

1 Joshua Stacy
2 7721 Haskell Flats Drive
3 Las Vegas, NV 89128
4 310-773-2620
5 joshua.stacy@gmail.com

CASE NO: A-24-895506-C
Department 31

6 **IN THE COUNTY COURT OF CLARK COUNTY, NEVADA**

<p>Joshua Stacy, Plaintiff, v. Jill Douglass, individually, Chuck Muth, and FRIENDS OF JILL DOUGLASS, Defendants.</p>	<p>Case No.: Department:</p>
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8 **COMPLAINT FOR DECLARATORY RELIEF, INJUNCTIVE RELIEF, AND**
9 **DAMAGES**

10 **I. INTRODUCTION**

11 Plaintiff Joshua Stacy brings this action against Defendant Jill Douglass, Defendant Chuck Muth,
12 and Friends of Jill Douglass for declaratory relief, injunctive relief, and damages. This complaint
13 arises from the Defendants' defamatory and unethical conduct during the recent Nevada State
14 Senate primary election for District 6.

1 Despite the significant challenges faced during his campaign, Plaintiff Joshua Stacy received
2 27.98% of the vote, totaling 2,134 votes, as per the official results reported by
3 SilverStateElection.nv.gov on June 15, 2024. This performance was achieved with less than
4 \$2,000 in campaign funds, contrasting sharply with Defendant Jill Douglass's campaign, which
5 operated with over \$100,000. The substantial difference in campaign resources, combined with
6 the Defendants' defamatory statements and other unethical practices, highlights the severity of
7 the misconduct and its potential impact on the election outcome.

8 Plaintiff seeks to uphold the principles of fair and transparent elections and to protect his
9 reputation from the baseless and damaging claims made by Defendants. Plaintiff is an ordained
10 elder in the Melchizedek Priesthood of the Church of Jesus Christ of Latter-day Saints (LDS
11 Church) and has Jewish friends and customers. The defamatory statements made by Defendants
12 are not only false but also potentially damaging to Plaintiff's personal and professional
13 relationships.

14 Defendant Jill Douglass, a candidate for the Nevada State Senate, and her campaign committee,
15 Friends of Jill Douglass, engaged in actions that included making false and defamatory
16 statements about Plaintiff Joshua Stacy. Additionally, Defendant Chuck Muth, acting in concert
17 with Jill Douglass, contributed to the dissemination of false and defamatory information, further
18 damaging Plaintiff's reputation and candidacy.

19 As a result of these actions, Plaintiff Joshua Stacy has suffered harm to his reputation and has
20 been unfairly prejudiced in the electoral process. The voters were deprived of a fair election, and
21 Plaintiff was deprived of the opportunity to fairly work for the chance to serve the good people

1 of Senate District 6 in Carson City. Plaintiff seeks relief from this Court to address these
2 violations and prevent further defamatory conduct, ensuring the integrity of future elections.

3 **II. PARTIES**

4 Plaintiff Joshua Stacy is a self-employed resident of Clark County, Nevada and former candidate
5 for the Nevada State Senate, District 6.

6 Defendant Jill Douglass is a retired resident of Clark County, Nevada, and is a candidate for the
7 Nevada State Senate, District 6.

8 Defendant Friends of Jill Douglass is believed to be the campaign committee supporting Jill
9 Douglass.

10 Defendant Chuck Muth is among other things, a campaign consultant, and runs a blog.

11 **III. JURISDICTION AND VENUE**

12 This Court has jurisdiction over this matter pursuant to the laws of the State of Nevada.

13 Venue is proper in this Court because the events giving rise to this Complaint occurred in Clark
14 County, Nevada.

15 Venue is proper in this Court because this Court has personal jurisdiction over the parties.

16 **IV. FACTUAL ALLEGATIONS**

17 **A. Defamation and False Statements**

18 1. On May 20th, 2024, Jill Douglass (x.com/VoteJillDouglas) publicly stated, “The Nevada
19 Current should stop being Christphobic and maybe focus on Nicole’s bad for Nevada
20 voting record or my primary opponent’s antisemitic rants” (Exhibit 1)

- 1 2. On May 22nd, the same account posted a screenshot from Defendant Chuck Muth's
2 website which claimed Plaintiff Joshua Stacy hates Israel and loves Hamas. Defendant
3 Douglass shared this image stating, "Thank you Chuck Muth for sharing truth and
4 making voters aware of the stark contrast between the candidates in this race" (exhibit 2).
- 5 3. On June 11th, at the Rainbow Road Library Polling location in Clark County, Nevada,
6 Defendant Douglass accused Plaintiff of being antisemitic, a statement which is false and
7 defamatory.
- 8 4. Despite Plaintiff's requests for clarification and evidence, Defendant Douglass refused to
9 retract or explain her accusations. Instead, she merely stated that she stands with Israel
10 and that Plaintiff said "Free Palestine." This response ignores the fact that Israel is a
11 country, not a religion, and that advocating for the freedom of Palestinians from
12 perceived oppression is not equivalent to antisemitism.
- 13 5. These false statements were made in the presence of voters and volunteers, including
14 those from Victoria Seaman's mayoral campaign who witnessed it firsthand.
- 15 6. Plaintiff Joshua Stacy unequivocally condemns all forms of antisemitism, terrorism, and
16 violence. Plaintiff has criticized the influence of foreign governments, such as AIPAC, on
17 American elections. Plaintiff believes that organizations representing foreign interests
18 should be transparent and, where appropriate, registered as foreign agents. This helps
19 ensure American sovereignty in its electoral processes.
- 20 7. Plaintiff has also stated "Free Palestine" from the perspective of calling for peace and
21 freedom; as an ordained elder, Plaintiff's response to any conflict is a cry for peace. As a
22 proud American, and as the descendant of men who would not be ruled, Plaintiff also
23 strongly advocates for freedom for all people.

1 8. Plaintiff, as an ordained Elder in the Melchizedek Priesthood of the LDS Church and a
2 Mormon scholar, upholds the principle that "We believe that men are free to worship
3 according to the dictates of their own conscience, let them worship how, where, or what
4 they may" (Article of Faith 11). Plaintiff believes that Jews have the same right to
5 worship as any other American and should be able to worship freely in America. Plaintiff
6 avers one of the many beautiful aspects of this country is the ability for us to coexist
7 peacefully and respectfully without being divisive and hostile.

8 9. Plaintiff has Jewish friends and customers, and these baseless claims of antisemitism are
9 damaging to his reputation and relationships. While Plaintiff's reputation is strong enough
10 that these claims have not caused significant harm, addressing them promptly is
11 necessary to prevent future damage. Plaintiff seeks a court ruling that declares these
12 antisemitism claims as baseless and a permanent injunction against all defendants from
13 making such statements in the future.

14 **B. Campaign Finance Violations**

15 10. On 4/15/2024 Jill Douglass filed her Contribution and Expense Report (exhibit 3) where
16 she indicated:

- 17 a. She paid \$1,000 to Citizens Outreach (a PAC) for special events (Code K)
- 18 b. Declared a loan to herself of \$100,000.

19 11. Citizen Outreach PAC is listed with NVSOS with "Chuck Muth" as the contact name and
20 an address of 5841 #. Charleston Blvd, #230-253 Las Vegas, NV 89142.

21 12. Per NVSOS, it appears Citizen Outreach PAC has not filed a CE report since 2008,
22 despite being listed as active (exhibit 4).

1 13. Shortly after the April C&E report deadline, Defendant Douglass received endorsements
2 and public support from many organizations including Keystone Corporation, BetterNV
3 PAC, Nevada WINS PAC, Morning in Nevada PAC, and others (exhibit 5).

4 14. Absent the Defendant Douglass loaning her campaign \$100,000, her total C&E report
5 donations would have been less than \$1,000; as of that point, Plaintiff Stacy had also
6 raised less than \$1,000.

7 **C. Unfair Campaign Practices**

8 15. On June 11th (primary day), Defendant Douglass and/or Friends of Jill Douglass hired a
9 mobile ad truck to perpetually circle the parking lot of the library with a mobile ad truck
10 that not only was displaying LED moving graphics, but was playing music. This was so
11 disruptive that the security guard for the library took action.

12 16. Defendant Douglass repeatedly made false and defamatory statements about Plaintiff
13 Stacy and refused to engage in any public discourse. Defendant Douglass was invited by
14 Plaintiff Stacy more than five separate times to join him for a public debate and she never
15 accepted nor even responded.

16 17. Defendant Douglass also made false claims about Plaintiff Stacy at the Clark County
17 Republican Party meeting in May of 2024 where she claimed Plaintiff Stacy was not a
18 Republican.

19 18. Mr. Stacy is a registered Republican and a constitutional conservative.

20 **V. LEGAL STANDARD**

21 Under Nevada law, a plaintiff must demonstrate the following elements to establish the
22 respective claims:

1 A. Violation of Nevada Campaign Finance Laws

- 2 • **NRS 294A.120:** Requires candidates to report all contributions received, including
3 in-kind contributions. Failure to disclose these contributions is a violation.
- 4 • **NRS 294A.200:** Outlines the reporting requirements for campaign contributions and
5 expenditures. Misrepresenting or failing to report contributions can result in penalties.
- 6 • **NRS 294A.325:** Prohibits contributions or commitments to make contributions by
7 foreign nationals and penalizes knowing solicitation, acceptance, or receipt of such
8 contributions.

9 B. Defamation

- 10 • **NRS 200.510:** Defines libel as a malicious defamation, expressed by printing, writing,
11 signs, pictures or the like, tending to blacken the memory of the dead, or to impeach the
12 honesty, integrity, virtue, or reputation, or to publish the natural defects of a living person
13 or persons, or community of persons, or association of persons, and thereby to expose
14 them to public hatred, contempt or ridicule.
- 15 • **NRS 200.520:** Defines publication as any method by which matter charged as libelous
16 may be communicated to another.
- 17 • **NRS 200.530:** Establishes liability for editors or publishers for libelous material.
- 18 • **NRS 200.550:** Penalizes individuals who willfully furnish libelous information.

19 C. Unfair Campaign Practices

- 20 • **NRS 294A.290:** Code of Fair Campaign Practices provides a legal reference for ethical
21 campaign behavior.

1 VI. ARGUMENT

2 A. Violation of Nevada Campaign Finance Laws

3 14. Defendants failed to disclose significant in-kind donations and the true sources of their
4 campaign funding, violating **NRS 294A.120**, **NRS 294A.200**, and **NRS 294A.325**. These
5 actions obscured the transparency required by campaign finance laws, misleading voters
6 about the true financial support for Defendant Douglass's campaign.

7 15. By way of further clarification, the entire foundation of why campaign contributions must
8 be reported is to allow voters to know what financial interests a politician may have as a
9 result of donations. Defendant Douglass' actions appear to be an overt attempt to
10 obscure the source of her donations until after the primary. Plaintiff Stacy contends this
11 was done knowingly and intentionally, with intent to deceive; Mr. Stacy further notes the
12 Court need not find intention to deceive in order to find Defendant Douglass guilty of
13 violations of the campaign reporting requirements.

14 16. With respect to **NRS 294A.325**, Defendants' public conflation of antisemitism (a
15 religious bigotry) with criticism of Israel's military actions (a country), was undoubtedly
16 connected with support from Pro Israel groups (see exhibits 6, 7, and 8). The exact
17 sources of those funds, by virtue of Ms. Douglass loaning her campaign money vs
18 sharing publicly what her donations were, is unclear. What is clear is that Per Exhibit X,
19 Jill Douglass received public support from pro Israel groups. It would stand to reason
20 that she would have received donations of cash or in-kind donations, from these sources;
21 this set of arguments helps underscore the importance of transparent donations.

22 17. In an effort to clarify the argument presented before the court is, did Ms. Douglass accept
23 donations violative of NRS 294A.325? One simple test of one prong of this argument

1 would be to interchange the country “Israel” with a few others that the U.S. is on
2 different terms with. If Ms. Douglass where to have taken money from groups
3 advocating for Russian interests and held a sign saying “A strong Russia = A strong US”,
4 that hits the ear differently and helps clarify the concern. The reason why NRS 294A.325
5 exists is because there should be no foreign interference with domestic elections. If the
6 Court finds the information and evidence in this complaint credible, this means Ms.
7 Douglass (1) publicly accepted campaign support in exchange for declaring public
8 support for another country, (2) essentially failed to disclose the source of 99.42%¹ of her
9 campaign funds presuming she intended to have the campaign repay the loan, and then (3)
10 publicly attacked her opponent on the basis of trying to conflate a religion with a country
11 in exchange for support for nationals from a foreign country.

12 18. While Plaintiff Stacy understands a great deal of controversy has been in the public
13 sphere regarding the conflict with Israel and Palestine, another way of testing the logic of
14 these claims would be to assume that Defendant Douglass had accepted donations from
15 Palestinian’s to publicly criticize anyone not sympathetic to Palestinian positions on this
16 matter.

17 19. The people of Nevada State Senate District 6 were denied the opportunity to have a fair
18 election as a result of these campaign violations.

19 **B. Defamation**

20 20. Defendants made false and defamatory statements about Plaintiff, knowing them to be
21 false, or with reckless disregard for their truth or falsity, in violation of **NRS 200.510**.

22 ¹The full calculation is 99.42786069651741% of campaign funds effectively had their source concealed by
23 virtue of being a loan.

1 These statements have caused harm to Plaintiff's reputation and candidacy. The claim
2 that Mr. Stacy was "antisemitic" or "loves Hamas" was meant to intentionally mislead
3 voters and was offered with malicious intent (see exhibit 9, page 3). Mr. Stacy repeatedly
4 addressed these claims online, but Defendant Douglass refused to engage in open
5 discussion and debate. The severity of this issue is further underscored by the fact that
6 under NRS 200.510, is in fact a misdemeanor.

7 21. Plaintiff Joshua Stacy unequivocally condemns all forms of antisemitism, terrorism, and
8 violence. Plaintiff's criticism is primarily directed towards the influence of foreign
9 governments on American elections by foreign interest groups such as AIPAC. Plaintiff
10 believes that organizations representing foreign interests should be transparent and, where
11 appropriate, registered as foreign agents. This is in line with ensuring American
12 sovereignty in its electoral processes.

13 22. Plaintiff, as an ordained elder in the Melchizedek Priesthood of the LDS Church and a
14 Mormon scholar, upholds the principle that "We believe that men are free to worship
15 according to the dictates of their own conscience, let them worship how, where, or what
16 they may" (Article of Faith 11). Plaintiff believes that Jews and essentially all other
17 religions (especially any peaceful ones) should be able to worship freely in America and
18 conduct themselves in any generally public space. One of the many beautiful aspects of
19 this country is the ability for us to coexist peacefully and respectfully without being
20 divisive and hostile.

21 23. Plaintiff has Jewish friends and customers, and these baseless claims of antisemitism are
22 damaging to his reputation and relationships. While Plaintiff's reputation is strong enough
23 that these claims have not caused significant harm, addressing them promptly is

1 necessary to prevent any potential escalation of damage. Plaintiff seeks a court ruling that
2 declares these claims of antisemitism as baseless, and asks that a permanent injunction
3 against Defendant Muth, Defendant Douglass, and Friends of Jill from making such
4 statements in the future.

5 24. The claims made by Defendant Douglass, Chuck Muth, and Friends of Jill Douglass were
6 false and offered in an attempt to mislead voters. These statements were given
7 maliciously and with the intention of being deceptive.

8 **C. Unfair Campaign Practices**

9 19. Defendants' conduct, including making false statements, refusing to engage in direct
10 discourse, and engaging in disruptive behavior, constitutes unfair campaign practices that
11 have prejudiced the electoral process.

12 20. Plaintiff Stacy's ability to garner nearly 28% of the vote with less than \$2,000 and in the
13 face of these various challenges leads Mr. Stacy to believe that the cumulative impact of
14 these was material to the outcome of the election. When Ms. Douglass publicly accepted
15 support from those advocating for interests of a foreign country, that gave her campaign
16 more support. When Defendant Douglass intentionally defamed Mr. Stacy by conflating
17 a religion with a country, Defendant Douglass essentially violated most, if not all of the
18 provisions in the Code of Fair Campaign Practices all candidates are invited to sign
19 (NAC 294A.290).

20 21. Defendant Douglass not only made these claims, but she made them without any attempt
21 to verify the truth of her claims. In fact, Defendant Douglass' actions appear to be so
22 wanton and egregious that even when she was contacted on multiple occasions to provide
23 accurate information, or even host a public discussion so she could explain her position in

1 an environment where I could respond, she refused. In fact, Defendant Douglass' desire
2 to defame Mr. Stacy went to such great lengths that she claimed he wasn't a republican; it
3 is provably false and by virtue of Mr. Stacy being a registered republican and a candidate
4 on the republican ballot, Plaintiff Stacy avers this more than satisfactorily establishes that
5 Mr. Stacy, is in fact, a republican.

6 22. On July 3, 2023 Veterans In Politics (a youtube channel) posted an interview they did
7 with Defendant Douglass who was a candidate for Clark County Republican Chair at the
8 time. She ultimately lost to Jesse Law, but not before accusing him of not being a
9 republican; the logic offered was that he once said he was a libertarian. Plaintiff Stacy is
10 a constitutional conservative and finds the differences between libertarians and
11 republicans to be fairly limited given they are both largely aligned on virtually all major
12 points. Plaintiff Stacy proffers that Ms. Douglass accusation of claiming Mr. Stacy was
13 not a republican at the county party meeting was much less surprising given that she
14 claimed her opponent in the prior election was not a republican.

15 23. Plaintiff Stacy avers to the Court that Ms. Douglass et al knowingly and intentionally
16 violated NRS criminal code, campaign finance laws, and even the Code of Fair
17 Campaign Practices. If the Court finds the evidence, testimony, and argument of Plaintiff
18 Stacy credible, there should be a finding of violations of these laws.

19 **VII. PRAYER FOR RELIEF**


20 WHEREFORE, Plaintiff respectfully requests that this Court:

21 A. Declare that Defendants' actions violated Nevada campaign finance laws and ethical
22 standards.

- 1 B. Disqualify Defendant Jill Douglass from the Nevada State Senate primary election.
- 2 C. Award Plaintiff Stacy damages in the amount of \$25,000 for harm to his reputation from the
3 false claims.
- 4 D. Issue a preliminary injunction preventing Defendants from making any further libelous or
5 defamatory claims about Mr. Stacy.
- 6 E. Issue a permanent injunction preventing Defendants from making defamatory statements
7 about Plaintiff in the future.
- 8 F. Award Plaintiff his costs incurred in bringing this action.
- 9 G. Grant any other relief the Court deems just and proper.

10 Dated this 17 day of June, 2024.

11 **Respectfully submitted,**

12 
13 Joshua Stacy

14 7721 Haskell Flats Drive

15 Las Vegas, NV 89128

16 310-773-2620

17 joshua.stacy@gmail.com

18 **Pro Se Plaintiff**