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Cc: PVPS Email
Subject: WVIO-PLA24-0100 NOTICE OF RECORD DEFECT AND REQUEST FOR VERIFICATION OF PRIOR COUNTY APPEAL FILING
Date: Thursday, March 5, 2026 8:58:23 AM

BEFORE THE WASHOE COUNTY BOARD OF ADJUSTMENT

In the Matter of:

Code Enforcement Case: WVIO-PLA24-0100

BOA Appeal: WCAH2025-000045

Property: 300 Pah Rah Springs Road

Owner: Jonathan Belfort

NOTICE OF RECORD DEFECT AND REQUEST FOR VERIFICATION OF PRIOR COUNTY APPEAL FILING

Jonathan Belfort respectfully submits this notice in order to preserve procedural objections and clarify the administrative record regarding appeals filed in this matter.

1. The County previously initiated an appeal to the Washoe County Board of Adjustment concerning the Administrative Hearing Officer's decision related to Case WVIO-PLA24-0100.
2. That County appeal was the first appeal initiated concerning the Administrative Hearing Officer's order.
3. Plaintiff subsequently filed his own appeal concerning the same administrative matter.
4. The hearing currently scheduled before the Board concerns Plaintiff's appeal and related issues arising from the Administrative Hearing Officer's January 9, 2026 order.
5. Through a Nevada Public Records Act request and administrative record production requests, Plaintiff obtained a copy of the County's "Appeal to Board of Adjustment Application."
6. The copy provided contains no visible file stamp verifying the official filing date of the County appeal.
7. The affidavit section of the appeal form, which states that the appellant is "duly

sworn,” contains no signature and no notarization.

8. Because the affidavit language requires a sworn declaration, the absence of a signature or notary acknowledgment prevents verification that the appeal was properly executed.

9. Plaintiff formally requested the following records relating to the County appeal:

- file-stamped appeal copy
- appeal intake logs
- routing sheets
- notarized affidavit version of the appeal

10. Those materials have not been produced.

11. Without a verified filing date or sworn affidavit, the procedural validity and timing of the County’s previously filed appeal cannot be confirmed.

12. Plaintiff respectfully requests that the Board clarify on the record:

- whether a file-stamped version of the County appeal exists
- whether a notarized affidavit exists
- the official filing date of the County appeal
- whether the County appeal remains active or was superseded by subsequent proceedings

13. These questions are raised in good faith to ensure the integrity and completeness of the administrative record.

DATED: March 5, 2026

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