdown analysis, final contamination controls, long-term monitoring, and enforceable well-impairment relief. (Ex. S-1, source PDF pp. 5-6, Sections VI-VII.)

45. Plaintiff alleges concrete injury to her own use, health-related interests, home connection, and water security; traceability to the challenged approvals and implementation acts; and redressability through relief stopping or conditioning those acts. See *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560-61 (1992); *Friends of the Earth, Inc. v. Laidlaw Env't Servs. (TOC), Inc.*, 528 U.S. 167, 181-85 (2000).
46. Plaintiff alleges a substantial and sufficiently immediate threat tied to present approvals and defined implementation activities, not a someday intention to encounter an unspecified condition. See *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 158-59 (2014). The precise timing of grading, drilling, or pumping is information substantially controlled by Defendants and may be tested through expedited disclosure.

PILLAR G - GOVERNMENT AND PROJECT APPROVALS

47. Sierra Reflections is proposed in the South Valleys Planning Area west of Old U.S. 395, south of Pagni Lane, between Pleasant Valley and Old Washoe City. County records identify World Properties as applicant, appellant, and owner. (Ex. G-2, source PDF pp. 1-2.)
48. The project includes approximately 940 residential lots, water tanks, two sewer lift stations, and three bridge crossings over sensitive or critical stream-zone buffers for Steamboat Creek and Browns Creek. (Ex. G-1, source PDF pp. 1-2; Ex. G-2, source PDF pp. 1-2.)
49. The County's own history states that in 1984 the St. James Resort/Sierra Reflections property received a conditional special use permit for a 250-room hotel, casino, 550 condominium units, fitness center, and golf course; the permit was amended in 1991. (Ex. G-2, source PDF p. 3.)
50. In 2004, Washoe County initiated and approved land-use changes that allowed residential development, with a reduced maximum of up to 995 units. County

records state that the Galena/Steamboat CAB, Planning Commission, and Board approved or recommended that proposal. (Ex. G-2, source PDF pp. 3-4.)

51. The County record identifies a 2005 sewer special-use-permit process, a May 2, 2006 unanimous Planning Commission approval of a 938-lot tentative map, and June 14, 2006 regional approval. (Ex. G-2, source PDF p. 4; Ex. G-14, source PDF pp. 1-11.)
52. The County record identifies extensions or amended development agreements in 2008, 2010, 2014, and 2020, and a 2016 sanitary sewer dedication agreement requiring project sewer infrastructure connected to the County system. (Ex. G-2, source PDF pp. 4-5; Ex. G-11, source PDF pp. 1-5.)
53. The Board declined a further extension in 2022; final-map submissions were rejected or withdrawn; and the prior project expired on June 22, 2023 when no final map was recorded. (Ex. G-2, source PDF p. 5.)
54. On January 6, 2026, the Planning Commission denied the current tentative-map and special-use-permit applications. Its Action Order states that commissioners could not make required findings concerning consistency, improvements, site suitability, non-detriment, natural resources, services, public health, design, and the type of development. (Ex. G-1, source PDF pp. 1-3; Ex. G-31, source PDF pp. 20-22.)
55. World Properties appealed. The Board could affirm, modify, reverse, remand, or directly grant the applications. County staff recommended approval and concluded that required findings could be made subject to conditions. (Ex. G-2, source PDF pp. 2, 7-17.)
56. On March 10, 2026, the Board reversed the denial by a 3-2 vote and allowed the project to proceed. Plaintiff alleges that Andriola, Garcia, and Hill voted for reversal and that Clark and Herman voted against it. Clark and Herman are nonparty witnesses, not defendants. (Ex. S-1, source PDF p. 5, Section VI.)

57. On June 16, 2026, the regional planning commission approved a conformance determination by a 5-2 vote. Those decisions moved the project materially closer to implementation. (Ex. S-1, source PDF p. 5, Section VI.)
58. The Board was the final County decisionmaker on the appeal. In a July 7, 2026 extension order, this Court recorded World Properties' position that the litigation was stagnating its ability to market the property. (ECF No. 33 at 1:14-18.)
59. Washoe County establishes Citizens Advisory Boards as public forums and advisory bodies. The South Truckee Meadows/Washoe Valley or South Valleys CAB did not possess legal authority to deny Sierra Reflections. The County, not the CAB, retained decision authority.
60. The January 6, 2026 minutes record Lynda Bell raising law-enforcement, emergency-response, fire-evacuation, and Station 32 response-time concerns; stating that Finding B could not be made; and urging denial. Plaintiff treats Bell as a nonparty witness and does not allege that this 2026 testimony supported the project. (Ex. G-31, source PDF pp. 13-14.)
61. Plaintiff alleges that the CAB structure and related public process gave the County repeated notice of community concerns. Any failure of that advisory process to prevent approval is alleged as County notice and institutional history, not as an actionable omission by a CAB that lacked final authority.

PILLAR E - EARTH, CONTAMINATION, CULTURAL, AND ENVIRONMENTAL CONDITIONS

62. In September 2025, UES Professional Solutions prepared a Draft RAP for World Properties to address part of the project containing mercury in soil above stated residential and commercial action levels. The Draft RAP says it will be finalized during the final-map process to include final grading plans. (Ex. E-12, source PDF p. 5 (RAP p. 1), Section 1.0.)

- 63.** The Draft RAP describes a site of approximately 760 acres traversed by Steamboat Creek and Browns Creek. It states that portions, including Steamboat Creek and the former mill location, lie within the Carson River Mercury Superfund Site. (Ex. E-12, source PDF pp. 5-6 (RAP pp. 1-2), Sections 2.1-2.3.)
- 64.** EPA's Fifth Five-Year Review describes the Carson River Mercury Superfund Site as including affected portions of the Carson drainage and Washoe Valley and identifies mercury, arsenic, and lead as Operable Unit 1 soil contaminants of concern. (Ex. E-78, source PDF pp. 2, 9, 12.)
- 65.** Limited 1993 site sampling reported mercury from 9.68 to 117.49 mg/kg in four samples collected from Steamboat Creek banks on the project site. (Ex. E-12, source PDF p. 6 (RAP p. 2), Section 2.3.2.)
- 66.** The 2023 screening event detected mercury in all 43 samples, with 30 above the Draft RAP's stated 7.1 mg/kg residential level and six above its 30 mg/kg commercial level. (Ex. E-12, source PDF p. 7 (RAP p. 3), Section 2.3.4.)
- 67.** The 2024 characterization collected 449 samples. The Draft RAP reports 81 above 7.1 mg/kg and 16 above 30 mg/kg, with meadow samples up to 181 mg/kg and Steamboat Creek bank samples up to 311 mg/kg. (Ex. E-12, source PDF pp. 7-8 (RAP pp. 3-4), Section 2.3.5.)
- 68.** One former-mill sample contained arsenic at 308 mg/kg and lead at 556 mg/kg. The Draft RAP characterizes that affected area as limited and proposes the same mitigation methodology used for mercury-impacted soil. (Ex. E-12, source PDF p. 8 (RAP p. 4), Section 2.3.5.)
- 69.** The Draft RAP also contains limiting evidence: Zone 3 mercury results were below 7.1 mg/kg; Zone 2 impacts were described as sporadic; Zones 2 and 3 were excluded from the RAP; and most arsenic and lead results were described as consistent with regional background. Plaintiff includes rather than conceals that evidence. (Ex. E-12, source PDF p. 8 (RAP p. 4), Section 2.3.5.)

70. The proposed remedy would excavate or cap impacted soil, move meadow soil to beneficial-reuse fill areas, and place at least eight feet of clean material over specified impacted areas. (Ex. E-12, source PDF p. 10 (RAP p. 6), Sections 6.0-6.2.)
71. The contractor-specific materials-handling plan would be developed before mass grading and submitted at least 30 days before grading. (Ex. E-12, source PDF p. 11 (RAP p. 7), Section 6.2.)
72. The Draft RAP assumes soil in open space and the Steamboat Creek avoidance area is contaminated but proposes no specific remediation or cap there. Bridge and utility work would disturb soil and move spoils to beneficial-reuse areas. (Ex. E-12, source PDF p. 11 (RAP p. 7), Section 6.3.)
73. The Draft RAP identifies future wells and tanks in the meadow and states that, per discussion with NDEP, no additional mercury-soil sampling would be required for well installation under the RAP. (Ex. E-12, source PDF pp. 11-12 (RAP pp. 7-8), Section 6.4.)
74. EPA's Fifth Five-Year Review states that institutional controls were finalized in 2018 and identifies implementation and communication gaps, including inconsistent Long-Term Sampling and Response Plan implementation and inadequate state-county communication affecting soil-management coverage. (Ex. E-78, source PDF pp. 17, 20, 24, 26, 46-47, 54.)
75. EPA's 2018 Long-Term Sampling and Response Plan reports that USGS found high mercury in Carson River sediment and water in the early 1970s; that subsequent studies documented mercury and methylmercury in sediment, soil, water, and wildlife; and that the Nevada State Health Division later issued fish-consumption advisories that included white bass from Big and Little Washoe Lakes. (Ex. E-73, source PDF p. 5.)

76. That record supports early institutional knowledge of a regional contamination problem, but it does not by itself prove that any Nevada official knew before Plaintiff's family acquired its home that the specific parcel, domestic well, or household exposure pathway was unsafe; that an individualized warning was legally required; or that a particular former official received parcel-specific information. Plaintiff pleads the history as notice and context, not as a timely damages claim against an unidentified 1980 officeholder.
77. EPA's 2023 site summary states that historic mill sites in Washoe and Pleasant Valleys have mercury contamination; that OU1 includes former mill sites, tailings, and contaminated soils; that arsenic and lead are also of concern; and that EPA and NDEP may sample residential yards within the OU1 footprint. (Ex. E-80, source PDF pp. 1-3.)
78. The Nevada SHPO historical material supports the long cultural association of Washoe people with the valley region. Plaintiff uses that source as cultural context only; it does not establish her authority to assert tribal rights or prove a project-specific burial site. (Ex. E-4, source PDF pp. 1-3.)
79. The County's project presentation reports a Kautz desktop review and a total of 49 archaeological sites within the project boundaries. It also reports Kautz's conclusion that previously identified National Register-eligible resources had been mitigated and that other identified resources required no further consideration. (Ex. G-4, source PDF p. 20.) Plaintiff pleads both the site count and the consultant's limiting conclusion.
80. RSIC's January 6, 2026 letter identifies the project area as a high-use area of its ancestors, states that RSIC had not been contacted or given an opportunity to comment on the project or Kautz review, disputes the conclusion that there were no known resources of concern to local Tribes, and requests monitoring and discovery protections. (Ex. G-28, source PDF pp. 3-5.)

- 81.** County staff proposed conditions requiring a stop at the specific discovery location and immediate notice to the Sheriff, SHPO, and RSIC THPO if a Native American cairn or grave is discovered; non-destruction or removal before notice and NRS 383.170 procedures; SHPO mediation under NRS 383.160(1)(b); tribal-monitor participation; and pre-final-map consultation. (Ex. G-4, source PDF pp. 32-34; Ex. G-28, source PDF pp. 1-5.)
- 82.** NRS 383.160 directs SHPO, in consultation with the closest culturally affiliated Tribe, to endeavor to protect Indian burial sites from excavation, vandalism, and destruction. NRS 383.170 prescribes reporting and consultation after a discovery. NRS 383.190, however, authorizes its civil remedy only to an Indian tribe or enrolled tribal member, imposes a two-year discovery period, and identifies a Nevada county district court as the filing forum. Plaintiff does not allege tribal enrollment or plead a personal NRS 383.190 count.
- 83.** Plaintiff is deeply concerned about alleged trespass and inadequate barriers at dune and burial areas near Big Washoe Lake. The present record does not establish a federal undertaking, a federal defendant, Plaintiff's authority to enforce a Tribe's rights, or a judicial basis to compel transfer of Nevada parkland. Plaintiff therefore does not request that this Court order Nevada to convey Washoe Lake State Park or other State property.
- 84.** Plaintiff seeks project-specific cultural-resource avoidance, qualified monitoring, discovery stop-work measures, confidentiality, temporary protective barriers, security, and consultation only as supported by admissible evidence, the approved project conditions, a viable claim, and the Court's remedial authority. She does not seek adjudication of tribal title or an archaeological survey untethered to a viable cause of action.

PILLAR W - WATER, GROUNDWATER, AND DOMESTIC WELLS

- 85.** County records identify project water demand greater than 625 acre-feet per year and drinking-water infrastructure that includes wells and tanks. (Ex. G-1, source PDF p. 1; Ex. G-2, source PDF pp. 1-2; Ex. E-12, source PDF pp. 11-12.)
- 86.** NDWR's 2022 Pleasant Valley inventory identifies Hydrographic Basin 6-088 as designated, states that denials based on water availability apply to all uses, reports 7,462 acre-feet of committed groundwater resources, and estimates 2,630 acre-feet of pumpage, including 739 acre-feet from domestic wells. (Ex. W-18, source PDF pp. 3-4 (report pp. 1-2).)
- 87.** NDWR's 2022 Washoe Valley inventory identifies Hydrographic Basin 6-089 as designated, reports 13,091 acre-feet of committed groundwater resources, and estimates 6,299 acre-feet of pumpage, including 1,605 acre-feet from domestic wells. (Ex. W-30, source PDF pp. 3-4 (report pp. 1-2).)
- 88.** The NDWR reports describe Pleasant Valley and Washoe Valley as adjacent hydrographic basins connected in the surface-water system through Washoe Lake, Little Washoe Lake, and Steamboat Creek. They do not, by themselves, prove hydraulic connection between any particular project well and Plaintiff's family well. (Ex. W-18, source PDF p. 5 (report p. 3); Ex. W-30, source PDF p. 5 (report p. 3).)
- 89.** Planning Commission minutes record public testimony about basin status, proposed annual demand, possible interbasin transfer, pumping-test drawdown, water temperature, and domestic-well concerns. Those comments show notice and disputed issues; they are not substituted for expert proof. (Ex. G-31, source PDF pp. 14-18.)
- 90.** The minutes record a commissioner asking whether the developer would guarantee funds to deepen existing wells or provide services and record the applicant's response that TMWA and the State Engineer would not approve wells if other area wells would be affected. (Ex. G-31, source PDF p. 18.)

91. County staff reported TMWA's view that long-term negative groundwater effects were not anticipated and that conditions would make adequate water and wastewater facilities available. This is material contrary evidence. (Ex. G-2, source PDF pp. 9-10, 14.)
92. Plaintiff has not received a complete package of final project-well specifications, screened intervals, pumping rates and duration, aquifer and pump tests, baseline measurements for potentially affected domestic wells, drawdown modeling, long-term monitoring, and an enforceable impaired-well response protocol. (Ex. S-1, source PDF pp. 3, 5-6, Sections III, VI-VII.)
93. Plaintiff acknowledges that well depth alone does not prove interference. Connectivity, screened intervals, pumping rate and duration, recharge, drought, static levels, and drawdown must be analyzed. She seeks that analysis before sustained production. (Ex. S-1, source PDF p. 3, Section III.)

PILLAR A - AIR, WIND, AND DUST PATHWAYS

94. Peer-reviewed meteorological literature describes the Washoe Zephyr as a recurring afternoon downslope wind on the eastern Sierra slope, often strongest in the warm season, with westerly events affecting western Nevada. (Ex. A-1, source PDF pp. 1-2, 5.)
95. The Washoe Zephyr source states that mountain wind systems affect air pollution, visibility, and fire behavior and associates strong downslope winds with dust storms. It establishes regional transport conditions, not that project contaminants will necessarily become airborne or reach Plaintiff. (Ex. A-1, source PDF pp. 1-2.)
96. The Draft RAP itself seeks to prevent migration by wind and stormwater during excavation and beneficial reuse. The project therefore recognizes wind transport as a pathway requiring controls. (Ex. E-12, source PDF pp. 10-12 (RAP pp. 6-8), Sections 6.1-6.5.)

97. Plaintiff seeks enforceable dust suppression, air monitoring proportionate to the work, covered transport or equivalent controls, defined wind thresholds, and stop-work criteria during impacted-soil excavation. She does not allege that regional wind evidence alone proves exposure or causation.

PILLAR F - FIRE, EVACUATION, TRAFFIC, AND EMERGENCY CAPACITY

98. Nevada's September 8, 2024 Davis Fire emergency declaration states that the fire burned approximately 5,000 acres, destroyed at least 13 structures, threatened homes and infrastructure, and caused evacuation of approximately 20,000 people. (Ex. F-5, source PDF pp. 1-2.)

99. The Davis Fire declaration attributes worsening conditions to dry conditions, high temperatures, and severe winds and states that Washoe County experienced a response-resource shortage. (Ex. F-5, source PDF p. 2.)

100. Truckee Meadows Fire Protection District records identify Station 32 in East Washoe Valley and Station 33 on Foothill Road. (Ex. F-13, source PDF pp. 1-2.)

101. Lynda Bell's recorded 2026 testimony cited poor evacuation performance in prior fires, increased Station 32 response times, and added demand from 940 homes as reasons a required finding could not be made. (Ex. G-31, source PDF pp. 13-14.)

102. County records identify more than 6,250 average daily trips for Sierra Reflections. The record also contains traffic, school-peak, roundabout, access, and fire-capacity disputes. (Ex. G-2, source PDF pp. 1-2; Ex. G-31, source PDF pp. 12-18.)

103. The fire sources establish regional events, locations, and notice; they do not alone prove that Sierra Reflections will cause a particular response failure. Plaintiff seeks project-specific evacuation, secondary-access, phasing, and emergency-service evidence before implementation and occupancy.

PILLAR H - HUMAN HEALTH AND TOXICOLOGY

104. The project-specific Draft RAP reports mercury, arsenic, and lead in soil at the levels and locations alleged above. EPA's Fifth Five-Year Review identifies those

metals as soil contaminants of concern and describes ingestion of residential soil by young children as a primary OU1 health threat. (Ex. E-12, source PDF pp. 5-8; Ex. E-78, source PDF p. 12.)

105. ATSDR educational material describes recognized health effects associated with arsenic exposure across neurologic, respiratory, hematologic, cardiovascular, gastrointestinal, dermal, and other systems and identifies arsenic as a carcinogen. (Ex. H-3, source PDF pp. 2-11.)

106. A systematic review in the medical literature reports associations between arsenic exposure and cardiovascular disease. (Ex. H-11, source PDF p. 1.)

107. The health sources are general evidence. They do not establish Plaintiff's dose, route, source attribution, diagnosis, or project-specific causation, and Plaintiff does not offer them for that purpose.

108. Plaintiff's reported arsenic blood result does not prove that the unbuilt project caused exposure. It does make avoidance of additional exposure and mobilization personally important and supports her request for preventive controls. (Ex. S-1, source PDF p. 4, Section IV.)

109. County staff concluded that mercury concerns were addressed through lot placement, capping, conditions, and remediation and that no significant public-health effects were anticipated. Plaintiff includes this contrary conclusion and asks the Court to test the completeness and enforceability of the safeguards. (Ex. G-2, source PDF pp. 9-12.)

PILLAR M - MILITARY AND NATIONAL-SECURITY CONTEXT

110. Exhibit M-1 depicts the project, a 100-mile geodesic reference circle, and listed Nevada military installations, with stated straight-line geodesic distances. It is offered as geographic context. (Ex. M-1, source PDF p. 1.)

- 111.** 31 C.F.R. Part 802 defines covered real estate and certain real-estate transactions involving foreign persons near listed military installations and supplies a federal review process. (Ex. M-2, source PDF pp. 5-14, 20-28.)
- 112.** The current record does not establish that World Properties, St. James's Village, or the project is foreign-controlled; that a covered transaction exists; that a military installation has objected; or that Part 802 supplies Plaintiff a private cause of action. Plaintiff pleads no CFIUS count.
- 113.** If discovery reveals a material foreign ownership or covered transaction fact, Plaintiff may provide the information to the appropriate federal agency or seek leave to amend if a legally cognizable claim exists. M-1 and M-2 presently serve only as preserved contextual evidence.

TRACEABILITY, IMMINENCE, AND IRREVERSIBILITY

- 114.** The threatened pathways are tied to defined implementation acts: mass grading; excavation, transport, beneficial reuse, and capping of impacted soil; creek-crossing and utility construction; project-well installation and sustained groundwater production; and large-scale road and residential construction.
- 115.** The March 10 and June 16 approvals materially advanced those acts. NDEP is identified in the Draft RAP process, and the State Engineer has prospective authority over project-related well or transfer approvals identified in the administrative record. (Ex. E-12, source PDF pp. 9, 12; Ex. G-31, source PDF pp. 14, 18.)
- 116.** World Properties owns and proposes the development. St. James's Village and Doe defendants are responsible only to the extent evidence proves their own control or participation in implementing the identified conduct.
- 117.** Once impacted soil migrates, a domestic well is materially impaired, a cultural feature is destroyed, or open space and habitat are permanently graded, later money

may not restore the prior condition or Plaintiff's longstanding use and security of the family home. (Ex. S-1, source PDF pp. 5-6, Sections VI-VII.)

- 118.** The present record does not establish a verified construction-start date. It does establish current approvals, a defined Draft RAP, and World Properties' representation that this litigation affects marketing. Plaintiff seeks expedited disclosure and notice before the defined activities begin, and relief can be narrowed if Defendants establish that no such activity is imminent. (ECF No. 33 at 1:14-18.)
- 119.** An order preserving the status quo for defined high-risk activities until final safeguards are completed would reduce or prevent Plaintiff's alleged injuries without adjudicating unrelated land use or granting relief for nonparties.

EQUITABLE RELIEF AND THE PUBLIC INTEREST

- 120.** Plaintiff acknowledges that preliminary relief requires likely success on the merits, likely irreparable harm absent relief, a favorable balance of equities, and consistency with the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20, 22-24 (2008). In the Ninth Circuit, serious questions may support relief only when the other factors, including a sharply favorable hardship balance, are satisfied. *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1134-35 (9th Cir. 2011).
- 121.** Plaintiff alleges likely irreparable harm only from the defined implementation pathways: contaminated-soil dispersion, domestic-well impairment, destruction of an archaeological or cultural feature, and permanent grading of the rural environment she uses. Economic loss alone is not irreparable, but loss of water security, exposure prevention, and permanent resource destruction cannot necessarily be repaired by money after the fact. (Ex. S-1, source PDF pp. 5-6.)
- 122.** The requested status-quo relief is activity-specific and may be dissolved or narrowed when safeguards are complete or evidence disproves a pathway. By contrast, Defendants' asserted marketing and delay interests are documented but can

be measured. (ECF No. 33 at 1:14-20.) Plaintiff alleges that temporary, tailored restraint before irreversible work is less harmful than attempting restoration after a preventable injury.

- 123.** The public interest favors lawful land use, reliable water supplies, safe handling of impacted soil, fire-safe development, and protection of cultural resources. It also favors enforceable approvals, respect for private property, tribal self-determination, and remedies confined to the Court's jurisdiction. Plaintiff therefore requests no relief on behalf of absent persons and no compelled land transfer.

COUNT I

42 U.S.C. SECTION 1983 - FOURTEENTH AMENDMENT SUBSTANTIVE DUE PROCESS / STATE-CREATED DANGER

(Against Washoe County and Andriola, Garcia, and Hill in Their Official Capacities)

- 124.** Plaintiff incorporates the preceding paragraphs.
- 125.** Substantive due process imposes a demanding standard. A state-law procedural error or planning disagreement is insufficient. Plaintiff must prove an affirmative governmental act that placed her in danger she otherwise would not have faced, a particularized and foreseeable risk, deliberate indifference, causation, and conduct meeting the governing constitutional standard. See *Kennedy v. City of Ridgefield*, 439 F.3d 1055, 1061-64 (9th Cir. 2006); *Henry A. v. Willden*, 678 F.3d 991, 998-1002 (9th Cir. 2012); *Pauluk v. Savage*, 836 F.3d 1117, 1122-25 (9th Cir. 2016). *Shanks v. Dressel*, 540 F.3d 1082, 1088-91 (9th Cir. 2008), confirms that ordinary land-use error does not itself satisfy substantive due process.
- 126.** Plaintiff alleges protected interests in bodily integrity and in the use, habitability, water security, and value of the family home in which she has a longstanding personal and financial stake. (Ex. S-1, source PDF pp. 1-4.)
- 127.** The Board did not merely fail to regulate private conduct. It affirmatively reversed the Planning Commission's unanimous denial, made or accepted the required

approval findings, and changed the project's legal status so that grading, soil handling, infrastructure construction, and water development could advance.

- 128.** The Board had notice of project scale, documented contamination, the draft status of the RAP, deferred contractor-specific materials controls, proposed well infrastructure, fire and evacuation concerns, groundwater disputes, and the Planning Commission's inability to make numerous findings. (Ex. G-1, source PDF pp. 1-3; Ex. G-2, source PDF pp. 1-17; Ex. G-31, source PDF pp. 12-22; Ex. E-12, source PDF pp. 5-12.)
- 129.** Plaintiff alleges that reversing the denial did more than preserve the status quo: it changed the project's legal position and enabled defined grading, contaminated-soil handling, drilling, pumping, and infrastructure activities before final project-specific safeguards were complete, thereby creating or increasing a particularized danger to her bodily integrity, home, groundwater-related interests, and use of the valley beyond the danger she faced while the project stood denied.
- 130.** Plaintiff alleges deliberate indifference because the Board had time to deliberate, knew of the asserted pathways, and consciously chose approval without first requiring a complete, publicly reviewable package of final remediation, air and materials handling, project-well, baseline domestic-well, drawdown, monitoring, fire/evacuation, and enforceable response protections.
- 131.** Plaintiff acknowledges that County staff found the project consistent with required findings and considered capping, agency review, infrastructure conditions, wildlife mitigation, and TMWA's expected surface-water use adequate. (Ex. G-2, source PDF pp. 8-16.) Those positions create a merits dispute; they do not negate standing at the pleading stage.
- 132.** The Board was authorized to affirm, modify, reverse, remand, or directly grant the applications. Its final 3-2 reversal is alleged as an official final decision attributable

to Washoe County. See *Pembaur v. City of Cincinnati*, 475 U.S. 469, 480-81 (1986). (Ex. G-2, source PDF p. 2.)

- 133.** The 1984, 1991, 2004, 2005-2006, 2008, 2010, 2014, 2016, 2020, 2022-2023, and 2026 actions are pleaded as documented institutional history, notice, policy, and context. Plaintiff does not seek damages for every historical act or avoid a limitations defense merely by labeling the history continuous.
- 134.** Plaintiff seeks prospective declaratory and injunctive relief against Washoe County and the current commissioners in their official capacities, plus nominal and individualized compensatory relief against the County only to the extent legally available and proved. She seeks no punitive damages against the County and no personal damages from the commissioners.

COUNT II

42 U.S.C. SECTION 1983 - PROSPECTIVE OFFICIAL-CAPACITY RELIEF

(Against Jennifer L. Carr and Joe Cacioppo in Their Official Capacities)

- 135.** Plaintiff incorporates the preceding paragraphs.
- 136.** This count is limited to an ongoing or threatened federal constitutional violation and relief within each official's present enforcement authority. It does not seek retrospective damages, a declaration that Nevada violated state law, or an order directing state-law compliance as such.
- 137.** The Draft RAP identifies NDEP direction in establishing action levels and states that, per discussion with NDEP, no additional sampling would be required for well installation under the RAP. EPA's Fifth Five-Year Review identifies NDEP's institutional-control role and communication and implementation gaps. (Ex. E-12, source PDF pp. 9, 12; Ex. E-78, source PDF pp. 17, 20, 24, 26, 39-40, 46-47, 54.)
- 138.** The project record identifies possible water transfers and project wells requiring State Engineer action and records a representation that the State Engineer would

withhold approval if other wells would be affected. (Ex. G-31, source PDF pp. 14, 18.)

139. Carr and Cacioppo are alleged to have current authority over the prospective state actions described above. Former NDEP or NDWR officials are not named because prospective official-capacity relief runs against the current official, not a predecessor who no longer holds the office.
140. Plaintiff alleges that finalizing or implementing project-specific contamination or groundwater approvals that affirmatively authorize the identified activities without adequate safeguards would create or increase the same particularized danger to her bodily integrity, home, water security, and use of the valley.
141. Plaintiff alleges deliberate indifference only if the officials proceed after actual notice of the project-specific contamination, domestic-well, monitoring, and response gaps and without resolving those gaps. Plaintiff does not allege that holding office, without more, creates liability.
142. If no relevant NDEP or State Engineer application is pending and no action is imminent, Plaintiff requests disclosure of that fact and narrowing or dismissal without prejudice rather than an advisory opinion.
143. Plaintiff seeks only a prospective order preventing current state officials from affirmatively authorizing the defined project activities in a manner that violates the federal constitutional standard proved in this case. She seeks no damages or retrospective relief from them or the State treasury.

COUNT III

NEVADA PRIVATE NUISANCE / ANTICIPATORY NUISANCE

(Against World Properties, Inc.; St. James's Village, Inc.; and Does I-100)

144. Plaintiff incorporates the preceding paragraphs.
145. Nevada recognizes a private nuisance when conduct substantially and unreasonably interferes with the use and enjoyment of land. *Land Baron Invs., Inc. v. Bonnie*

Springs Fam. Ltd. P'ship, 131 Nev. 686, 693, 356 P.3d 511, 516 (2015). An anticipatory injunction requires more than a possibility or fear; the alleged nuisance must be practically certain from the proposed conduct. *Sowers v. Forest Hills Subdivision*, 129 Nev. 99, 104-06, 294 P.3d 427, 430-32 (2013).

- 146.** Plaintiff maintains a permanent, longstanding, personal and financial connection to the family home and regularly uses and enjoys the property and affected Washoe Valley environment. (Ex. S-1, source PDF pp. 1-3, Sections I-III.)
- 147.** World Properties proposes mass grading; excavation, movement, beneficial reuse, and capping of impacted soil; bridge and utility construction; well installation and groundwater production; and large-scale residential construction. St. James's Village and the Does are responsible only to the extent evidence proves their own control or participation.
- 148.** The Draft RAP confirms that planned acts will occur in known or assumed impacted soil, including excavation, beneficial reuse, creek-crossing work, utility installation, and drinking-water infrastructure. (Ex. E-12, source PDF pp. 10-12, Sections 6.0-6.5.)
- 149.** Absent complete and effective controls, the activities threaten dust, runoff, soil migration, exposure, groundwater interference, noise, traffic, and permanent loss of rural use and enjoyment. Material impairment of a dependable domestic-well supply would substantially affect habitability, use, and family equity.
- 150.** The threatened nuisance is concrete because the project has current approvals, World Properties has represented that litigation affects marketing, and the Draft RAP supplies a defined implementation plan. (Ex. S-1, source PDF p. 5; ECF No. 33 at 1:14-18; Ex. E-12, source PDF pp. 5, 10-12.)
- 151.** Plaintiff does not ask the Court to enjoin ordinary lawful use based only on fear. She requests an evidentiary determination and an injunction limited to activities for

which the evidence proves a sufficiently certain, substantial, unreasonable, and preventable interference.

- 152.** Money after a well is impaired, impacted soil migrates, or open space is permanently graded would not fully restore Plaintiff's use, security, and longstanding relationship to the family home and valley. Preventive equitable relief is appropriate if the evidence satisfies Nevada's anticipatory-nuisance standard.
- 153.** Plaintiff seeks individualized compensatory damages against the private defendants only for injury she proves they caused, in an amount determined at trial. She does not seek a community fund, nonprofit capitalization, or damages belonging to other people.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A.** Declare the parties' rights and, upon proof, declare whether the challenged final County decision and project-implementation sequencing violate Plaintiff's federal substantive-due-process rights;
- B.** Declare the limited prospective obligations, if any, of the current NDEP Administrator and State Engineer under the federal constitutional standard proved in this case, without ordering compliance with state law as such;
- C.** Preliminarily and permanently enjoin mass grading; excavation, transport, relocation, or beneficial reuse of impacted soil; creek-crossing or utility construction in known impacted areas; and project-well installation or sustained groundwater production until the Court determines that the applicable legal standard is met and appropriate safeguards are final, reviewable, and enforceable;
- D.** In tailoring relief, require only measures supported by admissible evidence and legal authority, which may include: (1) a final regulator-reviewed RAP and grading plans; (2) a final site-specific materials-handling and dust-control plan with monitoring and stop-work thresholds; (3) authenticated project-well specifications,

demand, screened intervals, aquifer and pump testing, and drawdown analysis; (4) baseline data and monitoring for potentially affected domestic wells; (5) enforceable stop-pumping, replacement-water, treatment, deepening, or replacement responses for proven project-caused impairment; (6) project-specific fire, evacuation, access, and phased-occupancy protections; and (7) project-specific cultural-resource avoidance, qualified monitoring, discovery stop-work procedures, confidentiality, temporary protective barriers, security, and consultation to the extent authorized by a viable claim and the Court's remedial power;

- E.** Require reasonable advance written notice to Plaintiff and the Court before the defined high-risk activities begin and preservation of relevant project, environmental, water, approval, and implementation records while the claims are adjudicated;
- F.** Award nominal damages and individualized compensatory damages only to the extent authorized and proved, in an amount determined at trial, with no punitive damages against Washoe County or any official-capacity defendant and no damages for nonparties;
- G.** Award Plaintiff allowable costs, but no pro se attorney's fees;
- H.** At an appropriate stage, refer the parties to a settlement conference to explore voluntary, willing-seller conservation alternatives for the Sierra Reflections and related St. James parcels whose ownership and acreage are established by admissible title records, including the approximately 1,131-acre combined conservation concept described by Plaintiff; possible mechanisms include a bargain sale through Trust for Public Land or another qualified conservation entity, a conservation easement, environmental covenant, consent decree, or Washoe stewardship if the Tribe and every legally necessary owner and governmental actor consent. Plaintiff does not request compelled transfer of private or State title, adjudication of tribal title, or a judicial appraisal untethered to a viable claim; and

I. Grant such other relief as the Court finds just, lawful, and properly tailored to Plaintiff's individual injuries.

JURY DEMAND

Plaintiff demands a jury trial on all issues so triable. Requests for preliminary and permanent equitable relief remain for the Court.

DECLARATION REGARDING EXHIBITS

The accompanying Exhibit Index and Pinpoint Citation Schedule identifies each selected exhibit, source-document PDF pages, relevant internal sections, the proposition supported, and the FAC paragraphs where cited. The selected exhibits are filed in separate consecutively paginated volumes so each citation can be located by source page and packet page. The index and exhibit cover sheets do not change the source documents.

The complete 221-document collection has been inventoried and preserved. This FAC cites the strongest materials needed to support the pleaded individual claims and eight factual pillars. Nonselected documents are not destroyed, waived, or represented as irrelevant; they remain available for discovery, later motion practice, authentication, or trial if a specific proposition becomes material.

SIGNATURE

DATED: August 5, 2026

Respectfully submitted,

/s/ Jeannette Porrazzo

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