



May 20, 2016

Clerk of the Superior Court
RR1 9000
1st Floor, Room 101
Kingshill, VI 00850

**RE: Case No. ST-16-CV-114
Yob v. Board of Elections**

Dear Clerk of the Superior Court:

The following original and copy of the following documents are attached and must be filed with the Superior Court Division of St. Thomas/St. John:

- SCOT F. McCHAIN'S MOTION FOR SANCTIONS AGAINST JOHN P. YOB, ERICA L. YOB, ETHAN EILON, LINDSEY EILON AND RUSSELL PATE

Respectfully,

Kalijah Sweeney

Attachment
ks



II. Facts

a. Plaintiff's Fraud against the People

Plaintiff's lies continue to pile up. They have been cataloged to some extent in Ed Barry's prior pleadings in this case but, discovery will likely uncover many more.

I will share one of the most glaring examples now to lend credence to my claims above. Plaintiffs all signed Registration affidavits in which they swore and affirmed to the Virgin Islands Board of Elections that they were not registered voters in any other state or territory. See **Exhibit A**. The Registrant is required to fill out this affidavit under Title 18 V.I.C. 99, and the penalty for lying on it is perjury under Title 18 V.I.C. 100. John Yob, Erica Yob and Lindsey Eilon perjured themselves when they swore in their affidavits that they were not registered to vote in any other state. They were. John and Erica Yob were still registered as of March 12, 2016 in Michigan and Lindsey Eilon was registered at that time in Michigan and Virginiaⁱ. See **Exhibit B**.

This was perjury committed in furtherance of election fraud against the People of the Virgin Islands. While this fraud was likely committed to allow the Plaintiffs to become delegates for the local Republican Party, the harm is to the integrity of the election system as a whole. The Plaintiffs are corrupting our Virgin Islands election process. The harm is suffered by all of us. This fraud is against the People. This corruption of the Virgin Islands election process is what the Plaintiffs seek to avert our attention from by their constant pandering to the press.

Plaintiffs and their counsel went too far in their latest pleading. In it, they seek to disqualify undersigned as counsel in this case when they know full well that I am not counsel in the case.

III. The Law

Federal Rule of Civil Procedure 11 requires that factual contentions asserted in a pleading have evidentiary support. In this case they do not. Plaintiffs assert that I am an attorney for a party, and suggest that I need to be disqualified in an effort to divert attention from their fraudulent conduct. The pleading is patently false as I am not counsel for anyone in the case as the Plaintiffs and Attorney Pate are well aware. Accordingly, I am seeking sanctions for the costs associated with having to review and respond to Plaintiffs' and their counsel's frivolous motion

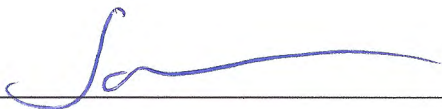
WHEREFORE, for all the reasons stated above, Scot McChain, Pro Se, respectfully asks this Court for monetary sanctions against John Yob, Erica Yob, Lindsey Eilon, Ethan Eilon and Russell Pate for the wasted time and effort undersigned has spent reviewing and responding to their frivolous motion.

RESPECTFULLY SUBMITTED

This 20th Day of May, 2016

ILP+ MCCHAIN MILLER NISSMAN

Pro Se,



Scot F. McChain, Esq.
53A Company Street
Christiansted, USVI 00820
Tel: (340) 719-0601 Fax: (340) 719-0602

Certificate of Service

A copy of the foregoing was mailed first class, postage prepaid this May 20, 2016, to:

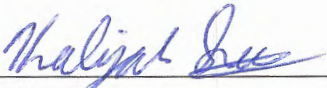
Arturo Watlington, Esq., Pro Se
Board of Elections
P.O. Box 216
St. Thomas, VI 00801
arwatlington@yahoo.com

J. Russell B. Pate, Esq.
Attorney for Plaintiffs
Post Office Box 890
St. Thomas, VI 00804
Tel. (340) 777-7283
Fax (888) 889-1132
pate@sunlawvi.com

Ed Barry
53A Company Street (Third Floor)
Christiansted, VI 00820

Courtesy copy to:

Hugh Greentree, Esq. Assistant Attorney General
Hugh.Greentree@doj.vi.gov



Kalijah Sweeney

ⁱ Plaintiffs will likely say that they thought that the VI Board of Elections would notify Michigan and Virginia of their registration here, and remove them from the rolls up there, but how would the VI Board know to do that when they swear they are not registered anywhere else?

Patrick Yob

DISTRICT BEGAN

2015

PHYSICAL ADDRESS

300-44 Chocolate Hole

MAILING ADDRESS

PMB 397 5000 Enighed 00830

TEL NO.

DESIGNATION of POLITICAL PARTY for PRIMARY VOTE

| Year | Party Affiliation |
|------|-------------------|
| 2015 | Rep. |



SS #

8357

Waterford Rapids MI

Waterford Dr 1994

Indiana

MALE
 FEMALE

DERIVATIVE NATURALIZATION

FATHER
 MOTHER
 HUSBAND
 WIFE

I HEREBY SWEAR (OR AFFIRM) THAT I AM A CITIZEN OF THE UNITED STATES, THAT I AM NOT A REGISTERED VOTER IN ANY OTHER STATE OR TERRITORY OF THE UNITED STATES OR IN ANY FOREIGN COUNTRY OR IN ANY OTHER ELECTION DISTRICT, THAT ON THE DAY OF THE NEXT ELECTION I SHALL BE AT LEAST 18 YEARS OF AGE AND SHALL HAVE RESIDED IN THE TERRITORY OF THE VIRGIN ISLANDS AND THIS ELECTION DISTRICT FOR AT LEAST 90 DAYS NEXT PRECEDING SAID ELECTION, THAT I AM LEGALLY QUALIFIED TO VOTE, THAT I HAVE NOT BEEN CONVICTED OF A FELONY, THAT I HAVE READ (OR HAVE HAD READ TO ME) THE FOREGOING STATEMENTS MADE IN CONNECTION WITH MY REGISTRATION THAT THEY ARE TRUE AND CORRECT.

Patrick Yob

Signature of Voter

SUBSCRIBED AND SWORN TO BEFORE ME THIS

8

DAY OF

1/2016

SR Richardson

Signature of Notary, Member of Clerk

Registrar - Do not Write Below

FIRST NAME or NAMES

John Patrick

NOT ELIGIBLE

OR

OR

OR

OR

OR

OR

OR

OR

OR

| | ELECT OFF'RS INITIALS | SPECIAL ELECTION BALLOT# | ELECT OFF'RS INITIALS | YEAR | PRIMARY BALLOT LET. & NO. | ELECT OFF'RS INITIALS | GENERAL ELECTION BALLOT# | ELECT OFF'RS INITIALS | SPECIAL ELECTION BALLOT# | ELECT OFF'RS INITIALS |
|--|-----------------------|--------------------------|-----------------------|------|---------------------------|-----------------------|--------------------------|-----------------------|--------------------------|-----------------------|
| | | | | 2027 | | | | | | |
| | | | | 2028 | | | | | | |
| | | | | 2029 | | | | | | |
| | | | | 2030 | | | | | | |
| | | | | 2031 | | | | | | |
| | | | | 2032 | | | | | | |
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| | | | | 2038 | | | | | | |
| | | | | 2039 | | | | | | |
| | | | | 2040 | | | | | | |
| | | | | 2041 | | | | | | |

| STREET | WHOLE HOUSE | APT NO. | NO. OF ROOMS | FLOOR NO. | WARD | ELECTION DISTRICT |
|-----------------|-------------|---------|--------------|-----------|------|-------------------|
| Chocolate House | | | | | | 511 |
| | | | | | | |
| | | | | | | |

Lorraine Job

PHYSICAL ADDRESS

300-44 Est. Chardate Hole

DISTRICT BEGAN

Aug. 2015

MAILING ADDRESS

397 5000 Est. Engh

TEL NO.

616-460-7692

DESIGNATION of POLITICAL PARTY for PRIMARY VOTE

Year

Party Affiliation

1-20-2016 Republican



SS # 4097

City, Town or Borough

State

Renewed: NOT ELIGIBLE

Street

Year

Country

MALE

FEMALE

Michigan

US Passport

DERIVATIVE NATURALIZATION

FATHER

MOTHER

HUSBAND

WIFE

Court

Place

58839

Certificate No.

I HEREBY SWEAR (OR AFFIRM) THAT I AM A CITIZEN OF THE UNITED STATES, THAT I AM NOT A REGISTERED VOTER IN ANY OTHER STATE OR TERRITORY OF THE UNITED STATES OR IN ANY FOREIGN COUNTRY OR IN ANY OTHER ELECTION DISTRICT, THAT ON THE DAY OF THE NEXT ELECTION I SHALL BE AT LEAST 18 YEARS OF AGE AND SHALL HAVE RESIDED IN THE TERRITORY OF THE VIRGIN ISLANDS AND THIS ELECTION DISTRICT FOR AT LEAST 90 DAYS NEXT PRECEDING SAID ELECTION, THAT I AM LEGALLY QUALIFIED TO VOTE, THAT I HAVE NOT BEEN CONVICTED OF A FELONY, THAT I HAVE READ (OR HAVE HAD READ TO ME) THE FOREGOING STATEMENTS MADE IN CONNECTION WITH MY REGISTRATION THAT THEY ARE TRUE AND CORRECT

COLOR OF HAIR

COLOR OF EYES

DATE OF BIRTH

Brunette Brown Sept. 6, 1978

Signature of Voter

SUBSCRIBED AND SWORN TO BEFORE ME THIS

20

DAY OF

Jan. 2016

(Registrar - Do not Write Below)

FIRST NAME or NAMES

Erica Lorraine

Melba [Signature]

Signature of Board Member or Clerk

0211010

| LINE # | ELECT OFF'RS INITIALS | SPECIAL ELECTION BALLOT# | ELECT OFF'RS INITIALS | YEAR | PRIMARY BALLOT LET. & NO. | ELECT OFF'RS INITIALS | GENERAL ELECTION BALLOT# | ELECT OFF'RS INITIALS | SPECIAL ELECTION BALLOT# | ELECT OFF'RS INITIALS |
|--------|-----------------------|--------------------------|-----------------------|------|---------------------------|-----------------------|--------------------------|-----------------------|--------------------------|-----------------------|
| | | | | 2027 | | | | | | |
| | | | | 2028 | | | | | | |
| | | | | 2029 | | | | | | |
| | | | | 2030 | | | | | | |
| | | | | 2031 | | | | | | |
| | | | | 2032 | | | | | | |
| | | | | 2033 | | | | | | |
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| | | | | 2037 | | | | | | |
| | | | | 2038 | | | | | | |
| | | | | 2039 | | | | | | |
| | | | | 2040 | | | | | | |
| | | | | 2041 | | | | | | |

| STREET | WHOLE HOUSE | APT NO. | NO. OF ROOMS | FLOOR NO. | WARD | ELECTION DISTRICT |
|-------------------------|-------------|---------|--------------|-----------|------|-------------------|
| wcolate H ^{ld} | | | | | | 30 |
| | | | | | | |
| | | | | | | |

by Kate Eilon

PHYSICAL ADDRESS C-5-B17 Louverland

DISTRICT BEGAN 10/2015

MAILING ADDRESS 6501 Red Hook 201 00802

TEL NO. _____

DESIGNATION of POLITICAL PARTY for PRIMARY VOTE

| Year | Party Affiliation |
|------|-------------------|
| 2016 | Rep |
| | |
| | |



SS # 0290

City, Town or Borough _____ State _____

Street _____ Year _____

Country New York MALE FEMALE

Court sport

DERIVATIVE NATURALIZATION

Place 3376

- FATHER
- MOTHER
- HUSBAND
- WIFE

I HEREBY SWEAR (OR AFFIRM) THAT I AM A CITIZEN OF THE UNITED STATES, THAT I AM NOT A REGISTERED VOTER IN ANY OTHER STATE OR TERRITORY OF THE UNITED STATES OR IN ANY FOREIGN COUNTRY OR IN ANY OTHER ELECTION DISTRICT THAT ON THE DAY OF THE NEXT ELECTION I SHALL BE AT LEAST 18 YEARS OF AGE AND SHALL HAVE RESIDED IN THE TERRITORY OF THE VIRGIN ISLANDS AND THIS ELECTION DISTRICT FOR AT LEAST 90 DAYS NEXT PRECEDING SAID ELECTION, THAT I AM LEGALLY QUALIFIED TO VOTE, THAT I HAVE NOT BEEN CONVICTED OF A FELONY, THAT I HAVE READ (OR HAVE HAD READ TO ME) THE FOREGOING STATEMENTS MADE IN CONNECTION WITH MY REGISTRATION THAT THEY ARE TRUE AND CORRECT

Certificate No. _____

HAIR COLOR OF EYES DATE OF BIRTH

Dark Brown 3/9/82

Signature of Voter

SUBSCRIBED AND SWORN TO BEFORE ME THIS 2 DAY OF 2/2016 20

(Registrar - Do not Write Below)

FIRST NAME of NAMES

Lindsey Kate

Signature of Board Member or Clerk

Eilon

PHYSICAL ADDRESS

C-5-B17 Courthouse

MAILING ADDRESS

1501 Kalhau Dr 201 Sit 00502

DISTRICT BEGAN

10/2015

TEL NO.

DESIGNATION of POLITICAL PARTY for PRIMARY VOTE

| Year | Party Affiliation |
|------|-------------------|
| 2016 | Rep |
| | |
| | |



SS #

6707

City, Town or Borough

State

Street

Year

Territory Country

ILLINOIS

- MALE
 FEMALE

DERIVATIVE NATURALIZATION

- FATHER
 MOTHER
 HUSBAND
 WIFE

I HEREBY SWEAR (OR AFFIRM) THAT I AM A CITIZEN OF THE UNITED STATES, THAT I AM NOT REGISTERED VOTER IN ANY OTHER STATE OR TERRITORY OF THE UNITED STATES OR IN AN FOREIGN COUNTRY OR IN ANY OTHER ELECTION DISTRICT, THAT ON THE DAY OF THE NEXT ELECTION I SHALL BE AT LEAST 18 YEARS OF AGE AND SHALL HAVE RESIDED IN THE TERRITORY OF THE VIRGIN ISLANDS AND THIS ELECTION DISTRICT FOR AT LEAST 90 DAYS NEXT PRECEDING SAID ELECTION, THAT I AM LEGALLY QUALIFIED TO VOTE, THAT I HAVE NOT BEEN CONVICTED OF A FELONY, THAT I HAVE READ (OR HAVE HAD READ TO ME) THE FOREGOING STATEMENTS MADE IN CONNECTION WITH MY REGISTRATION THAT THEY ARE TRUE AND CORRECT.

Court

89742

Place

Certificate No.

COLOR OF HAIR

COLOR OF EYES

DATE OF BIRTH

Blk

Blue

9/12/83

(Registrar - Do not Write Below)

FIRST NAME or NAMES

Ethan

Signature of Voter

SUBSCRIBED AND SWORN TO BEFORE ME THIS

2

DAY OF

2/04

20

SRick


Signature of Board Member or Clerk

State of Michigan

County of EATON

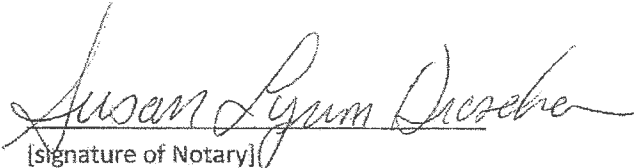
BEFORE ME, the undersigned Notary, Brian Began on
this 21 day of MARCH 2016, personally appeared
DRIVERS license, known to me to be a credible person
and of lawful age, who being by me first duly sworn, on his oath, deposes and says:

On March 13, 2016 I went on the Michigan Secretary of State to verify the voter registration of John & Erica Yob. The website <https://webapps.sos.state.mi.us/MVIC/> confirmed that as of that date they were still registered in the State of Michigan. On March 14, 2016 I emailed the township clerk under the FOIA statute to confirm their registration and vote history. I called the Clerk on 3/15 to confirm the receipt of my request. On 3/16 the deputy clerk returned my call and informed me that township counsel was reviewing. On 3/17 I received a PDF of my request. On 3/21 I returned to the state of Michigan's site to again confirm that John and Erica Yob are registered voters in the state of Michigan.


[signature of affiant]

Brian Began
1060 Aaron Dr #801
Dewitt, MI 48820

Subscribed and sworn to before me, this 21 day of March, 2016


[signature of Notary]

Susan Lynn Droscha
Printed name of Notary]

NOTARY PUBLIC


My commission expires: 9/20, 2020


Susan Lynn Droscha
Notary Public - Michigan
Ingham County
Acting in the County of Eaton, MI
My commission expires September 20, 2020



Exhibit B


Erica Yob Moving To St. John 12/28/2016 (Part Time)

Life event posted 3/6/2016:





Erica Yob at  Cruz Bay - St. John, VI. ...

December 28 •  Cruz Bay • 



Moved to Cruz Bay - St. John, VI

December 28, 2015 at Cruz Bay - St. John, VI

  7 Comments

Comments as of 3/6/2016 indicating they will live in St. John just part of the year.



AT&T 4G 8:29 PM 100%

Search

 **Shelby Grinwis**
Nice how did you swing that move. 
January 11


 **Suzanne Wyzinski Smith**
Exciting! Are you keeping a place in MI too?
January 12

 **Erica Yob**
The plan is to live here six months (Jan-June) and in Michigan the other six months.


 **Suzanne Wyzinski Smith**
I want to visit!! Totally serious

 **Sarah Soderman Grochoski**
So jealous!! Lucky you!!
January 12

 **Kimberly Vander**
I'm coming to visit :)
January 13 

 **Howard Goei**
AWESOME!! :)
January 13

 **Dana Campbell Kingrey**
Lucky you...enjoy and stay in touch! xox 
January 12

Facebook 99 | @ericayob | @ericayob | 27 | Home

All of this information was taken down and is no longer available.

3/15/2016

CHANGE HISTORY FOR

1

ERICA LORRAINE YOB

1878 WATERMARK DR SE, GRAND RAPIDS MI 49546

| Description | Date / Time | User Code |
|---|-----------------------|--------------------------------------|
| LONG MOVE(06/24/2014) TO 1878 WATERMARK SE DR, GRAND RAPIDS MI 49546 (CASCADE TOWNSHIP) | 06/25/2014 2:00:22 PM | BAM WEB TRANSACTION 830 BRANCH (830) |
| LICENSENUM CHANGED FROM T100234546894 TO Y100234546894 | 09/05/2007 2:09:00 PM | GRAND RAPIDS DOWNTOWN BRANCH (262) |
| NAME CHANGED FROM ERICA LORRAINE TIBBE TO ERICA LORRAINE YOB | 09/05/2007 2:09:00 PM | GRAND RAPIDS DOWNTOWN BRANCH (262) |
| LONG MOVE(08/31/2007) TO 2331 BYRON SHORES DR, BYRON CENTER MI 49315 (BYRON TOWNSHIP) | 09/05/2007 2:09:00 PM | GRAND RAPIDS DOWNTOWN BRANCH (262) |
| INTERMEDIATE MOVE(09/15/2003) TO 2052 COLLEGE AVE SE, GRAND RAPIDS MI 49507 (GRAND RAPIDS CITY) | 09/26/2003 9:49:32 AM | MINDY @ GRAND RAPIDS CITY (34000) |
| HISTORY STARTED WITH A REG. DATE OF 09/25/2002 FOR ERICA LORRAINE TIBBE OF 211 BENJAMIN AVE SE, GRAND RAPIDS MI 49506 (GRAND RAPIDS CITY) WITH A STATUS OF ACTIVE | 01/12/2003 9:12:37 PM | STATE |
| Total | 6 | |

3/15/2016

CHANGE HISTORY FOR

JOHN PATRICK YOB

1878 WATERMARK DR SE, GRAND RAPIDS MI 49546

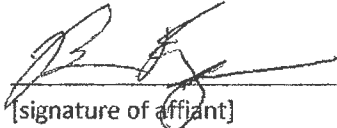
| Description | Date / Time | User Code |
|---|-----------------------|---|
| LONG MOVE(08/05/2014) TO 1878 WATERMARK DR SE, GRAND RAPIDS MI 49546 (CASCADE TOWNSHIP) | 08/07/2014 2:07:23 PM | GRAND RAPIDS DOWNTOWN BRANCH (262) |
| LONG MOVE(11/13/2006) TO 2331 BYRON SHORES DR, BYRON CENTER MI 49315 (BYRON TOWNSHIP) | 11/15/2006 7:40:46 PM | GRAND RAPIDS AREA SUPERICENTER BRANCH (263) |
| LONG MOVE(05/25/2005) TO 6149 W FIELDSTONE HILLS DR APT 12, CALEDONIA MI 49318 (GAINES TOWNSHIP) | 05/27/2005 8:02:24 PM | GRAND RAPIDS AREA SUPERICENTER BRANCH (263) |
| LONG MOVE(07/08/2004) TO 602 BRIDGE ST, CHARLEVOIX MI 49720 (CHARLEVOIX CITY) | 07/08/2004 7:54:39 PM | CHARLEVOIX BRANCH (387) |
| HISTORY STARTED WITH A REG. DATE OF 08/14/2001 FOR JOHN PATRICK YOB OF 940 MONROE AVE NW APT 559, GRAND RAPIDS MI 49503 (GRAND RAPIDS CITY) WITH A STATUS OF ACTIVE | 01/12/2003 8:11:38 PM | STATE |
| Total | 5 | |

State of Michigan

County of Ingham

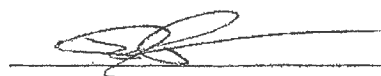
BEFORE ME, the undersigned Notary, Rick Riemersma on this 22 day of MARCH, 2016, personally appeared Brian Began, known to me to be a credible person and of lawful age, who being by me first duly sworn, on his oath, deposes and says:

On March 21, 2016 I went on the Michigan Secretary of State to verify the voter registration Lindsey Eilon. The website <https://webapps.sos.state.mi.us/MVIC/> confirmed that as of that date she was still registered in the State of Michigan. On March 22, 2016 I called the Clerk in the city of Wyoming who confirmed that Mrs. Eilon was still a registered voter in Michigan.


[signature of affiant]

Brian Began
1060 Aaron Dr #801
Dewitt, MI 48820

Subscribed and sworn to before me, this 22 day of MARCH, 2016.


[signature of Notary]

Rick Riemersma
Printed name of Notary]

Rick Riemersma
Notary Public, Livingston County
My Commission Expires 3-31-2018

NOTARY PUBLIC

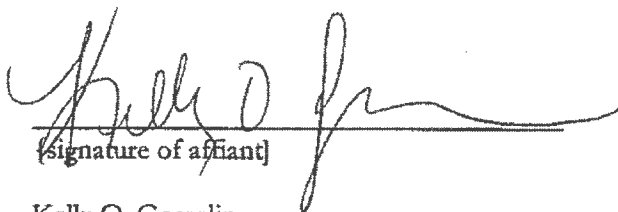
My commission expires: 3/31, 2018.

AFFIDAVIT

STATE OF VIRGINIA
COUNTY OF FAIRFAX

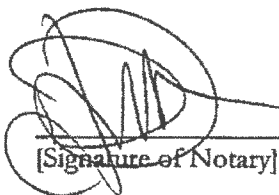
Before me, the undersigned Notary, Kelly O. Gosselin on this 21 day of March 2016, personally appeared DL MD known to me to be a credible person and of lawful age, who being by me first duly sworn, on her oath, deposes and says:

On March 21, 2016, I went to the Fairfax County Office of Elections located at the Fairfax County Government Center, Suite 323, 12000 Government Center Parkway, Fairfax, VA 22035 to verify the voter registration of Lindsey Eilon. Per the records reviewed at the public computer terminal in the Elections Office, Lindsey Eilon registered to vote in the state of Virginia in 2010. Further, Lindsey Eilon voted in Virginia in the November 2015 General Election and is currently listed as a registered voter in the state. According to Elections Office officials, voter records for the March 2016 Primary Election are not yet publicly available, as of March 21, 2016. Voter registration records were available for public review only at the in-office computer terminals and no printed record of the registration was available.


[signature of affiant]

Kelly O. Gosselin
268 Fairhaven Road
Tracy's Landing, MD 20779

Subscribed and sworn to before me, this 21 day of March, 2016.


[Signature of Notary]

Heidi L. Caraballo Contron
[Printed Name of Notary]



HEIDY L. CARABALLO CONTRON
NOTARY PUBLIC
COMMONWEALTH OF VIRGINIA
Registration #: 7509152
Expires: 04/30/2019