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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. \_\_\_\_\_

FILED BY MLE D.C.

AUG 17 2020

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.F.B.

-----X  
REBA SHERRILL,

Plaintiff.

**EX-PARTE MANDAMUS  
PETITION**

vs.

**CONSTITUTIONAL RIGHTS**

THE FLORIDA ELECTIONS  
COMMISSION

Defendant  
-----X

NOW COMES Reba Sherrill, the Plaintiff, a United States Citizen and resident of Florida, who files this EMERGENCY PETITION FOR A WRIT OF MANDAMUS in *propia persona* pursuant to 28 Code ss. 1361, and in support states the following:

1. The Plaintiff is a registered Congressional Candidate for The United States Republican Party for Florida District 21, Palm Beach.

2. The Republican primary election is fraught with scandal and criminal activity surrounding Plaintiff's multiple opponents; The Florida Elections Commission is tasked with the responsibility to investigate that activity on an emergency basis.

3. Plaintiff has registered her candidacy fully by the Law as per the rules proscribed by The Florida Elections Commission ("F.E.C.") that require all candidates of this type prove they are legal residents of The State of Florida; the residency requirement is determined by factual proof that they *reside* in the state as per the rules.

4. Candidates are subject to inquiry from the F.E.C. requiring proof of Florida residency per Fla. Sta. 104 and 106, which Plaintiff has proved on her behalf to the commission in the form of a sworn statement and she is in fact a resident and guaranteed the protections of her residency per The Florida Constitution.

5. Plaintiff has an irrefutable Constitutional Right against criminal activity; **On August 13, 2020 Plaintiff filed a formal complaint with the F.E.C. concerning Loomer** requesting the F.E.C. take action within 24 hours on an emergency basis. (EXHIBIT A)

6. The complaint's affidavit shows with evidence well above a *prima facie* standard proof that:

a) Loomer does not qualify as a candidate in the CD 21 election, has not provided any valid certification that she is, in fact, a resident of the state as per the F.E.C. rules. Plaintiff conducted a private investigation of the candidate Loomer and has ascertained that she is not domiciled in Florida and resides at 16 Willow Street West, Harrison, New York 10604.

b) Loomer, with full authority, has committed crimes against Florida election laws in pursuit of her office, appointing unregistered agents to move and utilize donations from State residents, sending the money out of state, and threatening and harassing her opponents.(1)

c) That Loomer and her campaign are engaged in illegal foreign and domestic lobbying activities, **including with Roger Stone and the banned Chinese firm Heuwei**, plus other State and Federal crimes, and is a danger to public safety.(2)

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(1) The United States Postal Service confirms Loomer is receiving mail the address. Investigators have determined via interviews with current and former members of Loomer's campaign staff that campaign funds have been transferred from Florida to bank accounts in New Jersey using the services of campaign manager Karen Giorno and Kingston Public Affairs, Inc.

Fla. Sta. 104 and 106 regulate that all treasurers of the campaign must be registered with the F.E.C. This is strictly enforced by the State to curtail tax fraud and other types of money laundering. The registration law negates a defense that any treasurer is exempt from registration.

(2) The F.E.C. complaint features documents related to members of the campaign showing their work as unregistered lobbyists, including illegal representation of the Chinese government to tap radio communications of The U.S. Embassy in The Dominican Republic on behalf of Huewei.

c) That Loomer and her campaign are engaged in illegal foreign and domestic lobbying activities, **including with Roger Stone and the banned Chinese firm Heuwei**, plus other State and Federal crimes, and is a danger to public safety.(2)

d) That Loomer has threatened, in a series of high profile media pieces, crimes against United States officials in violation of Florida elections laws, the Constitutional Rights of the people of Florida, and U.S. counterintelligence laws.

e) That Loomer has made illegal statements to the media proving her campaign is not a legitimate attempt to represent the people of Florida, but only certain select religious groups within the State, as part of an ulterior motive, a quest for social media fame, to gain financial advantages over opponents in her many current lawsuits. Loomer is a true stalking horse to Justice. One such judicial admission shows a statement by Loomer, just days old, in which she tells *The Palm Beach Post* Muslim U.S. citizens should be banned from ever running for public office.

f) That Loomer is currently in clear and alarming violation of The Florida Voter Protection Act (Fla. Sta. 104.061, 104.0615), The Florida promotion of tyranny crimes laws (Fla. Sta. 876.02, et al.), as well as Federal criminal codes relating to Conspiracy Against The United States per Title 18 and Title 22, and other felony criminal codes.

6. Plaintiff has been tasked with the duty of showing the public why she is the most qualified candidate to protect the public in her district (1), and as such is subject to all public ethics laws and other legal requirements when meeting this obligation; if her competitors do not meet the same legal standard to participate, Plaintiff is immediately obligated to show the taxpayers why this is factual to upholding the public trust in Government.

7. The F.E.C. has denied Plaintiff the normal routine task of government of acting on its normal jurisdictional authority as mandated by Fla. Sta. 104 and 106 to investigate the crimes alleged by the complainant in the time frame requested on an emergency basis -- this is a part of our law and the Plaintiff's Constitutional Right, and must be done.

8. Subsequently the defendants continue to openly and blatantly continue these crimes in knowing violation of the law.

**STANDARD OF LAW**

10. Due Process and Mandamus Petition requests cannot be separated. The basis in The Constitution guaranteeing fair practice upon citizens by all agents of The United States of America in administering the elections process is a given. The Florida Constitution provides for equal treatment under the law, and the right to seek this elected office is guaranteed only to persons with qualified residence under the State Constitution.

The only authority that can intervene in the electoral process in this matter and way is the F.E.C., and therefore Plaintiff has exhausted all lower authority remedies.

**RELIEF REQUESTED**

WHEREFORE, Plaintiff prays that this Court issue an immediate hearing and, as per 28 U.S. Code ss. 1361 enter writ of Mandamus no later than 5 p.m. Monday August 17, 2020:

- A. Directing the F.E.C. to remove Ms. Loomer's status as a candidate.
- B. Order the Republican Party of Florida to conduct a special election with only candidates who are legally qualified to participate.
- C. That the F.E.C. affirm all candidates of said special election have proven they are legally qualified to compete.
- D. All other relief/orders the court deems proper.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Reba Sherrill', with a long, sweeping horizontal stroke extending to the right.

Reba Sherrill  
P.O. Box 2874  
Palm Beach, FL 33480  
(561) 574-8237  
[reba@rebaforcongress.com](mailto:reba@rebaforcongress.com)

# EXHIBIT A

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FLORIDA ELECTIONS COMMISSION  
107 West Gaines Street, Suite 224, Tallahassee, FL 32399-1050

### COMPLAINT

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom it is brought.

#### 1. PERSON BRINGING COMPLAINT:

Name: Reba Sherrill Work Phone: (561) 574-8237  
Address: P.O. Box 2874 Home Phone: (561) 574-8237  
City: Palm Beach County: Palm Beach State: FL Zip Code: 33480

#### 2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

If you intend to name more than one individual or entity, please file multiple complaints. A person can be an individual, political committee, political party, electioneering communication organization, club, corporation, partnership, company, association, or other type of organization.

Name of individual or entity: Laura Loomer / Loomer for Congress, et al.  
Address: 3580 S. Ocean Blvd. BASEMENT Phone: (561) 635-2962  
City: Lake Worth County: Palm Beach State: FL Zip Code: 33480

If individual is a candidate, list the office or position sought: CD21 Congress. Rep.

Have you filed this complaint with the State Attorney's Office? (check one) ☐ Yes ☒ No

Are you alleging a violation of Section 104.271(2), F.S.? (check one) ☒ Yes ☐ No

Are you alleging a violation of Section 104.2715, F.S.? (check one) ☐ Yes ☒ No

#### 3. ALLEGED VIOLATION(S):

Please attach a concise narrative statement in which you list the provisions of the Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigate provisions of Chapter 104 and Chapter 106, Florida Statutes. Please include the following items as part of your attached statement:

- The facts and actions that you believe support the violations you allege;
- The names/telephone numbers of persons whom you believe may be witnesses to the facts;
- A copy or picture of any political advertisement(s) you mention in your statement;
- A copy of each document you mention in your statement;
- An explanation of why you believe information you reference from websites is relevant; and
- Any other evidence supporting your allegations.

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

*Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.*

FLORIDA ELECTIONS COMMISSION  
107 West Gaines Street, Suite 224, Tallahassee, FL 32399-1050

**4. OATH:**

STATE OF FLORIDA

COUNTY OF Palm Beach

I swear or affirm that the above information is true and correct to the best of my knowledge.

[Signature]  
Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 13<sup>th</sup> day of  
August, 2020

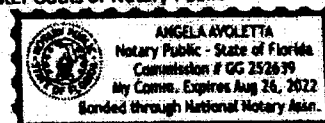
[Signature]  
Signature of Officer Authorized to Administer Oaths or Notary Public

Angela Avioletta

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☒ Or Produced Identification ☐

Type of Identification Produced \_\_\_\_\_



**5. IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:**

- You **MUST** submit this completed complaint form in order to file a complaint.
- You **MUST** complete **ALL FOUR** of the above sections of this form. **DO NOT** leave any blanks.
- You **MUST** submit the **ORIGINAL** complaint form. Copied/faxed/emailed forms are returned.
- Each complaint can only be filed against **ONE PERSON** or **ENTITY**. If you wish to file against multiple parties, you **MUST** submit a complaint form for each party you wish to file against.
- **DO NOT** submit multiple complaint forms with one set of attachments applying to multiple complaints. You **MUST** attach copies of attachments to each complaint to which they apply.
- **MAKE SURE** the alleged violation(s) of Chapters 104 or 106 occurred within the last 2 years.
- **MAKE SURE** your complaint is sworn and there is no defect to the notarization in Section 4.

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THE FLORIDA ELECTIONS COMMISSION  
107 West Gaines Street  
Suite 224, Collins Building  
Tallahassee, FL 32399-1050

**AFFIDAVIT**

I, the undersigned, state in support of my complaint against Laura Loomer / Loomer For Congress, et al.:

The campaign has engaged in direct and cursing violations of Florida Statutes 104 and 106 and I respectfully request this commission's response and decision concerning this complaint no later than (NLT) 24 hours from the date/time of filing.

My complaint is brought on an emergency basis and requires the commission exercise it's jurisdiction and authority to protect the People of The State of Florida. I request the commission act sua sponte utilizing it's authorities to bar Ms. Loomer from participating in this election.

This complaint is not, and is not intended to be, a full recital of the facts concerning this matter.

**LOOMER DOES NOT QUALIFY AS A CANDIDATE IN THIS ELECTION**

The election is open only to persons who are residents of the State of Florida. The U.S. Postal Service confirms that Laura Loomer's current residential address is 16 Willow Street West, Harrison, New York 10604. A review of Florida tax records shows no domicile or business taxes filed by Loomer in Florida. Ms. Loomer's cell phone numbers are registered to persons other than herself in Arizona and New York.

There are strict evidence requirements for an individual to prove they are no longer a New York domiciliary. Florida's domicile law prescribes: "...the burden of proof rests on the party asserting the **abandonment** of one domicile to demonstrate the acquisitions of another." (**Emp. Ad.**) See *Keveloh*, 699 So. 2d at 288. Ms. Loomer currently **maintains** her residence at 15 Willow Street West, Harrison, New York.

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Ms. Loomer is required by New York tax code to prove she has spent less than 30 days in New York during this tax year to qualify to domicile in Florida. Investigation cooperators and informants have provided that Loomer lives in New York with her boyfriend, **Jacob Wohl**.

Resident status is established through a fact-intensive investigation process, and includes that the investigation target prove he/she resides at the address they provide for this purpose. Ms. Loomer's only known addresses are business addresses, not residences.

Loomer is employed at 2223 2nd Avenue N #B121 by Illominate Media LLC, Lake Worth, FL 33461.

Loomer is listed as a **possible** past resident of 3580 South Ocean Boulevard, Apt. B, Palm Beach, FL, on consumer credit databases. (**Emp. Ad.**) The U.S. government has her last known appearance at that address being March 9, 2020.

**LOOMER HAS ASSIGNED DEPUTY TREASURERS AND FINANCIAL ADVISORS TO THE CAMPAIGN WHO ARE UNAUTHORIZED, AND HIRED CAMPAIGN EMPLOYEES SHE FAILED TO PAY FOR NO REASON.**

Investigators and intelligence consultants have provided above prima facie standard proof via emails and text messages showing that Loomer, in her full legal authority, has assigned persons who are not registered with the Florida Elections Commission to manage campaign money.

Investigators and intelligence consultants have provided above prima facie standard proof via emails and text messages showing that Loomer, in her full legal authority, has assigned persons who are not registered with the Florida Elections Commission to perform campaign duties requiring oversight by the commission.

(EXHIBIT 1)

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**CAMPAIGN IS FRAUGHT WITH CRIMINAL ACTIVITY, WITNESSES SAY MONEY IS SENT OUT OF STATE, CANDIDATE IS ENGAGED IN ILLEGAL FOREIGN LOBBYING ACTIVITIES**

Investigators and intelligence consultants have provided above prima facie standard proof that monetary support (donations, items of value) have been forwarded, in some cases transferred via bank accounts, to company named **Named Kingston Public Affairs**, operated by **Karen Giorno**.

Loomer receives the support of **Joe Korff**, engaging in unlicensed international lobbying practices via a Palm Beach synagogue. Korff is a promoter of Loomer and of **Roger Stone**, making introductions to politicians on the behalf of investigation targets including charged and convicted criminals.

Investigators have uncovered that Korff is lobbying on the behalf of a large Florida based criminal group, affiliates of and/or family to Rafael Trujillo, the one time Dominican dictator. The consortium operates over a dozen for-profit companies based out of storage lockers and mail drops in Miami and Coral Gables, FL. (EXHIBIT 2)

The family has engaged in widespread fraud in Florida, including operating a for-profit company and billing it as a registered political party and/or 501(c)(3) charity. **This is in direct relation to the current Memorandum of Indictment against U.S. Ambassador Robin Bernstein**, as investigation targets, cooperators, and other judicial instruments clearly show Korff and his associates engaging with known criminals to alter and effect U.S. and foreign elections in support of the Chinese state-owned company **Hytera Dominicana**, a subsidiary of **Huawei**. (EXHIBIT 3)

Korff has made judicial statements that he is in support of the Dominican criminal enterprise, overseen by the Cuban Directorate of Intelligence and The Venezuelan Government. Detailed and thorough monitoring has revealed Loomer is a representative for Korff and **Steven Alembik**, a Boca Raton businessman operating **SMA**, a public data marketing company. Alembik's criminal history shows a current felony domestic battery charge.

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The synagogue members include known criminals, some of sensational standing. The logistics of the illegal lobbying scheme are coordinated in-part by a man name **Roh** and a man named **Luis Adrian Ibarra Celis**. (EXHIBIT 4)

There is substantial evidence revealing that multiple candidates have worked together to fix this election of behalf of third parties, and engaged in documented communications to further this ulterior agenda.

**LOOMER'S CAMPAIGN HAS ENGAGED IN THREATS AND FALSE STATEMENTS AGAINST IT'S OPPONENTS IN VIOLATION OF THE VOTER PROTETCION ACT.**

In violation of **The Voter Protection Act**, Fla. Stat. 104.061, 104.0615, Ms. Loomer's campaign has launched documented attempts to bribe and intimidate opposing candidates and voters into abandoning the election. There is clear proof that Loomer has regularly engaged in this activity. (EXHIBIT 5).

Loomer has recently informed The Palm Beach Post that she is promoting her campaign on the basis that:

Islam is "...a cancer on humanity... Muslims should not be allowed to seek positions of political office in this country." *Dicta, Six GOP Candidates Compete in U.S House District 21, article by Christine Stapleton.*

Loomer has recently informed

"In a grandiose letter [email] to her fans, Loomer imagines using her congressional bid to get back on Twitter - and once she wins, using her position to harass Democrats in Congress's members only elevators. *Dicta, Laura Loomer Pledges to Harass Lawmakers in Elevators if Elected to Congress, Daily Beast, article by Will Sommer, 8/8/2019*

**This is a direct violation of Fla. Sta. 876.02, parts 1, 2 and 3.**

**LOOMER IS OPERATING HER CAMPAIGN FOR ULTERIOR PURPOSES;  
STALKING HORSE TO JUSTICE.**

Loomer is operating her campaign with the ulterior agenda of gaining financial advantage in her many lawsuits relating to her removal from social media platforms for hate speech and faking

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subscriber counts. Loomer has made the following judicial admission as relates to the purpose of her running for CD 21:

"I can't wait to see the reactions of Mark Zuckerberg and Jack Dorsey as they have to reinstate a 'dangerous individual' to their platforms... I can't help but laugh as I think about it." *Dicta, Laura Loomer Pledges to Harass Lawmakers in Elevators if Elected to Congress, Daily Beast, article by Will Sommer, 8/8/2019*

**LOOMER HAS ENGAGED IN THE PROMOTION OF TYRANNY IN VIOLATION OF FLORIDA STATUTE 876.02, HATE SPEECH, ETC., ET AL.**

In the current negative security state we are facing, Loomer has engaged in hate speech promotion of tyranny as a means of influencing the elections process as recently as three days ago, violating Fla. Sta. 876.02, applicable to Loomer directly and blatantly, and applicable to all members of her organization, mandating arrest and imprisonment for

"...by force or violence; of disobeying or sabotaging or hindering or carrying out of the laws, orders, or decrees of duly constituted civil, naval, or military authorities; or by the assassination of officials of the Government of The United States or of the state, or by **any unlawful means or under the guidance of, or in collaboration with**, officials, agents, or representatives of a foreign state or an international revolutionary party or group..." Fla. Sta. 876.02(1) and/or;

"Prints, publishes, edits, issues, or knowingly circulates, sells, distributes, or publicly displays any book, paper, document, or written or printed matter in any form, containing or advocating, advising, or teaching the doctrine that constitutional government should be over thrown by force, violence or any lawful means." Fla. Sta. 876.02(2) and/or;

"Openly, willfully and deliberately urges, advocates, or justifies by word of mouth the... assaulting of any official of The United States or of this state because of her official character, or any other crime, with the intent to teach, spread or advocate the propriety of the doctrines of criminal anarchy...Fla. Sta. 876.02(3) and/or;

"Organizes or helps to organize or becomes a member of any such [group]." Fla. Sta. 876.02(4) and/or;

"Becomes a member of, associated with or promotes the interest of [any such group]." Fla. Sta. 876.02(5).

For the aforementioned reasons, Laura Loomer is in direct and abhorrent violation of our State election laws. I ask that this commission utilize its authority to enforce the laws it is chartered by The State of Florida to enforce, and bring immediate Justice to this matter on behalf of the

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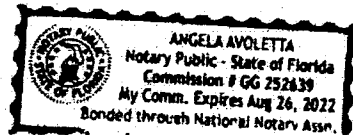
people.

I will testify to the statements of this affidavit in any United States Court of Law.

By: REBA SHERRILL

Sworn to before me this 13<sup>th</sup> day of August, 2020.

*Angela Avoletta*





**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

-----X  
REBA SHERRILL,  
Plaintiff.

vs.

FLORIDA ELECTIONS COMMISSION  
Defendant

**CERTIFICATE OF SERVICE  
DOCKET NUMBER**

**PRO SE APPELLANT  
CONSTITUTIONAL RIGHTS**

-----X

I, Brenna Outlaw hereby certify under penalty of perjury that on 8/15/20  
served a copy of ~~12/30/2018~~

**WRIT OF MANDAMUS PETITION OF REBA SHERRILL V. FLORIDA ELECTIONS  
COMMISSION, DATED 8/14/2020**

*fec @ my florida legal . com*

in the above matter by United States Mail and electronic mail on the following parties:

**FLORIDA ELECTIONS COMMISSION**  
107 west Gaines street, Suite 224, Tallahassee, FL 32399-1050

Dated: August 15, 2020

Palm Beach, FL

By: 

Name: Brenna Outlaw

Add. 1: P.O. Box 2016

Add 2: Palm Beach FL 33480

Telephone: 786-503-1858

Email: *brennaoutlaw@gmail.com*

JS 44 (Rev. 06/17) FLSD Revised 06/01/2017

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST indicate ALL Re-filed Cases Below.

## I. (a) PLAINTIFFS

REBA SHERRELL

(b) County of Residence of First Listed Plaintiff Palm Beach  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se

## DEFENDANTS

Florida Elections Commission

(b) County of Residence of First Listed Defendant Tallahassee  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

To Legal Dept.

(d) Check County Where Action Arose: ☐ MIAMI-DADE ☐ MONROE ☐ BROWARD ☒ PALM BEACH ☐ MARTIN ☐ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE ☐ HIGHLANDS

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ 1 ☐ 1
- Citizen of Another State ☐ 2 ☐ 2
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3
- Incorporated or Principal Place of Business In This State ☐ 1 ☐ 1
- Incorporated and Principal Place of Business In Another State ☐ 2 ☐ 2
- Foreign Nation ☐ 3 ☐ 3

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefit
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise
- PERSONAL INJURY**
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Med. Malpractice
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability
- PERSONAL PROPERTY**
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729 (a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property
- ☐ 440 Other Civil Rights
- ☒ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education
- Habeas Corpus:**
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- Other:**
- ☐ 530 General
- ☐ 535 Death Penalty
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Mgmt. Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Enpl. Ret. Inc. Security Act
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - Third Party 26 USC 7609
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

## ORIGIN

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Re-filed (See VI below)
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation Transfer
- ☐ 7 Appeal to District Judge from Magistrate Judgment
- ☐ 8 Multidistrict Litigation - Direct File
- ☐ 9 Remanded from Appellate Court

## VI. RELATED/RE-FILED CASE(S)

(See instructions): a) Re-filed Case ☐ YES ☒ NOb) Related Cases ☐ YES ☒ NO

JUDGE:

DOCKET NUMBER:

## VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

U.S. CODE 28 § 1361 - MANDAMUS WRIT FOR ORDER

LENGTH OF TRIAL via days estimated (for both sides to try entire case) ON ELECTIONS COMMISSION

## VIII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

ABOVE INFORMATION IS TRUE &amp; CORRECT TO THE BEST OF MY KNOWLEDGE

DATE 8/14/2020 SIGNATURE OF ATTORNEY OF RECORD X

FOR OFFICE USE ONLY  
RECEIPT #

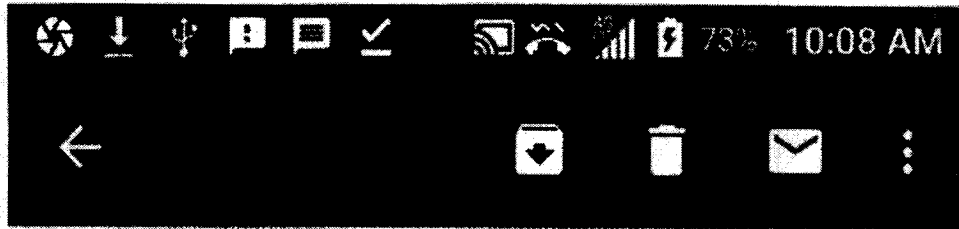
AMOUNT

IFP

JUDGE

MAG JUDGE

# **EXHIBIT 1**



**Audra LaRay**

to me

4 days ago View details



Email I sent to Laura's lawyer confirming my employment. Forwarding a few others.

Sincerely,  
Audra LaRay Pendry

—— Forwarded message ——

**From: Audra LaRay**

<audralaraybooking@gmail.com>

**Date:** Fri, Apr 24, 2020 at 5:30 PM

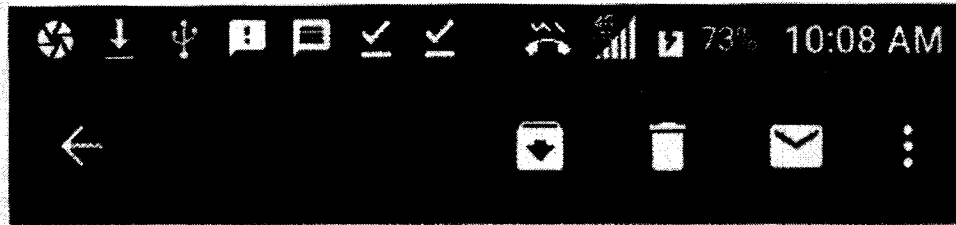
**Subject:** Information

**To:** <cspies@dickinsonwright.com>

I have attached the invoices that I sent to Liz on February 13, 2020. I have also attached the W-9 that proves that I was a paid employee.

I had a verbal agreement on the phone with Laura on February 7, 2020, where we agreed upon the amount of \$1500/month + my 50% revenue share + \$1 per signed petition. We also established that I would be paid on the 15th and the 30th of each month. Verbal agreements are legally binding in the state of Florida.





You will also find attached a screenshot of texts between Laura and I where she acknowledges payment being sent to me for my salary.

I will forward you emails that I had with Liz to try and sort this out.

If you need anyone to corroborate this information, you can contact Garrett Mann, her former campaign manager who brought me on board, at: (850) 776-5060.

You can also contact Rudy Giuliani, who spoke to Laura about how he would endorse her and even throw a fundraiser for her - but only if I, Audra Pendry, was on board her campaign. This phone call took place on January 31st.

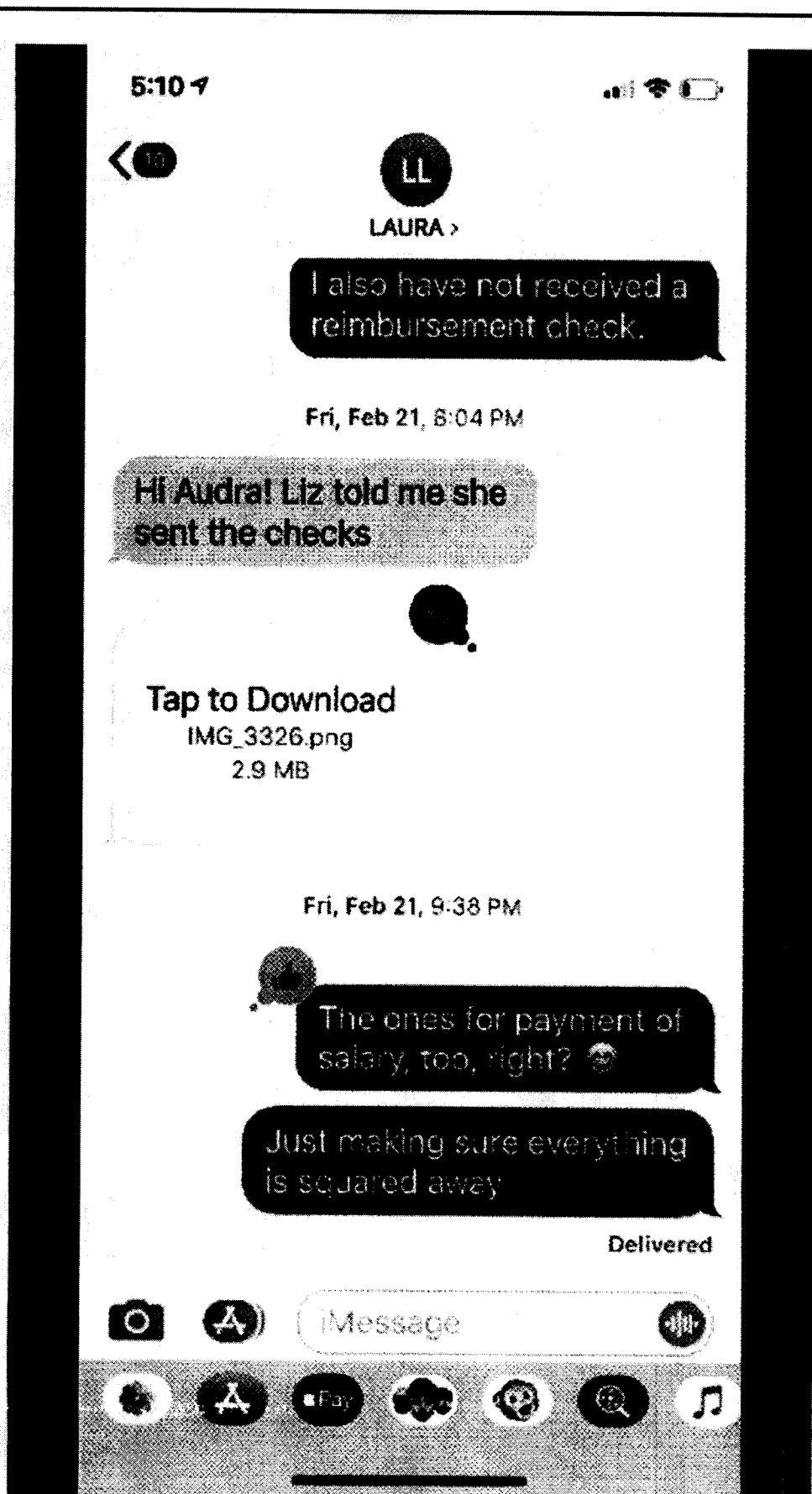
You can also contact any of the volunteers I recruited: Alexa Amor, Dwain Rheinbolt, Ryan Pence, Steven Stabile, Herbert Esmahan, Tricia DeBlasis, Kyra Jeffers, and even Jessi Melton - a prospective congresswoman in FL-22. Let me know if you'd like their information.

Going forward, feel free to contact my attorney:  
Mayor Rudolph Giuliani

~~\_\_\_\_\_~~ (alternate)

Again, I will forward those emails with Liz.





**Form W-9**  
 (Rev. October 2019)  
 Department of the Treasury  
 Internal Revenue Service

**Request for Taxpayer Identification Number and Certification**

Go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9) for instructions and the latest information.

Give Form to the requester. Do not send to the IRS.

1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.  
Audra Pendry

2 Business name (disregarded entity name, if different from above)

3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only one of the following seven boxes.

☒ Individual sole proprietor or single-member LLC  
☐ C Corporation  
☐ S Corporation  
☐ Partnership  
☐ Trust/estate  
☐ Limited liability company. Enter the tax classification (C-Corporation, S-Corporation, Partnership) in                       
 Note: Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is not disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner.  
☐ Other (see instructions) in                     

4 Exemptions (codes apply only to certain entities; not individuals; see instructions on page 3):  
 Exempt payee code (if any)                       
 Exemption from FATCA reporting code (if any)                       
 (Apply to amounts restricted under the U.S.)

5 Address (number, street, and apt. or suite no.) See instructions.  
PO Box 111111

6 City, state, and ZIP code  
DeVray Beach, FL 33446

7 List account number(s) here (optional)

**Part II Taxpayer Identification Number (TIN)**

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

Note: If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidance on whose number to enter.

Social security number								
1	2	3	4	5	6	7	8	9
Employer identification number								
1	2	3	4	5	6	7	8	9

**Part III Certification**

Under penalties of perjury, I certify that:

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
- I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- I am a U.S. citizen or other U.S. person (defined below); and
- The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

**Sign Here**

Signature of U.S. person Audra Pendry Date 2/2/20

## General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

## Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following:

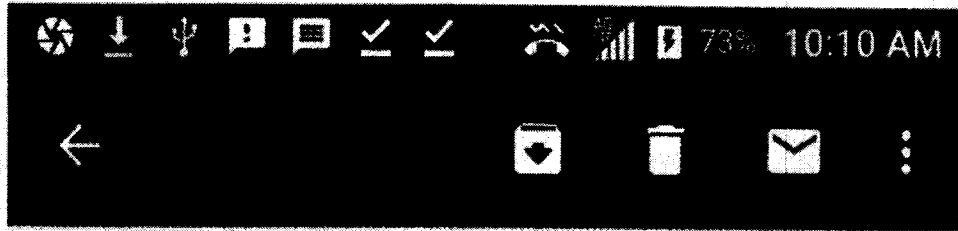
- Form 1099-DIV (interest earned or paid)

- Form 1099-DIV (dividends, including those from stocks or mutual funds)
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)
- Form 1099 (home mortgage interest), 1099-E (student loan interest), 1099-T (tuition)
- Form 1099-C (canceled debt)
- Form 1099-A (acquisition or abandonment of secured property)

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See *What is backup withholding*, later.





—— Forwarded message ——

From: **Audra LaRay**

<audralaraybooking@gmail.com>

Date: Fri, Apr 24, 2020 at 5:31 PM

Subject: Fwd: Expense Reports and January Invoice,  
1/2 February Invoice

To: <cspies@dickinsonwright.com>

—— Forwarded message ——

From: **Liz Curtis** <liz@lizcurtisassociates.com>

Date: Thu, Feb 13, 2020 at 5:06 PM

Subject: Re: Expense Reports and January Invoice,  
1/2 February Invoice

To: Audra LaRay <audralaraybooking@gmail.com>

Cc: Laura Loomer <laura.loomer93@gmail.com>

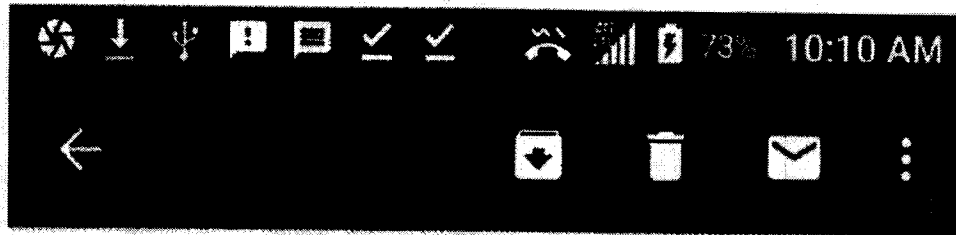
Thanks, Audra. Copying Laura on this as she  
approves all bills. Thanks!

Show quoted text

—  
Audra LaRay Pendry







—— Forwarded message ——

From: **Liz Curtis** <liz@lizcurtisassociates.com>

Date: Fri, Mar 6, 2020 at 11:17 AM

Subject: Re: Paychecks

To: Audra LaRay <audralaraybooking@gmail.com>

Hi Audra,

Yes I did receive both the one to me and the one to Laura.

Thank you for informing me of that. Do you have a signed contract you could send me?

I will work to get an update on this, however, you may be confused. I do mail the checks, however, I am not the authorizer of any payments. Like I said though, if you have a signed contract you could get me, that would definitely help me get things moved along. I wasn't aware there was a signed agreement stating payment dates.

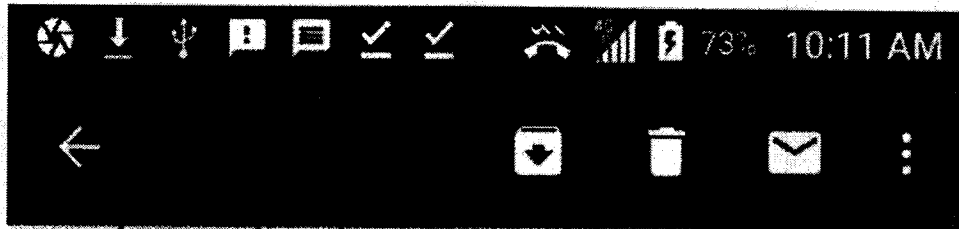
On Fri, Mar 6, 2020 at 11:14 AM Audra LaRay <audralaraybooking@gmail.com> wrote:

Hi Liz,

I'm just confirming that you received the email that you told me to resend for Laura to authorize my paychecks?

You do know that, by law, this was supposed to be





you have a signed contract you could get me, that would definitely help me get things moved along. I wasn't aware there was a signed agreement stating payment dates.

On Fri, Mar 6, 2020 at 11:14 AM Audra LaRay <audralaraybooking@gmail.com> wrote:

Hi Liz,  
I'm just confirming that you received the email that you told me to resend for Laura to authorize my paychecks?

You do know that, by law, this was supposed to be paid by February 15th, and it's now March 6th..

Show quoted text

--  
Audra LaRay Pendry

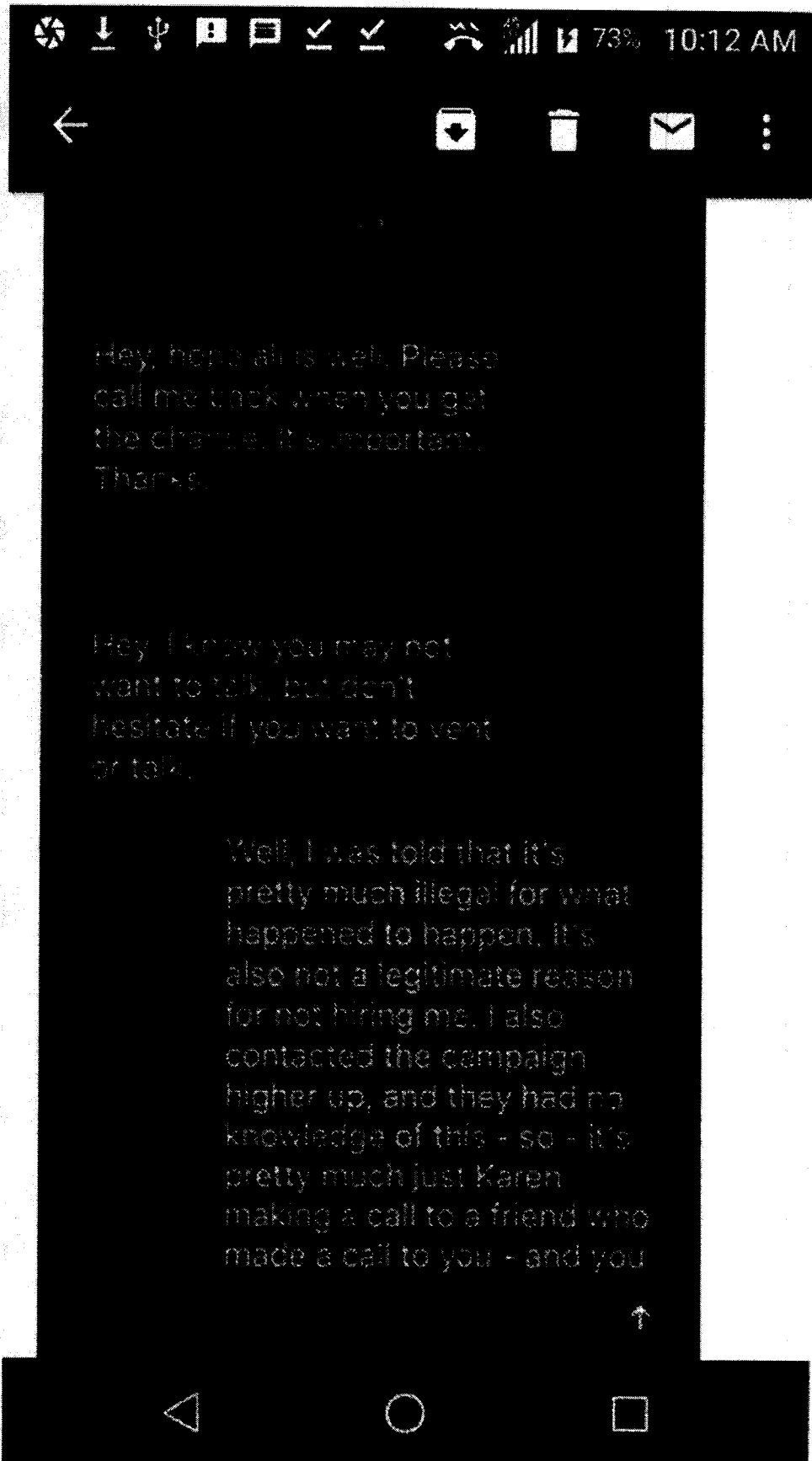
--  
Audra LaRay Pendry

↩  
Reply

↩↩  
Reply all

➡  
Forward

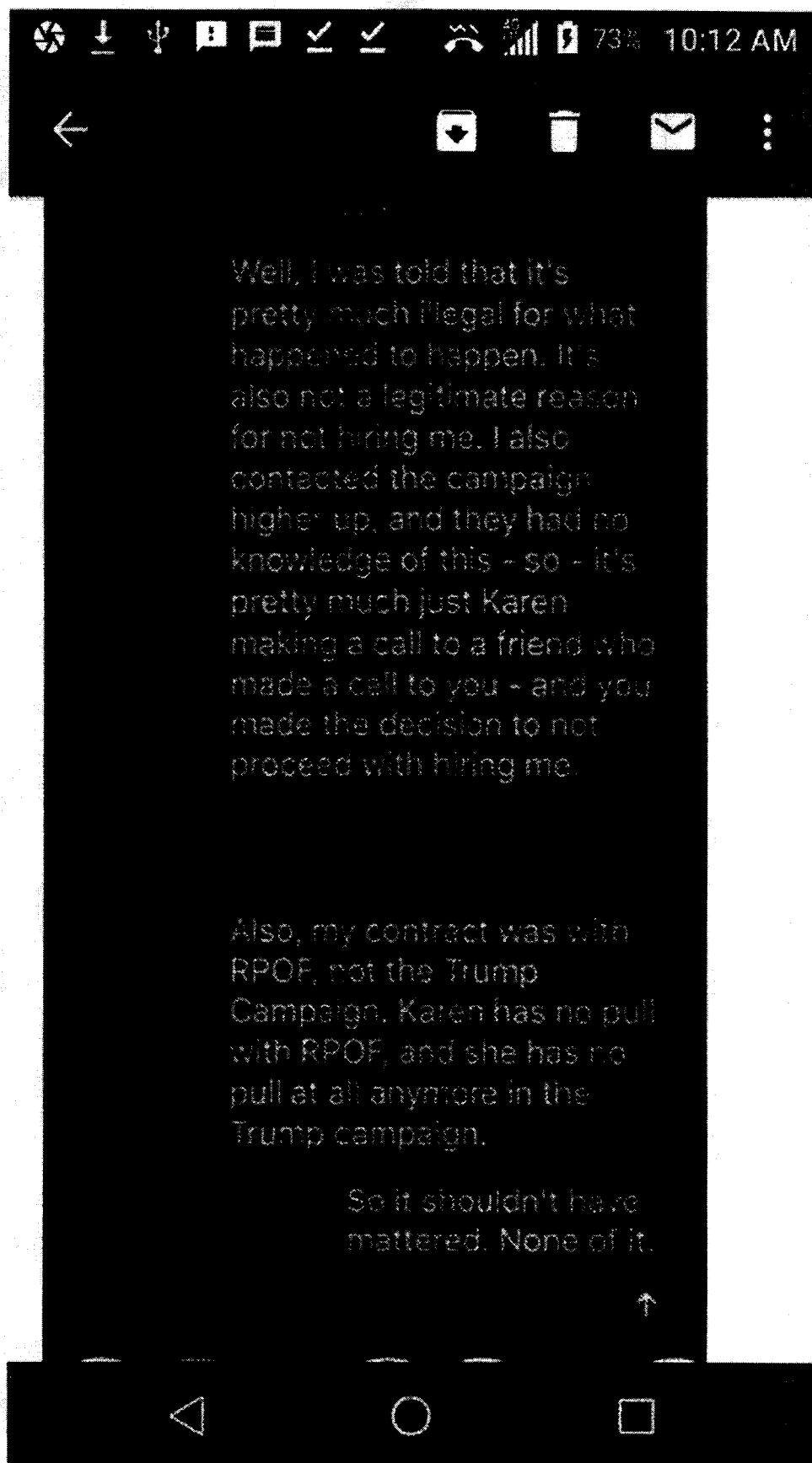




Hey, hope all is well. Please call me back when you get the charter. It's important. Thanks.

Hey. I know you may not want to talk, but don't hesitate if you want to vent or talk.

Well, I was told that it's pretty much illegal for what happened to happen. It's also not a legitimate reason for not hiring me. I also contacted the campaign higher up, and they had no knowledge of this - so - it's pretty much just Karen making a call to a friend who made a call to you - and you



Well, I was told that it's pretty much illegal for what happened to happen. It's also not a legitimate reason for not hiring me. I also contacted the campaign higher up, and they had no knowledge of this - so - it's pretty much just Karen making a call to a friend who made a call to you - and you made the decision to not proceed with hiring me.

Also, my contract was with RPOF, not the Trump Campaign. Karen has no pull with RPOF, and she has no pull at all anymore in the Trump campaign.

So it shouldn't have mattered. None of it.



Lucdwin Luck was my boss at the campaign. That's who I'm communicating with here. I also have recordings, if needed.

Sent from my iPhone

On Aug 9, 2020, at 10:12 PM, Benjamin Benjamin  
1125503000 wrote:

Show quoted text



## **EXHIBIT 2**

June 26, 2020

To:

Mike Pompeo, Secretary of State  
William Barr, Attorney General  
Michael Horowitz, Inspector General

Memorandum for Record

The purpose of this memorandum is to illustrate criminal activity resulting in national security problems. This memorandum and the attached motion has no later than (NLT) 14 calendar days to be responded to.


1) I am filing the motion attached to the Department of State (DOS) and The Department of Justice (DOJ) to request criminal charges be filed in conjunction with Kathryn Ballard, Brian Ballard, James Rubin, and Robin Bernstein. The criminal charges are the following: *Conspiracy Against The United States, Conspiracy to Launder Money, Acts as an Unregistered Agent of A Foreign Principle, False and Misleading FARA Statements, False Statements.*

The defendants have conducted business with countries that are enemies of The United States, allowing foreign nations that are enemies of The United States to have personnel, equipment and monies flow through The Dominican Republic as far north as Southern Florida, and these actions have now allowed these nations to pre-position rockets aimed at The United States within The Dominican Republic with unknown enemies of The United States given placement and access to those weapons.

2) There are potential ties and caveats to Dominican Presidential Candidate Gonzolo Castillo, Dominican President of OBRA Publica Felix Bautista, drug trafficker Ramon Antonio de Rosario Puente, Dominican Generals who are drug dealers and gun runners, and Islamic terror target Ashlakaan Mohammed Said, as well as ISIS, The Juarez, Sinaloa, and Carcel del Sol cartels, Hezbola, Trinitarios, etc.

3) The executive branch has made it clear that nobody does any type of business with rogue nations as listed in and collateral to this motion being Venezuela, Iran, Cuba, China. This is in direct violation of our counter espionage laws as applies to lobbyists and their principles, as well as in direct conflict with The Logan Act and The Vienna Law on Treaties.

4) The point of contact (POC) is

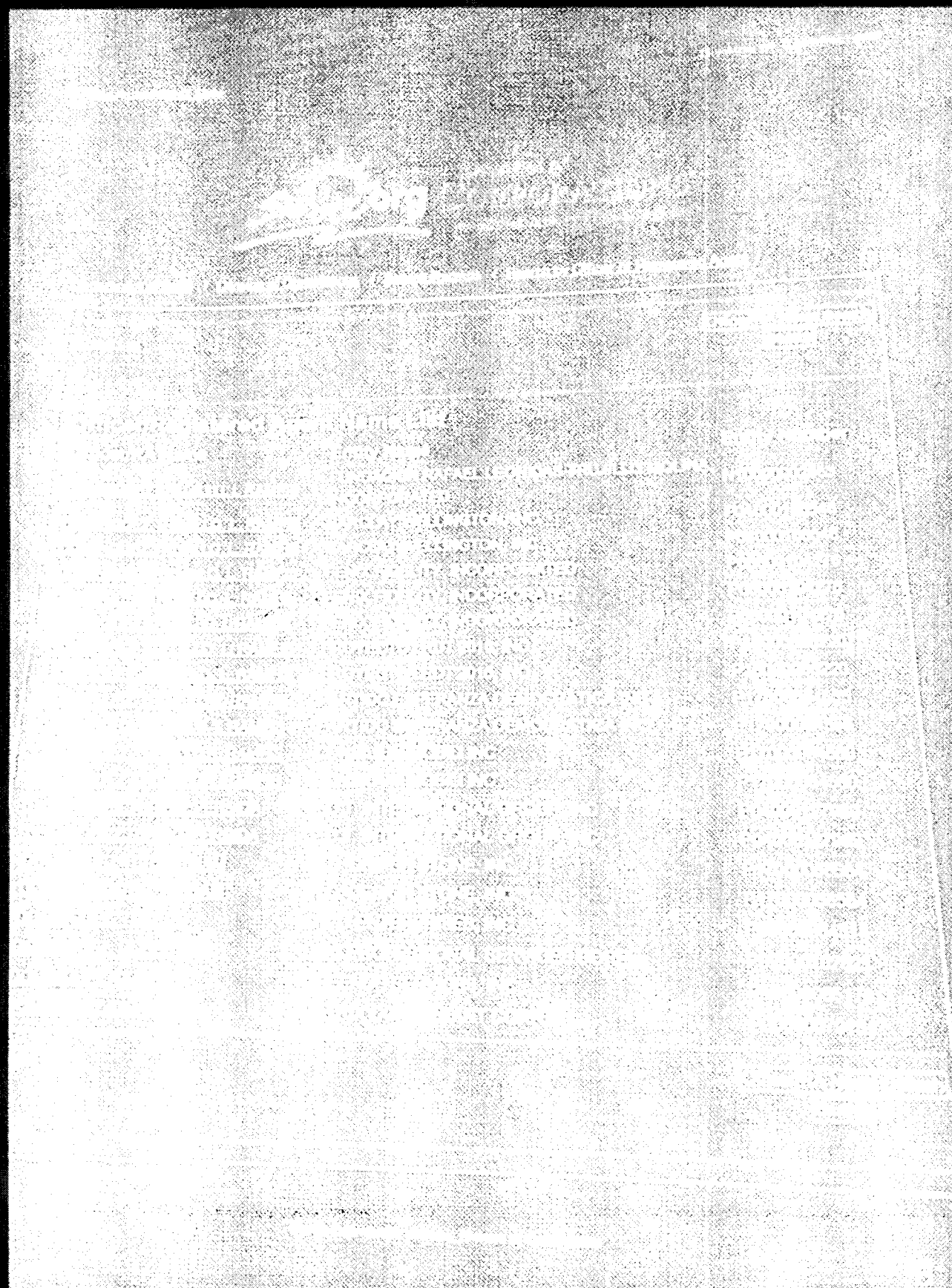


Lagerstrom, Benjamin  
Candidate for U.S. Ambassador  
to The Dominican Republic



Intelligence Consultant

CC: P.O.T.U.S.





# **EXHIBIT 3**

**Mrs.  
Robin Bernstein  
Ambassador of the United States of America  
In Dominican Republic.**

Santo Domingo  
01-07-2019

Distinguished Ambassador

I am writing to you to inform you of the abuses that as a US citizen I have been the object of the Dominican justice system.

Also sending a copy of the letter sent to the Ambassador of China in the country where my situation is explained

Also I am adding the writ of an appeal of unconstitutionality, for violations of my right to defend myself from my counterpart a Chinese Company of Origin but with a subsidiary in the City of Miramar, State of Florida, which operates under the laws American.

This company called HYTERA AMERICA INC. I participated in a consortium with our AVELOCK DOMINICANA, SRL here in the country in what was the first stage of the 9-1-1 national emergency system, which won the bid and we operated said project under the name of CONSORCIO AVELOCK-HYTERA, awarded entity to develop the project.

It seems that Hytera saw the magnitude of the project at the national level and decided to form a local company and take ours from the consortium, which they achieved through a CONSPIRATION with the participation of 9-1-1 people which originated in the minister's office of the presidency Gustavo Montalvo.

This company HYTERA to achieve its goal, BRIBE to the Dominican state, to the detriment of other brands participating in the future tender.

Also this company HYTERA has defrauded the Dominican government, by not delivering goods and services that the Consortium paid, until today, has not been implemented, as is the case of the ENCRYPTION of that platform.

Due to the fact that this project was carried out in part with funds donated by the North American government, I formally requested an investigation of the HYTERA Company by the Department of Commerce and the Department of Justice of the United States.

At the same time, I hold the following leaders responsible for any attack on my physical integrity or that of my family:

**Lic. Danilo Medina Sanchez, President of the Dominican Republic, Gustavo Montalvo, minister of the Presidency; Dr. Xenia Garcia, vice minister of ethics of the presidency; Luis Ibarra Celis manager of HYTERA Dominicana; Carlos Cordova, vice president of HYTERA America, Inc.; Ing. Jose Amado Perez, assistant minister of the presidency; Eng. Welbis Beltran, director of technology 911 and Juan Herrera, in charge of the radio platform of 911.**

Thank you for your attention.



William Henriquez  
FLD# H562-936-60-178-0

9 ENE 2019

## LICITACIONES REALIZADAS POR HYTERA DESPUES DE ROMPER EL CONSORCIO CON AVELOCK

NUMERO DE LICITACION	DESCRIPCION	MONTO	FECHA
PE-279/2016	SISTEMA RADIOS TETRA Y CONSOLAS DE DESPACHO POLICIA NACIONAL	105,732,904.29	30 NOVIEMBRE 2016
911-CCC-LPN-2015-22	SOLUCION RADIOS TETRA Y CONSOLAS DE DESPACHO SANTIAGO Y PUERTO PLATA	236,435,243.98	30 DE AGOSTO 2016
911-CCC-LPN-2015-18	SOLUCION RADIOS TETRA Y CONSOLAS DE DESPACHO SANTO DOMINGO Y SAN CRISTOBAL	86,149,770.37	18 DE AGOSTO 2016
911-CCC-LPN-2018-0010	MICROONDAS BANDAS LICENCIADAS 11GHZ	6,899,902.41	25 DE FEBRERO 2019
911-CCC-LPN-2019-0008	EXPANSION SISTEMA DE RADIOS TETRA A NIVEL NACIONAL	398,579,054.33	08 SEPT. 2019
911-CCC-LPN-2019-0017	COMPRA DE RADIOS MOVILES FIJOS Y PORTATILES	119,450,887.92	1 DE NOVIEMBRE 2019
911-CCC-LPN-2019-0026	REPARACIONES MAYORES DE RADIOS TERMINALES	7,758,730.00	2019
911-CCC-LPN-2019-0007	SERVICIOS DE SOPORTE 2 Y 3 NIVELES PARA LA RED DE ESTACIONES BASE	59,922,202.23	2019

# Hytera

Packing List No. 23112422  
Page: 4

Pcs.	Part-No. Description	Quantity	
	SW license per total sum of each number of connected applications (ID) of all AGW gateways in the network. Only to be applied if any applications other than TCAD dispatcher, TVR voice recorder and TVG voice gateway are used with ACCESSNET® T IP.		
15.0 4020	<b>5500.0713.00</b> TETRA AIE Class 2 Feature License for network per 100 subscribers (SS) Air Interface Encryption using Static Keying (Static Cipher Keys, SCK)  AIE Class 2 is available with the following encryption algorithms: TEA1, TEA2, TEA3 Use of TEA2 Encryption Algorithm 2 (TEA2) for the air interface encryption requires usage understanding agreement between base organization and the possession of TEA2, which is subject to German and European export regulations.  Feature license per number of subscribers in the network (stepping of 100 subscribers)	42	pcs
15.5	<b>5500.1283.03</b> Package Version 8 SW License per network incl. TEA1 algorithm  subject to German and European Export Regulations	1	pcs
16.0 4030	<b>5500.0707.00</b> TETRA Authentication Feature license for network per 100 subscribers (SS) Authentication of TETRA Mobile Stations in the TETRA network - TETRA Mobile Station versus TETRA Switching & Management Infrastructure (SwMI) - Mutual Authentication of both parties  Feature License per number of subscribers in the network (stepping of 100 subscribers)	42	pcs
17.0 4040	<b>5500.0587.00</b> Individual Call (Full Duplex) Feature license for network per 100 subscribers (SS) Allows net-wide Full-Duplex calls between TETRA radio subscribers with Hook-Signaling (ringing) and manual call acceptance (telephone mode)  Feature License per number of subscribers in the network (stepping of 100 subscribers)	42	pcs
18.0 4050	<b>5500.0736.00</b> Enable / Disable Feature License for network per 100 subscribers (SS) Temporary & permanent disabling of TETRA Mobile Stations via the Air Interface and enabling from temporarily disabled state  Feature License per number of subscribers in the network (stepping of 100 subscribers)	42	pcs
19.0 4060	<b>5500.0607.00</b> Packet Data (Single Slot) Feature license for network per 100 subscribers (SS) Feature license per max. number of Packet Data connections in the network (stepping of 100)	1	pcs
20.0 4070	<b>5500.1132.00</b> PGW Packet Data Gateway SW License per gateway & per capacity for 100 PD users PGW is the ACCESSNET® T IP gateway to IP networks and the company's IP connection's interface for the transmission of IP data (IP over TETRA). Using software connections, external peripheral equipment, TETRA subscribers can access data networks, which are internally connected to ACCESSNET® T IP.	1	pcs



**Juan Carlos De los Santos**

**De:** Geraldo Vargas <gevargas@a24.com.do>  
**Enviado el:** lunes, 18 de junio de 2018 8:44 a. m.  
**Para:** j.delossantos@acropolisdr.com  
**Asunto:** Seguimiento Propuesta

Espero se encuentre bien.

Nos gustaría saber el estatus de la propuesta que le enviamos hace unos días luego de habernos reunido. La misma se trataba del intercambio de los radios y el servicio de comunicación por el uso de un espacio en el techo de su edificio.

En espera de sus buenos oficios.

Saludos.

**A24**

ALARMA 24

Gerardo

Gerardo Vargas  
Gerente General

• Calle Jose R. Lopez No. 1  
Calle esq. John F. Kennedy Los Prados,  
Santo Domingo, Republica Dominicana

• 809-227-6060 Ext. 2110 • 849-863-9362

• gevargas@a24.com.do

www.a24.com.do

**Hytera**  
**sepura**

# A24.

**PROTEGE LO QUE VALORAS.**

## ALARMA 24

Señores

Acrópolis

Att.: Sr. Juan Carlos De Los Santos.

Gerente de Seguridad.

Distinguido Señor:

Después de un afectuoso saludo, nos dirigimos a usted después de haber sostenido una reunión en el día de ayer. En la misma le presentamos una propuesta, para la solución a sus necesidades, en el área de radio comunicación presente y futuro.

La propuesta sería la siguiente, nosotros A24 le instalaríamos en el último piso de su edificio (sala de máquinas de los ascensores) una plataforma de radio comunicación **HYTERA 100% DIGITAL**. Propiedad de A24, con una cobertura 100%, desde el último nivel de sótano, hasta el piso 27, incluyendo 5 kilómetros a la redonda del edificio.

La misma operaría con frecuencias nuestras. Al mismo tiempo le sustituiríamos los 40 radios que ustedes tienen en existencia por radio **HYTERA PD506 Análogo Digital**. Con sus accesorios. los radios serían propiedad de A24, esto garantizaría que los radios se mantengan en óptimo funcionamiento.

Estos radios tendrían la capacidad de interconectarse, con el sistema de despacho NexusTalk. El cual permite que un radio se comunique en tiempo real, con un celular, y viceversa en forma de radio.

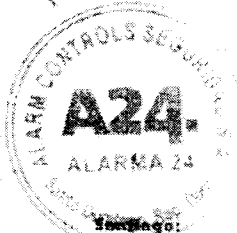
Esto le garantizaría el control total de su fuerza de trabajo, no importando donde se encuentre, el supervisor inmediato.

El fin de esta propuesta sería para nosotros poder intercambiar un espacio de 1.50 Mt x 1.50 Mt en el último piso de su edificio en la sala de máquinas de los ascensores. En el mismo instalaríamos dentro de un gabinete metálico cerrado nuestros equipos y en los balcones del mismo piso instalaríamos las antenas.

El tiempo que necesitamos de contrato es de 5 años renovables debido a que la inversión que haríamos. No nos sería factible con un tiempo menor de contrato. Nuestro interés es poder satisfacer todas sus necesidades de comunicación inalámbrica.

Agradeciendo de antemano su atención a la presente, se despide cordialmente,

Gerardo Vargas  
Gerente Productos  
Radios Comunicación

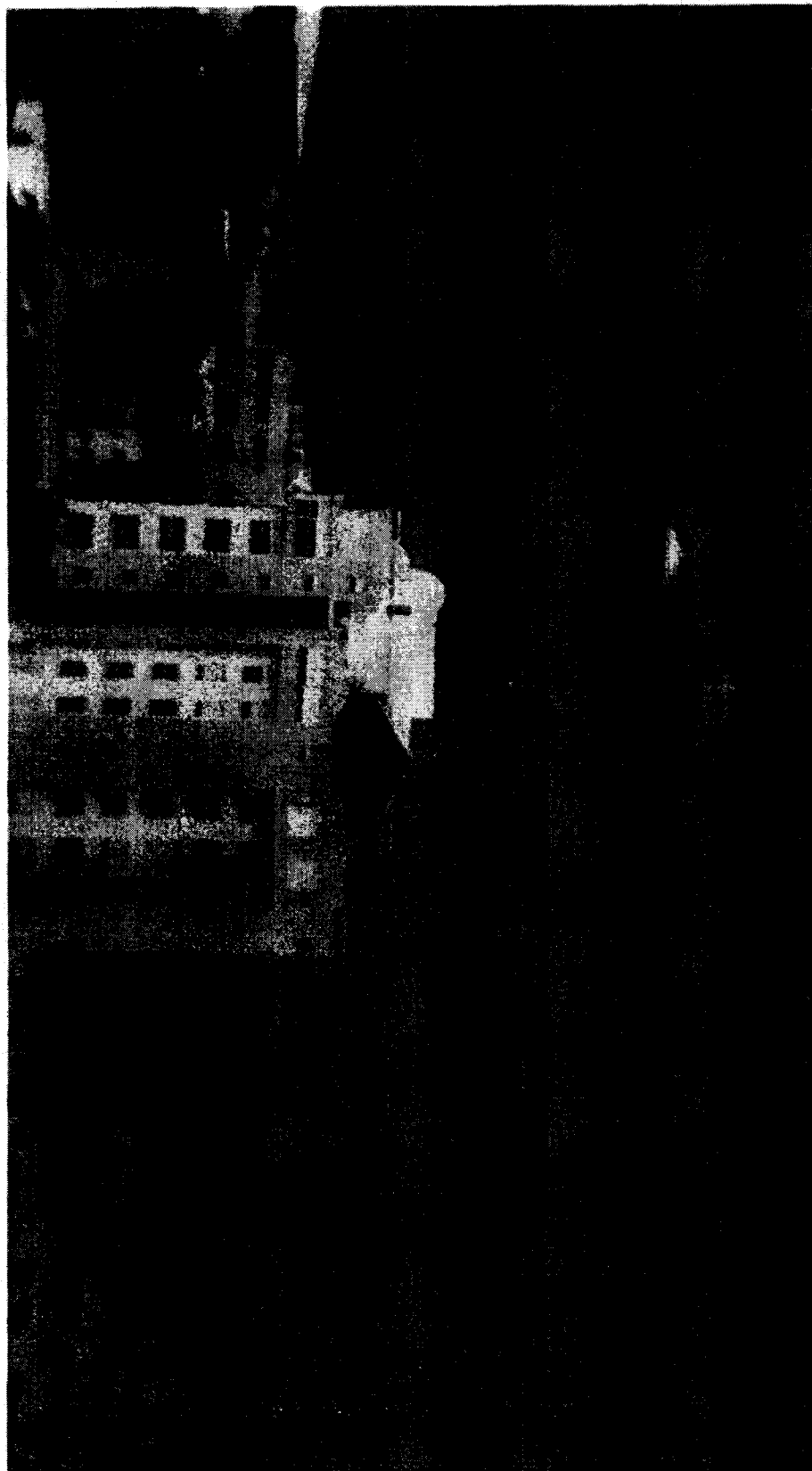


Santo Domingo: Edificio Lucille I,  
Calle José B. López No. 1, Los Prados,  
Santo Domingo, Rep. Dom. T. 809 227 6060

Santo Domingo:  
Ave. General Luperón No. 60  
T. 809-241-0303 / 809-241-0500

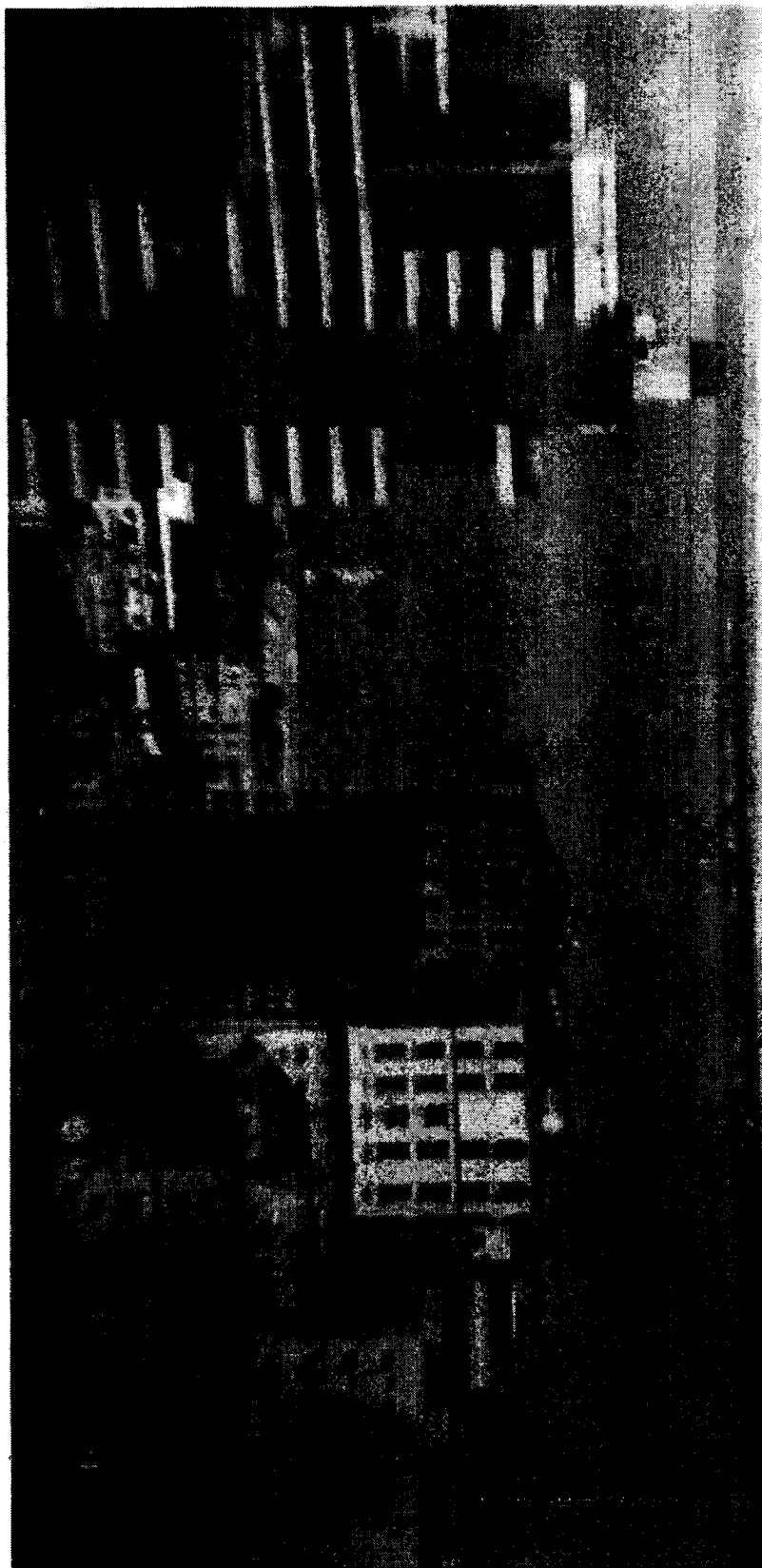
www.a24.com.do  
info@a24.com.do

RNC 101803114

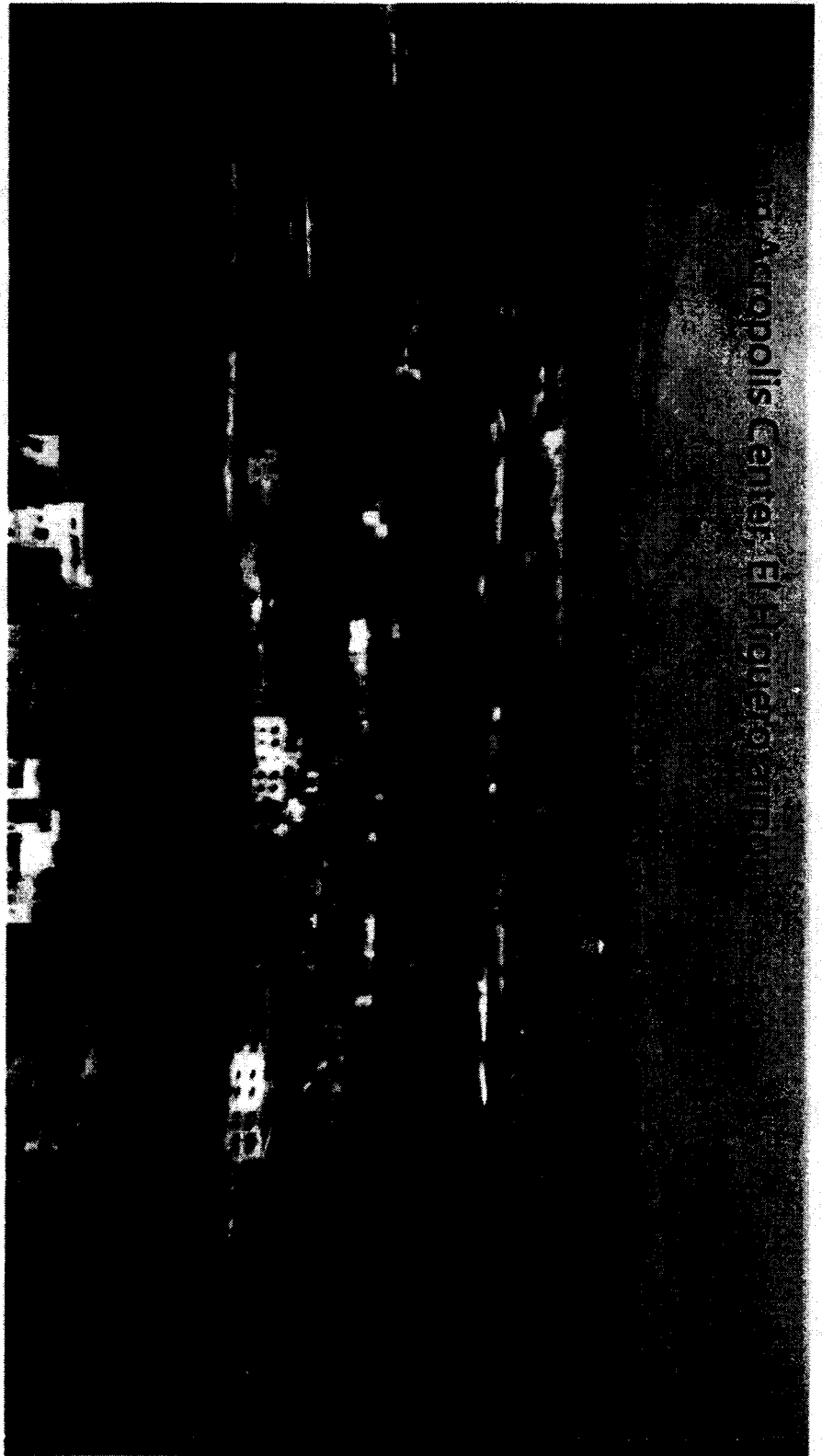




**View from Acropolis Center, Las Americas airport and Cancado port**



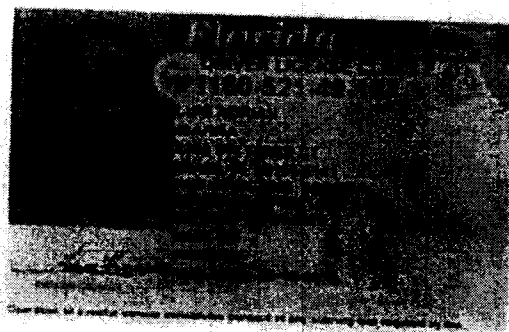






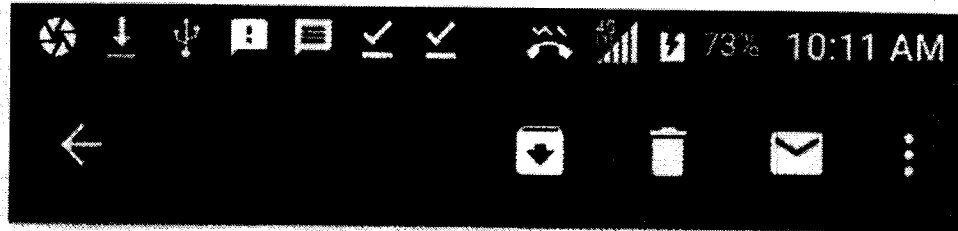
# **EXHIBIT 4**

ORIGINAL



# HytEra

# **EXHIBIT 5**



Audra LaRay



to me

4 days ago View details

- Fired from the Trump Campaign because Karen Giorno made a call to a friend of hers in the campaign. I have screenshots confirming this.

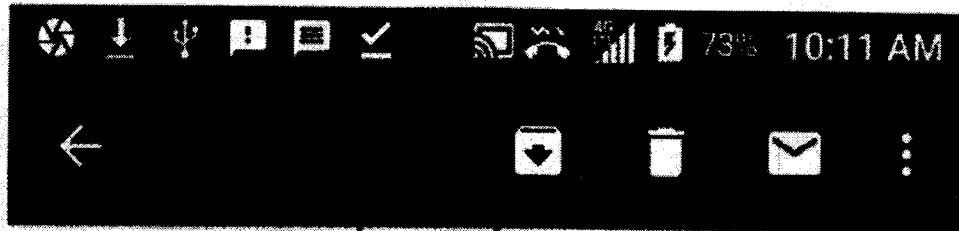
- Buys email lists for campaigning - she has spent \$16,857.45 on email lists. She knew the law against this existed in January when I brought up Christian Acosta sending me campaign emails when I never opted-in. She looked at Karen, and said, "We need to report that to the FEC, because sending bulk unsolicited emails is against the law."

"The CAN-SPAM Act is a United States law that regulates commercial email. While it doesn't actually prohibit someone from buying and selling email addresses, it *does* prohibit sending bulk unsolicited emails. And if you're sending to a purchased email list, that's exactly what you're doing. You would be in violation of the law."

- Laura's "team" made calls to Christian Acosta's campaign "team" and threatened them, saying that if Christian didn't drop out, that they would make sure that everyone there was "investigated" and that they "would never be able to work in Palm Beach again". Christian didn't drop out.

- Mossad agent possible - their whole mission is to "cause chaos" which is exactly what LL has done. This would also explain why she doesn't have certain





documents - because she's possibly a foreign agent. Many people think this. Her ties to Jacob Wohl and Ghislaine Maxwell also back this up. She also takes many trips to Israel, and apparently talks to her "dad" like a "handler" - relaying information to him on what is happening here, etc.

- You mentioned the Latin Cartel and the Dominican Republic, she is extremely close with Enrique Tarrio - the "Proud Boys" leader.

- Lastly, these are the phone numbers I have for LL: (561) 635-2962, (520) 870-9791.

Please let me know if you need anything else and the information about the 4 pm call!

Thank you!

Sincerely,  
Audra LaRay Pendry

—  
Audra LaRay Pendry

5



**Benjamin Benjamin**

to Audra

3 days ago [View details](#)





## Extremely Urgent

This envelope is for use with the following services:

UPS Next Day Air®  
UPS Worldwide Express®  
UPS 2nd Day Air®

Visit [theupsstore.com](http://theupsstore.com) to find a location near you.

### Domestic Shipments

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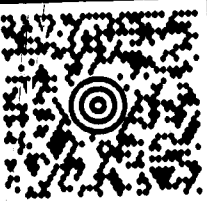
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