

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JEANNETTE PORRAZZO,
Plaintiff, Pro Se,

v.

STATE OF NEVADA, et al.,
Defendants.

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

PLAINTIFF’S OBJECTIONS TO REPORT AND RECOMMENDATION

Plaintiff Jeannette Porrazzo appears pro se, solely on her own behalf. Plaintiff does not hold herself out as an attorney and is fully aware of the prohibitions against the unauthorized practice of law under NRS 7.285. Although Plaintiff has professional experience as a paralegal, she is not providing legal advice or representation to any third party. References to the Stop Sierra Reflections for Good Coalition are included solely to explain the factual and public-interest context of the dispute and the necessity of preserving the status quo while Plaintiff actively seeks qualified counsel. Plaintiff expressly disclaims representation of any other person or entity.

Plaintiff respectfully submits these objections to the Magistrate Judge’s Report and Recommendation filed January 27, 2026.

Plaintiff notes for the Court’s clarity that this is a single action involving multiple defendants. Certain filings, including the Notice of Pendency of Action, reference World Properties, Inc. specifically because those filings pertain only to parcels owned by that defendant. Additional notices will be filed on a defendant-by-defendant basis as appropriate following amendment, all within this same case.

Plaintiff further notes that the filing of the current Notice of Pendency of Action is limited to parcels owned by World Properties, Inc. Plaintiff expressly preserves the right to record additional notices of pendency prior to amendment as necessary to protect the status quo with respect to other defendant-owned or defendant-managed parcels implicated by this action, including but not limited to lands administered by the State of Nevada, Nevada State Parks, Washoe County, and lands managed or co-managed by Washoe County in coordination with the Bureau of Land Management within the affected zip codes. Any such notices will be parcel-specific, ownership-specific, and filed within this same action.

Plaintiff acknowledges the Court’s concerns regarding the current pleading posture. At this time, Plaintiff does not attach a proposed amended complaint solely because amendment is not yet

procedurally ripe. Plaintiff is actively coordinating with the Washoe Tribe regarding formal joinder as a necessary and indispensable sovereign party. The anticipated participation of the Tribe would materially alter the structure of the pleadings, including issues of standing, jurisdiction, sovereign authority, and remedies.

Plaintiff therefore respectfully requests the Court's guidance regarding proposed amendment and submits that dismissal without leave to amend is premature where amendment depends on the participation of a sovereign entity whose interests are central to the claims asserted. Because the contemplated amendment depends on the joinder of a sovereign party with independent standing and federal interests, the Court cannot conclude at this stage that amendment would be futile.

Plaintiff further objects to the recommendation that the Court deny the In Forma Pauperis application as "moot" while simultaneously recommending dismissal of the action. A court may not bypass the mandatory screening requirements of 28 U.S.C. § 1915 by declaring an IFP application moot while issuing a dispositive recommendation. Such a posture deprives Plaintiff of the statutory protections afforded to indigent pro se litigants and constitutes procedural error. Plaintiff qualifies for in forma pauperis status, as she is permanently disabled, receives federal disability benefits, and has a monthly income of less than \$1,000. Plaintiff has received disability benefits continuously since August 2010 and is prepared to provide official documentation from the federal government verifying her disability status and income upon the Court's request.

Plaintiff further notes that no defendant has yet been served due to the pendency of Plaintiff's application to proceed in forma pauperis and the absence of Court authorization for service by the United States Marshals Service. As a result, no responsive pleadings have been filed and no adversarial testing of the claims has occurred. Dismissal at this preliminary stage, prior to service and without permitting amendment, would be procedurally premature and inconsistent with the protections afforded to indigent pro se litigants under 28 U.S.C. § 1915.

Following the filing of the Complaint and in an effort to preserve the status quo pending judicial review and potential sovereign joinder, Plaintiff has filed a supplemental addendum identifying the subject parcels affected by this action and has recorded a Notice of Pendency of Action (Lis Pendens) in Washoe County. These filings are non-dispositive and non-punitive and are intended solely to provide constructive notice and prevent irreversible harm to land, water resources, and culturally significant sites while this Court considers jurisdictional and procedural issues. Plaintiff does not request adjudication of these instruments at this time and includes them solely for completeness and transparency.

The claims asserted are not limited to a local land-use dispute. The subject parcels are located within proximity to Nevada Air and Army National Guard installations and implicate national security considerations, water rights, environmental contamination risks, and the disturbance of known and suspected Native American burial grounds. These matters fall within federal

constitutional and statutory authority and are not capable of adequate adjudication through state or county administrative processes.

Plaintiff is a long-term resident and property owner in Washoe Valley who relies on groundwater wells for daily drinking water for herself and her federally protected service animal. Once disturbed, burial grounds, aquifers, and culturally significant sites cannot be restored. Monetary damages are insufficient to remedy these harms, rendering injunctive relief and preservation of the status quo essential.

Plaintiff further notes that requests for emergency injunctive relief remain pending and unadjudicated, underscoring the need to preserve the status quo pending proper service and judicial review.

Plaintiff respectfully requests referral to the Court's Federal Pro Bono Program. Plaintiff has made diligent efforts to secure representation but has encountered pervasive conflicts of interest among local firms with professional or financial ties to Defendants and related entities. The complexity, scope, and federal nature of the issues presented warrant referral in the interests of justice.

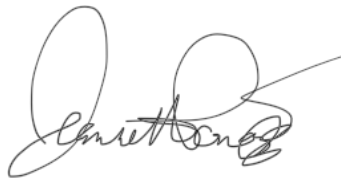
For the foregoing reasons, Plaintiff respectfully requests that the Court decline to adopt the recommendation of dismissal without leave to amend, provide guidance regarding amendment upon sovereign joinder, authorize service by the United States Marshals Service upon approval of Plaintiff's in forma pauperis application, and permit this action to proceed in a posture that preserves jurisdiction and prevents irreparable harm.

DATED: **February 6, 2026**

Respectfully submitted,

Jeannette Porrazzo
Plaintiff, Pro Se

1705 Irving Place
Washoe Valley, Nevada

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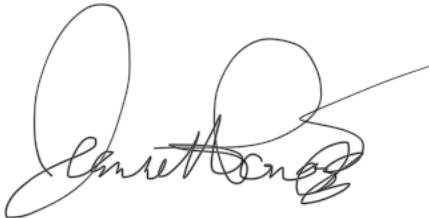
ssr4gc@gmail.com

CERTIFICATE REGARDING SERVICE STATUS

I, Jeannette Porrazzo, hereby certify that service of process has not yet been effected in this action. Plaintiff has applied to proceed in forma pauperis and is awaiting the Court's determination on that application, including authorization for service by the United States Marshals Service pursuant to 28 U.S.C. § 1915(d) and Federal Rule of Civil Procedure 4(c)(3). Plaintiff lacks the financial means to effect private service and is unable to advance the costs associated with service by professional process servers or the United States Marshals Service absent Court authorization. Plaintiff further notes that due to the concentration of defendants, affiliated entities, government agencies, and coalition members within the affected zip codes, Plaintiff is unable to identify a disinterested nonparty eligible to effect service under Rule 4. Upon approval of Plaintiff's in forma pauperis application and authorization by the Court, Plaintiff stands ready to promptly proceed with service through the United States Marshals Service or as otherwise directed by the Court.

DATED: **February 6, 2026**

Jeannette Porrazzo
Plaintiff, Pro Se

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