

Oscar Dey Williams



May 22, 2026

Clara Andriola
Washoe County Commissioner
1001 E. 9th Street, Bldg. A
Reno, NV 89512

Francisco Aguilar
Nevada Secretary of State
101 N. Carson Street, Suite 3
Carson City, NV 89701

CC: Andrew McDonald, Registrar of Voters
Eric Neff, Acting Dir. DOJ Civil Rights-Voting Section
Sigal Chattah, US Atty-NV

Re: Formal Civil-Rights Complaint – 2026 Washoe County Primary Election Sample Ballot Booklet Violates Voters’ Bill of Rights (NRS 293.2546(7)) and Imposes Disparate Impact on Protected Classes Under State and Federal Law

Dear Ms. Andriola and Mr. Aguilar,

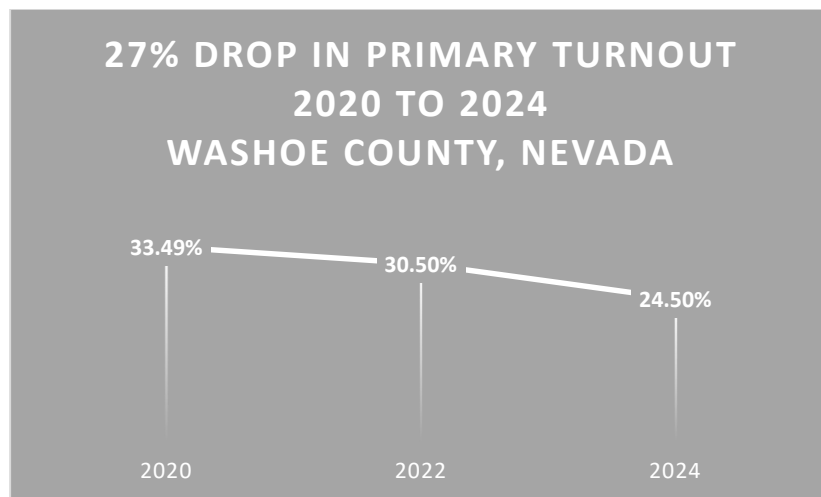
I am writing as a voter residing in the City of Reno, Washoe County, along with Bruce Parks, chair of the WashoeGOP and Tammy Holt-Still from unincorporated Lemmon Valley, candidate for county commissioner District 5, and County Commissioner Jeanne Herman, also from District 5, and Tanya Freeman, Northern Nevada chapter president of Veterans in Politics International, to file this complaint regarding the 2026 Primary Election Sample Ballot that I and thousands of other voters received.

This complaint is submitted to formally notify Washoe County and the Nevada Secretary of State that the 2026 Primary Election sample-ballot booklet fails to comply with Nevada’s Voters’ Bill of Rights and related statutory requirements, and that its design and implementation impose unlawful, disparate burdens on elderly, disabled, low-literacy, low-income, rural, and tribal voters.

The County’s shift from precinct-specific mailed sample ballots to a generic party-wide booklet—combined with a reliance on online tools to obtain accurate information—constitutes a statutory regression, creates a prohibited two-tier system of access, and results in discriminatory effects under state and federal civil-rights laws.

This complaint seeks corrective action to restore equal access to accurate, precinct-specific election information for all voters and thus restore waning voter trust and confidence.

The Secretary of State’s turnout data suggests that the County’s shift toward internet-dependent sample-ballot access has played a role in eroding voter trust. As voters were pushed to rely on online tools to obtain the accurate, precinct-specific information once provided in the mailed sample ballot, turnout in Washoe County fell sharply—dropping 27% between the 2020 and 2024 primaries (33.49% to 24.5%). This decline tracks directly with the County’s move away from accessible, precinct-specific printed materials.



Clara Andriola acknowledges the public’s concerns as she did in the Board’s meeting of May 12, yet, she plays the role of the captain of a ship, steering us into the digital age. She’s talked about “looking under the hood” in elections but the technology will never be transparent.

The internet will never be safe. Here, though, with online sample ballots and party-precinct accuracy, the “trust in elections” ship is sinking.

I can make the same assertion about Mr. Aguilar.

Maybe it’s time to jump ship and chart a different course in elections for the sake of voter trust and turnout?

Intent/Motive

The Washoe County Registrar of Voters has been clear about his motive to force voters to use the Internet to access accurate primary ballot information, according to Ryan Canaday, host of Your 2 Cents on Channel 2 KTVN News:

“I sent your [Judi’s] concern to the Washoe County Registrar of Voters office. And officials there tell me... voters who want to see their unique sample ballot to see exactly what they will be voting for, you can either scan the QR code that’s inside your sample ballot or you can visit <http://washoecounty.gov/sampleballot>.”

The county’s website provides the voter a sample ballot that is accurate as to party-and-precinct, showing only the races that voter will vote on. The voter can make choices by clicking on a star to the left of the candidate then printing and/or downloading the digital file.

This appears to be a conscious effort to normalize using the Internet to cast votes; a form of programming the electorate, rooted in manipulation and coercion and discrimination.

Specific Deficiencies in the 2026 Sample Ballot

- No detachable pull-out sample ballot on thicker, color-coded paper with matching ovals (the proven format of 2022 and 2024).
- The printed races are not tailored to my precinct and include numerous races in which I cannot vote (e.g., Sparks City Mayor, Sparks City Council Wards 2 and 4,

County Commissioner District 2, Senate District 16, Assembly District 40, School Board districts B and C).

- Voters are directed via a prominent QR code on the cover to an online "eSample Ballot," shifting the burden of obtaining accurate, personalized information to the voter.

These design choices create actual confusion. A Reno voter opening the booklet sees a full slate of Sparks municipal races, county commissioner seats outside their district, and other irrelevant contests. The document no longer functions as a true "sample ballot" for the voter's specific ballot; it is now a generic county-wide party overview that directs the voter to take extra steps online for precinct-specific information.

Deficiencies in the 2026 Online Sample Ballot

On May 16, I accessed my online sample ballot using my laptop, Firefox browser, no VPN, and this is what I experienced:

1. I'm offered a choice of sample ballots: Democrat, Non-Partisan, Republican. I chose Republican and was able to view a sample ballot with Republican races. It appears to be accurate to my precinct.
2. However, the precinct number is not my precinct. I live in 5030:

Sample Ballot

Election: June 9, 2026 Primary Election

This is not an official ballot.

Precinct: RENO-VERDI 5015

Ballot Style: WASH_PRI_REP_STY0039

3. When I tried to download my blank sample ballot, I received an error message:

Error

The following error has occurred. Please go back and try again or contact support@democracylive.com with the following information for further assistance.

Support ID	78dfe7e3-e06c-45ac-ac30-585f8a88450d
Message	Tracking is missing userId in workflow: /sites/32031/site/app/sb/sample-ballot
Account ID	32031
Election ID	2138
URL	https://nv.omniballot.us/sites/32031/site/app/sb/sample-ballot

4. I went back and made some choices but not all and received the same error message when I attempted to download.
5. I went back and selected a candidate in every race and received the same error message when I attempted to download.

I tried it using Google Chrome browser and got the same error message.

I tried it using my cell phone and Firefox browser and got the same error message.

As such, I cannot determine what the downloaded file contains. Is it a booklet or just the races, similar to the pull-out of old?

What is Confusing?

Tammy Holt-Still, candidate for Board of Commissioners, said in public comment at the Board's May 12th meeting:

"I live in unincorporated Washoe County, as you know, and my ballot as a sample ballot is showing the City of Reno and the City of Sparks on top of what I should be voting for. Now, you talk about trying to confuse people, that's really going to confuse people."

A lady named Judi called into KTVN's Your 2 Cents on May 14th and said:

"I'm very disappointed in the sample ballot I received. It is too confusing. While I live in Washoe County my sample ballot included nominees for both Reno and Sparks mayor, Sparks city council, and a couple of school board districts I don't believe I live

in. While I personally can and will research more online, this is going to be very confusing to people.”

Internet searches do not return a result showing the sample ballot, using the following terms: “washoe county sample ballot 2026 primary online”.

Washoe County’s landing page does not provide a clear, easy-to-find link to the sample ballot.

As a practical matter, for people such as Craig Taylor (see below), voters who are confused are less likely to trust the system and the staff and others who conduct elections. They’re more likely to not vote.

In the case of the current sample ballot mailed and online, the system fails certain voters, is confusing, and is cumbersome at the least. The accurate mailed sample ballot with pull-out of past elections is the standard to follow. We need to get back to that to help reverse the trend of lessening voter participation.

Statutes and Civil-Rights Framework

Nevada Statutory Requirements (NRS 293.2546(7) and Related Law)

The legal foundation of this complaint begins with NRS 293.2546(7), part of Nevada’s Voters’ Bill of Rights, which guarantees every voter “the right to receive a sample ballot which is accurate, informative and delivered in a timely manner as provided by law.” In Nevada election practice, “accurate” and “informative” have always been understood in relation to precinct-specific ballot content, because—even with Nevada’s vote-anywhere policy—all ballots are printed, sorted, reported, and stored by precinct. This precinct-based structure is reinforced by NRS 293.565(6), which requires the clerk to mail “the sample ballot for his or her precinct.”

For decades, Nevada voters received mailed sample ballots that reflected the actual contests they would vote on. The 2022 precinct-specific pull-out sample ballot followed this statutory

model. The 2024 and 2026 booklets do not. By mailing a generic, county-wide party booklet that includes irrelevant contests and then directing voters to an online eSample Ballot to obtain accurate precinct-specific information, the County has created a two-tier system that the statute does not permit. Voters with internet access, devices, and digital literacy can retrieve accurate information online; voters without such access receive only the inaccurate, misleading booklet. NRS 293.2546(7) does not allow this disparity. The right to an accurate and informative sample ballot is universal, not conditional.

Nevada law does not permit the County to condition a voter's statutory right on internet access, smartphone ownership, computer access, or the ability to download and print a file. The sample-ballot statutes were written in an era when mailed, precinct-specific printed ballots were the norm and internet access was not assumed. Nothing in NRS 293.2546(7) authorizes the County to shift accuracy to a website, require voters to scan a QR code, or require them to supplement the mailed booklet with technology they may not possess. The statute places the burden squarely on the County—not the voter.

The mailed sample ballot must stand on its own as an accurate and informative representation of the voter's actual ballot. The 2026 booklet does not, and therefore fails to satisfy Nevada's Voters' Bill of Rights.

Beyond violating Nevada law, the 2026 format also conflicts with multiple federal civil-rights statutes.

Accessibility and Equal-Access Requirements Under Federal Law

The 2026 format raises substantial accessibility and equal-access concerns, particularly for elderly, disabled, low-literacy, low-income, rural, and tribal voters. These concerns implicate multiple federal civil-rights statutes that overlay and reinforce Nevada law by prohibiting practices that deny or abridge voting rights through discriminatory effect or failure to provide equal access.

Americans with Disabilities Act (ADA), Title II (42 U.S.C. § 12132)

As a public entity, Washoe County must ensure that no qualified individual with a disability is excluded from participation in or denied the benefits of its services, programs, or activities—including the provision of accurate voter information such as sample ballots. Election administration is a “service” under the ADA. By mailing a generic booklet filled with irrelevant races and directing voters to an online eSample Ballot (which itself suffers documented functionality failures), the County denies elderly, disabled, rural, and tribal voters, who disproportionately lack reliable internet access the full, and equal opportunity to obtain precinct-specific information. Federal data confirms that only 84% of people with disabilities have internet access, and seniors with disabilities are the most disconnected group, with 30% lacking access entirely. This is not an equal alternative. It is an impermissible barrier.¹

Voting Rights Act of 1965, Section 2 (52 U.S.C. § 10301)

Section 2 prohibits any voting practice that results in the denial or abridgment of the right to vote on account of race, color, or membership in a language-minority group. No discriminatory intent is required—only discriminatory effect. The County’s shift to a generic printed booklet plus mandatory online supplement has a clear disparate impact on protected classes. The digital divide disproportionately burdens racial and language minorities, low-income households, rural residents, and Native American communities—groups already overrepresented among non-internet users and low-turnout voters. Internet users voted at rates 25 percentage points higher than non-users in recent federal elections. (*Ibid.* Human-I-T.org and EAC) This turnout disparity underscores how digital-dependent election information suppresses participation among the very groups Section 2 was enacted to protect. By imposing this modern barrier, the County abridges the right to cast an informed ballot for these voters.

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https://www.eac.gov/sites/default/files/electionofficials/accessibility/Digital_divide_and_voting_report_FINAL_read_only.docx

Help America Vote Act of 2002 (HAVA)

HAVA mandates accessible voting systems and voter-education materials, requiring equal opportunity for individuals with disabilities. It explicitly requires accessible sample ballots and instructions. The County’s policy—providing confusing printed information while routing voters to an online tool that is non-functional for some—undermines HAVA’s accessibility mandates and exacerbates the digital divide documented in EAC research.²

Voting Accessibility for the Elderly and Handicapped Act of 1984 (VAEHA)

VAEHA requires accessible voting aids for elderly and handicapped voters in federal elections. Sample ballots are a core voting aid. Where full accessibility cannot be provided in one format, alternative means must be offered. The mailed generic booklet plus QR-code redirection fails to deliver an accessible aid to elderly and disabled voters without internet, violating VAEHA’s core purpose.

Practical Example of Disparate Impact

Mr. Craig Taylor, age 65, living in the 89502 zip code, does not use the internet and owns only a 3G flip phone. He cannot access the online sample ballot, cannot download or print it, and therefore cannot obtain accurate precinct-specific information. He is denied the very right NRS 293.2546(7) guarantees. His experience exemplifies the equal-access harms the ADA, VRA § 2, HAVA, and VAEHA prohibit. Mr. Taylor already distrusts the system and has a history of not voting. The 2026 sample-ballot format reinforces that distrust and risks disenfranchising him entirely.

Conclusion

Nevada’s statutes and federal civil-rights laws do not contemplate forcing voters to supplement a generic, inaccurate mailed sample ballot with internet access they may not possess. Presenting a booklet filled with irrelevant races while directing voters to a digital supplement constitutes a deceptive shift of burden and a modern barrier to equal access. The County’s 2026 sample-ballot format violates Nevada’s Voters’ Bill of Rights and multiple

² <https://www.eac.gov/voting-accessibility>

federal protections designed to ensure that all voters—especially the most vulnerable—receive accurate, accessible, and meaningful election information.

The Digital Divide

The digital divide is well-documented and disproportionately affects elderly and disabled voters, underserved communities, voters with limited internet access, and low-literacy and low technology voters. By making the mailed sample ballot materially less useful and accurate while directing voters to an online tool many cannot easily access, and which appears to not be fully functional for some, the County has imposed a modern barrier to informed voting. This nudges voters toward mail ballots and remote voting at the expense of in-person voting, burdens voters to seek out party-precinct information, requires they have internet or Wi-Fi devices and an Internet connection, which are not free (poll tax?), costs taxpayers exponentially more to build, maintain, and secure the website, and most importantly, erodes public confidence.

Research shows a significant percentage of voters rely on printed materials compared to the Internet with respect to elections, affecting turnout to some degree, according to a report by Human-I-T.org based on Election Assistance Commission data:³

FAQ

Does the digital divide really affect voter turnout?

Yes — dramatically. In the 2020 election, 81% of internet users voted compared to just 56% of non-users. Internet users are also 13 percentage points more likely to say they will "definitely vote" in future elections. The gap persists even when controlling for demographics and geography.

Which groups are most affected by the digital divide in elections?

People with disabilities, low-income households, rural residents, older adults, and Native American communities face the steepest barriers. For example, only 84% of people with

³ <https://www.human-i-t.org/digital-divide-impact-voting/>

disabilities have internet access, and seniors with disabilities are the most disconnected group — 30% lack internet access entirely.

How does the digital divide lead to voter misinformation?

Disconnected individuals rely more heavily on television, word of mouth, and printed mailings for voting information. Only 19% of non-internet users trust information from election offices, compared to 54% of internet users. This trust gap increases vulnerability to misinformation and political disengagement.

My interpretation of the FAQs above is that a significant percentage of voters rely on paper and the postal service to receive election mail. These voters require that a party-precinct sample ballot be delivered to them. But they are not receiving that information with the current sample ballot they got in the mail.

Practical Harm

- All voters are affected when mailed election materials include contests that do not apply to their actual ballot, showing irrelevant races is confusing.
- Elderly and low-literacy voters are also confused by irrelevant races and the absence of a clear, portable pull-out they can mark and take to the polls.
- Poor, non-tech-savvy, low-technology, and disabled voters without reliable internet/devices are deprived of the precise information they need.
- The result is longer lines, higher error rates, and reduced participation—precisely the harms federal civil-rights laws are designed to prevent.

Requested Remedies and Closure

This complaint demonstrates both state-law violations and clear federal civil-rights and voter-protection violations through disparate impact and denial of equal access. We request immediate corrective action:

- 1) Reinstatement of precinct-specific, detachable pull-out sample ballots on thicker, color-coded paper for all future elections;
- 2) Full functionality fixes to the online eSample Ballot with printed alternatives offered upon request; and
- 3) An independent audit of the 2026 sample-ballot process to restore voter trust.

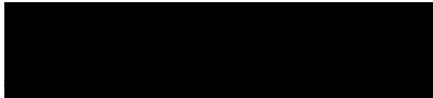
We are prepared to supply copies of the 2022 and 2024 pull-out ballots and the 2026 booklet for your immediate review. I/we also welcome the opportunity to discuss this matter further.

Accurate, accessible, and voter-friendly election materials are essential to protecting the fundamental right to vote for all citizens, especially the most vulnerable and those who don't have or use the Internet.

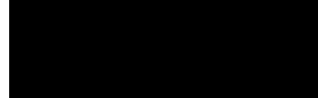
Thank you for your prompt attention to these serious civil-rights and statutory concerns.

Sincerely,

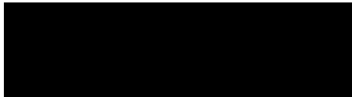
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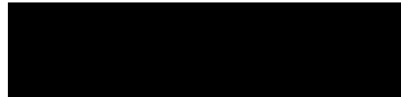
Bruce Parks



Tammy Holt-Still



Jeanne Herman



Tanya Freeman

