

POINTS OF FACT

- 1) I investigated 36 public records showing a long, premeditated, preexisting pattern of transit arrangements under the authority of the City of SLT being used to facilitate counterproductive and malicious “cluster-based planning and development” at an unknown total number of regional housing development projects and at the US HWY 50-CA Rt. 89 intersection during October of 2025 (*Exs. F(2), G(3-4 & 6-7), J(3-4)*);
- 2) I documented an ongoing pattern of members of the SLT City Council taking active measures to oppose the rights of City constituents to be reasonably well-informed about the conversion or modification of property rights and other high-priority topics at City Council meetings beginning in January of 2026 (*Ex. F(2)*); and
- 3) I documented various SLT City resources providing planning and development incentives and other advantages to projects sponsored by four defendants and potential defendants in order to allegedly develop Sugar Pine Village at 1888 Lake Tahoe Blvd., “Motel 6” at 2375 Lake Tahoe Blvd., and a past environmental restoration site at 3900-3909 Lake Tahoe Blvd. (*Ex. E(10), G(3-6), J(3-4)*); and
- 4) I documented a long, premeditated, ongoing pattern of members of the SLT City Council taking active measures to oppose public access in regard to public comment period inconsistent with *CA GOV 54953.4(d) and 54943.8(b)(6)* since October of 2025, with elements of personal microaggression consistent with *CA GOV 36512(b)* (*Ex. G(7)*); and
- 5) I made emails, calls, and public appearances to SLT City resources from on October 21st of 2025 to March 30th of 2026 to comment on regional housing needs topics, with elements of increasingly incited duress on my part (*Ex. F(6)*); and
- 6) I documented an incident where SLT City resources were used in aid of exploiting and harassing a vulnerable person with possible connections to affordable-housing funding for “undersubscribed jurisdictions” and “self-help efficacy” as defined between *CA HSC 50675.1.3* and the CA HCD “Homekey+” notice of funding availability published in August of 2025 (*point 42*); and
- 7) Active measures of “cluster-based planning and development” in contravention of “2025 City Strategic Priority #1” established between *the City of South Lake Tahoe Strategic Plan for 2025-2030* and language used in *SLTCC 6.20.010(B)* and *6.15.150* constitute causes for action as expressed by privileges and immunities on economic inequality, social classes, attainder, nobility, malicious mischief, and servitude; and
- 8) A reading of *SLTCC 2.01.040(D)* corroborates points above and would lead any reasonable person to suspicions within the scope of denial and disparagement of the counting of provisional ballots, which warrants a reasonable opportunity for further investigation or discovery of public access for substantial certainty; and
- 9) One of the videos sponsored by Mother Jones about “glyphosate in Lake Tahoe” contains direct evidence that someone involved in the reporting is knowingly and willfully using deceit with an intent to deny and disparage the protected rights of locals: in the video, the individual states very plainly that the dead trees in the Caldor fire burn zone are dead as a direct result of glyphosate, when as we all know, that is not true; and
- 10) I documented the “healthy Tahoe” group(s) publishing and then promptly deleting websites and webpages purporting to go by several different names including “protect Tahoe, save Tahoe, don’t poison Tahoe” which follows a well-documented pattern;” and
- 11) Gold-medal olympian, Hannah Teter, has discovered evidence that spraying of glyphosate has already taken place right on the shoreline of the Lake at the Baldwin-Kiva area on June 25 of 2026, however, those who go by several names are STILL assuring us all that we do not have to worry for “another fiscal year;” and**

- 12) I documented an instance where the “healthy Tahoe” people adopted the language used in the “looproad/chateau/Stateline/US HWY 50” planning documents within a scope directly challenged in my preexisting lawsuit leading up to October of 2026; and
- 13) I documented direct evidence of intent to damage or remove trees with malice in the Lake Tahoe basin; and
- 14) I contacted the Washoe County Sheriff's Department with some of the same information, in the context of the notorious case on damage to trees in an Incline Village park and the causes to search for the source of "the most illogical human behaviors directly within the course of decision-making" by our local leaders; and
- 15) I completed a Criminology course on Surveillance and Society in winter of 2020-2021 where a segment on private data-collection included a lesson on extremely-invasive, personally-targeted AI marketing intelligence profiles which could be illustrated in comparison to the “metaverse” life simulator (*Ex. J(8)*); and
- 16) I gathered physical and photographic evidence of a conspiracy to sabotage the public-interest powers of the newly-formed SLT Police Advisory Commission by local advocacy groups beginning in June of 2020 (*see Exs. G(2&7)*); and
- 17) I documented an insistent public conspiracy to facilitate “Black Lives Matter tourism issues vacation rentals in Lake Tahoe where there is no racism” by local advocacy beginning in June of 2020 (*points 37B-37C*); and
- 18) Recent SLT City infrastructure projects developed by partners using public funds set aside for low-income housing have manifested in the form of significant elements of premeditation to allegedly “weigh the option of developing ‘Black Lives Matter tourism issues’ units” which are allegedly intended to instead be rented out to “visitors of our region” (*Exs. G(1,2,4)*); and
- 19) US Senator for CA, Adam Schiff, was coincidentally scheduled to publicly deliver federal infrastructure funding to the City of South Lake Tahoe on March 31st of 2026 for underground infrastructure at the 3900-3909 US HWY 50 project following issues with private data security; and
- 20) The elements in points above would hypothetically express the public-trust interests of residents of the south-shore of Lake Tahoe to be temporarily forfeited an office space to be open to the public within realistic capacity for purposes of public interest to “inform the community about the modification of their rights,” inspect “cluster-based planning and development,” facilitate “actual cost-per-unit spending consistent with 2025 City strategic priority #1,” and “encourage public participation” consistent with *CCP 486.090(b)*.

POINTS OF LAW

- 1) **CA Const. Art. I Sec. 7** prohibits the denial to constituents on the same terms as all other citizens of any right to due process of law, including for the residents of a local jurisdiction to be reasonably well-informed through public participation procedures about a proposed modification of a privilege, immunity, or obligation of public interest; and
- 2) **CA Const. Art. I Sec. 19** establishes additional due process obligations and immunities related to forfeiture, conversion, or modification of a property right consistent with *CA Const. Art. I(7)*; and
- 3) **CA Const. Art. II Sec. 1** defines the guarantees of the republican form of government to Californians to include “government instituted for the security, protection, and benefit” of the people consistent with *CA Const. Art. I Secs. 24, 26, and Art. III Sec. 1*; and

- 4) **CA Const. Art. XI Sec. 13** establishes prerogatives relating to matters effecting distribution of powers and local supersession within the State of California consistent with *CA CIV 22.1*; and
- 5) **CA Const. Art. I Secs. 1, 3(a), 3(b)(1), 8, 9, 13, and Art. XX(1.5)** define additional circumstances and conditions for the “active measures” of interchangeable “cluster-based” terminology; and
- 6) **CA Const. Art. XXXIV Sec. 1** prohibits the development and acquisition of low rent housing projects by California state actors except by election or federal assistance; and
- 7) **CA GOV 36512(b)** establishes procedures to elect or appoint persons to a vacant City Council seat in the State of California based on the number of days before the expiration of the term of that seat on which the vacancy occurred; and
- 8) **CA GOV 65584.04(d)** establishes public access procedures in the State of California for “the development of the methodology and in the process of drafting and adoption of the allocation” of a City “housing element” and other “regional housing needs assessment” matters by the appropriate governing body consistent with *CA GOV 54950-54963, 65582(e), and 65583(c)(9)*; and
- 9) **CA GOV 54953.4(a)** encourages local jurisdictions to “exceed” public access requirements in the Brown Act; and
- 10) **CA GOV 54953.4(d)** prohibits local jurisdictions from utilizing the Brown Act to “affect or supersede “any other applicable civil rights, nondiscrimination, or public access laws;” and
- 11) **CA GOV 54953.4(b)(3)(B)(II)** permits local jurisdictions to establish an “explanation of procedures” for public access to public functions only when public interest to continue business outweighs elements of public access in general and whole; and
- 12) **CA GOV 54953.8(b)(2)** permits local jurisdictions to establish rules for the “means by which members of the public may access” legislative teleconference meetings; and
- 13) **CA GOV 54953.8(b)(6)** prohibits local jurisdictions from arbitrarily and capriciously closing the functions of a timed “public comment;” and
- 14) **CA PEN 237** establishes the punishment for violation of personal liberty by “menace, fraud, or deceit” as a crime in the State of California; and
- 15) **CA PEN 368(c) and 368(d)** establishes the punishment of exploitation, abuse, causing of mental suffering theft, embezzlement, forgery, or fraud committed against persons experiencing a behavioral health challenge or who are elderly as a crime in the State of California; and
- 16) **CA CCP 354.8(a)(1)(E)(ii)(IX)** considers “widespread and systematic measures directed at a civil population which result in great suffering and serious mental injuries;” and
- 17) **CA PEN 203** establishes the punishment unlawfully and maliciously depriving a human being of the usefulness of a member of the victim’s body as a crime in the State of California.