ROUND VALLEY INDIAN TRIBES

A Sovereign Nation of Confederated Tribes

Filed: 11/12/2026 DB

Received Date: 11/13/26 CO

Round Valley Tribal Court
Administrative Office: Tribal Court, 77826 Covelo Road. Covelo, California 95428
Phone: 707-983-8227 x 17 j Fax: 707-983-6590

CIVIL COMPLAINT -PETITION

Case No. RVIT-CV-2026-0039-JW

Date of Petition: 11/17/2026

CIVILCOMPLAINT PETITION

Plaintiff/Petitioner:

(List full name) Carlino Bettega
(Address) 707-621-2217
(Telephone number)

Defendant/Respondent:

Election Board + other Appropriate Parties
(List full name)
77826 Covelo Rd
(Address)
Covelo, Ca 95428
(Telephone number)

Plaintiff's Attorney:

In pro per
(List full name, address, and telephone number)

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PLAINTIFF STATES THE FOLLOWI G FOR (HIS/HER/THEIR) COMPLAINT/PETITION:
Instructions: *Your 1st state your complaint below. Number each statement chronologically. Start from the beginning and explain what happened. Use additional sheets of paper if necessary. Attach any necessary documentation and label as Exhibit A, B, C. etc.)*

See Attached

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See Attached

If you need more space, please check the box here and list the number of additional pages.
I have attached ____ pages to this petition.

(1^VE) REQUEST THAT THE COURT ORDER THE FOLOWJ G RELIEF:
Instructions: You must explain what you would like the Court to order.

See Attached

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I declare that the information above and contained in the attached complaint is true to the best of my information, knowledge and belief.

Date: 11/17/2026 Signature of Plaintiff(s): Carlos Bettyn

Filed: 11/17/2026
ROUND VALLEY INDIAN TRIBES
TRIBAL COURT
77435 COVELO ROAD
COVELO, CA 95428
JB

IN THE ROUND VALLEY INDIAN TRIBES TRIBAL COURT

COVELO, CALIFORNIA

IN THE MATTER OF THE APPEAL OF THE 2026 GENERAL ELECTION OF THE ROUND VALLEY INDIAN TRIBES

APPELLANT: Carlino Bettega

RESPONDENTS: Round Valley Indian Tribes Election Board and other appropriate parties

FORMAL APPEAL AND PETITION FOR JUDICIAL REVIEW

Request to Declare the 2026 General Election Invalid and Order Appropriate Election Relief

TO THE HONORABLE TRIBAL JUDGE:

I respectfully submit this formal appeal requesting judicial review of the 2026 General Election of the Round Valley Indian Tribes. I believe serious violations of the Round Valley Indian Tribes Constitution, Tribal Council Code of Ethics, and Election Ordinance may have occurred during the election process.

These concerns involve potential conflicts of interest, election board impartiality, ballot counting procedures, voter eligibility, and the adoption of revised election rules.

I am asking this Court to review these matters to protect the integrity of our tribal government and ensure that every enrolled tribal member is afforded a fair, impartial, and lawful election process.

I. CONFLICT OF INTEREST AND VIOLATION OF THE TRIBAL CODE OF ETHICS

Under Article IV, Tribal Council Code of Ethics, Page 10, a conflict of interest is described as an actual or potential conflict occurring when a Council member is in a position to influence a decision that may result in personal gain for that Council member.

The Code also addresses relationships involving blood, marriage, and other family connections.

I am requesting that the Court examine the relationship between Joe Parker, President of the Tribal Council, and Erika Shepard, Chairperson of the Election Board.

It is my understanding that they share the same household and have a relationship that raises concerns about potential conflicts of interest and the impartiality of the election process.

Mr. Parker participated as a candidate in the 2026 election, while Ms. Shepard held a position of authority over the election process.

I believe this situation raises serious questions about whether the Election Board could independently and impartially oversee an election involving the Tribal Council President.

I further request that the Court determine whether the applicable Code of Ethics, conflict-of-interest provisions, and election rules were followed, and whether any required disclosure or recusal should have occurred.

II. IMPROPER HANDLING OF THE ELECTION AND CANDIDATE ELIGIBILITY

I was denied the opportunity to run for Tribal Council based on an alleged requirement that my paperwork receive a signature from the Fiscal Department.

I was informed that the Director of the Round Valley Tribal Housing Authority would not sign my paperwork because I supposedly owed money.

However, I understand that the Director was aware that signing the paperwork was not required in the manner it was being applied to me, and I believe I was improperly denied the opportunity to run for Tribal Council.

I requested clarification and attempted to resolve this matter with the Tribal Council and Election Board on two separate occasions. My concerns were not resolved.

I could not locate a provision in the Round Valley Indian Tribes Constitution or Election Ordinance establishing that this Fiscal Department signature was a requirement for candidacy.

I request that the Court review the authority for this requirement, determine whether it was lawfully applied, and examine whether I and other enrolled tribal members were treated equally.

III. IMPROPER VOTE COUNTING AND FAILURE TO FOLLOW TIE-BREAKING PROCEDURES

On election day, the counting of ballots reportedly resulted in a three-way tie for the final Tribal Council seat.

Rather than following the tie-breaking procedure established in Article VII, Section 13 of the Round Valley Indian Tribes Constitution, the Election Board allowed one of the candidates involved in the tie to have her votes counted again.

Following this recount, an additional five votes were reportedly identified, resulting in that candidate being awarded the final seat.

This raises serious concerns about the fairness, consistency, and impartiality of the counting process.

Article VII, Section 13, states:

"In case of a tie between one or more candidates, a run-off election shall be held within thirty (30) days until the tie is broken."

I am requesting that the Court determine why the constitutional runoff procedure was not followed and whether the recount was conducted in accordance with the Constitution and Election Ordinance.

No candidate should receive preferential treatment during a recount, and all candidates must be subject to the same election procedures.

IV. QUESTIONABLE REVISION OF THE ELECTION ORDINANCE ON JUNE 9, 2026

I recently obtained a copy of a revised Election Ordinance resolution dated June 9, 2026.

I have serious concerns about the validity of this revision because it appears to have been signed by the Tribal Council Chairman without a properly called Tribal Council meeting and without the required quorum.

Under the Rules of Governance for the Round Valley Tribal Council, Article II, Section 3, the quorum requirement provides:

"No meeting of the Round Valley Tribal Council shall be conducted where there is not a quorum present."

I understand that a quorum requires at least four Tribal Council members to be present.

I am requesting that the Court examine the June 9, 2026 resolution, including:

1. Whether a properly noticed Tribal Council meeting was called.
2. Whether the required quorum was present.
3. Whether the resolution was properly discussed and voted upon.
4. Whether the Chairman had authority to approve and sign the revision without the required Council action.
5. Whether the revised Election Ordinance was legally effective when used in connection with the 2026 General Election.

If the ordinance revision was not lawfully adopted, I request that the Court determine whether its use affected the validity of the election.

V. VOTER PARTICIPATION AND ENROLLED MEMBER RIGHTS

During the election process, I understand that approximately 25 election packets were distributed, 23 were returned, and only 11 enrolled members were determined eligible to run.

I was among the 12 enrolled members who were denied the opportunity to run.

I am requesting that the Court review the eligibility determinations, the requirements imposed on candidates, and whether all enrolled members were treated consistently under the Constitution and Election Ordinance.

The election process must protect the rights of enrolled tribal members and provide equal treatment under the governing laws of the Tribe.

VI. CONSTITUTIONAL AND ETHICAL OBLIGATIONS

The positions of Tribal Council members and Election Board members carry a responsibility to protect the Tribe, its members, and the integrity of tribal government.

The concerns raised in this appeal involve not only election procedures but also public trust, accountability, impartiality, and the proper exercise of authority.

I believe the circumstances surrounding this election warrant independent judicial review.

No individual should be permitted to influence an election process in which they have a personal interest, and no candidate should receive an advantage through procedures that are not equally available to all candidates.

VII. RELIEF REQUESTED FROM THE TRIBAL COURT

Based on the foregoing concerns, I respectfully request that the Honorable Tribal Court:

1. Declare the 2026 General Election null and void if the Court determines that the violations materially affected the election or its outcome.

2. Order a new election conducted in accordance with the Round Valley Indian Tribes Constitution and a lawfully adopted Election Ordinance, if warranted.

3. Review the alleged conflict of interest involving Tribal Council President Joe Parker and Election Board Chairperson Erika Shepard, including any applicable disclosure and recusal requirements.

4. Determine whether the Election Board Chairperson acted impartially and within the authority granted under tribal law.

5. Review the ballot-counting process, including the recount that reportedly resulted in five additional votes, and determine whether the constitutional runoff procedure was improperly bypassed.

6. Determine whether the June 9, 2026 Election Ordinance revision was lawfully adopted and whether it was validly applied during the election.

7. Review the denial of candidate eligibility, including the requirement for Fiscal Department approval or signatures, and determine whether that requirement had a valid legal basis.

8. Order the preservation and production of all relevant election records, including ballots, tally sheets, recount records, candidate eligibility determinations, election packets, meeting minutes, resolutions, and communications relating to the election.

9. Grant any additional relief the Court determines necessary to protect the constitutional rights of enrolled tribal members and restore public confidence in the tribal election process.

VIII. CONCLUSION

I am bringing this appeal because I believe the integrity of our tribal election process must be protected.

Our Constitution, Tribal Code of Ethics, and Election Ordinance exist to ensure fairness, accountability, and equal treatment for all enrolled members.

These governing documents must apply equally to everyone, regardless of their position, family relationships, or political interests.

I am not asking this Court to favor any individual or candidate. I am asking for an impartial review of the facts, the applicable tribal laws, and the procedures followed during the 2026 General Election.

The members of the Round Valley Indian Tribes deserve an election process they can trust. Our tribal government must be accountable to its Constitution and to the people it represents.

For these reasons, I respectfully request that this Court accept this appeal, review the alleged violations, and grant the appropriate relief in the interest of justice and the protection of our tribal membership.

Section 15. Challenges to Election Results. Any member of the Tribe may challenge the election results by filing a suit in Tribal Court within ten (10) days after the Election Board certifies the election results. The Tribal Court shall hear and decide election cases within thirty (30) days after the Election Board certifies the election results, except where the party challenging the results requests additional time which may be granted at the discretion of the Tribal Court, provided, that only one thirty-day extension of time may be granted. If the Tribal Court invalidates the election results, the Court shall order that a new election be held as soon as possible.

Section 16. Vacancies. The Tribal Council shall call a special election to fill a vacancy on the Tribal Council unless six (6) months or less remain in the term of office for the vacant position, in which case the Tribal Council shall appoint a person to fill the position. All persons appointed or elected to fill a vacant position shall fill out the term of the person whom he or she is replacing.

Section 17. Election Ordinance. The Tribal Council shall have the power to adopt an election ordinance covering all necessary procedures for both general and special elections.

ARTICLE IX - POPULAR PARTICIPATION IN GOVERNMENT

Section 1. Initiative. The Tribal Council shall submit any proposed ordinance or resolution to popular initiative upon petition of at least thirty-three percent (33%) of the eligible voters of the Tribe, or upon the request of the majority of the members of the Tribal Council. The vote of the majority of the eligible voters in such initiative shall decide whether the proposed ordinance or resolution shall thereafter be in effect, provided, that at least thirty-three percent (33%) of the eligible voters shall vote in such initiative.

Section 2. Referendum. The Tribal Council shall submit any enacted ordinance, resolution or other official action of the Tribal Council to popular referendum upon petition of at least thirty-three percent (33%) of the eligible voters of the Tribe or upon the request of the majority of the members of the Tribal Council. The vote of the majority of the eligible voters in such referendum shall decide whether the enacted ordinance, resolution or other official action shall thereafter be in effect, provided, that at least thirty-three percent (33%) of the eligible voters shall vote in such referendum.

Section 3. Official Petition Forms. Official petition forms shall be issued by the Tribal Council secretary and shall be circulated and completed within ninety (90) days of the date of issuance. The secretary shall notify the petitioners in writing of the number of required signatures for a valid petition. The Tribal Council shall schedule an election on the proposed petition within thirty (30) days of receipt of a valid petition.

Respectfully submitted,

Carlino Bettega

Appellant's Signature

Printed Name: Carlino Bettega

Date: 11/17/2026

Telephone/Contact Information: 707-621-2817

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Round Valley Tribal Court

Administrative Office: Tribal Court, 77826 Covelo Road, Covelo, California
95428 Phone: 707-983-8227 | Fax: 707-983-6590

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Mendocino,

State of California. I am over the age of 18 years. The name and address of my

Residence or business is 77826 Covelo Road

On 17 Nov 2026 (Date), I served the Formal Appeal and Petition (Description of document(s))

For Judicial Review (Description of document(s) continued) in Case No. RVIT-CV-2026-0089-JW (PERB Case No., if known)

on the parties listed below by (check the applicable method(s)):

- [ ] placing a true copy thereof enclosed in a sealed envelope for collection and delivery by the United States Postal Service or private delivery service following ordinary business practices with postage or other costs prepaid;
- [x] personal delivery; 115 Concow Blvd, Covelo, Ca 95428
- [ ] electronic service - I served a copy of the above-listed document(s) by transmitting via electronic mail (e-mail) or via e-PERB to the electronic service address(es) listed below on the date indicated. (*May be used only if the party being served has filed and served a notice consenting to electronic service or has electronically filed a document with the Board. See PERB Regulation 32140(b).*)

(*Include here the name, address and/or e-mail address of the Respondent and/or any other parties served.*)

Kirsten Britton

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on _____ (Date),

at Covelo (City) CA (State).

CLAY RABANO #246 (Type or print name) [signature] (Signature)

(02/2021) 11:30 AM

Proof of Service

ERICA SHEPPARD

ROUND VALLEY INDIAN TRIBES

A Sovereign Nation of Confederated Tribes

Round Valley Tribal Court

Administrative Office: Tribal Court, 77826 Covelo Road, Covelo, California
95428 Phone: 707-983-8227 | Fax: 707-983-6590

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Mendocino,

State of California. I am over the age of 18 years. The name and address of my

Residence or business is 77826 Covelo Road

On 11/17/2026 (Date), I served the Formal and Petition for Appeal (Description of document(s))

Judicial Review (Description of document(s) continued) in Case No. RVIT. CV. 2026.0039.JW (PERB Case No., if known)

on the parties listed below by (check the applicable method(s)):

- [ ] placing a true copy thereof enclosed in a sealed envelope for collection and delivery by the United States Postal Service or private delivery service following ordinary business practices with postage or other costs prepaid;
- [x] personal delivery; Erica Shepherd
- [ ] electronic service - I served a copy of the above-listed document(s) by transmitting via electronic mail (e-mail) or via e-PERB to the electronic service address(es) listed below on the date indicated. (*May be used only if the party being served has filed and served a notice consenting to electronic service or has electronically filed a document with the Board. See PERB Regulation 32140(b).*)

(*Include here the name, address and/or e-mail address of the Respondent and/or any other parties served.*)

77826 Covelo Rd.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on _____ (Date),

at Covelo (City) CA (State).

Cindy RABANO #246 (Type or print name) [signature] (Signature)

11:25 AM