

IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

MR ROBERT BEADLES, an individual,  
Plaintiff,

vs.

JAMIE RODRIGUEZ, in her official capacity as Registrar of Voters and in her personal capacity; the WASHOE COUNTY REGISTRAR OF VOTERS, a government agency; ERIC BROWN in his official capacity as WASHOE COUNTY MANAGER and in his personal capacity, ALEXIS HILL in her official capacity as CHAIRWOMAN OF WASHOE COUNTY BOARD OF COMMISSIONERS and in her personal capacity; WASHOE COUNTY, Nevada a political subdivision of the State of Nevada, and DOES I-X; and ROE CORPORATIONS I-X.  
Defendants.

No. 87683

No. 23-OC-00105 1B

DOCKETING STATEMENT  
CIVIL APPEALS

FILED

NOV 30 2023

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY   
CHIEF DEPUTY CLERK

GENERAL INFORMATION

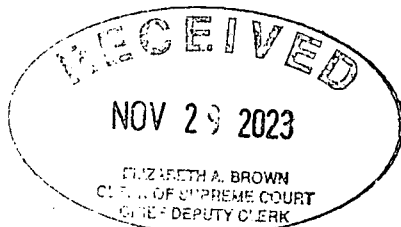
Appellants must complete this docketing statement in compliance with NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, identifying issues on appeal, assessing presumptive assignment to the Court of Appeals under NRAP 17, scheduling cases for oral argument and settlement conferences, classifying cases for expedited treatment and assignment to the Court of Appeals, and compiling statistical information.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 27 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. See KDI Sylvan Pools v. Workman, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.



23-32838

1. Judicial District 1 Department 1  
County Carson City-Storey County Judge Russell  
District Ct. Case No. 23-OC-00105 1B

**2. Attorney filing this docketing statement:**

Attorney Proper Person Telephone 916-573-7133

Firm N/A

Address 10580 N. McCarran Blvd. #115, Apt. 386  
Reno, NV 89503

Client(s) Robert Beadles

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

**3. Attorney(s) representing respondents(s):**

Attorney Lindsay Liddell Telephone 775-337-5714

Firm Washoe County District Attorney's Office

Address One South Sierra Street

Reno, Nevada 89501

Client(s) Jamie Rodriguez, Eric Brown, Alexis Hill and Washoe County

Attorney \_\_\_\_\_ Telephone \_\_\_\_\_

Firm \_\_\_\_\_

Address \_\_\_\_\_

Client(s) \_\_\_\_\_

(List additional counsel on separate sheet if necessary)

**4. Nature of disposition below (check all that apply):**

- |  |   |
|--|---|
| <input type="checkbox"/> Judgment after bench trial                    | <input checked="" type="checkbox"/> Dismissal:                          |
| <input type="checkbox"/> Judgment after jury verdict                   | <input type="checkbox"/> Lack of jurisdiction                           |
| <input type="checkbox"/> Summary judgment                              | <input checked="" type="checkbox"/> Failure to state a claim            |
| <input type="checkbox"/> Default judgment                              | <input type="checkbox"/> Failure to prosecute                           |
| <input type="checkbox"/> Grant/Denial of NRCP 60(b) relief             | <input type="checkbox"/> Other (specify): _____                         |
| <input checked="" type="checkbox"/> Grant/Denial of injunction         | <input type="checkbox"/> Divorce Decree:                                |
| <input checked="" type="checkbox"/> Grant/Denial of declaratory relief | <input type="checkbox"/> Original <input type="checkbox"/> Modification |
| <input type="checkbox"/> Review of agency determination                | <input type="checkbox"/> Other disposition (specify): _____             |

**5. Does this appeal raise issues concerning any of the following?**

- ☐ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

**6. Pending and prior proceedings in this court.** List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

Robert Beadles V Jamie Rodriguez et al 23-OC-00105 1B

Robert Beadles V Jamie Rodriguez et al CV23-01341

**7. Pending and prior proceedings in other courts.** List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (e.g., bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

Robert Beadles V Jamie Rodriguez et al 23-OC-00105 1B

Robert Beadles V Jamie Rodriguez et al CV23-01341

11/21/23

**8. Nature of the action.** Briefly describe the nature of the action and the result below:

Judge Russell disregarded the rule of law, authorities, and my rights, creating irreparable harm to both the myself and the Public, if allowed to stand. He dismissed my case with prejudice even after I had clearly overcome the motion to dismiss based on Rule 12(B)(5). In the absence of this Honorable Courts intervention, the integrity of the upcoming election in Washoe County will be compromised, this is good cause to hear my case and expedite the briefing schedule.

**9. Issues on appeal.** State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

Judge Russell dismissed my case with prejudice, which presents clear evidence that the defendants are compromising the integrity of the 2024 election. This dismissal, coupled with the denial of my request for a change of venue, violates my right to a fair trial. The court must ensure the defendants respond to the issues outlined in my 160 exhibits and multiple pleadings, in a neutral venue. Russell's decision sets a dangerous precedent, suggesting public servants can disregard legal obligations without consequence. His interpretation of the 12(B)(5) motion deviates from established NRCP 8 and 12(B)(5) laws. Additionally he has now created case law in which court orders no longer are worth the paper they are printed on. If unchallenged, his ruling threatens the legality of future elections and undermines the legal framework in Nevada courts.

**10. Pending proceedings in this court raising the same or similar issues.** If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

Not aware of any.



**11. Constitutional issues.** If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

☒ N/A

☐ Yes

☐ No

If not, explain:

**12. Other issues.** Does this appeal involve any of the following issues?

☐ Reversal of well-settled Nevada precedent (identify the case(s))

☐ An issue arising under the United States and/or Nevada Constitutions

☐ A substantial issue of first impression

☐ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question

If so, explain: NO

**13. Assignment to the Court of Appeals or retention in the Supreme Court.** Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraph(s) of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

A few subparagraphs may apply to the Court of Appeals, such as: (7) Appeals from post-judgment orders in civil cases; (11) Appeals challenging venue; (12) Cases challenging the grant or denial of injunctive relief. However, his appeal must be taken by the Supreme Court under: (3) Cases involving judicial discipline; and (12) Matters raising as a principal issue a question of statewide public importance. Judge Russell specifically said to take this to the Supreme Court. His actions must be addressed by this Honorable Court. The allegations in this case are of paramount public interest, including their right to suffrage as enshrined by law. The Supreme Court must intervene prior to irreparable harm occurring.

**14. Trial.** If this action proceeded to trial, how many days did the trial last? N/A

Was it a bench or jury trial? Dismissed w/prejudice at preliminary hearing

**15. Judicial Disqualification.** Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?

No

## TIMELINESS OF NOTICE OF APPEAL

**16. Date of entry of written judgment or order appealed from** 11/21/23

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

N/A

**17. Date written notice of entry of judgment or order was served** 11/21/23

Was service by:

☐ Delivery

☒ Mail/electronic/fax

**18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)**

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b)      Date of filing \_\_\_\_\_

☐ NRCP 52(b)      Date of filing \_\_\_\_\_

☐ NRCP 59      Date of filing \_\_\_\_\_

**NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. See AA Primo Builders v. Washington, 126 Nev. \_\_\_\_, 245 P.3d 1190 (2010).**

(b) Date of entry of written order resolving tolling motion \_\_\_\_\_

(c) Date written notice of entry of order resolving tolling motion was served \_\_\_\_\_

Was service by:

☐ Delivery

☐ Mail

**19. Date notice of appeal filed** 11/29/23

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

**20. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a) or other**

NRAP 4(a) (1)

**SUBSTANTIVE APPEALABILITY**

**21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:**

(a)

☒ NRAP 3A(b)(1)

☐ NRS 38.205

☐ NRAP 3A(b)(2)

☐ NRS 233B.150

☐ NRAP 3A(b)(3)

☐ NRS 703.376

☐ Other (specify) \_\_\_\_\_

(b) Explain how each authority provides a basis for appeal from the judgment or order:

My case was unlawfully dismissed w/prejudice on 11/20/23. Orders were received on 11/21/23. I have 30 days to appeal as stated under NRAP 3A(b)(1). I am timely filing my appeal, which this Honorable Court has the authority to hear under NRAP 3A(b)(1) and NRAP 2.

**22. List all parties involved in the action or consolidated actions in the district court:**

(a) Parties:

Robert Beadles - Plaintiff

In Personal and Official Capacity

Jamie Rodriguez, Washoe Registrar of Voters, Eric Brown, Washoe County Manager, Alexis Hill, County Commissioner Chair, and Washoe County, a political subdivision of Nevada.

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

N/A

**23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.**

Robert Beadles, Plaintiff, filed a complaint against the defendants above for violation of Nevada Constitution Articles 1, 2, 15, and the Voter's Bill of Rights and petition for removal of officers from office. All claims were unlawfully dismissed w/prejudice on 11/20/23.

**24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?**

☒ Yes

☐ No

**25. If you answered "No" to question 24, complete the following:**

(a) Specify the claims remaining pending below:

(b) Specify the parties remaining below:

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☐ Yes

☒ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☐ Yes

☒ No

**26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (*e.g.*, order is independently appealable under NRAP 3A(b)):**

Russell dismissed the entire case, including both causes of action. However, if I understand NRCP 54(b) correctly, it seems to suggest that part of the case is still proceeding. Russell was clear, though; he dismissed the case with prejudice and instructed us to appeal it to the Supreme Court.

**27. Attach file-stamped copies of the following documents:**

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- Any other order challenged on appeal
- Notices of entry for each attached order

## VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Robert Beadles

Name of appellant

11/29/23

Date

In proper person

Name of counsel of record

Signature of counsel of record

Nevada, Storey County

State and county where signed

## CERTIFICATE OF SERVICE

I certify that on the 29th day of November, 2023, I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her; or

☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

Lindsay Liddell, on behalf of all defendants, emailed to:

Haldeman, Suzanne shaldeman@da.washoecounty.gov

Hickman, Elizabeth ehickman@da.washoecounty.gov

Liddell, Lindsay L lliddell@da.washoecounty.gov

As per our previously arranged agreement on how we would serve each other.

Dated this 29th day of November, 2023

Signature

1 ROBERT BEADLES

2 10580 N. McCarran Blvd. #115, Apt. 386

3 Reno, NV 89503

4 916-573-7133

5 *Plaintiff, Pro Se*

6 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**  
7 **CARSON CITY**

8 MR ROBERT BEADLES, an individual,

Case No.: 23-OC-00105 1B

9 Plaintiff,

Dept. No.: 1

10 vs.

11 JAMIE RODRIGUEZ, in her official capacity as  
12 Registrar of Voters and in her personal capacity;  
13 the WASHOE COUNTY REGISTRAR OF  
14 VOTERS, a government agency; ERIC BROWN in  
15 his official capacity as WASHOE COUNTY  
16 MANAGER and in his personal capacity, ALEXIS  
17 HILL in her official capacity as CHAIRWOMAN  
18 OF WASHOE COUNTY BOARD OF  
19 COMMISSIONERS and in her personal capacity;  
20 WASHOE COUNTY, Nevada a political  
21 subdivision of the State of Nevada, and DOES I-X;  
22 and ROE CORPORATIONS I-X.

23 Defendants.

24 **MOTION TO EXPEDITE HEARING**

25 Plaintiff Robert Beadles ("Beadles") is requesting an expedited hearing before the  
26 Nevada Supreme Court.

27 **Background**

28 Beadles filed a Complaint and supplemental exhibits to the complaint on August 4,  
2023, and more supplemental exhibits on August 9. Numerous motions from both  
sides were filed, as the court docket shows. Beadles filed a motion to change the



venue to Lyon County. Judge Drakulich granted the motion to change venue, citing the law, but she misapplied it, moving it to Carson City where Beadles had no chance of a fair trial. Beadles then filed another motion for a change of venue in Carson City Judicial District 1, Dept 1, to which the defense filed an opposition. Oral arguments occurred on November 20, 2023. Beadles' fears of bias were confirmed when Judge Russell showed extreme bias and dismissed the entire case with prejudice, clearly violating Beadles' rights, the law, authorities, statutes, and case law. Beadles is now seeking an expedited appeal from the Supreme Court of Nevada, as the issues presented in his case and over 160 exhibits clearly demonstrate the need to address his allegations and findings well before the 2024 elections to prevent irreparable harm to the Plaintiff and the public.

#### **Authority For The Supreme Court Of Nevada To Intervene**

This Honorable Court has the authority to intervene and repair this grave injustice as per NRAP 3A(b)(1): "A final judgment entered in an action or proceeding commenced in the court in which the judgment is rendered." The plaintiff is filing this appeal and motion in proper person. If I made any errors in the procedures or structure, I ask this Honorable Court, in the pursuit of justice, to allow this appeal and motion to proceed as per NRCP Rule 61, which states, "Unless justice requires otherwise, no error in admitting or excluding evidence—or any other error by the court or a party—is ground for granting a new trial, for setting aside a verdict, or for vacating, modifying, or otherwise disturbing a judgment or order. At every stage of the proceeding, the court must disregard all errors and defects that do not affect any party's substantial rights."

Additionally, I ask this Honorable Court to adhere to NRAP Rule 2:

"On the court's own or a party's motion, the court may—to expedite its decision or for other good cause—suspend any provision of these Rules in a particular case and order proceedings as the court directs, except as otherwise provided in Rule 26(b)," if it

1 applies. Rule 26(d) also grants the authority as it states: “**Shortening Time.** Except as  
2 otherwise provided in these Rules, or when not otherwise controlled by statute, the  
3 time prescribed by these Rules to perform any act may be shortened by stipulation of  
4 the parties, or by order of the court or a justice or judge.”

### 5 6 **The Basis Of The Complaint**

7  
8 In the absence of this Honorable Courts intervention, the integrity of the upcoming  
9 election in Washoe County will be compromised, this is good cause to expedite the  
10 briefing schedule.  
11

12 Judge Russell disregarded the rule of law, authorities, and the Plaintiff's rights,  
13 creating irreparable harm to both the Plaintiff and the Public. If his ruling stands, the  
14 Defendants, who by their own admission are not prepared for the 2024 Elections, will  
15 conduct an unlawful election, disenfranchising every voter's right to suffrage.

16 Additionally, the Defendants have committed malfeasance and malpractice in office.  
17 The court must allow the underlying case to go forward on it's merits and Beadles  
18 must be allowed to present evidence (which he has already done so in his exhibits)  
19 regarding the removal of defendants from their as allowing them to continue shows  
20 that there is no longer rule of law in Nevada. Failure to allow the case to move  
21 forward will create a situation in where the public can no longer hold public servants  
22 accountable for any crime, and they no longer have any rights guaranteed to them by  
23 God and the Constitution. This results in a lack of adequate remedies for them and  
24 catastrophic consequences for society. This Honorable Court must intervene before  
25 irreparable damage is done.  
26  
27  
28

1 **This Case Must Be Expedited**

2  
3 **I. Defendants Are Not Ready For 2024 Election**

4 Exhibits 1-24, 97, 101, 118-122 definitively show that the defendants are not ready for  
5 the 2024 elections. Defendant Brown's own statement, indicating the need to take the  
6 Washoe ROV's office "down to the studs and start over," underscores this  
7 unpreparedness. With the Primary election scheduled for June of 2024, and the  
8 process already underway, the current decisions and lack thereof by highly unsuitable  
9 people are ensuring that our election will significantly deviate from the laws and  
10 authorities. It is paramount that these issues are rectified immediately. Time is of the  
11 essence, and without this Honorable Court's intervention, our elections will be  
12 unlawful and a disgrace to our great state.

13 **II. Irreparable Harm Will Occur to the Plaintiff and the Public Unless The**  
14 **Supreme Court Provides Justice**

15 The defendants cannot be allowed to continue their current course of action, as  
16 demonstrated by over 160 exhibits. A review of just exhibits 1-24, 72, and 109 clearly  
17 illustrates this point. The defense acknowledges that the plaintiff has the authority to  
18 remove the defendants from office via NRS 283.44, citing Madsen v. Brown, 701  
19 P.2d 1086, 1093 (Utah 1985) in their Motion to Dismiss, page 11, lines 5-15. The  
20 evidence and allegations against the defendants must be weighed and ruled upon  
21 immediately, and certainly well before the 2024 Elections. The issues highlighted by  
22 both the plaintiff and the defendants require immediate attention. Nevada courts have  
23 already held that private citizens can seek to remove public officials via NRS 283.440  
24 as per Mason v. Gammick, No. 71691 (Nev. App. June 26, 2017) and Charles A.  
25 Muth v. Robert Loux, No. 2008 WL 6498697 (Nev. Dist. Ct., First Judicial Dist.,  
26 Carson City County, Trial Order) demonstrate. Even though in these cases the plaintiff  
27 was not successful, the courts allowed the process to go forward to find whether the  
28 defendants should be removed from office. I must be allowed the same right as the

1 pursuit of justice so demands, as do my rights.

2  
3 **III. Russell Disregards Rules, Laws, and Authorities Creating Damning**  
4 **Precedent For All Cases Going Forward.**

5 Judge Russell, from the outset of the oral arguments, see exhibits 161-163, showed  
6 extreme bias and disregard for the rule of law. He even went so far as to state Beadle's  
7 case was "smoke and mirrors," Exhibit 161 page 37, line 7. He further created case  
8 law that now completely undermines NRCP Rule 8 regarding filing a complaint, and  
9 goes further by completely undermining NRCP Rule 12(B)(5), where any case going  
10 forward would have to entirely prove their case in their original complaint, and even  
11 after that, the Judge could rule unlawfully ignoring all facts, evidence, rules, etc., and  
12 simply toss a case because the Judge feels like it. Furthermore, Russell lied and said  
13 he didn't know who Beadles was; therefore, a motion to change venue was not needed.  
14 Beadles has witnesses who, under oath, will attest to the fact he knew who Beadles  
15 was far before the case reached his court. Beadles clearly and concisely exposed that  
16 he would not receive a fair trial in Carson, as all the reasons and more that Judge  
17 Drakulich granted his motion to Change Venue are 9x more amplified in Carson City.  
18 The Judge disregarded these facts, lied to the court, and then dismissed his motion to  
19 Change Venue. These types of injustices are a disgrace to courtrooms across our great  
20 Country.

21 To give one example, in which Beadles could give hundreds, look no further than  
22 exhibit 72. Beadles has court orders stating he and the public will have the right to  
23 observe the entire vote-counting process. Exhibits 23 and 24 clearly show the  
24 defendants broke the court order. So Beadles clearly states in his complaint that the  
25 defendants broke the court orders, and the judge could enjoin them from breaking the  
26 laws, and court orders going forward. Showing the complaint should never have been  
27 thrown out. Instead, the Judge broke the rule of law, signaling even court orders mean  
28 nothing in his courtroom. Signaling worse, there is zero rule of law in his court, and

1 he is accountable to no one if allowed to stand. He calls court orders, “smoke and  
2 mirrors”. Beadles gave 7 succinct examples just like this, see exhibits 161-163; he  
3 again could have given mountains more, yet Russell refused to follow the law and  
4 allow the complaint to go forward.

5  
6 It is of the utmost urgency his rulings are overturned, and Beadles is guaranteed his  
7 rights to justice, which only this court can give him. Allowing these injustices to stand  
8 will create irreparable harm to Beadles, and the public. It signals there is no rule of  
9 law in Nevada if allowed to stand. This Honorable Court must intervene immediately.

#### 10 11 **Oral Arguments Must Be Allowed**

12 It's imperative that this honorable court hear from both sides, as much can be lost in  
13 fully digesting the mountain of exhibits and pleadings Beadles has presented to the  
14 courts. The evidence and allegations must be heard. In this motion, Beadles has barely  
15 touched on 1% of the issues uncovered. Beadles requests that after the briefs are  
16 submitted, this honorable court then hears the arguments in person prior to ruling. It's  
17 in the utmost pursuit of justice this Honorable Court is presented the facts, succinctly  
18 and honestly, so this Honorable Court can weigh, measure, and then rule  
19 appropriately.

#### 20 21 **Remedies Required In Pursuit Of Justice**

22 In the absence of this Honorable Court's intervention, the integrity of the upcoming  
23 election in Washoe County will be compromised, this is good cause to expedite the  
24 briefing schedule.

25  
26 By allowing the defendants to continue operating as they have, there is zero chance  
27 that the elections in Washoe County will be conducted lawfully. Russell's rulings have  
28 now created a situation where what a 12(b)(5) motion used to mean, versus what it

1 means now, is anyone's guess, which is unconstitutional. Russell's ruling on what Rule  
2 8 now means is anyone's guess as well. These two unconstitutional and unlawful  
3 rulings, in addition to lying to the court and stating he doesn't know Beadles when  
4 witnesses will attest to the fact he does, cannot stand.

5  
6 It is imperative to ensure irreparable harm does not occur and that this honorable court  
7 reverses Russell's Rulings and Orders, changes the venue to Lyon or White Pine  
8 County, and grants a jury trial on an expedited basis because the evidence clearly  
9 shows the defendants have broken numerous laws, will continue to break numerous  
10 laws, and will conduct an unlawful election, depriving every legal voter of their right  
11 to suffrage unless this motion to expedite is granted.

12  
13 It is imperative that the public is allowed to hear both sides of the issues, as entitled to  
14 the Plaintiff and public via the Constitution of the United States and the Nevada  
15 Constitution, then issue their verdict on an expedited basis. Additionally, Russell's  
16 rulings have created unlawful case law that will leave all plaintiffs guessing as to what  
17 is now required to file a complaint, as now a Judge can simply make up the law as he  
18 or she goes. The harm created by these rulings is staggering to the rule of law.

19  
20 Justice must not die in the darkness of Nevada Courts. If this appeal is not heard on an  
21 expedited basis, if these unlawful acts are allowed to stand, there will be significant,  
22 irreparable harm that will result to Beadles and the public. It is imperative the  
23 Supreme Court of Nevada intervenes and rights these wrongs before it's too late.

1 **Conclusion**

2  
3 Your Honors,

4 As Justice Sonia Sotomayor so rightly stated, "Not only is it important that justice be  
5 done; it is equally important that it be seen to be done."  
6

7 You have a Constitutional duty to ensure the rule of law is followed in Nevada by all  
8 its courts. It is in the best interest of the public that these allegations are brought  
9 before them, so they may decide who is right or wrong, as opposed to a biased judge  
10 who refuses to follow the law.  
11

12 Justice demands that these allegations do not die in the darkness of unlawfulness or  
13 inaction. This Court will either declare to the world that there is no justice or rule of  
14 law in Nevada or affirm that they are here to ensure the law is upheld.  
15

16 Currently, the defendants have no obligation to follow the laws, face no consequences  
17 for breaking them, and the courts will merely cover for them, dismiss the case, and  
18 penalize the truth tellers.  
19

20 I have clearly presented exhibit 72, which are the Washoe County Court orders stating  
21 that all Nevadans have the right to observe the vote counting process for its entire  
22 duration. The defendants violated these court orders, as exhibits 23-24 demonstrate,  
23 showing utter contempt for the justice system and the people.  
24

25 This example alone conclusively demonstrates that I have overcome the 12(b)(5)  
26 motion, as I have stated a clear and concise claim, and the Judge has the authority to  
27 compel the defendants to follow the law. This instance exemplifies the sheer  
28 unconstitutionality and disregard for the law exhibited by Russell.

1 If this is permitted to stand, Nevada courts will be seen as utterly corrupt, and even  
2 their court orders will be deemed meaningless, casting them as mere illusions of  
3 justice.

4  
5 There is good cause and the law requires you to act, you must intervene, you must  
6 expedite this case, as justice and the public require. Inaction would be an even greater  
7 affirmation that justice no longer resides in Nevada. Grant the appeal to be heard,  
8 grant the motion to expedite, and demonstrate to the state and the world that the rule  
9 of law will be defended in Nevada.

10  
11 In the absence of this Honorable Courts intervention, the integrity of the upcoming  
12 election in Washoe County will be compromised.

13  
14  
15 Dated: 11/29/23

16  
17  
18  
19  
20 Respectfully submitted,

21  
22 By: \_\_\_\_\_

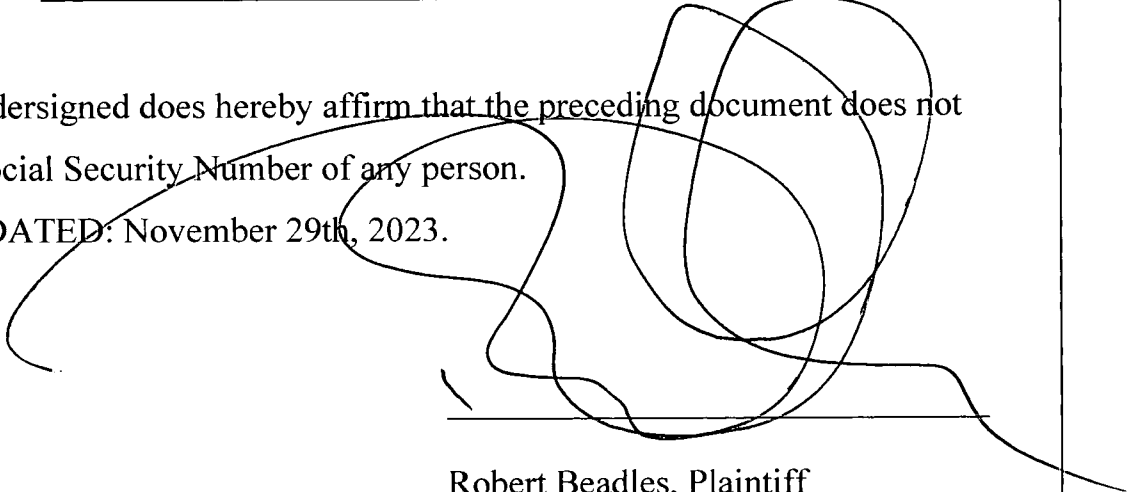
23 ROBERT BEADLES, Plaintiff Pro Se  
24  
25  
26  
27  
28



1                                   **AFFIRMATION PURSUANT TO NRS 239B.030**

2  
3           The undersigned does hereby affirm that the preceding document does not  
4 contain the Social Security Number of any person.

5                   DATED: November 29th, 2023.

6  
7  
8                                     
9                                   Robert Beadles, Plaintiff

10  
11                                   **CERTIFICATE OF SERVICE**

12  
13           Pursuant to NRCP 5(b), I hereby certify that on November 29th, I electronically  
14 served all parties of record as per the agreed upon arrangement with the defense.

15  
16           Haldeman, Suzanne shaldeman@da.washoecounty.gov

17           Hickman, Elizabeth ehickman@da.washoecounty.gov

18           Liddell, Lindsay L lliddell@da.washoecounty.gov  
19

20  
21  
22                                     
23                                   Robert Beadles, Plaintiff  
24  
25  
26  
27  
28

## **Exhibit Glossary**

Exhibit 161 11\_20\_23 Hearing Transcript 48 pg.

Exhibit 162 11\_20\_23 Hearing (Video) (USB Drive)

Exhibit 163 11\_20\_23 Hearing Transcript-Court Reporter 37 pg.

JUDGE 925

Judge: RUSSELL, JUDGE JAMES  
TODD

Case No. 23 OC 00105 1B

Ticket No.  
CTN:

BEADLES, ROBERT

By:

-vs-

BROWN, ERIC

DRSPND

By:

Dob: Sex:  
Lic: Sid:  
CHAIRWOMAN OF WASHOE DRSPND  
COUNTY BOARD OF  
COMMISSIONERS

By:

Dob: Sex:  
Lic: Sid:  
HILL, ALEXIS DRSPND

By:

Dob: Sex:  
Lic: Sid:  
RODRIGUEZ, JAMIE DRSPND

By:

Dob: Sex:  
Lic: Sid:  
WASHOE COUNTY DRSPND

By:

Dob: Sex:  
Lic: Sid:  
WASHOE COUNTY MANAGER DRSPND

By:

Dob: Sex:  
Lic: Sid:  
WASHOE COUNTY REGISTER OF DRSPND  
VOTERS

By:

Dob: Sex:  
Lic: Sid:Plate#:  
Make:  
Year: Accident:  
Type:  
Venue:  
Location:

BEADLES, ROBERT

PLNTPET

Bond:  
Type:Set:  
Posted:

Charges:

Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:Ct. Offense Dt: Cvr:  
Arrest Dt:  
Comments:

Sentencing:

No.	Filed	Action	Operator	Fine/Cost	Due
1	11/21/23	NOTICE OF ENTRY OF ORDER (2)	1BSBARAJAS	0.00	0.00

MIJR5925

No.	Filed	Action	Operator	Fine/Cost	Due
2	11/20/23	ORDER GRANTING DEFENDANTS' MOTION TO DISMISS	1BSBARAJAS	0.00	0.00
3	11/20/23	ORDER DENYING PLAINTIFF'S MOTION TO CHANGE VENUE	1BSBARAJAS	0.00	0.00
4	11/20/23	HEARING HELD: The following event: MOTION HEARING - CIVIL scheduled for 11/20/2023 at 1:30 pm has been resulted as follows:  Result: HEARING HELD Judge: RUSSELL, JUDGE JAMES TODD Location: DEPT I	1BSBARAJAS	0.00	0.00
5	11/17/23	FILE RETURNED AFTER SUBMISSION - ORDER ENTERED	1BJULIEH	0.00	0.00
6	11/17/23	ORDER GRANTING NEWS REPORTERS ACCESS	1BJULIEH	0.00	0.00
7	11/17/23	MEDIA REQUEST TO ALLOW CAMERAS IN THE COURTROOM	1BJULIEH	0.00	0.00
8	10/16/23	REPLY TO DEFENDANTS' OPPOSITION FOR MOTION TO LEAVE TO FILE LIMITED MOTION FOR RECONSIDERATION OF CHAGNE OF VENUE LOCATION	1BJULIEH	0.00	0.00
9	10/13/23	RESPONSE TO OPPOSITION OF MOTION TO CHANGE OF VENUE	1BDORTIZ	0.00	0.00
10	10/04/23	RESPONSE TO DEFENDANT'S OPPOSITION TO LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION	1BDORTIZ	0.00	0.00
11	10/04/23	DEFENDANTS' OPPOSITION TO PLAINTIFF'S SECOND MOTION TO CHANGE VENUE	1BDORTIZ	0.00	0.00
12	10/04/23	NOTICE OF ENTRY OF ORDER (2)	1BDORTIZ	0.00	0.00
13	09/29/23	DEFENDANTS' OPPOSITION TO ROBERT BEADLES'S LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION	1BDORTIZ	0.00	0.00
14	09/29/23	ORDER GRANTING DEFENDANTS' MOTION TO ENLARGE PAGE LIMITS FOR REPLY IN SUPPORT OF MOTION FOR SANCTIONS	1BJULIEH	0.00	0.00
15	09/29/23	ORDER SETTING HEARING	1BJULIEH	0.00	0.00
16	09/28/23	REQUEST FOR SUBMISSION OF DEFENDANTS' MOTION FOR SANCTIONS	1BJULIEH	0.00	0.00
17	09/28/23	DEFENDANTS' MOTION TO ENLARGE PAGE LIMITS FOR REPLY IN SUPPORT OF MOTION FOR SANCTIONS	1BJULIEH	0.00	0.00
18	09/28/23	DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR SANCTIONS	1BJULIEH	0.00	0.00
19	09/26/23	CORRECTED ORDER GRANTING PLAINTIFF'S MOTION TO CHANGE VENUE	1BPETERSON	0.00	0.00
20	09/26/23	ORDER GRANTING DEFENDANTS MOTION TO CHANGE VENUE Receipt: 81577 Date: 09/28/2023	1BCCOOPER	155.00	0.00
Total:				155.00	0.00
Totals By: COST				155.00	0.00
INFORMATION				0.00	0.00
*** End of Report ***					



Second Judicial District Court  
State of Nevada  
Washoe County

Electronic Filing

## Case Summary for Case: CV23-01341

Change of Venue: date sent out 9/22/2023

**Case Number** CV23-01341

**Case Type** OTHER CIVIL MATTERS

**Opened** 08-04-2023

**Status** DISPOSED

**Plaintiff**

**Defendant**

**Judge**

ROBERT BEADLES

WASHOE COUNTY et al

HONORABLE KATHLEEN DRAKULICH - Division  
D1

☒ Show/Hide Participants

### File Date

### Case History

10-02-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service Transaction 9917171 - Approved By: NOREVIEW : 10-02-2023:08:54:51</p>
10-02-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service Transaction 9917166 - Approved By: NOREVIEW : 10-02-2023:08:53:42</p>
10-02-2023 Plaintiff	<p>Motion</p> <p>Filed by: ROBERT BEADLES</p> <p>Motion ... DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT – CARSON CITY 9/22/23 - MOTION TO REQUEST LEAVE TO FILE LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION - Transaction 9916948 - Approved By: YVILORIA : 10-02-2023:08:54:14</p>
10-02-2023 Plaintiff	<p>Response</p> <p>Filed by: ROBERT BEADLES</p> <p>Response... DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/22/23 - RESPONSE TO DEFENDANT'S OPPOSITION TO LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION - Transaction 9916947 - Approved By: YVILORIA : 10-02-2023:08:53:00</p>
09-22-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service Transaction 9902275 - Approved By: NOREVIEW : 09-22-2023:11:22:28</p>
09-22-2023	<p>Certificate of Mailing</p> <p>Filed</p> <p>Certificate of Mailing Additional Documents Mailed to First Judicial District Court on 9/22/2023 - Transaction 9902273 - Approved By: NOREVIEW : 09-22-2023:11:21:59</p>
09-22-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service NEF Belongs to Document Filed in Error - Scolabianchi - 9/22/2023 - Transaction 9902192 - Approved By: NOREVIEW : 09-22-2023:11:03:37</p>
09-22-2023	<p>Certificate of Mailing</p> <p>Filed</p> <p>Certificate of Mailing</p>
09-21-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service Transaction 9901023 - Approved By: NOREVIEW : 09-21-2023:15:24:07</p>
09-21-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service Transaction 9900810 - Approved By: NOREVIEW : 09-21-2023:14:51:01</p>
09-21-2023	<p>Notice of Electronic Filing</p> <p>Filed</p> <p>Proof of Electronic Service Transaction 9900796 - Approved By: NOREVIEW : 09-21-2023:14:49:47</p>
09-21-2023 Plaintiff	<p>Mtn for Change of Venue</p> <p>Filed by: ROBERT BEADLES</p> <p>Mtn for Change of Venue DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/14/23 - Transaction 9900739 - Approved By: YVILORIA : 09-21-2023:15:23:13</p> <ul style="list-style-type: none"> <li>- Exhibit 154</li> <li>- Exhibit 155</li> <li>- Exhibit 156</li> <li>- Exhibit 157</li> </ul>
09-21-2023 Plaintiff	<p>Opposition to Mtn</p> <p>Filed by: ROBERT BEADLES</p>

Opposition to Mtn ... dfx: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/22/23 OPPOSITION TO MOTION FOR SANCTIONS - Transaction 9900704 - Approved By: YVILORIA : 09-21-2023:14:47:49

- Exhibit 154
- Exhibit 155
- Exhibit 156
- Exhibit 157

#### Opposition to Mtn

Filed by: ROBERT BEADLES

09-21-2023  
Plaintiff

Opposition to Mtn ... DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/22/23 OPPOSITION OF MOTION FOR SANCTIONS - Transaction 9900677 - Approved By: YVILORIA : 09-21-2023:14:46:29

- Exhibit 154
- Exhibit 155
- Exhibit 156
- Exhibit 157

#### Notice of Electronic Filing

09-18-2023

Filed

Proof of Electronic Service Transaction 9892342 - Approved By: NOREVIEW : 09-18-2023:14:01:11

#### Mtn for Reconsideration

Filed by: ROBERT BEADLES

09-18-2023  
Plaintiff

Mtn for Reconsideration LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION - Transaction 9892233 - Approved By: YVILORIA : 09-18-2023:13:59:03

- Exhibit 155
- Exhibit 156

#### Notice of Electronic Filing

09-14-2023

Filed

Proof of Electronic Service Transaction 9885610 - Approved By: NOREVIEW : 09-14-2023:08:34:08

#### Notice of Entry of Ord

09-14-2023  
Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Notice of Entry of Ord Transaction 9885609 - Approved By: NOREVIEW : 09-14-2023:08:33:29

#### Notice of Electronic Filing

09-14-2023

Filed

Proof of Electronic Service Transaction 9885575 - Approved By: NOREVIEW : 09-14-2023:08:14:00

#### Corrected Judgment or Ord

09-14-2023

Filed

Corrected Judgment or Ord CORRECTED ORDER GRANTING PLAINTIFF'S MOTION TO CHANGE VENUE - Transaction 9885572 - Approved By: NOREVIEW : 09-14-2023:08:13:18 Change of Venue: date sent out 9/22/2023 - Via FEDEX.

#### Notice of Electronic Filing

09-13-2023

Filed

Proof of Electronic Service Transaction 9885177 - Approved By: NOREVIEW : 09-13-2023:16:36:25

#### Notice of Entry of Ord

09-13-2023  
Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Notice of Entry of Ord Transaction 9885163 - Approved By: NOREVIEW : 09-13-2023:16:35:20

#### Notice of Electronic Filing

09-13-2023

Filed

Proof of Electronic Service Transaction 9884699 - Approved By: NOREVIEW : 09-13-2023:15:19:58

#### Opposition to Mtn

09-13-2023  
Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Opposition to Mtn ... OPPOSITION OF MOTION IN REQUEST OF SUR-REPLY - Transaction 9884666 - Approved By: YVILORIA : 09-13-2023:15:18:48

#### Notice of Electronic Filing

09-13-2023

Filed

Proof of Electronic Service Transaction 9884303 - Approved By: NOREVIEW : 09-13-2023:14:04:34

#### Ord for Change of Venue

09-13-2023

Filed

Ord for Change of Venue ORDER GRANTING DEFENDANT'S MOTION TO CHANGE VENUE - Transaction 9884298 - Approved By: NOREVIEW : 09-13-2023:14:04:06 Change of Venue: date sent out 9/22/2023 - Via FEDEX.

#### Notice of Electronic Filing

09-11-2023

Filed

Proof of Electronic Service Transaction 9879805 - Approved By: NOREVIEW : 09-11-2023:15:03:47

09-11-2023  
Defendant

#### Mtn for Sanctions

Filed by: LINDSAY LIDDELL, ESQ.

Mtn for Sanctions Transaction 9879797 - Approved By: NOREVIEW : 09-11-2023:15:02:42

- Exhibit 1

- Exhibit 2
- Exhibit 3
- Exhibit 4
- Exhibit 5
- Exhibit 6
- Exhibit 7
- Exhibit 8
- Exhibit 9
- Exhibit 10
- Exhibit 11

## Notice of Electronic Filing

09-07-2023

Filed

Proof of Electronic Service Transaction 9873074 - Approved By: NOREVIEW : 09-07-2023:10:40:29

## Motion

09-07-2023

Plaintiff

Filed by: ROBERT BEADLES

Motion ... MOTION IN REQUEST OF SUR-REPLY - Transaction 9873046 - Approved By: YVILORIA : 09-07-2023:10:39:40

- Exhibit 147
- Exhibit 148

## Notice of Electronic Filing

09-05-2023

Filed

Proof of Electronic Service Transaction 9867439 - Approved By: NOREVIEW : 09-05-2023:10:53:58

## Notice of Electronic Filing

09-05-2023

Filed

Proof of Electronic Service Transaction 9867437 - Approved By: NOREVIEW : 09-05-2023:10:53:37

## Request for Submission

09-05-2023

Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Request for Submission Transaction 9867436 - Approved By: NOREVIEW : 09-05-2023:10:53:21 DOCUMENT TITLE: MOTION TO DISMISS FILED BY DEFENDANTS ON AUGUST 15, 2023 PARTY SUBMITTING: LINDSAY LIDDELL ESQ DATE SUBMITTED: 9-5-23 SUBMITTED BY: YV DATE RECEIVED JUDGE OFFICE:

## Reply

09-05-2023

Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Reply... REPLY IN SUPPORT OF MOTION TO DISMISS - Transaction 9867433 - Approved By: NOREVIEW : 09-05-2023:10:52:55

## Notice of Electronic Filing

08-31-2023

Filed

Proof of Electronic Service Transaction 9861121 - Approved By: NOREVIEW : 08-31-2023:11:12:21

## Affidavit

08-31-2023

Plaintiff

Filed by: ROBERT BEADLES

Affidavit ... Proof of Service - Transaction 9861117 - Approved By: NOREVIEW : 08-31-2023:11:11:54

## Notice of Electronic Filing

08-29-2023

Filed

Proof of Electronic Service Transaction 9856405 - Approved By: NOREVIEW : 08-29-2023:11:38:56

## Opposition to Mtn

08-29-2023

Plaintiff

Filed by: ROBERT BEADLES

Opposition to Mtn ... PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS - Transaction 9856384 - Approved By: YVILORIA : 08-29-2023:11:38:16

- Exhibit 146

## Notice of Electronic Filing

08-24-2023

Filed

Proof of Electronic Service Transaction 9850150 - Approved By: NOREVIEW : 08-24-2023:14:35:14

## General Receipt

08-24-2023

Filed

General Receipt NOTICE OF RECEIPT (MEDIA MAIL) - TRANSFERRED TO EVIDENCE CLERK - Transaction 9850146 - Approved By: NOREVIEW : 08-24-2023:14:34:18

## Notice of Electronic Filing

08-24-2023

Filed

Proof of Electronic Service Transaction 9849400 - Approved By: NOREVIEW : 08-24-2023:11:56:17

## Supplemental ...

08-24-2023

Plaintiff

Filed by: ROBERT BEADLES

Supplemental ... SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION - Transaction 9849395 - Approved By: NOREVIEW : 08-24-2023:11:55:17

- Exhibit 117
- Exhibit 118 Thumbdrive
- Exhibit 119 Thumbdrive
- Exhibit 120
- Exhibit 121

- Exhibit 122 Thumbdrive
- Exhibit 123
- Exhibit 124
- Exhibit 125
- Exhibit 126
- Exhibit 127
- Exhibit 128
- Exhibit 129
- Exhibit 130
- Exhibit 131 Thumbdrive
- Exhibit 132
- Exhibit 133
- Exhibit 134
- Exhibit 135
- Exhibit 136 Thumbdrive
- Exhibit 137
- Exhibit 138
- Exhibit 139
- Exhibit 140
- Exhibit 141
- Exhibit 142
- Exhibit 143
- Exhibit 144
- Exhibit 145

## Notice of Electronic Filing

08-24-2023

Filed

Proof of Electronic Service Transaction 9849229 - Approved By: NOREVIEW : 08-24-2023:11:17:54

## Reply

08-24-2023  
Plaintiff

Filed by: ROBERT BEADLES

Reply... REPLY IN SUPPORT OF MOTION TO CHANGE VENUE - Transaction 9849224 - Approved By: NOREVIEW : 08-24-2023:11:16:55

## Reply

08-24-2023  
Plaintiff

Filed by: ROBERT BEADLES

Reply... REPLY IN SUPPORT OF MOTION TO COMPEL ISSUANCE OF CITATIONS - Transaction 9849224 - Approved By: NOREVIEW : 08-24-2023:11:16:55

## Notice of Electronic Filing

08-21-2023

Filed

Proof of Electronic Service Transaction 9841854 - Approved By: NOREVIEW : 08-21-2023:13:56:37

## Case Assignment Notification

08-21-2023

Filed

Case Assignment Notification RANDOMLY REASSIGNED TO D1 FROM D9 PER ORDER OF RECUSAL FILED 8/21/23 - Transaction 9841848 - Approved By: NOREVIEW : 08-21-2023:13:55:52

## Notice of Electronic Filing

08-21-2023

Filed

Proof of Electronic Service Transaction 9841739 - Approved By: NOREVIEW : 08-21-2023:13:34:03

## Ord of Recusal

08-21-2023

Filed

Ord of Recusal Transaction 9841736 - Approved By: NOREVIEW : 08-21-2023:13:33:21

## Notice of Electronic Filing

08-17-2023

Filed

Proof of Electronic Service Transaction 9835773 - Approved By: NOREVIEW : 08-17-2023:09:33:58

## Opposition to Mtn

08-17-2023  
Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Opposition to Mtn ... OPPOSITION TO MOTION TO COMPEL COURT TO ISSUE CITATIONS AGAINST DEFENDANTS - Transaction 9835737 - Approved By: SACORDAG : 08-17-2023:09:33:32

## Notice of Electronic Filing

08-17-2023

Filed

Proof of Electronic Service Transaction 9835605 - Approved By: NOREVIEW : 08-17-2023:08:45:10

## Notice of Electronic Filing

08-17-2023

Filed

Proof of Electronic Service Transaction 9835591 - Approved By: NOREVIEW : 08-17-2023:08:43:15

## Opposition to Mtn

08-17-2023  
Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Opposition to Mtn ... TO REQUEST JUDGE SIMONS - Transaction 9835583 - Approved By: DSTAGGS : 08-17-2023:08:44:38

## Opposition to Mtn

08-17-2023  
Defendant

Filed by: LINDSAY LIDDELL, ESQ.



Opposition to Mtn ... TO CHANGE VENUE - Transaction 9835579 - Approved By: DSTAGGS : 08-17-2023:08:42:34

Notice of Electronic Filing

08-16-2023

Filed

Proof of Electronic Service Transaction 9833112 - Approved By: NOREVIEW : 08-16-2023:08:33:03

Opposition to Mtn

08-16-2023

Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Opposition to Mtn ... OPPOSITION TO MOTION TO REQUEST JUDGE SIMONS - Transaction 9833100 - Approved By: YVILORIA : 08-16-2023:08:32:29

Notice of Electronic Filing

08-16-2023

Filed

Proof of Electronic Service Transaction 9833003 - Approved By: NOREVIEW : 08-16-2023:07:44:49

Mtn for Recusal

08-15-2023

Plaintiff

Filed by: ROBERT BEADLES

Mtn for Recusal MOTION FOR RECUSAL OF JUDGE - Transaction 9832928 - Approved By: SACORDAG : 08-16-2023:07:44:18

Notice of Electronic Filing

08-15-2023

Filed

Proof of Electronic Service Transaction 9831160 - Approved By: NOREVIEW : 08-15-2023:12:17:16

Mtn to Dismiss

08-15-2023

Defendant

Filed by: LINDSAY LIDDELL, ESQ.

Mtn to Dismiss ... Transaction 9831148 - Approved By: YVILORIA : 08-15-2023:12:16:36

- Exhibit 1
- Exhibit 2

Notice of Electronic Filing

08-14-2023

Filed

Proof of Electronic Service Transaction 9829575 - Approved By: NOREVIEW : 08-14-2023:15:22:33

Affidavit

08-14-2023

Plaintiff

Filed by: ROBERT BEADLES

Affidavit ... Proof of service for all exhibits, motions, orders etc filed thru 8/11/23 - Transaction 9829570 - Approved By: NOREVIEW : 08-14-2023:15:21:51

Notice of Electronic Filing

08-14-2023

Filed

Proof of Electronic Service Transaction 9827670 - Approved By: NOREVIEW : 08-14-2023:08:23:36

Notice of Electronic Filing

08-14-2023

Filed

Proof of Electronic Service Transaction 9827648 - Approved By: NOREVIEW : 08-14-2023:08:17:19

Mtn for Change of Venue

08-13-2023

Plaintiff

Filed by: ROBERT BEADLES

Mtn for Change of Venue Transaction 9827480 - Approved By: DSTAGGS : 08-14-2023:08:20:47

Mtn to Compel

08-13-2023

Plaintiff

Filed by: ROBERT BEADLES

Mtn to Compel... Motion to Compel Court to issue citations against defendants - Transaction 9827465 - Approved By: DSTAGGS : 08-14-2023:08:16:49

Notice of Electronic Filing

08-11-2023

Filed

Proof of Electronic Service Transaction 9826046 - Approved By: NOREVIEW : 08-11-2023:11:56:33

Affidavit/Declaration of Service

08-11-2023

Plaintiff

Filed by: ROBERT BEADLES

Affidavit/Declaration of Service DFX: CASE NUMBER IS ON LAST PAGE ALEXIS HILL 08/08/23, ERIC BROWN 08/08/23, JAMIE RODRIGUEZ 08/08/23 - Transaction 9826042 - Approved By: NOREVIEW : 08-11-2023:11:55:50

Notice of Electronic Filing

08-11-2023

Filed

Proof of Electronic Service Transaction 9825696 - Approved By: NOREVIEW : 08-11-2023:10:16:57

Case Assignment Notification

08-11-2023

Filed

Case Assignment Notification PER PEREMPTORY CHALLENGE FILED 08/11/2023 RANDOMLY REASSIGNED FROM DEPARTMENT 7 TO DEPARTMENT 9 - Transaction 9825693 - Approved By: NOREVIEW : 08-11-2023:10:16:26

Notice of Electronic Filing

08-11-2023

Filed

Proof of Electronic Service Transaction 9825253 - Approved By: NOREVIEW : 08-11-2023:08:00:49

08-10-2023

Plaintiff

Peremptory Challenge

Filed by: ROBERT BEADLES

\$Peremptory Challenge Transaction 9825101 - Approved By: CSULEZIC : 08-11-2023:08:00:10

Notice of Electronic Filing

08-10-2023

Filed

Proof of Electronic Service Transaction 9823860 - Approved By: NOREVIEW : 08-10-2023:13:02:53

Notice

08-10-2023  
Plaintiff

Filed by: ROBERT BEADLES

Notice ... DFX: AS WAS FILED INCORRECTLY AS A NOTICE, THIS DOCUMENT BYPASSED CLERK REVIEW AND NO PAYMENT WAS MADE FOR THIS PEREMPTORY CHALLENGE. Notice of Peremptory Challenge - Transaction 9823855 - Approved By: NOREVIEW : 08-10-2023:13:01:56

Notice of Electronic Filing

08-10-2023

Filed

Proof of Electronic Service Transaction 9823778 - Approved By: NOREVIEW : 08-10-2023:12:40:47

Motion

08-10-2023  
Plaintiff

Filed by: ROBERT BEADLES

Motion ... COMPLAINT FOR EQUITABLE, INJUNCTIVE RELIEF, PETITION FOR REMOVAL OF PUBLIC OFFICIAL FROM OFFICE, AND PUNITIVE DAMAGES - MOTION TO ASSIGN JUDGE - Transaction 9823730 - Approved By: SACORDAG : 08-10-2023:12:40:18

Notice of Electronic Filing

08-10-2023

Filed

Proof of Electronic Service Transaction 9823721 - Approved By: NOREVIEW : 08-10-2023:12:28:51

Case Assignment Notification

08-10-2023

Filed

Case Assignment Notification RANDOMLY REASSIGNED TO D7 FROM D15 PER ORDER OF RECUSAL FILED 8/7/23 - Transaction 9823719 - Approved By: NOREVIEW : 08-10-2023:12:28:07

Notice of Electronic Filing

08-09-2023

Filed

Proof of Electronic Service Transaction 9821695 - Approved By: NOREVIEW : 08-09-2023:14:34:52

General Receipt

08-09-2023

Filed

General Receipt NOTICE OF RECEIPT (MEDIA MAIL) - TRANSFERRED TO EVIDENCE CLERK - Transaction 9821676 - Approved By: NOREVIEW : 08-09-2023:14:33:37

Notice of Electronic Filing

08-09-2023

Filed

Proof of Electronic Service Transaction 9821272 - Approved By: NOREVIEW : 08-09-2023:13:43:12

Supplemental ...

08-09-2023  
Plaintiff

Filed by: ROBERT BEADLES

Supplemental ... SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S COMPLAINT - Transaction 9821268 - Approved By: NOREVIEW : 08-09-2023:13:42:35

Notice of Electronic Filing

08-09-2023

Filed

Proof of Electronic Service Transaction 9819971 - Approved By: NOREVIEW : 08-09-2023:08:29:31

Motion

08-09-2023  
Plaintiff

Filed by: ROBERT BEADLES

Motion ... 2nd Motion To Request Judge Simons - Transaction 9819860 - Approved By: MSALAZAR : 08-09-2023:08:28:49

Notice of Electronic Filing

08-07-2023

Filed

Proof of Electronic Service Transaction 9816680 - Approved By: NOREVIEW : 08-07-2023:14:27:13

Ord of Recusal

08-07-2023

Filed

Ord of Recusal Transaction 9816674 - Approved By: NOREVIEW : 08-07-2023:14:26:26

Notice of Electronic Filing

08-04-2023

Filed

Proof of Electronic Service Transaction 9814536 - Approved By: NOREVIEW : 08-04-2023:15:03:57

Motion

08-04-2023  
Plaintiff

Filed by: ROBERT BEADLES

Motion ... MOTION TO REQUEST JUDGE SIMONS - Transaction 9814373 - Approved By: YVILORIA : 08-04-2023:15:03:13

08-04-2023  
Plaintiff

Complaint - Civil

Filed by: ROBERT BEADLES

\$Complaint - Civil Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34

- Exhibit 1
- Exhibit 2

- Exhibit 3
- Exhibit 4

08-04-2023  
Plaintiff

**\*\* Summons Issued**

Filed by: ROBERT BEADLES

**\*\* Summons Issued WC - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34**

08-04-2023  
Plaintiff

**\*\* Summons Issued**

Filed by: ROBERT BEADLES

**\*\* Summons Issued RODRIGUEZ - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34**

08-04-2023  
Plaintiff

**\*\* Summons Issued**

Filed by: ROBERT BEADLES

**\*\* Summons Issued BROWN - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34**

08-04-2023  
Plaintiff

**\*\* Summons Issued**

Filed by: ROBERT BEADLES

**\*\* Summons Issued HILL - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34**

COMP  
ROBERT BEADLES  
10580 N. McCarran Blvd. #115, Apt. 386  
Reno, NV 89503  
*Plaintiff, Pro Se*

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN  
AND FOR THE COUNTY OF WASHOE**

MR ROBERT BEADLES, an individual,

Plaintiff,

vs.

JAMIE RODRIGUEZ, in her official capacity as Registrar of Voters and in her personal capacity; the WASHOE COUNTY REGISTRAR OF VOTERS, a government agency; ERIC BROWN in his official capacity as WASHOE COUNTY MANAGER and in his personal capacity, ALEXIS HILL in her official capacity as CHAIRWOMAN OF WASHOE COUNTY BOARD OF COMMISSIONERS and in her personal capacity; WASHOE COUNTY, Nevada, a political subdivision of the State of Nevada, and DOES I-X; and ROE CORPORATIONS I-X.

Defendants.

CASE NO.:  
DEPT. NO.:

**COMPLAINT FOR EQUITABLE,  
INJUNCTIVE RELIEF, PETITION FOR  
REMOVAL OF PUBLIC OFFICIAL  
FROM OFFICE,  
AND PUNITIVE DAMAGES**

**(Jury Trial Demanded)  
Automatically Exempt from Arbitration  
NAR 5(a)(1)(G)—Declaratory Relief**

Plaintiff ROBERT BEADLES ("Beadles"), in proper person, hereby files this Complaint against JAMIE RODRIGUEZ ("Rodriguez") in her official capacity as Registrar of Voters and in her personal capacity; the WASHOE COUNTY REGISTRAR OF VOTERS, a government agency; ERIC BROWN ("Brown") in his official capacity as WASHOE COUNTY MANAGER and in his personal capacity, ALEXIS HILL ("Hill") in her official capacity as CHAIRWOMAN OF WASHOE COUNTY BOARD OF COMMISSIONERS and in her personal capacity;

WASHOE COUNTY, Nevada, a political subdivision of the State of Nevada, and DOES I-X; and ROE CORPORATIONS I-X. collectively (“Defendants”), allege and petition this Court as follows:

**JURISDICTION & VENUE**

1. This Court has jurisdiction pursuant to NRS 13.030.
2. Under the doctrine of concurrent jurisdiction, this Court has jurisdiction to resolve claims under Nevada State Constitution and under Nevada State election laws.
3. This Court has jurisdiction to hear this matter, as all events giving rise to this incident took place in Washoe County, Nevada. The harm to be enjoined is threatened in Washoe County.
4. This Court has jurisdiction over this matter pursuant to Nev. Const. Art. 6 § 6, regarding all cases not assigned to the justices’ courts.
5. The venue is proper in Washoe County for election complaints pursuant to NRS 293.2546 (11).
6. The venue is proper in Washoe County pursuant to NRS 13.040, where the plaintiff and defendants reside.
7. In *Schumacher v. Furlong*, 78 Nev. 167, 370 P.2d 209 (1962), the Opinion of the Nevada Attorney General, “Under this statutory procedure any complainant can, for specifically enumerated grounds, e.g., malfeasance or nonfeasance, initiate district court proceedings to remove any person holding any nonjudicial office in this state. This statutory procedure has previously been used against a county officer.”
8. The Defendant(s), acting individually or in concert in contravention of Plaintiff’s right to equal protection are subject to penalties pursuant to NRS 283.440 and/or NRS 266.430.

9. Defendant Washoe County Nevada, is a political subdivision of the State of Nevada under the doctrine of respondent superior. Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
10. This Court has jurisdiction over this matter pursuant to NRS 4.370 (1) as the matter in controversy exceeds \$15,000, exclusive of attorney fees, interest, and costs.

### **PARTIES**

11. Plaintiff Robert Beadles resides in Washoe County, Nevada, and is a qualified elector who voted in the 2020 and 2022 elections and who intends to vote again in 2024.
12. Plaintiff comes before the court *pro se* because many BAR-certified attorneys are being targeted, dis-barred, sanctioned, etc. for simply bringing an elections-related lawsuit forward. Plaintiff hereby represents himself *pro se* to save his lawyers from attacks on their livelihoods.
13. Plaintiff's rights to have their legitimate grievances of matters of elections and the officials who conduct them responded to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants and DOES and ROES to be determined.
14. The office of the Registrar of Voters was created pursuant to NRS 244.164 and W.C.C. 5.541 (except duties imposed by virtue of NRS 293.393 to make out and deliver certificates of election). In general terms, the defendants handle voter registrations and conduct elections on behalf of the people of Washoe County.
15. Defendant Rodriguez is a resident of Washoe County. Rodriguez is and was at all times relevant hereto, the Washoe County Registrar of Voters and a person acting under the color and authority of law. Rodriguez is named in her official and personal capacities.
16. Rodriguez has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]

17. Rodriguez has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
18. Rodriguez has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
19. Defendant Brown is a resident of Washoe County. Brown is and was at all times relevant hereto, the Washoe County Manager and a person acting under the color and authority of law. Brown is named in his official and personal capacities.
20. Brown has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]
21. Brown has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
22. Brown has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
23. Defendant Hill is a resident of Washoe County. Hill is and was at all times relevant hereto, the Chairwoman of the Washoe County Board of Commissioners and a person acting under the color and authority of law. Hill is named in her official and personal capacities.
24. Hill has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]
25. Hill has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
26. Hill has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
27. Defendant Washoe County, Nevada, is a political subdivision of the State of Nevada under the doctrine of respondent superior. Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
28. Defendants Does I through X and Roe Corporations I through X are persons or entities that, at all times material hereto, committed acts, activities, misconduct or omissions which make them jointly and severally liable under the claims for relief set forth herein. The true names and capacities of the Doe Defendants and Roe Corporate Defendants are presently unknown, but when ascertained, Plaintiff requests leave of Court to amend this complaint to substitute their true names and identities.

### **III. NATURE OF THE CASE**

29. Plaintiff is and was at all times relevant hereto a legally registered voter in Washoe County who was affected by the 2020 and 2022 elections overseen by Defendants.
30. Plaintiff brings this complaint against Defendants based on their violations of Plaintiff's state Constitutional rights to due process, equal protection, voter's rights, and the laws and codes of Nevada in the conduct of elections, regarding Defendants' non-response to Plaintiff's grievances and general stonewalling when presented with reports and analysis on voting systems in use in Washoe County and various requests for information.
31. Plaintiff alleges violations of his rights and the laws of Nevada based on the Defendants having never acknowledged or responded to three formal Petitions filed with the county by Plaintiff.
32. Plaintiff will show that Defendants willfully committed acts of malpractice, maladministration, and/or nonfeasance, and perjury in the conduct of their official duties, thus having the appearance of impropriety and damaging the public's trust.
33. Plaintiff hereby introduces Exhibit 109 that is a highlight of several supplemental statements in support of the merits of the underlying Petitions. Individually and as a whole, highlights presented in Exhibit 109 are of such a serious matter that they cannot be ignored—just as the original Petitions should never have been ignored—to cure the problems that are self-evident, including but not limited to: unclean and grossly inaccurate voter rolls, un-approved and unsecure voting systems that Defendant(s) chose of their own volition, the rush toward pioneering new technology that could impact county, state, and national security, failure to train staff and election officials, failure to provide trained election officials, telling staff to not verify signatures, unequal treatment of signatures at



the polls, counting of votes in secret, illegal function within the election system, gross violations of the Nevada Revised Statutes and Administrative Codes regarding election procedures, and the list goes on.

34. Plaintiff wishes to direct the Court's attention to Exhibit 109, point 6 a) "The Washoe ROV's staff has seen: "100% turnover in permanent staff and a loss of institutional knowledge." The Elections Group 6-9-23" The Election Group is the consulting agency initially hired by County Manager Brown.
35. Plaintiff hereby alleges the Registrar of Voters is in violation of Nevada law and, if left uncorrected, is unprepared to run the 2024 presidential primary safely, securely, and accurately as required by law unless all the issues are put on the table and addressed by one or more Defendant(s) under the Court's supervision.
36. Plaintiff hereby alleges Defendant(s) ignored Plaintiff's Petitions as an annoyance and will continue to do so if this Court does not intervene.
37. The Plaintiff demands this complaint and the underlying Petitions be heard by this honorable court.

#### **FACTUAL ALLEGATIONS**

38. Plaintiff voted in Washoe County in the 2020 and 2022 elections overseen by Defendants.
39. Plaintiff intends to vote in Washoe County in the upcoming presidential primary to occur in January 2024 and in subsequent elections overseen by Defendants.
40. Plaintiff and others provided each of the Defendants with a Petition addressing certain violations of elections, errors, and anomalies, prior to the Board of Commissioner's canvass of the vote in public meeting held November 18, 2022. This first of three Petitions

was filed at the Washoe County Manager's office (the "November 18, 2022 Petition").  
[Exhibit 1]

41. Plaintiff provided Defendants with a second Petition addressing a different set of issues and related violations of elections and other laws enumerated therein on November 23, 2022 Petition (the "November 23<sup>rd</sup>, 2022 Petition"). [Exhibit 2]
42. Plaintiff provided Defendants with a third Petition addressing a different set of issues and related violations of elections and other laws enumerated therein on December 1, 2022 (the "December 1st, 2022 Petition"). [Exhibit 3]
43. Defendants have a duty and obligation to respond to Petitions of elections pursuant to the Voter's Bill of Rights Nev. Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11).
44. Defendants, and each of them, have failed and refused to respond to or address the allegations made in the Petitions and continue to fail and refuse to respond to or address the same since the filing of the Petitions.
45. Plaintiff's rights to have legitimate grievances regarding matters of elections and the officials who conduct them responded to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants, and each of them.
46. By failing to address the Petitions, Defendants have each violated their oath to office, Nevada Revised Statutes and Administrative Codes, and violated the Plaintiff's constitutional rights.
47. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address gross inaccuracies and improper maintenance of voter rolls.
48. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address illegal functions within the election system that alter intended votes.

49. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address the counting of votes in secret and without adequate verification.
50. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address instructions to Washoe County election workers to disregard signature verification, in violation of the law.
51. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address violations of the election processes required by Nevada statutes, Nevada administrative codes, and the Nevada Constitution.
52. Because of the violations alleged herein, Defendants have not and are not able to conduct elections fairly, accurately, and securely as required by law.
53. Defendants' actions or inaction going forward may impact state and national security because of the critical flaws and vulnerabilities in many of the systems and procedures related to voter registration, handling of signatures and voter data, voting, signature curing, and recording and reporting votes as mentioned in the underlying Petitions and Exhibit 109.
54. Plaintiff respectfully requests the court's indulgence to accept Exhibit 109 in support of a) timeliness of this complaint, b) the severity of problems that underpin the underlying Petitions.
55. Plaintiff has suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to pose grievances of elections and against election officials and have them answered and resolved.

56. Defendants' failure to address the various violations stated within the underlying Petitions has resulted in a loss of confidence in the election system in Washoe County and Nevada. The Defendants' continued failure will result in an irreparable erosion of public confidence in the election system and its results in future elections unless the Court intervenes.
57. The disregard of legal obligations by the Defendants will contribute to a more generalized erosion of the rule of law, encouraging further acts of disobedience by other public servants without the accountability this Court can and must impose.
58. If public officials are not held accountable for their actions, citizens will fear that their freedoms and rights are not adequately protected, leading to a sense of insecurity and potential suppression of those rights.
59. If left unchecked, if there is no accountability, public officials can act with impunity. By this Court not acting affirmatively to correct the ills before it will set a dangerous precedent, paving the way for more widespread infringement of civil liberties.
60. The mission statement of the ROV states in part: "that Washoe County's Elections are operated with the utmost integrity, transparency, and accountability; and that the department is known for excellence in customer service and the administration of elections."<sup>1</sup>
61. Plaintiff hereby alleges the Registrar of Voters has failed their mission statement.
62. Plaintiff hereby alleges that the Defendants, individually, have failed their oath of office and in their duties to Plaintiff and all electors who reside in Washoe County.
63. The Court should hold Defendants to a standard of propriety and as stated in Plaintiff's November 18, 2022 Petition, which reads:

---

<sup>1</sup> <https://www.washoecounty.gov/voters/index.php>

- i. Federal judges are held to a standard known as a semblance of impropriety, to which Nevada's Chief Justice in 1980, Harry E. Claiborne, was accused. Judge Claiborne was the first federal judge to go to jail and the second to be impeached in U.S. history. (<https://www.senate.gov/about/powers-procedures/impeachment/impeachment-claiborne.htm>) Here, the defendants are held to a similar standard because of the nature of elections being a right and the pinnacle of a Constitutional Republic.
  - ii. By failing to address the petitions the Defendants have violated their oath to office, Nevada Revised Statutes and Administrative Codes, and violated the Plaintiff's constitutional rights.
  - iii. The actions of Defendants and/or those acting on behalf of Defendants and referred to herein, depriving Plaintiffs and other Washoe County residents of their rights secured by the Constitution and laws of the United States, were done while acting under color of law.
64. The plaintiff has diligently raised concerns regarding the flaws and irregularities within the Washoe County Nevada election system for the past two years. Despite the plaintiff's genuine efforts to bring these issues to the attention of the defendants, they have remained unresponsive.
65. Defendant Washoe County Nevada, a political subdivision of the State of Nevada under the doctrine of respondent superior, Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
66. Plaintiff has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless this honorable court intervenes to enjoin the Defendants.

**FIRST CAUSE OF ACTION**

**VIOLATION OF NEVADA CONSTITUTION ARTICLES 1, 2, 15 and THE**

**VOTER'S BILL OF RIGHTS**

**(EQUITABLE AND INJUNCTIVE RELIEF SOUGHT OR WRIT OF MANDAMUS)**

67. Plaintiff repeats and realleges his allegations herein above inclusively, as though set forth herein, and incorporates the same by this reference.
68. "A public office is a public trust and shall be held for the sole benefit of the people." NRS 281A.020.
69. **Duty:** Defendants, and each of them, pledged an oath pursuant to Nev. Const. Art. 15 Sec. 2 that provides in part: "... I will well and faithfully perform all the duties of the office of ....., on which I am about to enter; (if an oath) so help me God; (if an affirmation) under the pains and penalties of perjury."
70. Defendants, and each of them, have a duty to uphold Plaintiff's constitutional rights.
71. Plaintiff's right to have their grievances heard is enshrined in Nev. Const. Art. 1 § 10: "to petition the Legislature for redress of Grievances."
72. Plaintiff's right to have their Petitions of elections resolved "fairly, accurately and efficiently" is enshrined in Nev. Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11).
73. Plaintiff submitted valid Petitions to Defendant(s) as shown in Exhibits 1, 2, and 3 as referenced herein.
74. On information and belief, Defendants received and are aware of the underlying Petitions filed by Plaintiff.
75. **Breach Of Duty:** As of the filing of this complaint, there has been no acknowledgment or response from the Defendants regarding the underlying Petitions filed by Plaintiff.

76. Plaintiff exercised his constitutional right to pose grievances and have them resolved “fairly, accurately and efficiently” but was ignored by the Defendant(s).
77. Defendants have thus deprived Plaintiff to have his grievances heard as enshrined in Nev. Const. Art. 1 § 10.
78. Defendants have thus violated Plaintiff’s right to have his Petitions, individually or as a whole, resolved “fairly, accurately, and efficiently.” Nev. Const. Art. 2 Sec 1A § 11 and NRS 293.2546 (11) when they ignored said Petitions.
79. Defendants have thus perjured their oath of office.
80. In addition, Defendants have failed to address, correct, or rectify the issues raised in the underlying Petitions, including but not limited to, (1) updating and resolving the voter registration lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal function within the election system; (6) violations of election procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an injunction regarding the foregoing.
81. Plaintiff has further been damaged as his vote did not count as he cast it and thus has been robbed of his right to suffrage.
82. *Qui non negat, fatetur* is a Latin maxim of law, meaning “he who does not deny, admits.” As such, Plaintiff’s assertions in the underlying Petitions stand unopposed.
83. Plaintiff has a reasonable likelihood of prevailing on the merits.
84. As a result, Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one’s right to pose grievances of elections and against election officials and have them

answered and resolved. Without Injunctive Relief, Plaintiff will suffer irreparable harm for which monetary damages are inadequate.

85. The Defendant(s)' actions have resulted in harm to Plaintiff and unless admonished for their breach of oath and duty will continue to inflict harm upon Plaintiff.
86. Granting the requested relief will serve public interest in seeing the harm stopped. There is little to no hardship for the Defendants to respond to the Petitions and resolve discrepancies that are identified herein. In the alternative, Plaintiff seeks a writ of Mandamus from the Court as allowed by NRS 34.160; NRS 34.190, ordering the Defendants to respond to the Petitions and rectify those issues raised in Paragraph 80 herein.
87. Plaintiff has no adequate remedy at law and therefore seeks the injunctive and equitable relief as stated in Demand for Relief below.

## **SECOND CAUSE OF ACTION**

### **PETITION FOR REMOVAL OF OFFICERS FROM OFFICE**

88. Plaintiff repeats and realleges its allegations herein above inclusively, as through set forth herein, and incorporates the same by this reference.
89. Plaintiff respectfully demands this honorable court to remove Defendants Jaime Rodriguez, Washoe County Registrar of voters, Eric Brown, Washoe County Manager, Alexis Hill, Washoe County Commissioner from office pursuant to the Court's authority under NRS 283.440 and NRS 266.430.
90. Defendants, and each of them, have failed to fulfill the duties of their respective offices as alleged herein.



91. Defendants have additionally failed to address, correct, or rectify the issues raised in the underlying Petitions, including but not limited to, (1) updating and resolving the voter registration lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal function within the election system; (6) violations of election procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an injunction regarding the foregoing.
92. Defendants through their acts of malpractice, malfeasance, and or nonfeasance have failed to perform their duties and have harmed and will continue to harm plaintiff.
93. Granting the requested relief will serve public interest.

**JURY TRIAL DEMANDED**

94. Plaintiff demands a jury trial on all claims triable by jury as provided by Nevada State laws.

**PUNITIVE DAMAGES**

95. The Defendant(s) have acted in their personal and professional capacities.
96. The actions of Defendant(s) constitute a willful disregard for Plaintiff's rights, accuracy in elections, the mission statement of the ROV, and a free and fair Constitutional republic.
97. Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to pose grievances of elections and against election officials and have them answered and resolved timely.
98. The Defendant(s) have no cover of sovereign immunity. *Scheuer v. Rhodes*, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974).
99. Punitive damages are warranted when gross and willful violations of rights and law occur as is the case here. *Smith v. Wade*, 461 U.S. 30 (1983).

100. Punitive damages, in this case, are meant to punish and deter future abuses of the same sort and must be significant in their application to these Defendant(s) per the Court's discretion.

**DEMAND FOR RELIEF**

101. WHEREFORE, Plaintiff respectfully demands for a judgment against Defendant(s) for:

i. An adequate and proper response by Defendant(s) to Plaintiff's petition of November 18, 2022, through the discovery processes, under court supervision and seeks an injunction regarding the same;

ii. An adequate and proper response by Defendant(s) to Plaintiff's petition of December 1, 2022, through the discovery processes, under court supervision and seeks an injunction regarding the same;

iii. Defendants must take into account and redress all elections issues that Plaintiff puts on the table, no shying away;

iv. Award Plaintiff their cost of suit;

v. Award monetary damages in excess of \$15,000;

vi. Award punitive damages;

vii. Defendants that are found in violation of laws shall be fined, fired, and/or removed from office; [NRS 283.440, NRS 266.430]

viii. Enjoin Defendants from their continued violations of the following NRSs and strictly comply with NRS 293.530, NRS 293.2546(11), NRS 293B.033, NRS 293.269927, NRS 293.740, NRS 293B.063, NRS 293B.104, NRS 293B.1045(1), NAC 293B.110(1)(b), NRS 293.269931(1), NRS 293.3606(1), NRS 293.363(1), NRS 293B.353, NRS 293B.354, NRS 293B.380(2)(a), NAC 293.311(4), NRS 293.423, NRS 293.269927(4)(b), NRS

293.277(3), NRS 293.285(1)(b)(4), NRS 293.3075(4), NRS 293.3585(1)(d), NRS 293.403(2), NRS 293.404(2), Nev. Const. Art. 2 Sec.1A § 1(b);

ix. Enjoin Defendants from using any voting and tabulation machines for elections in Washoe County; and

x. Enjoin Defendants to use paper ballots at all polling locations and in every election;

xi. Enjoin Defendants to disclose ACB applicant's names and credentials publicly prior to appointment;

xii. Enjoin the defendants and halt the expenditure of \$12.6M of taxpayer dollars for unapproved and unsafe equipment and software;

xiii. Enjoin the Defendants and make the digitized vote tally database (Microsoft SQL) open for public inspection;

xiv. Honorable court to strike down NRS 293.269935(2) and 293.3606(4) to allow public inspection of ballots;

xv. Enjoin the Defendants to prohibit QR codes from use in recounts;

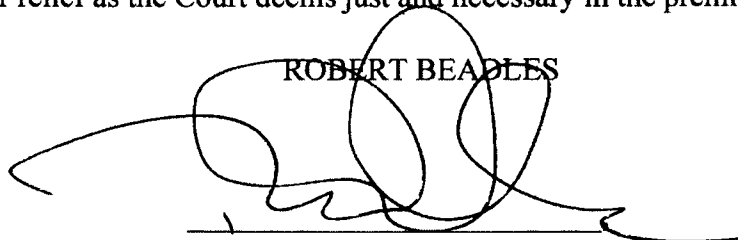
xvi. Grant or impose any remedy, and further relief at law or equity, that this Court deems just and proper in these circumstances;

xvii. Removal of Defendants from office; and

xviii. For such further relief as the Court deems just and necessary in the premises.

Dated: August 4, 2023

ROBERT BEADLES

A handwritten signature in black ink, appearing to read 'Robert Beadles', is written over the printed name. The signature is stylized with large loops and a long horizontal stroke extending to the left.

Robert Beadles, *pro se*

VERIFICATION

I, Robert Beadles have read Plaintiff's Verified Complaint for Removal Of Officers per 283.440 and believe the facts contained therein are true or based upon a good faith belief that the facts stated therein are true, under the penalty of perjury.

DATED: August 4<sup>th</sup>, 2023

  
Robert Beadles

**AFFIRMATION PURSUANT TO NRS 239B.030**

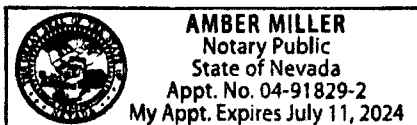
The undersigned does hereby affirm that this document does not contain the social security number of any person. UNDER PENALTIES OF PERJURY, I affirm that the facts alleged in the foregoing are true and correct according to my own personal knowledge.

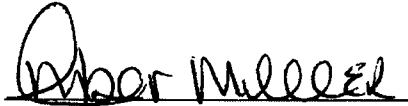
  
Robert Beadles, Plaintiff

STATE OF NEVADA

COUNTY OF WASHOE

On the 4<sup>th</sup> day of August, 2023, personally appeared before me Robert Beadles who, being by me first duly sworn, executed the foregoing in my presence and stated to me under penalties of perjury that the facts alleged therein are true and correct according to his own personal knowledge.



  
\_\_\_\_\_

Notary Public

My commission expires: July 2024

1  
2 SECOND JUDICIAL DISTRICT COURT  
3 COUNTY OF WASHOE, STATE OF NEVADA

4 AFFIRMATION  
5 Pursuant to NRS 239B.030 and 603A.040

6 The undersigned does hereby affirm that the preceding document, *(title of document)*

7 COMPLAINT FOR RELIEF AND REMOVAL OF OFFICE

8 file in case number: \_\_\_\_\_

9  
10 (☒ mark one)

11 ☒ Document does not contain the personal information of any person.

12  
13 ☐ Document contains the personal information of a person as required by: (☒ mark one)

14 ☐ A specific state or federal law, to wit: *(write the specific state or federal law)*

15 \_\_\_\_\_  
16 ☐ For the administration of a public program

17 ☐ For the administration for a federal or state grant

18 ☐ Confidential Family Court Information Sheet (NRS 125.130, NRS 125.230, and  
19 NRS 125B.055)

20  
21  
22 DATED this (day) 4th day of (month) August, 2023.

23  
24 Submitted By: *(Your signature)* \_\_\_\_\_

25 *(Print your name)* Robert Beadles

26 *(Attorney for)* N/A  
27  
28

## **Exhibit Glossary**

Exhibit 1 ROV 11-17-22- Petition. 40 pg.

Exhibit 2 11-23-22 Contest 11 pg.

Exhibit 3 Unanswered Petition served upon defendants 12/1/22. 19 pg.

Exhibit 109 Highlights of Supplemental Statements 4 pg.

# Exhibit Cover Page

**EXHIBIT NUMBER 1**

Washoe County Board of Commissioners and  
Registrar of Voters Jamie Rodriguez  
1001 E. Ninth Street  
Reno, Nevada 89512

RE: Complaint of Maladministration and Impropriety

To the Board of Commissioners and Ms. Rodriguez,

We, citizens of Washoe County, hereby submit this complaint of Maladministration and Impropriety against the Registrar of Voters based on the following facts and events leading up to and including the 2022 General Election.

---

To have complaints about elections and election contests resolved fairly, accurately and efficiently as provided by law.  
Nev. Const. Art. 2 Sec.1A § 11

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---

A public office is a public trust and shall be held for the sole benefit of the people.  
NRS 281A.020

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1. The purpose of this chapter is to foster democratic principles by providing members of the public with prompt access to inspect, copy or receive a copy of public books and records to the extent permitted by law;

2. The provisions of this chapter must be construed liberally to carry out this important purpose;

NRS 239.001

---

1. Any person who is now holding or who shall hereafter hold any office in this State and who refuses or neglects to perform any official act in the manner and form prescribed by law, or who is guilty of any malpractice or malfeasance in office, may be removed therefrom...

5. As used in this section, "malfeasance in office" includes, without limitation:

(a) Engaging in an unlawful employment practice of discrimination pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., or NRS 613.330 that is severe or pervasive such that removal from office is an appropriate remedy.

NRS 283.440

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### **Points of Complaint**

1. Extremely slow response time on information requests—February to September in some cases, blanket denials because of phrasing or did not request a specific document, clear ignorance or blatant omissions of information such as “What is an ‘ICX File?’” that is listed in the Pre- and Post-Certification of Voting System, or what is the File Election Computer Program’ which Ms. Rodriguez denies exists when it is stated in NRS 293B.135 and NAC 293B.050; [Exh. A: Williams affidavit, Exh. B: email from ROV of 9/21/22]
2. Unwillingness to provide for meaningful observation of equipment testing. The proprietary codes and logins used by administrators and testers could be shielded from the public, allowing observers to view the face of the equipment, but that was not done; [Exh. A, Exh. C: email from ROV of 10/4/22]
3. Unwillingness to provide evidence of partisan balance of election worker hires (NRS 293.269927 to 293.269937) (Goldman, Sheehan, Seymour et al v. Cegavske, Gloria et al, #A-22-851189-C, Nevada District Court, Dept 11);
4. Some critical equipment is not tested: Pollbooks and software, Sip ‘n Puff voting peripheral, Fluence mail sorter;
5. Use of Konnech spyware in pollbooks  
(<https://www.rgj.com/story/news/politics/elections/2022/10/13/washoe-county-nevada-uses-election-worker-pollchief-software-tied-identity-theft-case-konnech/10491086002/>);
6. Tallying and reporting votes too soon in violation of NRS 293.365: Accounting for all paper ballots before counting of votes begins. [Effective January 1, 2022.] Except as otherwise provided in NRS 293.269931, no counting board in any precinct, district or polling place in which paper ballots are used may commence to count the votes until all ballots used or unused are accounted for.
7. Intentionally boxing-in observers in a claustrophobic small enclosure with distant or no visibility of signature verification, ballot box resolution, adjudication, or administrative duties (Exh. D: Image of booth);
8. Providing a limited number of polling locations (19) for early voting, driving voters to vote by mail or to vote on election day (<https://mynews4.com/news/local/where-can-you-early-vote-in-washoe-county-ahead-of-general-election#>);
9. Additionally, available hours of early polls being open was restricted to 10:00 a.m. to 6:00 p.m., which represents a hardship for the average 9-5 worker (<https://mynews4.com/news/local/where-can-you-early-vote-in-washoe-county-ahead-of-general-election#>);

10. Equipment failures at Depoali Middle School and other locations also added to the inconvenience of voters (mechanized report to be provided);
11. The sixty-six election day polling locations out of 497 precincts (<https://www.washoecounty.gov/voters/files/precinct-districtreports/precinct-count-detail-10-07-2022-.xls>) is a form of deterrence of access to the polls which has been ruled unconstitutional by the U.S. Supreme Court in 2021: Brnovich v. DNC, No.19-1257 and Arizona Republican Party v. DNC, No. 19-1258;
12. Allowing insecure or unapproved WiFi connectivity of critical voting and pollbook systems at DePoali Middle School (eyewitness statement to be provided);
13. Sample ballot printing errors that resulted in excess waste and delay in mailing of ballots; (<https://www.rgj.com/story/news/politics/elections/2022/10/07/errors-washoe-county-sample-ballots-nevada-voting/8209759001/>)
14. Little to no signature verification training given to election workers (NRS 293.325, 293.877) (eyewitness statement to be provided);
15. An incongruous application of signature verification procedures between lax voting requirements and those stringently applied to ballot initiatives and contests of elections (Exh. E: Election Day manual, pg 57): "Election workers look for reasons to approve voter signatures, not to reject voter signatures.";
16. Presumably, the ROV is still not validating citizenship of voters (NRS 293.485, 293.4855, 293.5235). From the minutes of BOC meeting of 4/13/2021, page 13, para. 4 (Exh. F: BCC2021-04-13RMinutes.pdf): "[Ms. Spikula] stated there was no centralized database to confirm citizenship. The ROV relied on the voter to provide factual information and not commit a crime by voting if they were ineligible."
17. No plan or procedure in place to discover counterfeit ballots and report them to law enforcement;
18. Possibly due to an intentional and nefarious act, live video feeds of counting, adjudicating, etc. went dark at or around 11:24 p.m. of November 9 for about eight hours;
19. Allegedly, a forced error delayed reporting of results on election night, according to county spokesperson Bethany Drysdale: "The live file that was sent to T.S. (Washoe County's technical services team) on Election Night listed the names in a different manner, so the dashboard could not read or populate them correctly," Drysdale said in a follow-up email. "We believe there was an update in the machine's configuration in early May that may have contributed to this error."  
(<https://www.rgj.com/story/news/2022/06/16/washoe-county-changes-testing-protocols-after-primary-election-result-delays/7654451001/>)

20. No plan to protect vulnerable voters from bribery, coercion, or ballot or identity theft; (NRS 293.313, 293.775, 293.800, exceptions: NRS 293.329, 293.352)
21. Inability to enforce electioneering laws inside residences, including but not limited to senior independent living, assisted living, and restricted living for Alzheimer's/Dementia, nursing homes, and sanitariums; (NRS 293.361, 293.740)
22. Counties are required to secure chain-of-custody; however, Washoe County cannot prove chain-of-custody through the postal service and between when a voter receives their mail ballot and when that ballot is returned to county; (Chapter 293 of Nevada Administrative Code has been amended pursuant to regulatory amendment R090-21A Sec. 3 (eff. 2/28/22) to read as follows: 3. Each county clerk shall keep records of the chain of custody for all mail ballots, including, without limitation, the mailing of mail ballots, reissued mail ballots, rejected mail ballots, verified mail ballots, duplicated mail ballots and tabulated mail ballots.)
23. Hiring and employment discrimination: 12-hour shifts deter elderly persons and/or pregnant women from election work, no statistics on pregnant women hires, no known statistics on minority or ethnic hires; (NRS 613.330 and 613.4354 to 613.4383, 14<sup>th</sup> Amendment)
24. Sample ballots, ballots, and instructions printed only in English and Spanish, county voter population of Asian heritage in 2020 was ~10,000 adults (<https://suburbanstats.org/race/nevada/washoe-county/how-many-asian-people-live-in-washoe-county-nevada>) (NRS 293.2699, 52 USC 10503, 14<sup>th</sup> Amendment);
25. Systemic glitches and errors from 2020 persist in the 2022 primary and general elections, failure to correct known issues:
  - a. Voters who opted-out of mail ballots did not receive a sample ballot (Exh. G: Election violation affidavit of Williams);
  - b. DMV AVR changes party affiliation to nonpartisan without voter's consent or knowledge (Exh. H: NVSOS-memo reAVR\_2-15-22.pdf);
  - c. Bloated voter rolls—dead voters, ~30K adult deaths in NV each year (Click 'I Agree' at bottom of page for results: <https://wonder.cdc.gov/ucd-icd10.html>);
  - d. Excess provisional ballots in 2020 (Exh. I: Nic St. John's Cold Springs Provisional Report);
  - e. BallotTrax does not work, or provides useless information ([washoe.ballottrax.net/voter](http://washoe.ballottrax.net/voter)) (Exh. J: Williams's screenshot of 11/14/22).

We thus conclude that the Registrar has failed its mission statement:

*The Mission of the Washoe County Registrar of Voters Department is to ensure that ... Washoe County's Elections are operated with the utmost integrity, transparency, and accountability; and that the*

We the People 280 Greg Street, #10 Reno, NV 89502

*department is known for excellence in customer service and the administration of elections.*

In *Schumacher v. Furlong*, 78 Nev. 167, 370 P.2d 209 (1962), Opinion of the Nevada Attorney General, "Under this statutory procedure any complainant can, for specifically enumerated grounds, e.g. malfeasance or nonfeasance, initiate district court proceedings to remove any person holding any nonjudicial office in this state. This statutory procedure has previously been used against a county officer."

Federal judges are held to a standard known as a semblance of impropriety, to which Nevada's Chief Justice in 1980, Harry E. Claiborne, was accused.  
(<https://www.senate.gov/about/powers-procedures/impeachment/impeachment-claiborne.htm>)  
Here, the Registrar of Voters is held to a similar standard because of the nature of elections being a right and the pinnacle of a Constitutional Republic.

Wherefore, we, the undersigned, have no confidence in the Washoe County Office of the Registrar of Voters nor the results of the 2022 Primary and General elections under their watch. We believe we are not alone in our concerns among the general voting population. The situation portends to have a chilling effect on participation and representation going forward for if people don't trust the system, they're less likely to engage in it and will thus become disenfranchised.

Jamie Rodriguez, by virtue of her office, is required to uphold the integrity of elections and to perform the duties of her office impartially.

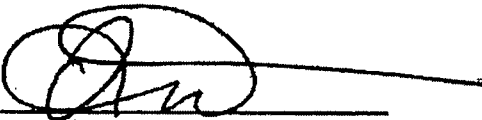
Jamie Rodriguez, by willfully and knowingly engaging in the numerous acts outlined in the Points of Complaint, has betrayed the trust of the people of Nevada and reduced confidence in the integrity and impartiality of the Office of the Registrar of Voters, thereby bringing disrepute on Washoe County and the administration of elections by the county commission.

As such, when individuals who are in the public's trust engage in acts of maladministration, fail to fulfill their mission, and damage the public's trust, they must be held accountable.

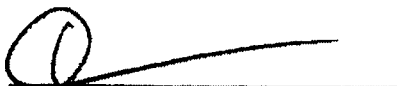
The Board of Commissioners appoints and has authority over the office of the ROV. It is thus incumbent upon the Commissioners to exercise their authority to protect voter rights and the true vote cast through removal of Jamie Rodriguez, Heather Carmen, and other staff members to be named. And to then investigate these individuals for their actions that are in contravention of the laws and the mission of the ROV.

We, the undersigned, hereby submit this complaint on this day, November 17, 2022:

Oscar D. Williams  
PRINT NAME

  
SIGNATURE

DAVID CHAMBERLIN  
PRINT NAME

  
SIGNATURE

JANICE HERMSEN  
PRINT NAME

JANICE HERMSEN  
SIGNATURE

Cc: District Attorney Chris Hicks

...ions right to free expression is inalienable, but that right is intruded by  
lack of transparency and by whatever lies behind that opaque curtain.  
Alameda County CO Forensic report 3, excerpt of introduction

Jamie Rodriguez, by willfully and knowingly engaging in the numerous acts outlined in the Points of Complaint, has betrayed the trust of the people of Nevada and reduced confidence in the integrity and impartiality of the Office of the Registrar of Voters, thereby bringing disrepute on Washoe County and the administration of elections by the county commission.

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We, the undersigned, hereby submit this complaint on this day, November 17, 2022:

We, the undersigned, hereby submit this complaint on this day, November 17, 2022:

1 Scott R. Moles — 1 [Signature]  
PRINT NAME SIGNATURE

Olena Alexander  
PRINT NAME

*Shanley*  
SIGNATURE

PRINTED BY THE GOVERNMENT PRINTER, CALCUTTA.

## ACKNOWLEDGMENTS

Cc: District Attorney Chris Hicks

Amereus, right? Precedent for the fact that I am is important, not of transference, and by whatever means that appears correct.

(1)  $\mathcal{A}'(G, \mathcal{B}_G, \{C_i\}_{i \in I}, \{D_i\}_{i \in I})$  is a  $\mathcal{B}_G$ -module,  $\mathcal{A}'(G, \mathcal{B}_G, \{C_i\}_{i \in I}, \{D_i\}_{i \in I}) \otimes_{\mathcal{B}_G} \mathcal{B}_G \cong \mathcal{A}'(G, \mathcal{B}_G, \{C_i\}_{i \in I}, \{D_i\}_{i \in I})$ .

**Exhibit**

**A**

**AFFIDAVIT**  
**(SWORN STATEMENT)**

Date: November 17, 2022

My legal name is **Oscar Dey Williams III** ("Affiant") and acknowledge I am:

- a.) Age: 58 years old
- b.) Address: 1540 Whisper Rock Way, Reno, Nevada, 89523
- c.) Residency: 29-years in Nevada
- d.) Citizenship: American

Being duly sworn, hereby swear under oath that:

- a) I submitted an information request to Washoe County in February 2022 and received a reply in September. County was unable to answer 'What is an ICX File?' that was certified by them. County also expressed ignorance of what is the 'File Election Computer Program.' And county failed to attach the historical EAV surveys that they agreed to attach to their email reply.
- b) When I asked at ICX and VVPAT equipment testing on Oct. 1 to be able to see the face of the units being tested, I was denied. The explanation given by Ms. Rodriguez said secret codes could not be viewed by the public.
- c) I opted-out of mail ballots for the 2022 primary and did not receive a sample ballot for the primary or the general until I opted back into mail ballot and then my sample ballot was received.
- d) Screenshot of my BallotTrax created 11/14/22.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

Affiant's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**NOTARY ACKNOWLEDGEMENT**



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which the certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of Nevada

County of Washoe

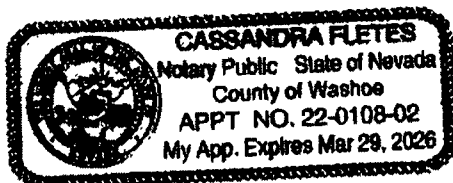
On November 17, 20 22, before me, Cassandra Fletes, personally appeared Oscar Dey Williams III who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

of Notary

Affiant's Signature: Cassandra Fletes



**Exhibit**

**B**



**Re: FW: Activity has been posted on Service Request #107024  
(Registrar of Voters - Public Records Requests) - Washoe  
County, NV**

From: "Oscar Williams" <osc.williams@mail.com>  
To: "Washoe 311 Public Records Requests" <washoe311-PRR@washoecounty.gov>  
Date: Sep 22, 2022 1:20:03 PM

Hello. Your reply to me is missing the EAV surveys. You asked some questions as well. And I wish to reply to the issue of foreign language ballots for the sake of discussion.

My responses below in BLUE.

Best regards, Oscar Williams

Sent: Wednesday, September 21, 2022 at 3:57 PM  
From: "Washoe 311 Public Records Requests" <washoe311-PRR@washoecounty.gov>  
To: "osc.williams@mail.com" <osc.williams@mail.com>  
Subject: FW: Activity has been posted on Service Request #107024 (Registrar of Voters - Public Records Requests) - Washoe County, NV  
Greetings,

Thank you for your patience while staff completed this public records request. Below and attached, please find the requested information.

**-How many indefinitely confined voters are there in Washoe County?**

Washoe County Registrar of Voters does not track this information so therefore we do not have any information to provide.

**-How many temporary confined voters?**

Washoe County Registrar of Voters does not track this information so therefore we do not have any information to provide.

**-Provide your ADA-compliance report on the 2020 general election**

Attached

**-Provide EAV Surveys for years 2012, 2014, 2016, and 2018**

2014, 2016, 2018 are attached. We do not have a copy of our 2012 report so therefore will not be able to provide.

**(S.CURRENTS NOT ATTACHED PLEASE PROVIDE)**

**-Provide a list of all reports generated in regards to elections and the funding and expenditures thereof**

The request for a list of all reports generated is vague and would like clarification. Staff may run their own reports to accomplish their specific tasks. The funding and expenditures there of, does this mean in correlation to the reports? Attached is our budget for the 2020 Election.

**APOLG FOR MY VAGUENESS. I WILL TRY TO BE MORE SPECIFIC IN THE FUTURE**

**-Provide the File Election Computer Program**

Please clarify this request. The terminology is not something we are familiar with.

**APOLG FOR MY VAGUENESS. I WILL TRY TO BE MORE SPECIFIC IN THE FUTURE**

**-Provide the Mechanized Report Post Election**

Attached

**-Provide the Malfunction Report**

Same as Mechanized Report

**-Provide the Election Process Report**

2020 General Election attached

**-Provide the 2020 elections budget with line item revenues and expenses**

Attached

**-Provide post 2020 general election financial audit or summary and/or cost-benefit analysis**

Per NRS 354.624 each local government shall provide for an annual audit of all of its financial statements. This audit requirement is a financial audit. It consists of a review and audit of each of the funds for the County as well as an audit of the grant funds that are received by the County. The Registrar of Voters does not conduct its own separate audit.

**-How much does the standard ballot, envelope, and return envelope cost to produce?"**

Printing of the ballot is \$.280 per card

Assembly &amp; Mailing Services is \$.260 per packet

Secrecy sleeve is \$.069 per sleeve

Return Envelope is \$.101 per envelope

Outbound Envelope is \$.105 per envelope

Instructional Insert is \$.044 per sheet

**-What are the mailing costs per unit of ballots/envelope/return envelope?**

Outgoing mail = \$.101

Return mail = \$.136

**-What languages are ballots printed in?**

English and Spanish

**-Are any ballots printed in Chinese?**

No, Section 203 of the Voting Rights Act does not require us to provide election materials in Chinese.

*Section 203 of the Voting Rights Act requires jurisdictions with substantial minority language populations to provide election materials in the minority language. The Department of Justice has determined that the County of Clark does not have a substantial minority language population and therefore is not required to provide election materials in Chinese.*

NRS 293.2699 Voting systems used by counties and cities: Voting materials to be provided in English and other languages as required by federal law or as authorized by county or city clerk.

**1. Each voting system used by a county or city shall provide voting materials in:**

(a) English; and

(b) Every language in which voting materials are required to be prepared in the county or city pursuant to 52 U.S.C. § 10503.

2. In addition to the requirements set forth in subsection 1, if a county clerk or city clerk determines that there is a significant and substantial need for voting materials of the county or city, as applicable, to be provided in the language or languages of a minority group, the county clerk or city clerk may prepare voting materials in such language or languages. For the purposes of this subsection, there is a significant and substantial need for voting materials to be provided in the language or languages of a minority group if, without limitation, the minority group has been subject to historical discrimination and unequal educational opportunities, and, as a result, members of the minority group are of limited-English proficiency.

**3. As used in this section:**

(a) "Limited-English proficiency" means being unable to speak or understand English adequately to participate in the electoral process.

(b) "Significant and substantial need" means a need that is based on the historical and current circumstances of the minority group.

(c) "Voting materials" has the meaning ascribed to it in 52 U.S.C. § 10503.

**-Has any voting equipment been replaced or decommissioned since Nov.**

3, 20207

We had 56 ICK Primes go out for RMA to the vendor and have since been returned.

-Has any voting equipment been updated or serviced by the vendor since start of early voting in the 2020 general? If so, when and why?

No

Explain a voter with "status unknown".

On the EAV survey the "status unknown" is for voters we had mailed an address confirmation card. If the voter does not respond or the card did not come back undeliverable, then it falls into a category of "status unknown".

-How long does the status hold, or how and when are these unknowns resolved? Did any of these "unknown" vote in the 2020 elections?

When a voter does not respond to a to an address confirmation card, or we do not receive an undeliverable notice, the voters status changes from "Active" to "Inactive". The voter remains inactive for 2 federal election cycles, or four years. If they do not update their voter registration, or appear to vote, after four years the voters record is removed from the voting rolls.

-Provide the names and contact info for adjudication board members in the 2020 primary and general elections.

We do not have this documentation so we won't be able to provide you with the information.

-Provide a list of election complaints received in 2020, both formal and informal

We only keep a record when a citizen completes a form and submits it to our office. Received complaints of individuals receiving ballots multiple ballots or ballots to individuals that are deceased or no longer living there. When researched there was no proof in our system that these claims were accurate except for the very few times a ballot was suspended and re-issued to a voter. Received complaints about third party mailers sent to households for individuals that are deceased or no longer living there. Explained to the concerned citizen they are not getting their voter list from us and we cannot control what they send and to whom. Received complaints about organizations touting/calling individuals about the status of their ballot confirming they had voted. Explained to concerned citizens that other organizations do not have the final and accurate information. Advised citizens to contact us directly with any concerns.

-Need clarification as to where these numbers are coming from. Which report or document shows 130,770 ballots counted and 31,951 treated as mail?

Confirm that out of 130,770 ballots counted, 31,951 were treated as mail? (The others were surrendered in-person)

Thank you,

Washoe County Services & Support

Communications Division | Office of the County Manager

1000 W. 1st St., Ste. 100, Reno, NV 89501 | P: 775.334.1000 | F: 775.334.2100

1000 W. 1st St., Ste. 100, Reno, NV 89501

1000 W. 1st St.

NOTICE: This communication, including any attachments, may contain confidential information and is intended only for the individual or entity whom it is addressed. Any review, dissemination, or copying of this communication by anyone other than the recipient is strictly prohibited by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521. If you are not the intended recipient, please contact the sender by reply email, delete and destroy all copies of the original message.

From: Washoe311 <washoe311@washoecounty.gov>  
Sent: Thursday, August 18, 2022 10:27 AM  
To: Washoe311 <Washoe311@washoecounty.gov>  
Subject: Activity has been posted on Service Request #107024 (Registrar of Voters - Public Records Requests) - Washoe County, NV

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Washoe County, NV

Activity was posted on service request ID 107024.

Service Request Details

ID 107024

Date/Time 2/25/2022 11:48 AM

Type Registrar of Voters - Public Records Request

Address 1540 WHISPER ROCK WAY, Reno

Comments Under the Open Records law, I hereby request an expedited response to the following inquiries:  
-How many indefinitely confined voters are there in Washoe County?  
-How many temporary confined voters?  
-Provide your ADA-compliance report on the 2020 general election  
-Provide EAV Surveys for years 2012, 2014, 2016, and 2018  
-Provide a list of all reports generated in regards to elections and the funding and expenditures thereof  
-Provide the File Election Computer Program  
-Provide the Mechanized Report Post Election  
-Provide the Malfunction Report  
-Provide the Election Process Report  
-Provide the 2020 elections budget with line item revenues and expenses -Provide post 2020 general election financial audit or summary and/or cost-benefit analysis  
-How much does the standard ballot, envelope, and return envelope cost to produce?  
-What are the mailing costs per unit of ballots/envelope/return envelope?  
-What languages are ballots printed in?  
-Are any ballots printed in Chinese?  
-Has any voting equipment been replaced or decommissioned since Nov. 3, 2020?  
-Has any voting equipment been updated or serviced by the vendor since start of early voting in the 2020 general? If so, when and why?  
Explain a voter with "status unknown".  
-How long does the status hold, or how and when are these unknowns resolved? Did any of these "unknown" vote in the 2020 elections?  
-Provide the names and contact info for adjudication board members in the 2020 primary and general elections.  
-Provide a list of election complaints received in 2020, both formal and informal. Confirm that out of 150,770 ballots counted, 31,651 were treated as mail? (The others were surrendered in-person)

Thank you for your interest and cooperation.

Oscar Williams

1540 Whisper Rock Way

Reno NV 89523

775-240-3456

Osc.williams@mail.com

[View in QA](#)

Washoe County, NV

Attachments

• image-png-attachment

- image-png-attachment
- image-png-attachment
- image-png-attachment
- image-png-attachment

# Exhibit C



**RE: My recent attendance of election equipment testing**

**From:** "Rodriguez, Jamie L" <JARodriguez@washoecounty.gov>  
**To:** "Oscar Williams" <osc.williams@mail.com>  
**Date:** Oct 4, 2022 8:36:14 AM

Good Morning Mr. Williams,

Staff did advise me on Saturday of your objections to the layout of the process. The ATI are tested with each set of ICX Primes at this time. I am not sure what you mean by testing the pollbook. The pollbooks are loaded a couple of days before early voting and then for election day. There is no testing of the pollbooks as part of the Pre-LAT process. As for the schedule it is more of a process, we will test the tabulators when we are completed with the ICX Prime and accompanying equipment portion, it will not be before the week of October 17 as I mentioned in my email to you last week, but the specific day will depend on when we are done with that first step in the process. The equipment that we test for Pre-LAT includes the ICX Primes, ATI, VVPAT, ICC Tabulators and the software that reads the results.

As for the codes, they are entered multiple times throughout the process so there is not an ability to enter the code and then show the rest of the process. I hope you understand that the security of the election is of the utmost priority for this department and we do not create rules or processes for any one individual, so I am not making any statement or judgment of you. We cannot make 1 set of rules for 1 group and a second set of rules for another.

Thank you,

Jamie

**From:** Oscar Williams <osc.williams@mail.com>  
**Sent:** Monday, October 3, 2022 4:54 PM  
**To:** Rodriguez, Jamie L <JARodriguez@washoecounty.gov>  
**Subject:** My recent attendance of election equipment testing

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Dear Jamie,

On Saturday, October 1, I briefly attended the preparations for the ICX machine testing and was disappointed to learn that I would not be allowed meaningful observation of the face of the voting machines nor the VVPAT. Jason explained that because they have to enter secret codes, the machines have to be turned away from my prying eyes and that of any member of the public.

So, basically you have labeled me a future criminal who would tamper with the machines.

The practice of denying me, the public, of any understanding of how the machines, peripherals, and software are being tested is discriminatory and a violation of my taxpayer rights and my civil rights.

For the record, I merely wish to observe and to learn how our equipment is being tested.

And also for the record, I am nearsighted, which classifies as a disability. I can't read small type five-feet away.

And it seems to me that with the use of blinds and/or privacy screens, the security issues posed by possible observance of

the input of a code could be mitigated.

Will you be testing the Auditory Tactile Interface or the Sip 'n Puff?

I'd like to see what is on the thumb drives for which you are welcome to provide a screen shot image of folders and files.

Are pollbooks being tested at this time? If so, is there a specific date and time scheduled for observation of that testing?

Can you provide a list of all the equipment to be tested because I am confused about what is tested and when?

May I suggest or request that you provide a demonstration for the public on at least one machine so that I and others can better understand the process? Put in your codes first and then allow people to view.

I want to believe our election system works, that my vote counts, and that you are fulfilling the mission of the ROV for "...the utmost integrity, transparency, and accountability; and that the department is known for excellence in customer service and the administration of elections."

Please let me know if a demonstration or change to visibility of the equipment during observation are possible. You are welcome to call me if you want to talk at 775-240-3456.

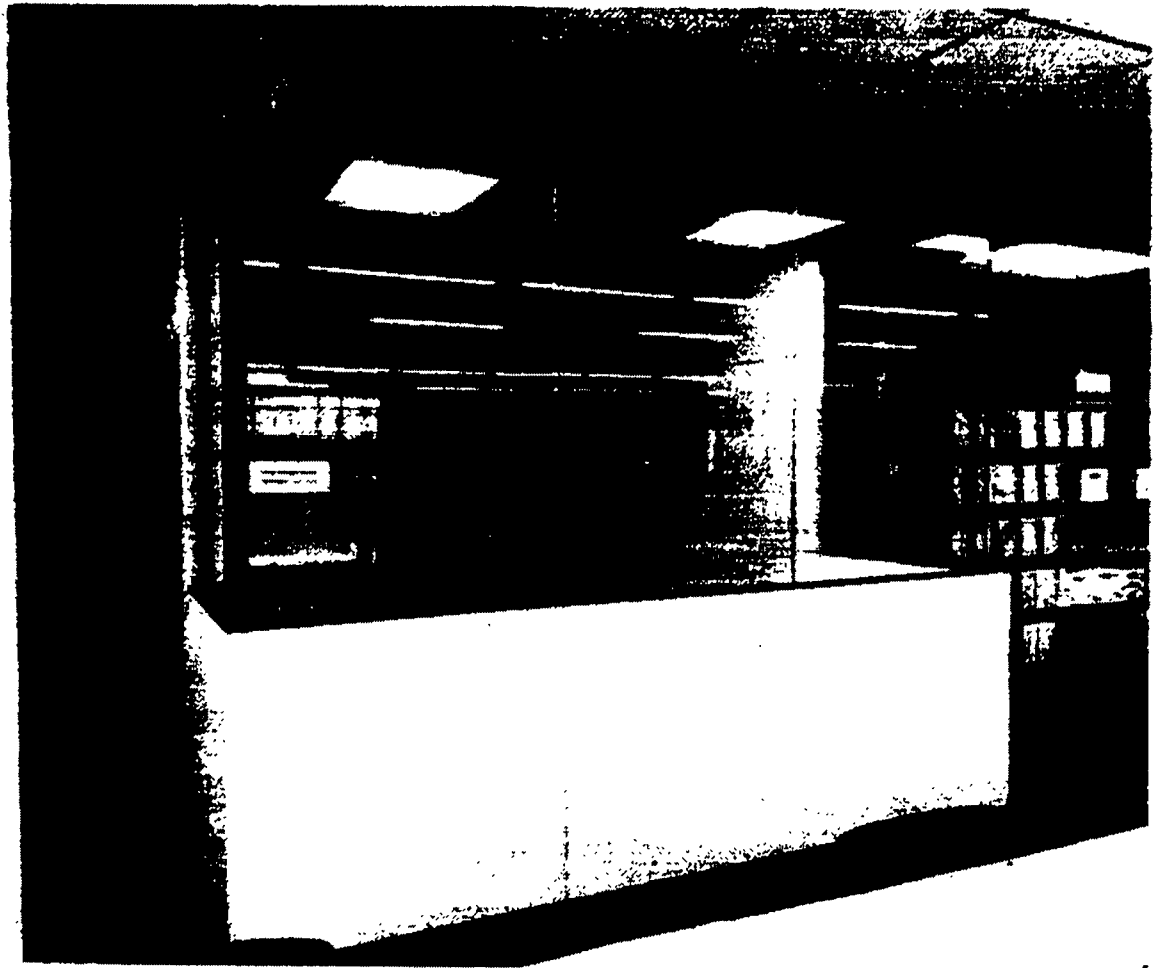
Thank you for your interest and cooperation.

Sincerely,

Oscar Williams  
1540 Whisper Rock Way  
Reno, NV 89523

**Exhibit**

**D**



**Exhibit**

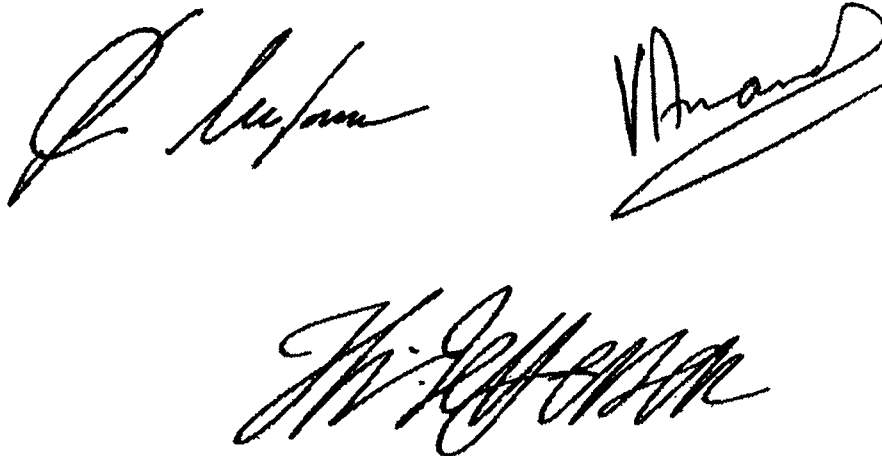
**E**

## Signature Verification

Election workers look for reasons to **approve** voter signatures, **not** to reject voter signatures. Signatures evolve as the signatory ages; they also change as the conditions under which the signature was made differ (e.g. electronic signature.)

Focus on the most basic elements of the two signatures being compared:

- Type of writing (e.g. cursive, print)
- Letter size, spacing, and proportion
- Letter slant
- Position of signature on the line



**Exhibit**

**F**

Ms. Spikula, Chair Lucey, Vice Chair Hartung, County Manager Eric Brown, and the County's legal team for providing the information for this agenda item. She encouraged people to speak to their legislators who could change NRS and Governor Steve Sisolak. She said Mr. Brown, Chair Lucey, Vice Chair Hartung, and the other Commissioners had fielded thousands of phone calls on this issue. She respected everyone's efforts in supporting democracy, stating she believed the playing field had to be kept fair.

Commissioner Hill thanked the ROV and SOS staff for the presentation which showed how well they managed things so people were not taken off of voter rolls unnecessarily. She thought the ROV did a great job, noting this presentation was part of Mr. Brown's efforts to inform the citizenry about what each County department did. She said she had discussions with Mr. Brown about providing classes for citizens to explain what County departments did and provide information about volunteer opportunities.

Vice Chair Hartung expressed a dislike of same-day voter registration. He asked how the ROV verified identity, eligibility to vote in Washoe County, and voters' registration statuses in other states. Ms. Spikula replied same-day voter registration required a Nevada driver's license or identification card. If the identification did not have the voter's current residential address, a secondary proof of residency was required. She said poll workers had access to electronic poll books and they would input the voter's information, which would send a query to the voter database. The query would confirm whether the individual was an active voter and would confirm the residential address. She noted voters who wanted to update their information as part of their same-day registration would also need to provide a Nevada driver's license or identification card. The poll worker would enter the new information and the verification process would occur. She said the voter would sign an affirmation after verification to complete the registration process and sign the roster. She mentioned the County used paper rosters instead of electronic ones, providing greater image quality and a better paper trail.

Vice Chair Hartung asked for a response to a public commenter's allegation that non-citizens could get a Nevada driver's license and not be eligible to vote. Ms. Spikula responded people could get a driver's authorization card and work and live in the country indefinitely without becoming a citizen. She said it was each individual's responsibility to ensure they did not sign the affirmation if they were ineligible to vote. She stated there was no centralized database to confirm citizenship. The ROV relied on the voter to provide factual information and not commit a crime by voting if they were ineligible. Falsifying a voter registration application was a crime. A voter registration application could be sent to the District Attorney or the Attorney General for review. She stated falsifying a voter registration could affect a citizenship application. She mentioned that a non-citizen voter registration should not get through the DMV automatically, but it could happen. The voter could then contact the ROV to indicate they had not intended to register and the ROV would act accordingly.

Mr. Wlaschin confirmed there was no current statute to authorize the SOS to request or pursue any sort of citizenship test to screen out automatic voter registrations. He encouraged anyone with knowledge of an elections process abuse to report it to the



# Exhibit

# G



## STATE OF NEVADA

SECRETARY OF STATE  
BARBARA K. CEGAUSKE

101 N. Carson St.  
Carson City, NV 89701

Phone: 775-694-5705  
Fax: 775-694-5718

nselect@sos.nv.gov

www.nv.sos.gov

For official use only

Received by: \_\_\_\_\_

Date Received: \_\_\_\_\_

Complaint

Type: \_\_\_\_\_

(Signature)

# ELECTION INTEGRITY VIOLATION REPORT

The information you report on this form may be used to help us investigate violations of Nevada election laws. When completed, mail, email, or fax your form and supporting documents to the office listed above. Upon receipt, your complaint will be reviewed by a member of our staff. The length of this process can vary depending on the circumstances and information you provide with your complaint. The Office of the Secretary of State may contact you if additional information is needed.

**INSTRUCTIONS:** Please TYPEPRINT your complaint in dark ink. You must write LEGIBLY. All fields MUST be completed.

## SECTION 1.

### COMPLAINANT INFORMATION

Salutation: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Miss

Your Name: Williams Oscar D  
Last First MI

Your Organization, if any: \_\_\_\_\_

Your Address: 1540 Whisper Rock Way Reno NV 89523  
Address City State Zip

Your Phone Number: (775) 240-3458  
Home Cell Work Fax

Email: osc.williams@att.net Call me between 8am-5pm at: ☐ Home ☒ Cell ☐ Work

## SECTION 2.

### TYPE OF COMPLAINT

- |   |   |
|---|---|
| <input type="checkbox"/> Campaign Practices       | <input type="checkbox"/> Voter Fraud                      |
| <input type="checkbox"/> Contributions / Expenses | <input type="checkbox"/> Initiative / Referendum Petition |
| <input type="checkbox"/> Voter Registration       | <input type="checkbox"/> Financial Disclosure Statement   |
| <input checked="" type="checkbox"/> Other         |   |

Election law violation

### SECTION 3.

#### COMPLAINT IS AGAINST

Please detail the nature of your complaint. Include the name and contact information (if known) of the individual, candidate, campaign, or group that is the subject of your complaint. Your complaint must also include a clear and concise statement of facts sufficient to establish that the alleged violation occurred. Any relevant documents or other evidence that support your complaint should be listed and attached. You may attach additional sheets if necessary.

The Washoe County Registrar of Voters failed to mail me a sample ballot.

I voted on June 14th at McQueen H.S. in Reno and asked for a sample ballot because I had not received one. My request was denied.

I was told to go online and get it at the ROV's website but I did not have my cell phone with me. However, that is secondary to the laws that state sample ballots must be mailed and hard copies made available at vote centers.

I believe my rights have been violated per:

Counties are required to print a sample ballot upon request inside a vote center (R097-21A (4, 13));

and to have a copy of the sample booklet available (NRS293.3025, 293.325, 293B.205);

and a paper sample ballot must be mailed to each registered voter (NRS293.585, 293C.530, and NAC293.120).


Most people, including me, want fair and accurate elections, and transparency. Thank you for your time and interest.

### SECTION 4.

Sign and date this form. The Secretary of State's Office cannot process any unsigned, incomplete, or illegible complaints. In order to resolve your complaint, we may send a copy of this form to the person or group about whom you are complaining.

I am filing this complaint to notify the Office of the Secretary of State of the activities of a particular candidate, campaign, individual or group. I understand that the information contained in this complaint may be used to establish violations of Nevada law in both private and public enforcement actions. I authorize the Office of the Secretary of State to send my complaint and supporting documents to the individual or group identified in this complaint.

By signing my name below, I certify under penalty of perjury that the information provided in this complaint is true and correct to the best of my knowledge.

  
Signature

Oscar D Williams

Print Name

6/15/22

Date (mm/dd/yyyy)

**Exhibit**

**H**

**BARBARA K. CEGAVSKE**  
*Secretary of State*

STATE OF NEVADA

**SCOTT W. ANDERSON**  
*Chief Deputy Secretary of State*

**GAIL J. ANDERSON**  
*Deputy Secretary for Southern Nevada*

**ERIN HOUSTON**  
*Deputy Secretary for Securities*

**DEBBIE I. BOWMAN**  
*Deputy Secretary for Operations*

**KIMBERLEY PERONDI**  
*Deputy Secretary for Commercial Recordings*

**OFFICE OF THE  
SECRETARY OF STATE**

**MARK A. WLASCHIN**  
*Deputy Secretary for Elections*

# MEMORANDUM

**To:** Nevada County Clerks & Registrars

**From:** Mark Wlaschin

**Date:** February 15, 2022

**Subject:** Memo 2022-004 - Guidance Regarding Candidates whose Party Affiliations were changed because of AVR

The following guidance is provided to address candidates whose major political party affiliations were changed due to the Automatic Voter Registration (AVR) process.

NRS 293.176 describes the requirements for candidacy of a major political party for partisan office in any election:

- If a candidate of a major political party for partisan office had previously been affiliated with a major party, but then submitted to their Clerk a document or digital request changing their party affiliation from a major party to any other party prior to December 31, 2021, but then attempts changes it back, pursuant to NRS 293.176 they are not eligible to run for office as a representative of that major political party.
- If a candidate of a major political party for partisan office had their party affiliation changed from a major political party to any other party through the AVR process, including by the establishment of a new voter registration in a different county than they had been previously registered, the candidate is eligible to run for office as a representative of that major political party.

It is the intent of the Office of the Secretary of State that this guidance be submitted as a regulation following the conclusion of the 2022 election cycle. To that end, if any Clerk identifies a means to improve this guidance, please notify the Deputy for Elections prior to December 15, 2022.

Respectfully,

Barbara K. Cegavske  
Secretary of State

By: Mark Wlaschin  
Mark Wlaschin, Deputy Secretary for Elections

# Exhibit

I

## Provisional Ballots Anomalies 2020 General Election

### Statistics:

- 336,518 total number of registered and eligible voters for the 2020 General Election held 11/03/2020
- 308,363 Active
- 28,155 Inactive
- Total voters that voted: 252,566
- Washoe County EAVS
  - Same-day Registrations: 4,139
    - Election day: 1,931
      - 2,950 on Election Day at Cold Springs alone
      - 2,041 counted from Cold Springs on Election Day of the 1,931
    - Early voting: 2,208
- Secretary of State statistics:
  - 5,173 Provisional ballots cast from Washoe County
  - 4,179 PV ballots counted
    - 40 difference between EAVS and SoS records, nearly a 1% error
- PRR 109342 request for all provisional ballots cast sent to the SoS and the returned records of those verified by the SoS
  - Received a CD in MS Excel format containing 5,565 records
  - Accepted: 4,230 vs the 4,179 reported on EAVS
  - Rejected: 995
  - PV Status blank: 80 records
  - Duplicate voters in PV database: 320, 215 with exact same pv number
  - Duplicate voters in PV database with 2 different pv numbers: 106
  - Breakdown by polling place
    - Nixon: 30
    - Incline Village: 91
    - Sun Valley Center: 97
    - Downtown Library: 116
    - Reno Town Mall: 143
    - South Valleys Lib: 158
    - Dbl Diamond Ath: 166
    - North Valleys Lib: 183
    - Northwest Lib: 186
    - Reno/Spark Conv: 193
    - RoV Office: 259
    - Spanish Springs: 279
    - Lawlor Ctr UNR: 306
    - **Cold Springs: 2,950**
- over entire Early Voting period  
all on Election Day 11/03/2020
- Polling books for Cold Springs processed 688 voters, NO provisionals processed on the polling books. That's 1 person every 1 minute and 3 seconds.
- IF Cold Springs processed 2,950 provisional ballots from Same Day Registrations, that would be an additional 1 person every 14.6 seconds for the entire 12 hour Election Day.
- If you got there to vote and the wait time was 10 minutes, you'd be 50<sup>th</sup> in line.
- 25 electronic voting machines, 10 election workers, this would not even be physically possible

- After receiving training to be a Ballot Intake Clerk, each new Same Day Registration would be manually entered into the polling books in real time.
  - Was told by Heather Carmen that when they (not sure who "they" was) entered the SDR provisional ballots that "they" did not select the correct polling place and that they defaulted to Cold Springs.
  - So if that is true, which I don't believe that is the way it works as outlined in my training and confirmed at Save Mart #155 polling place on Plumb, then by admission of the RoV office, they made approximately 2,900 errors or 52% of the Provisionals were in error.
  - It would also mean that when someone came into any polling place besides Cold Springs to do an SDR, that the Ballot Intake Clerk would have to log out and inadvertently log back in as the Cold Springs Polling Place, then log back out and re-log back in at the proper Polling Place.
  - All of the associated paperwork would also be collected from the wrong Polling Place.
- We have collected about a dozen Affidavits from people in Washoe City, Incline Village and up in Cold Springs.
  - 6 Affidavits from Washoe City testifying that they did NOT vote in Cold Springs, however, we can also not find them on the Poll Books as having voted in Washoe City provisionally.
  - 1 Affidavit from Incline Village testifying that they did NOT vote in Cold Springs, however, we can also not find them on the Poll Books as having voted in Incline Village provisionally.
  - Several from Cold Springs testifying that their wait time in line was not more than a few minutes if any wait time at all.
- Response to PRR by Heather Carmen
  - "I have the list that was provided to the Secretary of State of provisional voters. This list has over 5,000 names and contained on that list is the voters residential address. If you allow me to remove the individuals residential address from the list I can provide the list tomorrow. With some of our voters being "Confidential" I would have to ask a staff member to go through it before I can release it and the timeframe that I would be able to provide it would be 3 months from now.  
We do not have a report from the State because there were no provisional to report as a potential double vote." (highlight added)
    - It is NOT the job of the RoV in Washoe County to decide if there was the "potential" for double votes, that is the job of the SoS to certify they had NOT voted in any other county statewide.
    - If they "do not have a report from the State..." then how is it that I have a report from the SoS and that it came from the RoV?
  - I had them remove all the addresses and received the email and CD of the file in MS Excel format
  - About 5 minutes to convert the .xlsx file to a .csv format.
  - Another 3 minutes to import into a database program.
  - Another 3 minutes to pull the addresses from the Voter Registration database, the method by which they voted, last time they voted, and the state voter Id, btw, there were no Confidentials for any "Accepted"
  - Why would it have taken an estimated 3 months to do what I was able to do in less than 30 minutes?



- Removed from State Voter Rolls
  - By April 2021 the state's voter registration database shows that 399 of the 2,950 had already been removed from the Voter Rolls.
    - Did any statewide or countywide candidate win by less than 399 votes?
  - By September 2021, 673 of the 2,950 (22.8%) had been removed from the state's voter rolls
- 90 of the Provisional SDRs were processed AFTER 7 pm closing time of the Polling Place in Cold Springs. Does this mean there were 90 people still in line when the Polling Place closed?
- Why aren't any of the provisional voters listed in the polling books?
- According to the Voter History, 2041 of the 2,950 are marked as Polling Place (PP) voting NOT PV, Provisionally Voted

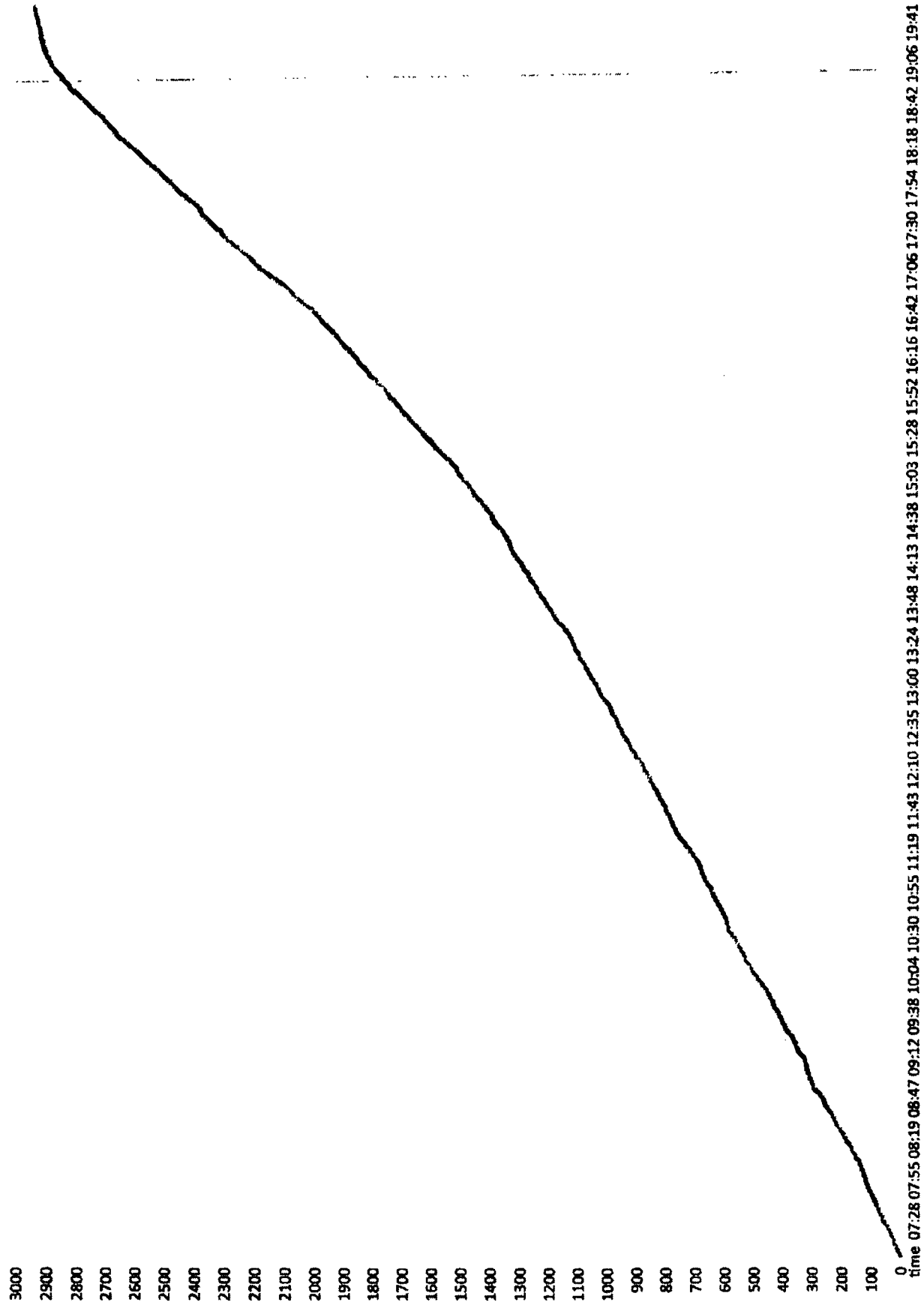
**Conclusion:** After Investigating and doing an analysis of the Provisional Voting Ballots cast and counted in Washoe County, it appears that there are now more questions than answers. Possible 2,900 errors in PV ballots in Cold Springs alone. Why do NONE of the Provisional Ballots show up in any of the Polling Books? Why are ALL of the Provisional Ballots listed in the Voter Rolls database listed as PP rather than PV? Why did Cold Springs have 53% of all Provisional Ballots cast in the county yet no record in the Cold Spring Polling Books or ANY polling books for that matter? Where is all the paperwork associated with Provisional Ballots from the 2020 General Election? Why are so many (over 22%) of PV already removed from the Voter Rolls by Sept 2021?

**Demand:** An Item be put on the June 21, 2022 Agenda to have a discussion on these findings and to have an investigation be opened looking into all these questions, anomalies, errors and concluded before the 22 months deadline to destroy all election data.

Place a "stay" on the destruction of all vote information in Washoe County to preserve all 2020 General Election data/information/paperwork.

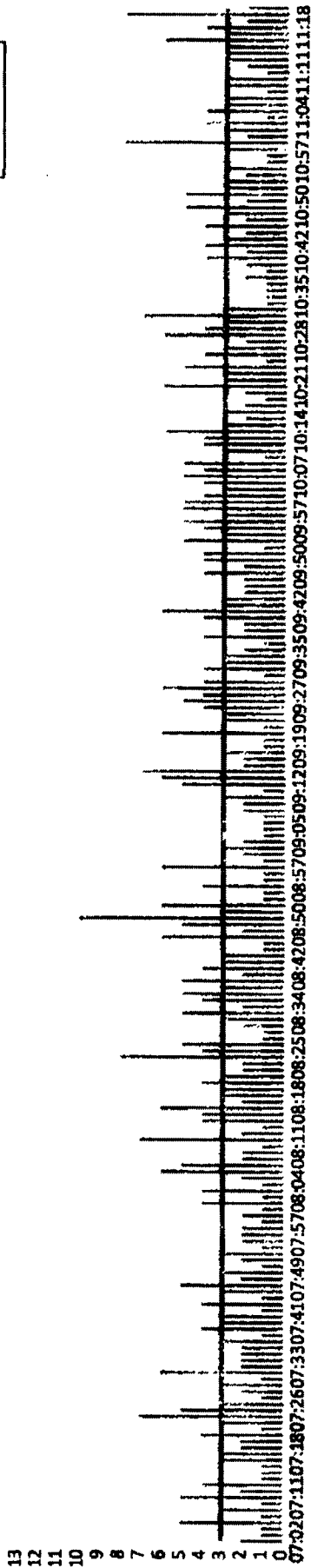
Provisional Ballots Cold Springs, NV November 3, 2020

Polls closed



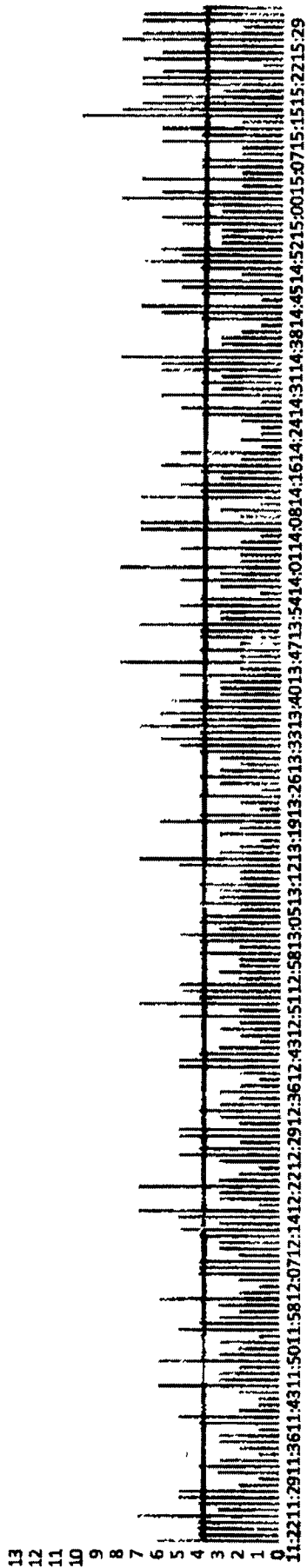
Provisional Ballots Cold Springs, NV 11-03-20 7:02 AM to 11:20 AM

Average 3



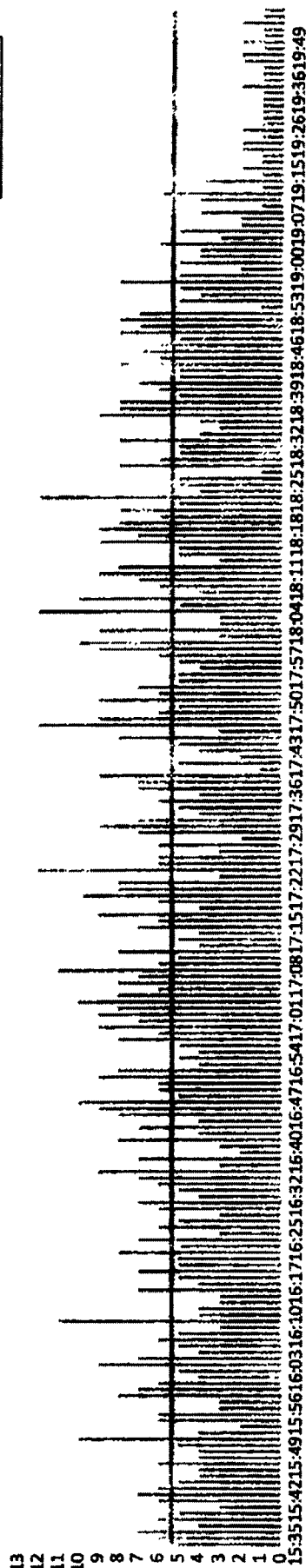
Provisional Ballots Cold Springs, NV 11-03-20 11:22 AM to 3:31 PM

Average 3.8



Provisional Ballots Cold Springs, NV 11-03-20 3:35 PM to 7:53 PM

Average 5.4



## Registration of Voter - Public Records Request

**ID**

109342

**Location**

Reno

**Status**

Closed

**Comment**

All written procedures of how the Dominion voting machine data gets entered into the DIMS county database.

All reports of Provisional Votes cast using the Dominion voting machines that went to the Secretary of State's office and the report returned to you on or after the Saturday following the General Election of 2020.

Were there any Provisional votes cast using paper ballots? If so, how many and on what days.

## History

**⊕ Created 2 months ago**

All written procedures of how the Dominion voting machine data gets entered into the DIMS county database.

All reports of Provisional Votes cast using the Dominion voting machines that went to the Secretary of State's office and the report returned to you on or after the Saturday following the General Election of 2020.

Were there any Provisional votes cast using paper ballots? If so, how many and on what days.

## Public Records Request

Carmen, Heather <HCarmen@washoecounty.gov>  
To: Nicholas St Jon <nicholas.stjon@gmail.com>

Thu, Apr 14, 2022 at 4:09 PM

Mr. St Jon,

The following is an update to your public records request.

There is not a written procedure on how Dominion voting machine data gets entered into the DIMS county database.

I have the list that was provided to the Secretary of State of provisional voters. This list has over 5,000 names and contained on that list is the voters residential address. If you allow me to remove the individuals residential address from the list I can provide the list tomorrow. With some of our voters being "Confidential" I would have to ask a staff member to go through it before I can release it and the timeframe that I would be able to provide it would be 3 months from now.

We do not have a report from the State because there were no provisional to report as a potential double vote.

Please advise.



**Heather Carmen**

Assistant Registrar | Registrar of Voters

hcarmen@washoecounty.gov | Office: 775.328.3672 Cell: 775.300.3197

1001 E. 9th St., Reno, NV 89512



**Exhibit**

**J**

## Current Mail Ballot Status

2022 GENERAL

Ballot Status  
2022 GENERAL

2022 GENERAL  
Ballot Status  
2022 GENERAL

1 / 3

## Contact Preferences

For assistance using this site or questions about information available on this site, contact your local election officials or the

☐ CONTACT US

☐ CONTACT US

☐ CONTACT US

☐ CONTACT US

☐ CONTACT US

☐ CONTACT US

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☐ CONTACT US

☐ CONTACT US

# Exhibit Cover Page

**EXHIBIT NUMBER 2**



**To: Nevada Secretary of State  
101 North Carson Street, Suite 3, Carson City, NV 89701**

**To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701**

**To: Supreme Court Of Nevada  
201 S Carson St #201, Carson City, NV 89701**

**[NRS 293.410] Statement of Contest**

**Please take notice that it is my wish as one of the People that the Election of November 8, 2022 be denied certification because of the following:**

- (A) There is more than one election worker who has been ordered by officials over the elections to do things outside the form of law which stands as maffesance.**
- (B) I further demand that under the fundamental principles of law, universally accepted, in all civilized nations, that you nullify this election as the will of one of the People, and by necessity, custom, and historical usages of the law.**

**Maxim: Legal form is essential form.**

**Maxim: Where form is not observed, nullity of the act is inferred or follows.**

**Maxim: Where the law prescribes a form, the non-observance of it is fatal to the proceeding, and the whole becomes a nullity.**

**Please take notice that the act of election workers, acting as trustees of the People, ordering government servants to ignore the form of elections presented in good faith is fatal to the whole proceeding and furthermore, government is without authority to certify anything that was void, null or invalid on its face as shown in the evidence below:**

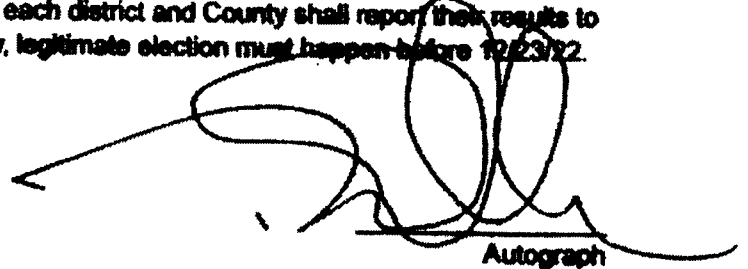
**Maxim: Things invalid from the beginning cannot be made valid by subsequent act.**

**Maxim: Things grounded upon an ill and void beginning cannot have a valid or good perfection.**

**Please take notice that the People have come together, assembled for the common good, and they realize that our servants swore to be instructed by us in the Nevada State Constitution. I therefore come to you in love to tell you that certifying the 2022 general election after being shown fundamental law, and the fact that workers were instructed to ignore the law and verifications which rendered the proceeding a nullity, will be considered a trespass against the People in the highest degree.**

A handwritten signature in black ink, appearing to be a stylized 'A' or 'Z' with a long horizontal stroke extending to the left.

Therefore, our remedy and cure is for a new election and to conduct the new election in such a way that our rights are not being violated. The public will have full transparency into the election process. The new election shall be conducted in one day, with picture voter ID required, using only paper ballots, and counted by hand. The election locations shall be numerous in order to comply with U.S. Supreme Court rulings. Mail ballots shall be opt-in. Indefinitely confined and military officers shall be mailed a paper ballot that must be filled out by the voter and mailed back to the Registrar of Voters or County Clerk in their county to be received by close of polls on election day. Election will be held from 7 am to 7 pm on the day of election. No late ballot arrivals after polls close. Election workers in each district and County shall report their results to the public by 9 PM on election day. This new, legitimate election must happen before 12/23/22.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Autograph

11/23/22  
Date

To: Nevada Secretary of State  
101 N. Carson Street, Suite 3  
Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. 9<sup>th</sup> Street  
Reno, NV 89512

## **AFFIDAVIT**

I, Tracey Thomas, one of the People, in this court of record, Sui Juris, do swear to the following claims:

1. The Constitution for the United States of America is the Supreme Law of the land and supersedes all other lesser law, statutes, codes, regulations and the State Constitution. What is written in the referenced national Constitution is valid, authorized and enforceable. What is not written in the national Constitution is prohibited by that Constitution. All provisions of the national and state Constitution are mandatory, and are not to be overlooked or ignored as if they did not exist. Any act committed by you either supports and upholds the Constitution, national and state, or opposes and violates them.
2. You have taken an oath to support and uphold the national and state Constitution and are constitutionally responsible and liable in the performance of your official duties as is further defined, but not limited to, in the state statutes. (Article 15, Section 2)
3. You have no Constitutional authority, or any other form of valid, lawful authority, to oppose and violate the very documents you swore or affirmed your oath and under which you were delegated by the people the limited authority to conduct the duties of your office.
4. No voting results of mail ballots may be released until all polling places are closed and all votes have been cast on the day of the election. Any person who disseminates to the public in any way information pertaining to the count of mail ballots before all polling places are closed and all votes have been cast on the day of the election is guilty of a misdemeanor. (NRS 293.269935)
5. A county clerk shall not post copies of the tabulated voting results for a statewide or multi-county race or ballot question until the county clerk has received notification from the Secretary of State that all polling places are closed and all votes have been cast. (NRS 293.383)



6. No counting board in any precinct, district or polling place in which paper ballots are used may commence to count the votes until all ballots used or unused are accounted for. (NRS 293.365)
7. You released 2022 General Election voting results before all votes had been cast on November 8, 2022. The United States Postal Service was still accepting and postmarking mail ballots on this date up until midnight Pacific Standard Time and Hawaiian Standard Time. This gave a vast amount of voters an unfair advantage that other voters did not have, as is evidenced by the number of ballots received November 8 through November 12. This gross breach of information thereby suppressed and diminished the value of lawfully cast ballots, as well as disenfranchised legal voters.
8. The processing procedures stipulated in NRS 293.269921, section 1(b) and section 2 are in direct violation of the above referenced state statutes and constitutions.
9. The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude. (15<sup>th</sup> Amendment)
10. The first qualification to vote listed under NRS 293.485 is citizenship and then item 1 proceeds with "Every citizen of the United States."
11. The Secretary of State shall verify the accuracy of the information in an application to register to vote. (NRS 293.675)
12. The first question on the State of Nevada Voter Registration Application is "Are you a citizen of the United States of America?"
13. Staff testified April 13, 2021 at the Washoe County Board of County Commissioners meeting that citizenship is not being verified on persons applying to register to vote.
14. You have not only infringed on the freedoms guaranteed to me as one of the People; but, you are flagrantly and willfully violating your trust indenture. You are practicing discrimination, segregation and intimidation by insisting on depriving me of my rights under color of law. You should be aware that Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws within the United States.



15. Licentiousness is to be understood as acting without regard to law, ethics, or the rights of others. Licentiousness, or practices inconsistent with the peace and safety of the state may be construed to have occurred with all trust indenture servants of the state and state agencies and associations mentioned herein who have acted in a licentious and disruptive manner related to the complaints listed herein.

16. Any failure on your part to protect the People's freedom is a breach of your trust indenture and your oath of office, to which you swore. You were given certain responsibilities by the People, and you have acted in malfeasance and maladministration, intentionally attacking the People you serve, as these responsibilities were not fully and faithfully completed.

This Affidavit is lawful notification to you, and is hereby made and delivered to you pursuant to the national Constitution, specifically, the Bill of Rights, and The Bill of Rights of the Nevada Constitution, and requires your written rebuttal to me, in kind, specific to each and every point of the subject matter stated herein, within ten (10) days, via your own sworn and notarized affidavit, using true fact, valid law and evidence to support your rebuttal of the specific subject matter stated in this Affidavit.

You are hereby noticed that your failure to respond, as stipulated, and rebut, with particularity and specificity, anything with which you disagree in this Affidavit, is your lawful, legal and binding tacit agreement with and admission to the fact that everything in this Affidavit is true, correct, legal, lawful, and fully binding upon you in any court in America, without your protest or objection and that of those who represent you.

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC 1746 that all of the above and forgoing representations are true and correct to the best of my knowledge, information, and belief.

Executed in Sparks, Nevada on this 25 day of November in the Year of Our Lord Two Thousand and Twenty-Two.



Tracey Thomas  
1344 Disc Drive #140  
Sparks, NV 89436


**Notary as JURAT CERTIFICATE**

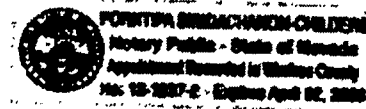
State of Nevada }  
 }  
Washoe County }

On this 23 day of November, 2022 before me, Pratima Sridharan-Chidlers, a Notary Public, personally appeared Tracey Thomas, Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the woman executed, the instrument.

I certify under PENALTY of PERJURY under the lawful laws of the State of Nevada and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

  
\_\_\_\_\_  
Signature of Notary/Jurat



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

**Affidavit**

Affiant, Renee Lou Rezendes, one of the People, in this Court of Record, Sui Juris,  
do swear to the following claims:

1. most of the time they were not  
comparing signatures.
2. most envelopes were being passed  
without checking

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of  
the United States of America, and by the provisions of 28 USC § 1746 that all of the  
above and foregoing representations are true and correct to the best of my knowledge,  
information and belief.

Executed in (city) Reno, Nevada on this 22<sup>nd</sup> day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

Renee Lou Rezendes  
Autograph of Affiant

**Notary as JURAT CERTIFICATE**

Nevada State )  
Washoe County )

On this 22<sup>nd</sup> day of November, 2022 (date) before me,

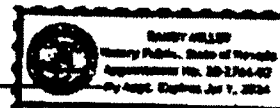
Randy Miller, a Notary Public, personally appeared

Renee Lou Rezendes Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the woman whose name is subscribed to the within instrument and  
acknowledged to me that she executed the same in her authorized capacity, and that by  
her autograph(s) on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat Randy Miller  
Commission Expires July 1, 2024



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central Pkwy., Las Vegas, NV 89155

**Affidavit**

Affiant, Aoife M. Tebbel, one of the People, in this Court of Record, do swear to the following claims:

1. In the Clark County Elections Department, in signature verification room I heard Victor, the room supervisor tell election workers the the signatures did not need to match as long as it was "close enough".
2. Victor also told them they did not need to use the second laptop to cross reference all other signatures on record, this is against Nevada Law.

**Verification**

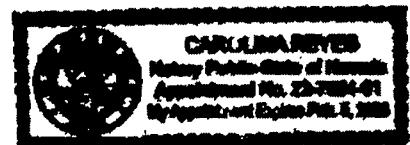
I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Las Vegas, Nevada on this 22 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

[Signature]  
Autograph of Affiant:

Nevada State  
Clark County

Notary as JURAT CERTIFICATE



On this 22 day of November, 2022 (date) before me,  
Carolina Reyes, a Notary Public, personally appeared  
Aoife M. Tebbel Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat

[Signature]



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
800 S. Grand Central PKWY., Las Vegas, NV 89155

Affidavit

Affiant Micah Jordan one of the People, in this Court of Record, Sui Juris,  
do swear to the following claims:

On October 28, 2022 at approximately 11:05 AM while  
in the signature verification room, I was seated single-file  
1. with other observers. There were on both sides, teams of two  
per monitor comparing voter signatures. One team noticed a discrepancy  
and had stopped and called for their supervisor. A younger man,  
who the team greeted as "Victor" told the team "no the signatures  
2. do not need to match, they may vary." I raised my hand, as  
instructed, to call for "Dan" who was our contact person and an  
Ambassador got him. When I asked about this, he said "he  
would look into it." He never got back to me. He never clarified

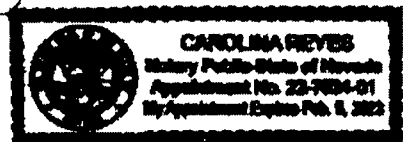
Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of  
the United States of America, and by the provisions of 28 USC § 1746 that all of the  
above and foregoing representations are true and correct to the best of my knowledge,  
information and belief.

Executed in (city) Las Vegas Nevada on this 22 day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

Micah Jordan  
Autograph of Affiant

Nevada State )  
Clark County )  
Notary as JURAT CERTIFICATE



On this 22 day of November, 2022 (date) before me,  
Carolina Reyes a Notary Public, personally appeared  
Micah Jordan Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the woman whose name is subscribed to the within instrument and  
acknowledged to me that she executed the same in her authorized capacity, and that by  
her autograph(s) on the instrument the woman constituted, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.  
WITNESS my hand and official seal:

Signature of Notary / Jurat

Carolina Reyes



**JURAT**

A notary public or other officer completing this certificate certifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on  
this 23 day of November, 20 22  
by Cynthia L. Sassenrath

proved to me on the basis of satisfactory evidence to be the person(s) who  
appeared before me.

Signature \_\_\_\_\_



(Cont)

# Exhibit Cover Page

**EXHIBIT NUMBER 3**

**To: Nevada Secretary of State  
101 North Carson Street, Suite 3, Carson City, NV 89701**

**To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701**

**To: Supreme Court of Nevada  
201 S Carson St #201, Carson City, NV 89701**

**We the People's Constitutional Demand to nullify and change the election system based  
on fundamental principles of law**

**Please take notice that it is my wish as one of the People that the Election of November 8,  
2022 be denied certification because of the following:**

- A. There is more than one election worker who has been ordered by officials over the  
elections to do things outside the form of law which stands as malfeasance.**
- B. I further demand that under the fundamental principles of law, universally accepted, in all  
civilized nations, that you nullify this election as the will of one of the People, and by  
necessity, custom, and historical usages of the law:**

**Maxim: Legal form is essential form.**

**Maxim: Where form is not observed, nullity of the act is inferred or follows.**

**Maxim: Where the law prescribes a form, the non-observance of it is fatal to the proceeding,  
and the whole becomes a nullity.**

**Please take notice that the acts of election workers, acting as trustees of the People, ordering  
government servants to ignore the form of elections, presented in good faith, is fatal to the  
whole proceeding. Furthermore, government is without authority to certify anything that was  
void, null, or invalid on its face as shown in the evidence below:**

**Maxim: Things invalid from the beginning cannot be made valid by subsequent act.**

**Maxim: Things grounded upon an ill and void beginning cannot have a valid or good perfection.**

**Please take notice that the People have come together, assembled for the common good, and  
they realize that our servants swore to be instructed by us in the Nevada State Constitution. I,  
therefore, come to you in love to tell you that certifying the 2022 general election after being  
shown fundamental law, and the fact that workers were instructed to ignore the law and  
verifications which rendered the proceeding a nullity, will be considered a trespass against the  
People in the highest degree.**

Therefore, our remedy and cure is for a new election and to conduct the new election in such a way that our rights are not being violated. The public will have full transparency in the election process. The new election shall be conducted in one day, with a picture voter ID required, using only paper ballots, and counted by hand. The election locations shall be numerous in order to comply with U.S. Supreme Court rulings. Mail ballots shall be opt-in. Indefinitely confined and military officers shall be mailed a paper ballot that must be filled out by the voter and mailed back to the Registrar of Voters or County Clerk in their county to be received by close of polls on election day. The election will be held from 7 am to 7 pm on the day of the election. No late ballot arrivals after polls close. Election workers in each district and County shall report their results to the public by 9 PM on election day. This new, legitimate election must happen before 12/23/22.

Additionally, the Registrar of Voters furnished a list of voters they have reported as voted. We have found this list to be in error. We have additionally found a function within the election system that changes the voters vote from what they cast. We have found the voter rolls to be in error.

As per the Nevada Constitution Article 1, Section 2 Purpose of government; paramount allegiance to United States.

"All political power is inherent in the people[.] Government is instituted for the protection, security, and benefit of the people; and they have the right to alter or reform the same whenever the public good may require it...."

Therefore we the people demand the following be abolished immediately:

- AB321
- Use of electronic voting machines and counting machines
- The current voter rolls.

Therefore we the people demand the following be enacted upon immediately:

- Legal voters shall be shown how to re-register to a new set of voter rolls by 6/1/23
- Voter rolls shall be independently kept and maintained by each of the 15 county clerks and 2 registrar of voters
- Valid Voter ID will be required to vote or register to vote

We the people demand a full investigation into the following people:

Jamie Rodriguez, Washoe County Registrar of Voters  
Eric Brown, Washoe County Manager  
Bethany Drysdale, Washoe County communications director

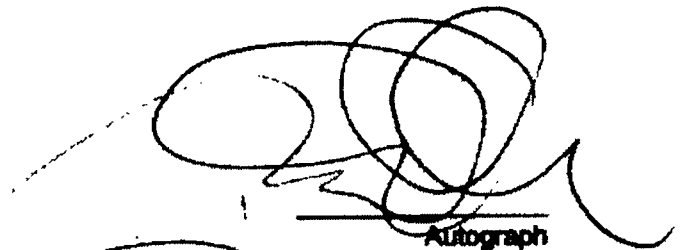

I have given proof of election errors to Eric Brown and Jamie Rodriguez of the Washoe County Registrar of Voters, including but not limited to:

- An algorithm flipping our votes,
- Voter rolls grossly in error,
- Missing votes and voters,
- Election equipment hooked up to the internet,
- Our votes being counted in secret,
- ROV reported voters who voted in 2022 General Election in error,

- Voters votes being cast without the voter's consent.

The errors still exist. After receiving notice of the errors, rather than correcting, the election officials used their communications team and Bethany Drysdale to deceive the public.

If, as Nevada government workers, you believe the People do not have rights as enumerated in the Nevada Constitution Article 1, Section 2: Purpose of Government and you refuse to immediately secure the People's elections and business by immediate investigations and nullifying this past election, that was filled with maladministration and malfeasance, you must present constitutional grants of authority showing you are allowed to do so, sworn under penalty of perjury, by affidavit within 7 days. If you should fail to respond, you agree that you are trespassing against the People, with full knowledge, intent, and malice, and that this notice can be used as evidence against you should you interfere with the People's rights.

  
Autograph  
  
Print Name  
12/1/22  
Date

To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

To: Washoe County Registrar of Voters 1001 E. Ninth Street, Reno, NV 89512

To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701

To: Supreme Court Of Nevada  
201 S Carson St #201, Carson City, NV 89701

### Affidavit

Affiant, Robert Beadles, one of the People, in this Court of Record, Sui Juris, do swear to the following claims:

I have given the following proof of election errors to Eric Brown and Jamie Rodriguez of the Washoe County Registrar of Voters.

An algorithm flipping our votes.

Voter rolls grossly in error.

Missing votes and voters

Signature verification not adequately done

Election equipment hooked up to the internet

Our votes being counted in secret.

ROV reported voters who did not vote in the 2022 General Election as voted.

Voters votes being cast without the voters consent.

The errors we have shown they then have their communications team discount to the public vs investigate and correct the errors.

### Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Reno Nevada on this 1st day of December  
in the Year of Our Lord Two Thousand and Twenty-Two.

  
Autograph of Affiant:

Notary as JURAT CERTIFICATE

Nevada State }

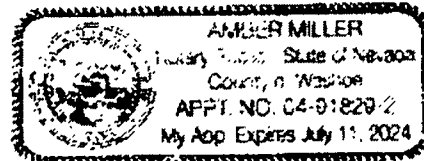


State of Nevada

Washoe County )

On this 1<sup>st</sup> day of Dec, 2022 (date) before me,  
Amber Miller, a Notary Public, personally appeared  
Robert D Beadles Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the man whose name is subscribed to the within instrument and  
acknowledged to me that he executed the same in his authorized capacity, and that by  
his autograph(s) on the instrument the man executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
800 S. Grand Central Parkway, Las Vegas, NV 89105

To: Washoe County Registrar of Voters 1001 E. Ninth Street, Reno, NV 89502

To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701

To: Supreme Court Of Nevada  
201 S Carson St 89201, Carson City, NV 89501

Affiant

Edward Shamon  
Affiant, Edward Shamon, one of the People, in this Court of Record, do hereby do swear to the following claims:

1. For each precinct, from the tabulations published by the Clark County Registrar of Voters, let:

$A = \text{Marshall's Early Vote}$   $B = \text{Cisero's Marshall's Vote}$   $X = \frac{A}{A+B}$   
2.  $C = \text{Marshall's Marshall's Vote}$   $D = \text{Cisero's Early}$   $Y = \frac{C}{C+D}$

$T = \frac{A+C}{A+B+C+D}$ , then there exists an algorithm that calculates  $T$  as a function of  $X$  and  $Y$ , a mathematical impossibility in the form

I hereby declare, verify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Reno, Nevada on this 26 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Edward Shamon  
Autograph of Affiant

Notary as JURAT CERTIFICATE

New York State  
Suffolk County

On this 26 day of November, 2022 (date) before me,

Edward Shamon, a Notary Public, personally appeared Edward Shamon Name of Affiant, who proved to me on the basis of satisfactory evidence to be the man whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his autograph(s) on the instrument the man executed the instrument.

I certify under PENALTY OF PERJURY under the laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat

BARBARA PARRISH  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 0194200004  
Qualified in Suffolk County  
Commission Expires May 15, 2025

$0T = k_0 + k_1x + k_2y + k_3x^2 + k_4xy + k_5y^2, R^2 = 0.99$

Affiant Name: Kimberly Gruber  
Affiant Address: 3408 Furlong Way, FORT WORTH, TX 76244  
To: The Nevada Secretary of State  
Address: 101 N Carson Street Suite 3 Carson City, NV 89701

**Nevada Affidavit to Change Voting in Election**

**Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent**

Affiant, Kimberly Gruber, one of the People, in this Court of Record, Sui Juris, do make the following claims in regards to voting in the November 4, 2022 Election;

I did not vote in the NV elections because I moved to Fort Worth, TX at the end of June 2022. I am no longer a resident of NV. I registered to vote in Texas, but did not renew my voter registration card until Nov. 7th 2022; therefore, I was unable to vote in November.

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 2385 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city)

Fort Worth, TX on this 30th day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Texas State )  
Tarrant County )

Notary as **NOTARY CERTIFICATE**

Autograph of Affiant

**NOTARIAL CERTIFICATE**  
Notary ID #13948888  
by Commission Expires  
February 1, 2026

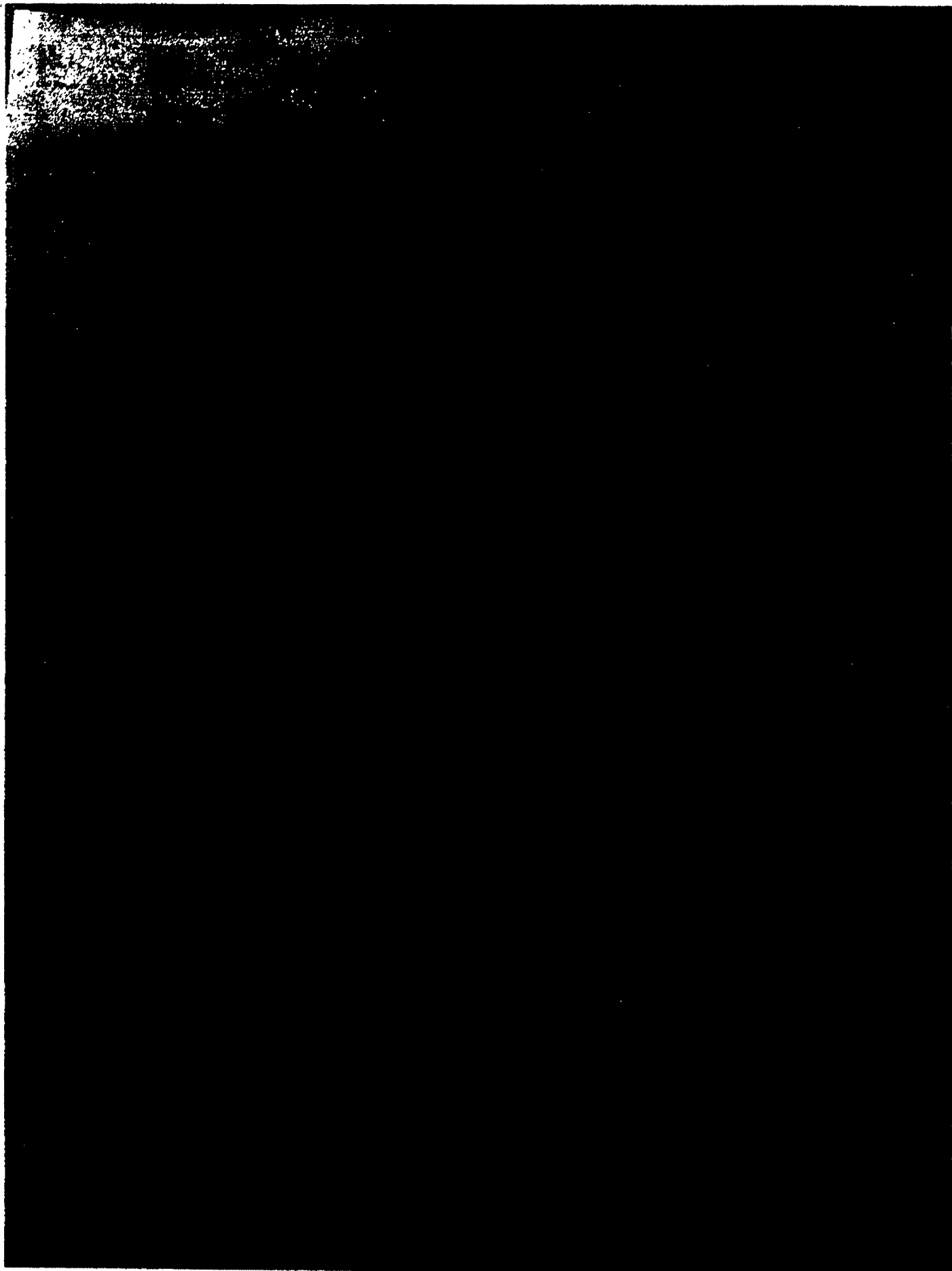
On this 30th day of November, 2022 (date) before me, Edward C. Gruber

a Notary Public, personally appeared Kimberly Gruber Name of Affiant, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature(s) on the instrument the person executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal

Signature of Notary / Just: Edward C. Gruber 01.02/01/2026



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

Affidavit

Affiant, Cynthia L. Sabin, one of the People, in this Court of Record, do swear to the following matters:

1. while working as a voter intake specialist at the library on Cold Springs Lane, while working as a voter intake specialist at the library on Cold Springs Lane, the assistant registrar of voters, came in and was showing a new employee the election process. He happened to be behind me looking over my shoulder when a governor's signature looked like a bunch of loops. I said "I am sorry sir, that signature does not mean, may I see your ID?" He showed me his ID without any problem. Another was watching the exchange and she said "that loop kind of looks like that loop" comparing the two signatures as if 2 people got together. I realized I had at least over two signatures that did not match.
2. we were given no signature verification training. We were told we would get a list of names in our email. It was after early voting started but I could not get it. If election workers needed signatures as a / in ballot we may have been requested during early voting there is no necessary signature verification.

Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1740 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Sparks, NV, on 23 day of November, in the Year of Our Lord Two Thousand and Twenty-Two.

Cynthia L. Sabin  
 Affidavit of Affiant

Notary on JURAT CERTIFICATE

California State  
 Los Angeles County

On this 23 day of November, 2022 (date) before me,

Alicia Bilch, a Notary Public, personally appeared Cynthia L. Sabin, one of the People, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature(s) on the instrument the person executed, the instrument. I certify under PENALTY OF PERJURY under the laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat

Alicia Bilch

Please, see attached a correct CA Notary Certificate.

**JURAT**

A sworn affidavit or other sworn statement certifying the contents only the identity of the individual who signed the document in which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on  
this 23 day of November, 20 22  
by Cynthia L. Sassenrath

proved to me on the basis of satisfactory evidence to be the person who appeared before me.

## Discussion



**Page 10**

To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
800 S. Grand Central PKWY., Las Vegas, NV 89155

Affidavit


Affiant, Anife M. Tebbe, one of the People, in this Court of Record, But Juris,  
do swear to the following claims:

1. In the Clark County Elections Department, in signature verification room I heard Victor, the room supervisor tell election workers the the signatures did not need to match as long as it was "close enough".
2. Victor also told them they did not need to use the second laptop to cross reference all other signatures on record, this is against Nevada Law.

Verification

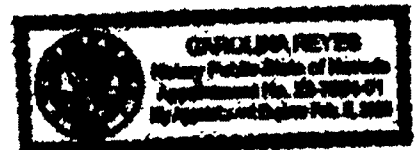
I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Las Vegas, Nevada on this 22 day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

  
Autograph of Affiant.

Nevada State  
Clark County

Notary as JURAT CERTIFICATE



On this 22 day of November, 2022 (date) before me,  
Carolina Reyes, a Notary Public, personally appeared  
Anife M. Tebbe, Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat



Affiant Name:  
Affiant Address:

To: The Nevada Secretary of State  
Address: 181 N Carson Street Suite 3 Carson City, NV 89701

**Nevada Affidavit to Deny Voting in Election**

Notice to Agent in Notice to Principal and Notice to Principal is Notice to Agent

Affiant, BRIAN HOWERY, one of the People, in this Court of Record, Sul Juris, do make the following claims in regards to voting in the November 8, 2022 Election;

I BRIAN HOWERY RESIDE AT 7421 VILLAGE ROAD, UNIT 13 IN SYKESVILLE MARYLAND, 21784. I VOTED IN MARYLAND ELECTIONS AND DID NOT VOTE IN REED, NEVADA. I MOVED TO MARYLAND IN JUNE 2022

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city)

SYKESVILLE, MD on this 25 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Autograph of Affiant:

**Notary as JURAT CERTIFICATE**

Maryland State  
Carroll County

On this 25<sup>th</sup> day of November, 2022 (date) before me, Barry H. Willem BH

a Notary Public, personally appeared Brian Howery Name of Affiant, who proved to me on the basis of satisfactory evidence to be the man whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his autograph(s) on the instrument the man executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat

**Barry H. Willem**  
Notary Public  
Baltimore County  
Maryland  
My Commission Expires July 11, 2025



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

**Affidavit**

Affiant: Micah Jordan, one of the People, in this Court of Record, Sol Justis,  
do swear to the following claims:

On October 28, 2022 at approximately 11:05 AM while  
in the signature verification room, I was seated single-file  
with other observers. There were on both sides, teams of two  
per monitor comparing voter signatures. One team noticed a discrepancy  
and had stopped and called for their supervisor. A younger man,  
who the team greeted as "Victor" told the team "no the signatures  
do not need to match, they may vary." I raised my hand, as  
instructed, to call for "Dawn" who was our contact person and an  
Ambassador got him. When I asked about this, he said "he  
would look into it." It never got back to me. He never clarified

**Verification**

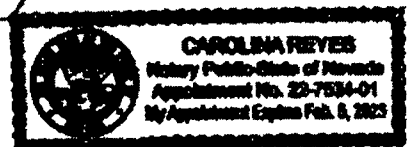
I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of  
the United States of America, and by the provisions of 28 USC § 1746 that all of the  
above and foregoing representations are true and correct to the best of my knowledge,  
information and belief.

Executed in (city) Las Vegas, Nevada on this 22 day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

Micah Jordan  
Autograph of Affiant

**Notary as JURAT CERTIFICATE**

Nevada State )  
Clark County )



On this 22 day of November, 2022 (date) before me,

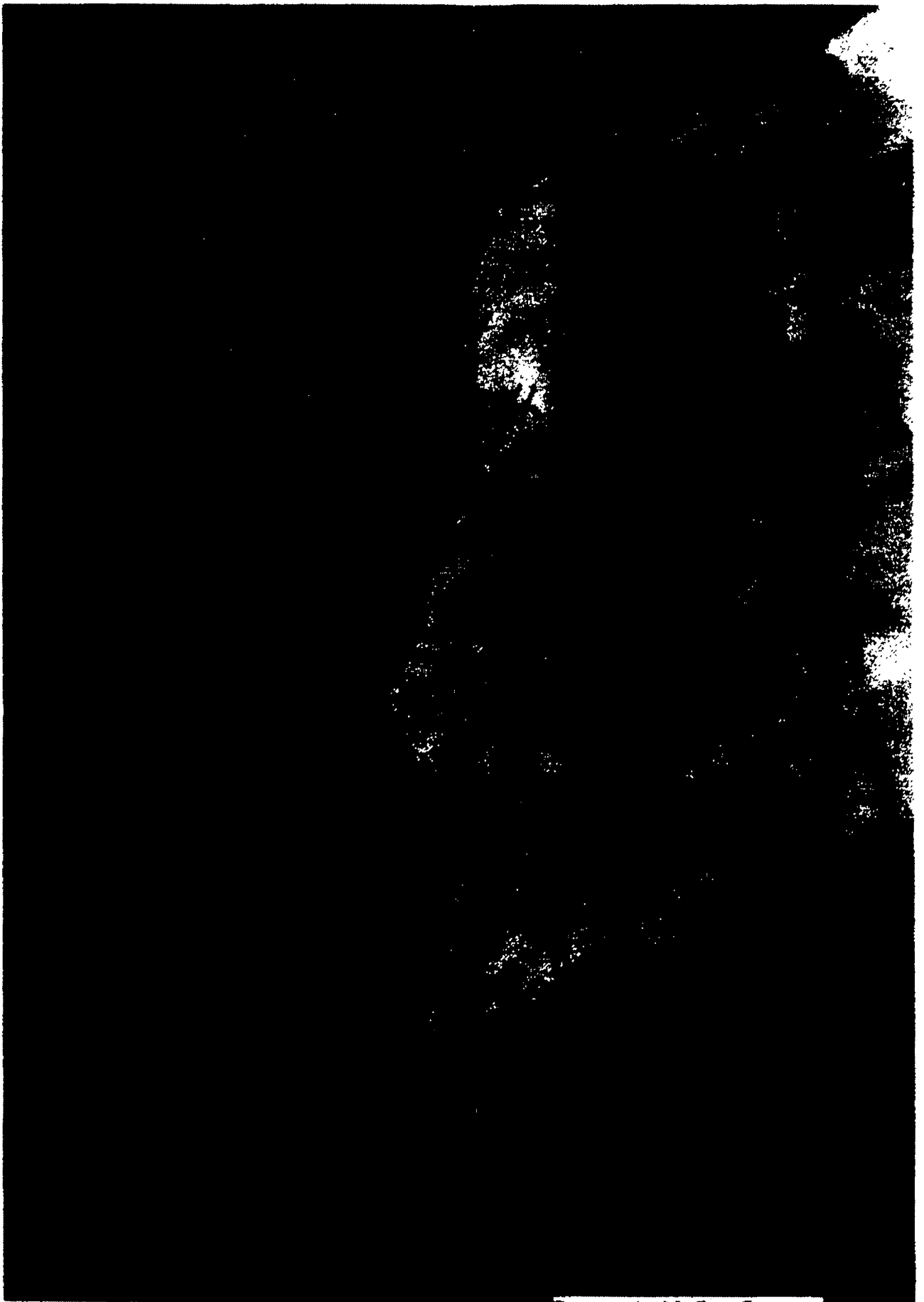
Carolina Reyes, a Notary Public, personally appeared  
Micah Jordan Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the woman whose name is subscribed to the within instrument and  
acknowledged to me that she executed the same in her authorized capacity, and that by  
her autograph(s) on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.

WITNESS my hand and official seal:

Signature of Notary / Jurat

Carolina Reyes



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

**Affidavit**

Affiant, Renee Lou Reyes, one of the People, in this Court of Record. Sui Juris,  
do swear to the following claims:

1. Most of the time they were not  
comparing signatures.
2. Most envelopes were being passed  
without checking

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of  
the United States of America, and by the provisions of 28 USC § 1746 that all of the  
above and foregoing representations are true and correct to the best of my knowledge,  
information and belief.

Executed in (city) Reno, Nevada on this 22<sup>nd</sup> day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

Renee Lou Reyes  
Autograph of Affiant.

**Notary as JURAT CERTIFICATE**

Nevada State )  
Washoe County )

On this 22<sup>nd</sup> day of November, 2022 (date) before me,  
Randy Miller, a Notary Public, personally appeared  
Renee Lou Reyes, Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the woman whose name is subscribed to the within instrument and  
acknowledged to me that she executed the same in her authorized capacity, and that by  
her autograph(s) on the instrument the woman executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat Randy Miller  
Commission Expires July 1, 2024



To: Nevada Secretary of State  
101 N. Carson Street, Suite 3  
Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. 9<sup>th</sup> Street  
Reno, NV 89512

## **AFFIDAVIT**

I, Tracey Thomas, one of the People, in this court of record, Sui Juris, do swear to the following claims:

1. The Constitution for the United States of America is the Supreme Law of the land and supersedes all other lesser law, statutes, codes, regulations and the State Constitution. What is written in the referenced national Constitution is valid, authorized and enforceable. What is not written in the national Constitution is prohibited by that Constitution. All provisions of the national and state Constitution are mandatory, and are not to be overlooked or ignored as if they did not exist. Any act committed by you either supports and upholds the Constitution, national and state, or opposes and violates them.
2. You have taken an oath to support and uphold the national and state Constitution and are constitutionally responsible and liable in the performance of your official duties as is further defined, but not limited to, in the state statutes. (Article 15, Section 2)
3. You have no Constitutional authority, or any other form of valid, lawful authority, to oppose and violate the very documents you swore or affirmed your oath and under which you were delegated by the people the limited authority to conduct the duties of your office.
4. No voting results of mail ballots may be released until all polling places are closed and all votes have been cast on the day of the election. Any person who disseminates to the public in any way information pertaining to the count of mail ballots before all polling places are closed and all votes have been cast on the day of the election is guilty of a misdemeanor. (NRS 293.269935)
5. A county clerk shall not post copies of the tabulated voting results for a statewide or multi-county race or ballot question until the county clerk has received notification from the Secretary of State that all polling places are closed and all votes have been cast. (NRS 293.383)



6. No counting board in any precinct, district or polling place in which paper ballots are used may commence to count the votes until all ballots used or unused are accounted for. (NRS 293.365)
7. You released 2022 General Election voting results before all votes had been cast on November 8, 2022. The United States Postal Service was still accepting and postmarking mail ballots on this date up until midnight Pacific Standard Time and Hawaiian Standard Time. This gave a vast amount of voters an unfair advantage that other voters did not have, as is evidenced by the number of ballots received November 8 through November 12. This gross breach of information thereby suppressed and diminished the value of lawfully cast ballots, as well as disenfranchised legal voters.
8. The processing procedures stipulated in NRS 293.269921, section 1(b) and section 2 are in direct violation of the above referenced state statutes and constitutions.
9. The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude. (15<sup>th</sup> Amendment)
10. The first qualification to vote listed under NRS 293.485 is citizenship and then item 1 proceeds with "Every citizen of the United States."
11. The Secretary of State shall verify the accuracy of the information in an application to register to vote. (NRS 293.675)
12. The first question on the State of Nevada Voter Registration Application is "Are you a citizen of the United States of America?"
13. Staff testified April 13, 2021 at the Washoe County Board of County Commissioners meeting that citizenship is not being verified on persons applying to register to vote.
14. You have not only infringed on the freedoms guaranteed to me as one of the People; but, you are flagrantly and willfully violating your trust Indenture. You are practicing discrimination, segregation and intimidation by insisting on depriving me of my rights under color of law. You should be aware that Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws within the United States.

15. Licentiousness is to be understood as acting without regard to law, ethics, or the rights of others. Licentiousness, or practices inconsistent with the peace and safety of the state may be construed to have occurred with all trust indenture servants of the state and state agencies and associations mentioned herein who have acted in a licentious and disruptive manner related to the complaints listed herein.
16. Any failure on your part to protect the People's freedom is a breach of your trust indenture and your oath of office, to which you swore. You were given certain responsibilities by the People, and you have acted in malfeasance and maladministration, intentionally attacking the People you serve, as these responsibilities were not fully and faithfully completed.

This Affidavit is lawful notification to you, and is hereby made and delivered to you pursuant to the national Constitution, specifically, the Bill of Rights, and The Bill of Rights of the Nevada Constitution, and requires your written rebuttal to me, in kind, specific to each and every point of the subject matter stated herein, within ten (10) days, via your own sworn and notarized affidavit, using true fact, valid law and evidence to support your rebuttal of the specific subject matter stated in this Affidavit.

You are hereby noticed that your failure to respond, as stipulated, and rebut, with particularity and specificity, anything with which you disagree in this Affidavit, is your lawful, legal and binding tacit agreement with and admission to the fact that everything in this Affidavit is true, correct, legal, lawful, and fully binding upon you in any court in America, without your protest or objection and that of those who represent you.

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC 1746 that all of the above and forgoing representations are true and correct to the best of my knowledge, information, and belief.

Executed in Sparks, Nevada on this 23 day of November in the Year of Our Lord Two Thousand and Twenty-Two.



Tracey Thomas  
1344 Disc Drive #140  
Sparks, NV 89436

**Notary as JURAT CERTIFICATE**

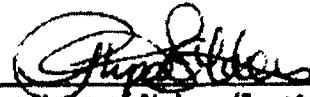
State of Nevada }

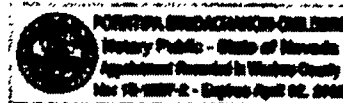
Washoe County }

On this 23 day of November, 2022 before me, Rebecca Sridharan Childers, a Notary Public, personally appeared Tracey Thomas, Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the woman executed, the instrument.

I certify under PENALTY of PERJURY under the lawful laws of the State of Nevada and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

  
\_\_\_\_\_  
Signature of Notary/Jurat



# **“Exhibit 109”**



## **Highlights of Supplemental Statements**

### **1. Votes counted in secret**

- a. Asst. Registrar of Voters Heather Carmen admitted on video she and the Registrar Jamie Rodriguez counted votes in secret in the 2022 primary and in the Joey Gilbert recount of the gubernatorial Republican primary, excluding the public from observation.

### **2. Lack of Transparency and Accountability**

- a. The Washoe ROV has failed its mission statement for “transparency and accountability” and will continue to do so.
- b. Election systems are not transparent or open to public observation, no public inspection allowed.
- c. Hidden and unaccountable ACB members certify equipment and election results, qualifications unknown.
- d. Laws provide no cure for a stolen cast ballot and ballots were stolen and cast in 2022; persons who attest to have moved away and did not vote in Nevada show a ballot cast in their name.
- e. Laws of secret ballot discriminate, and obfuscate accountability.
- f. Washoe ROV has not provided requested 2022 election statistics.

### **3. Unclean voter rolls**

- a. The Washoe ROV has repeatedly ignored valid challenges to voter registrations.
- b. Voter rolls are unclean.
- c. During election cycles, the numbers of active registered voters are a roller coaster in Washoe County:

-22,696 (7.2%) drop in active registered voters from Jun. to Jul. 2022

16,469 (5.72%) growth of active registered voters from Aug. to Oct. 2022

- a. 15,482 universal mail ballots were undeliverable in the 2022 general in Washoe; Over 95K undeliverable statewide.
- b. Nevada's U.S. Senate race was ultimately called four days late on a margin of 7,928 votes, which determined party control for the chamber.

## **2. Election System Issues**

- a. Certain equipment and/or software is unsafe, unapproved, and is locally tested and certified by the county's appointed Accuracy Certification Board.
- b. "[t]here is no realistic mechanism to fully secure vote casting and tabulation computer systems from cyber threats." (National Academies of Sciences, Engineering, and Medicine)
- c. Nevada has become a proving ground for high-tech companies. We are leading the nation in various respects and as non-paper voting is concerned.
- d. "...malware can alter voters' votes while subverting all of the procedural protections practiced by the State, including acceptance testing, hash validation, logic and accuracy testing, external firmware validation, and risk-limiting audits (RLAs)." Report by J. Alex Halderman
- e. "We conclude that the Dominion Voting System is intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results." Allied Security Operations Group

- f. In the 2020 general election in Washoe County, the percentage of votes across all precincts with over 200 votes in them show a defined ratio of Biden to Trump votes of 64.22%, with a margin of error of 2.15%.
- g. Any election worker has access to voter signatures with impunity; PollChief password printed in election worker manuals.
- h. Pollbooks used to verify signatures are infested with Konnech spyware, actual spying to be discovered.
- i. Washoe County plans to spend a whopping \$12.6 million to upgrade their elections systems; an automated signature verification system may be included.
- j. Agilis or any other automated signature verification system is expensive, unsafe, un-approved, non-transparent, and are prone to maladministration.
- k. 69.7% universal mail ballots wasted in Washoe County in the 2022 general.
- l. 71.5% universal mail ballots wasted statewide in the 2022 general.
- m. Email and self-printed ballots are problematic to safe and secure elections for the systems that support these new ways to vote and transmit a ballot are still being built and are evolving.
- n. The Washoe ROV cannot justify the use of no paper at the polls and electronic voting systems for the disabled because the ROV lacks statistical context to support such practices.

### **3. Deficiencies in signature verification methods**

- a. Heather Carmen instructed poll workers to not verify signatures.
- b. Poll workers were not properly trained in signature verification as required.

- c. Unequal treatment of signatures: loose for voting v. strict for sufficiency of certain petitions.
- d. Unequal treatment of signatures: Mail and PDF ballots allow variations of spelling of one's name v. voter's registration signature and official roster when voting in-person.
- e. Unequal origin of signature: Mail and PDF use signature history in DMV and county agencies v. voter's registration signature and official roster when voting in-person
- f. No state guidance on resolution of signature image such as 300 dpi, best practice for audit
- g. No state guidance on signature verification itself, when and how to accept or reject a signature

#### **4. Unprepared for 2024**

- a. The Washoe ROV's staff has seen: "100% turnover in permanent staff and a loss of institutional knowledge." The Elections Group 6-9-23
- b. The Washoe ROV does not have enough skilled workers to conduct the upcoming presidential primary properly and safely and is unlikely to do so.
- c. The hiring of temp labor does not solve the shortage of expertise needed to operate the complex systems and procedures in the conduct of elections.

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Deputy District Attorney  
Nevada State Bar Number 14079  
2 ELIZABETH HICKMAN  
Deputy District Attorney  
3 Nevada State Bar Number 11598  
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4 Reno, NV 89501  
(775) 337-5700  
5 lliddell@da.washoecounty.gov  
ehickman@da.washoecounty.gov  
6 REPRESENTING DEFENDANTS  
JAMIE RODRIGUEZ, WASHOE  
7 COUNTY REGISTRAR OF VOTERS,  
ERIC BROWN, ALEXIS HILL,  
8 and WASHOE COUNTY

9  
10 FIRST JUDICIAL DISTRICT COURT OF NEVADA  
CARSON CITY

11 \* \* \*

12 ROBERT BEADLES, an individual,

13 Plaintiff,

Case No. 23-OC-00105 1B

14 vs.

Dept No. D1

15 JAMIE RODRIGUEZ, in her official  
16 capacity as Registrar of Voters and in her  
personal capacity; the WASHOE COUNTY  
17 REGISTRAR OF VOTERS, a government  
agency; ERIC BROWN in his official  
18 capacity as WASHOE COUNTY  
MANAGER and in his personal capacity,  
19 ALEXIS HILL in her official capacity as  
CHAIRWOMAN OF WASHOE  
20 COUNTY BOARD OF  
COMMISSIONERS and in her personal  
21 capacity; WASHOE COUNTY, a political  
subdivision of the State of Nevada, and  
22 DOES I-X; and ROE CORPORATIONS I-  
X.

23 Defendants.  
24

25 NOTICE OF ENTRY OF ORDER

26 ///

1 TO: ALL INTERESTED PERSONS


2 PLEASE TAKE NOTICE that on November 20, 2023, the Court in the above  
3 entitled matter filed its Order Granting Defendant's Motion to Dismiss. A copy of the Order  
4 is attached hereto.

5 AFFIRMATION PURSUANT TO NRS 239B.030

6 The undersigned does hereby affirm that the preceding document does not contain  
7 the social security number of any person.

8 Dated this 21st day of November, 2023.

9 CHRISTOPHER J. HICKS  
District Attorney

10  
11 By   
12 LINDSAY L. LIDDELL  
13 Deputy District Attorney  
14 One South Sierra Street  
15 Reno, NV 89501  
16 lliddell@da.washoecounty.gov  
17 (775) 337-5700

18 ATTORNEY FOR DEFENDANTS  
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Robert Beadles  
beadlesmail@gmail.com

S. Haldeman

DEPUTY



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## PROCEDURAL HISTORY

Plaintiff Robert Beadles ("Beadles") brought this action against Defendants, the Washoe County Registrar of Voters Jamie Rodriguez ("Ms. Rodriguez"), the Washoe County Registrar of Voters ("ROV"), Washoe County Manager Eric Brown ("Manager Brown"), Chairperson of the Washoe County Board of County Commissioners Alexis Hill ("Commissioner Hill"), and Washoe County. The Complaint contains two causes of action: (1) "Violation of Nevada Constitution Articles 1, 2, 15 and The Voter's Bill of Rights," and (2) a "Petition for Removal of Officers from Office" seeking to remove Ms. Rodriguez, Manager Brown, and Commissioner Hill.

Defendants filed a Motion to Dismiss on August 15, 2023. Beadles filed Plaintiff's Opposition to Motion to Dismiss on August 29, 2023. Defendants filed a Reply in Support of Motion to Dismiss on September 5, 2023. On September 14, 2023, the Second Judicial District Court issued a Corrected Order Granting Plaintiff's Motion to Change Venue, transferring this case to the First Judicial District Court. This Court held a hearing on the Motion to Dismiss on November 20, 2023.

## FINDINGS OF FACT

Having reviewed the filings in this case, and having considered the parties' arguments, the Court makes the following findings of fact:

### I. Robert Beadles, Commissioner Hill, Manager Brown, Ms. Rodriguez, and the ROV

1. Beadles is an individual who resides in Washoe County, Nevada. *Compl.* at ¶11. He represents himself in this action "to save his lawyers from attacks on their livelihoods." *Id.* at ¶12.

2. Commissioner Hill, Manager Brown, and Ms. Rodriguez are employed by Washoe County, not an incorporated city or town, and this is a civil action.

3. Commissioner Hill is an elected public officer.

1        4. Manager Brown and Ms. Rodriguez are not elected public officers. Manager Brown  
2 is employed as the Manager for Washoe County. Ms. Rodriguez is employed as the  
3 Registrar of Voters for Washoe County.

4        5. The ROV is a department of Washoe County, and not a separate legal entity or  
5 political subdivision of the State of Nevada.

6        **II. The Present Case**

7        6. After he filed his Complaint, Beadles filed over one hundred "supplemental  
8 exhibits:" (1) the Supplemental Exhibits in Support of Plaintiff's Complaint filed August 9,  
9 2023, and (2) the Supplemental Exhibits in Support of Plaintiff's Motions filed August 24,  
10 2023. In this filing, Beadles provided the Court approximately six binders and two  
11 flashdrives of files accompanying the aforementioned supplements. Beadles has now filed  
12 one hundred and forty-five "supplemental exhibits," among other things, which include  
13 various national and local news articles and Edward Solomon<sup>1</sup> elections content. These  
14 supplemental exhibits were filed without leave of Court, are not part of the Complaint, and  
15 do not amend the Complaint.

16        7. Beadles alleges that by not acknowledging and not responding to the three  
17 documents he and others allegedly submitted to Defendants, Defendants "deprived  
18 Plaintiff to have his grievances heard as enshrined in Nev. Const. Art. 1 § 10." *Compl.* at  
19 ¶75, ¶71.

20        8. Beadles also alleges Defendants violated his rights under Article 2 Section 1A  
21 Subsection 11 of the Nevada Constitution. *Compl.* at ¶72. Beadles claims he has a  
22 "constitutional right to pose grievances" and have them resolved "fairly, accurately and  
23 efficiently," but Defendants ignored his complaints. *Compl.* at ¶45, ¶72, ¶75.

---

24  
25        <sup>1</sup> The Court takes judicial notice of *Joey Gilbert v. Steve Sisolak et al.*, Case no. 22 OC 000851B, filed in the First  
26 Jud. Dist. Ct. of the State of Nevada in and for Carson City. Therein, Joey Gilbert based a "highly dubious"  
claim alleging election fraud on mathematics created by individual named Edward Solomon.

1       9. Beadles alleges Defendants breached their duty under their oath because "[a]s of the  
2 filing of this complaint, there has been no acknowledgement or response from the  
3 Defendants regarding the underlying Petitions filed by Plaintiff." *Compl.* at ¶75.

4       10. Within his first cause of action, Beadles alternatively pleads that mandamus relief  
5 should issue to compel Defendants to respond to his grievances, and to "rectify" the issues  
6 alleged in those grievances. *Compl.* at ¶86.

7       11. Beadles states generally, "Defendants... failed to fulfill the duties of their respective  
8 offices as alleged herein." *Compl.* at ¶91. Beadles identifies no specific duty for which  
9 Defendants individually committed malpractice or neglect. Beadles alleges that, "By failing  
10 to address the Petitions, Defendants have each violated their oath to office, Nevada Revised  
11 Statutes and Administrative Codes, and violated the Plaintiff's constitutional rights."  
12 *Compl.* at ¶46.

13       12. Beadles also states, "Defendants have additionally failed to address, correct, or  
14 rectify the issues raised in the underlying Petitions, including but not limited to, (1)  
15 updating and resolving the voter registration lists; (2) providing proper vote counting  
16 mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal  
17 function within the election system; (6) violations of election procedures as required under  
18 Nevada law. [Exhibit 109]." *Compl.* at ¶91; *see also Compl.* at ¶¶46-51.

19       13. The Court finds that Beadles fails to identify a specific act of malfeasance or  
20 nonfeasance directly connected to a specific legal duty tied to Commissioner Hill, Manager  
21 Brown, or Ms. Rodriguez.

22       14. The Complaint and Opposition identify internal "mission statements," which are  
23 not laws and do not impose specific legal duties on specific employees. *Compl.* at ¶60; *Opp.*  
24 at 61.

25       15. Beadles provides numerous examples of a board of county commissioners' power to  
26 act regarding elections. *See e.g. Opp.* at 78. He provides no legal authority *requiring* those

1 actions, much less requiring Commissioner Hill, Manager Brown, or Ms. Rodriguez to  
2 perform those actions in the way Beadles would prefer them performed.

3 16. In his "Demand for Relief," Beadles asks the Court to "strike down NRS  
4 293.269935(2) and 293.3606(4) to allow public inspection of ballots." *Compl.* at p. 16. He  
5 asks that the Court prohibit Defendants from "using any voting and tabulation machines  
6 for elections," and asks for general monetary damages in excess of \$15,000. *Id.* He asks that  
7 the Court require Defendants to use paper ballots, "[e]njoin the Defendants and make the  
8 digitized vote tally database (Microsoft SQL) open for public inspection," require  
9 Defendants disclose applicant name and credentials, prohibit Defendants from using QR  
10 codes, "halt" Defendants' expenditure of "unapproved and unsafe equipment and  
11 software." *Id.* He also requests that the Court require Defendants "take into account and  
12 redress all elections issues that Plaintiff puts on the table, no shying away." *Id.* at p. 15.

13 17. In the Opposition to Motion to Dismiss, Beadles includes approximately fourteen  
14 pages setting forth calculations that Beadles claims prove the 2020 election was "rigged."  
15 *Opp.* 39–52. Based on his "formula," he argues that "Biden lost to Trump, Angie Taylor lost  
16 to Montognese, Devon Reese lost to Eddie Lorton, and Alexis Hill lost to Marsha  
17 Berkbigher in the 2020 elections." *Opp.* at 41. Notably, similar allegations regarding  
18 elections fraud based on mathematics from unqualified Edward Soloman were debunked in  
19 in last year's Beadles-funded primary elections contest.<sup>2</sup> Affirming sanctions in that case,  
20 the Nevada Supreme Court recently held that: "[s]ometimes, as is the case here, the issue is  
21 novel because it is so lacking in arguable merit that no previous litigant has raised it."<sup>3</sup>  
22 Allegations "that an election was affected by 'a predetermined algorithm' and 'illicit  
23

24 <sup>2</sup> Case no. 22 OC 000851B, filed in the First Jud. Dist. Ct. of the State of Nevada in and for Carson City. The  
25 Court takes judicial notice of Beadles's documented role in that case. *See Notice of Violation of Supreme Court*  
*Rule 229(2)(b)*, filed on August 12, 2022 in case no. 22 OC 000851B (discussing Beadles's role as "Mr. Gilbert's  
benefactor").

26 <sup>3</sup> *Mueller v. First Jud. Dist. Ct. in and for Cnty. of Carson City*, no. 86064, 2023 WL 5317951 at \*3 (Aug. 17, 2023).

1 mathematics,' with no legitimate explanation for how that occurred, much less evidence to  
2 support those allegations, falls far short of being 'legitimate.'" *Id.* More to the point,  
3 Beadles's mathematics have no bearing on whether he can state a claim for relief regarding  
4 his unanswered elections petitions or for removal based on a public officer's official duties.

#### 5 CONCLUSIONS OF LAW

6 18. A claim may be dismissed for "failure to state a claim upon which relief can be  
7 granted." NRCP 12(b)(5). On a Rule 12(b)(5) dismissal, the Court must liberally construe  
8 the pleadings and accept all allegations as true. *Buzz Stew, LLC v. City of N. Las Vegas*, 124  
9 Nev. 22, 227–28, 181 P.3d 670, 672 (2008). Dismissal is appropriate if the allegations fail  
10 to state a cognizable claim of relief when taken at "face value" and construed favorably on  
11 behalf of the non-moving party. *Morris v. Bank of Am.*, 110 Nev. 1274, 1276, 886 P.2d 454,  
12 456 (1994)(quoting *Edgar v. Wagner*, 101 Nev. 226, 227–28, 699 P.2d 110, 111–12 (1985)).

13 19. Beadles's rogue "supplemental exhibits," are outside the pleadings and will not be  
14 considered. Supplemental pleadings may not be filed without Court permission. NRCP  
15 15(d). A party must move the Court to file a supplemental pleading, and then the Court  
16 may, at its discretion, permit the filing. *Id.* There is no inherent right nor ability to  
17 unilaterally file supplements to pleadings. *See id.*

18 20. Beadles's supplemental exhibits ((1) the Supplemental Exhibits in Support of  
19 Plaintiff's Complaint filed August 9, 2023, and (2) the Supplemental Exhibits in Support of  
20 Plaintiff's Motions filed August 24, 2023) are not part of the Complaint, and are not within  
21 the scope of a Motion to Dismiss pursuant to Rule 12(b)(5).

22 21. Even if the Court were to convert the Motion to Dismiss to a Motion for Summary  
23 Judgment based on Beadles's supplemental exhibits, judgment in favor of Defendants  
24 would be appropriate. Beadles does not support any alleged facts with admissible evidence.  
25 Additionally, most facts alleged are immaterial to his causes of action, e.g. wide-spread  
26 election fraud, "unclean" voter rolls, etc. The nonmoving party "is not entitled to build a

1 case on the gossamer threads of whimsy, speculation, and conjecture." *Collins v. Union Fed.*  
2 *Savings & Loan*, 99 Nev. 284, 302, 662 P.2d 610, 621 (1983). No fact finder could return a  
3 verdict in Beadles's favor on the claims alleged against these Defendants, and therefore  
4 summary judgment would likewise be appropriate.

5 **I. BEADLES'S FIRST CAUSE OF ACTION**

6 22. Beadles's first cause of action alleges that Defendants' failure to respond to his  
7 "petitions" amounts to a constitutional violation under the Nevada Constitution Article 1  
8 Section 10, Article 2 Section 1A(11), Article 15 Section 2 and NRS 293.2546(11). *Compl.* at  
9 ¶¶67-87. The "petitions" are comprised of two complaints about elections processes and  
10 one Statement of Contest for the 2022 election. *Compl.* at ¶73; Exs. 1-3 to *Compl.*

11 **A. BEADLES FAILS TO STATE A CLAIM UNDER ARTICLE 1 SECTION 10 OF THE**  
12 **NEVADA CONSTITUTION.**

13 23. Article One, Section Ten of the Nevada Constitution, titled "Right to assemble and  
14 to petition," provides: "The people shall have the right freely to assemble together to  
15 consult for the common good, to instruct their representatives and to petition the  
16 Legislature for redress of Grievances." NEV. CONST. ART. 1 SEC. 10 (emph. added).

17 24. Beadles's allegations, specifically that Washoe County, Manager Brown,  
18 Commissioner Hill, and Ms. Rodriguez did not respond to his complaints, do not give rise  
19 to a claim under Article 1 Section 10 of the Nevada Constitution. Construing the  
20 Complaint broadly, there are no facts alleged that, if true, demonstrate that Defendants  
21 impeded Plaintiff's right to assemble, to instruct his representatives, or to petition the  
22 Legislature.

23 25. The Court finds that Beadles failed to state a claim under Article 1 Section 10 of  
24 the Nevada Constitution. Dismissal with prejudice is appropriate because amendment  
25 would be futile.

26

1           **B. BEADLES FAILS TO STATE A CLAIM UNDER ARTICLE 2 SECTION 1A**  
2           **SUBSECTION 11 OF THE NEVADA CONSTITUTION OR UNDER THE NEVADA**  
3           **VOTERS' BILL OF RIGHTS.**

4           26. Article 2 Section 1A Subsection 11 provides that each registered voter in the State of  
5 Nevada has the right "to have complaints about elections and election contests resolved  
6 fairly, accurately and efficiently as provided by law." This is codified in NRS 293.2546(11),  
7 the Nevada Voters' Bill of Rights.

8           27. The Nevada Secretary of State is the Chief Officer for Elections in the State. NRS  
9 293.124. As Chief Officer for Elections, the Secretary of State is responsible for the  
10 execution and enforcement of all provisions of NRS Title 24 (NRS Chapters 293-306), and  
11 all other provisions of State and Federal law relating to elections in this State. *Id.*

12           28. Consistent with this framework, the Nevada Administrative Code provides that "[a]  
13 person who wishes to file a complaint concerning an alleged violation of any provision of  
14 Title 24 of NRS [NRS Chapters 293-306], must: 1. **Submit the complaint in writing to the**  
15 **Secretary of State;** and 2. Sign the complaint." NAC 293.025 (emph. added). The  
16 obligation is on the Secretary of State to "resolve [the complaints] fairly, accurately and  
17 efficiently as provided by law." NRS 293.2546(11); NAC 293.025.

18           29. In addition to submitting complaints to the Secretary of State concerning any  
19 alleged violation of NRS Title 24, any registered voter may contest the election of a  
20 candidate by filing a Statement of Contest with the clerk of the district court. NRS  
21 293.407. The Court finds that this statute imposes no duty on a County, a County  
22 Commissioner, a County Manager, or a Registrar of Voters.

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1       30. Additionally, there is no private right of action to enforce Article 2 Section 1A  
2 Subsection 11 of the Nevada Constitution. In determining whether a private right of action  
3 exists to enforce a provision of the Nevada Constitution, the initial inquiry is whether the  
4 provision at issue is "self-executing." *Mack v. Williams*, 138 Nev. Adv. Op. 86, 522 P.3d  
5 434, 441-42 (2022) (citing *Wren v. Dixon*, 40 Nev. 170, 161 P. 722, 729 (1916)).<sup>4</sup> "A  
6 constitutional provision may be said to be self-executing if it supplies a sufficient rule by  
7 means of which the right given may be enjoyed and protected, or the duty imposed may be  
8 enforced; and it is not self-executing when it merely indicates principles, without laying  
9 down rules by means of which those principles may be given the force of law." *Wren*, 40  
10 Nev 170, 161 P. at 729. Additionally, a prohibitory provision is self-executing as it is  
11 complete in itself to the extent of the prohibition. *Mack*, 138 Nev. Adv. Op. 86, 522 P.3d at  
12 441-42. Only self-executing constitutional provisions give rise to a cause of action  
13 independent of any statutory procedure authorizing a private action. *Alper v. Clark County*,  
14 93 Nev. 569, 572, 571 P.2d 810, 812 (1977).

15       31. Beadles acknowledges "Nev. Const. Art 2 Sec 1A § 11 does not confer an obligation  
16 onto the Defendants, rather, Plaintiff contends that Sec 1A § 11 is silent as to the responsive  
17 agency or department. Nothing in the Nevada Constitution dictates how a grievance  
18 should be posed, just that a person's grievances cannot be simply ignored." *Opp.* at p. 99.  
19 With this, Beadles concedes Article 2 Section 1A is not a self-executing provision of the  
20 Nevada Constitution and he cannot bring a private right of action.

21       32. Addressing Beadles's allegation that he is entitled to relief under Article 2 § 1A(11)  
22 first, which is included in the Nevada Voters' Bill of Rights as NRS 293.2546(11), this  
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24  
25 <sup>4</sup> Beadles's Opposition includes analysis as to whether the Nevada Constitutions are self-executing, arguing  
26 he has a private right of action, and citing to *Mack v. Williams*, 138 Nev. Adv. Op. 86, 522 P.3d 434 (2022).  
*Opp.* at 10-12. Because he raised this argument, it is therefore appropriate to analyze the merits of those  
issues.



1 provision states that each registered voter in the State of Nevada has the right "to have  
2 complaints about elections and election contests resolved fairly, accurately and efficiently  
3 as provided by law." This is not a prohibitory provision and lacks the detailed means to  
4 describe how the policy would be enforced. Insofar as it explicitly states "as required by  
5 law," this provision defers to the legislature to set forth processes to enforce this policy.  
6 Therefore, Article 2 § 1A(11) of the Nevada Constitution is not self-executing.

7 33. Turning to the statute, nothing in NRS 293.2546(11) contemplates a private right of  
8 action. To the contrary, the Legislature made clear via NRS 293.840 that violations of  
9 Chapter 293 may result in criminal penalties and a civil penalty, but only in "a civil action  
10 brought in the name of the State of Nevada by the Attorney General or by any district  
11 attorney in a court of competent jurisdiction." Nothing in NRS Chapter 293 authorizes  
12 Plaintiff to pursue a private right of action for an alleged violation of NRS 293.3546(11),  
13 nor does Article 2 § 1A(11) provide for a private right of action.<sup>5</sup>

14 34. Assuming *arguendo* that a private right of action could be brought under Article 2 §  
15 1A(11) or NRS 293.3546, Beadles does not state a claim on which relief could be granted.  
16 Beadles erroneously suggests, "this Court must determine where the responsibility falls  
17 within local government when a citizen poses an inquiry or complaint and  
18 petition...regarding election abnormalities, errors, and improper procedures on behalf of  
19 the ROV." *Opp.* at 99.

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<sup>5</sup> That there is no private cause of action is separate from whether there may be a writ of mandamus compelling performance of a nondiscretionary duty. *See American Civil Liberties Union of Nev. v. Cnty. of Nye*, no. 85507, 2022 WL 14285458 (Oct. 21, 2022)(unpublished disposition)(granting a writ of mandamus regarding specific duties set forth in NRS Chapter 293); *Baldonado v. Wynn Las Vegas, LLC*, 124 Nev. 951, 961, 194 P.3d 96, 102 (2008)( "[W]hen an administrative official is expressly charged with enforcing a section of laws, a private cause of action generally cannot be employed." ).

1       35. Establishing the process through which a complaint about elections will be heard is  
2 within the purview of the legislature. Per NRS 293.124, the Secretary of State is the Chief  
3 Office for Elections in Nevada, and all execution and enforcement of NRS Title 24 (NRS  
4 Chapters 293-306), and all other provisions of State and Federal law relating to elections,  
5 are the responsibility of the Secretary of State. NRS 293.124(1). The Secretary of State  
6 was given broad authority to enact regulations as are necessary to carry out the provisions  
7 of Title 24. NRS 293.124(2). Such regulations have the force of law. NRS 233B.040(1)(a);  
8 *Banegas v. State Industrial Ins. Sys.*, 117 Nev. 222, 227, 19 P.3d 245, 248 (2001)(recognizing  
9 "the Legislature may authorize administrative agencies to make rules and regulations  
10 supplementing legislation.").

11       36. NAC 293.025 specifically provides: "A person who wishes to file a complaint  
12 concerning an alleged violation of any provision of Title 24 of NRS [NRS Chapters 293-  
13 306], must: 1. Submit the complaint in writing to the Secretary of State; and 2. Sign the  
14 complaint." The obligation is on the Secretary of State to "resolve [the complaints] fairly,  
15 accurately and efficiently as provided by law." NRS 293.2546(11); NAC 293.025. Thus,  
16 state law places the "duty" to resolve complaints about elections based on Article 2 §  
17 1A(11) on the Secretary of State's office rather than on the named Defendants in this  
18 action. Accordingly, Beadles's claim fails because there is no duty or obligation mandated  
19 by Nevada law for the Defendants to respond to his complaints related to the elections  
20 process.

21       37. In addition to submitting complaints to the Secretary of State concerning any  
22 alleged violation of NRS Title 24, any registered voter may contest the election of a  
23 candidate by filing a Statement of Contest with the clerk of the district court. NRS  
24 293.407. Again, this statute imposes no duty on a County, a County Commissioner, a  
25 County Manager, or a Registrar of Voters.

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1       38. The Court finds that nothing in Nevada law required Defendants to respond to  
2 documents that, by law, were required to be submitted to the Nevada Secretary of State or  
3 the district court. Even if there was a duty, that duty would only be to resolve the  
4 complaint—not to respond or “rectify” the alleged issue in the manner that the  
5 complainant prefers. The Complaint, construed liberally and in favor of Beadles, fails to  
6 state a claim under Article 2 Section 1A(11) of the Nevada Constitution or NRS  
7 293.2546(11).

8       39. Additionally, amendment would be futile because there is no set of facts that would  
9 give rise to a claim under Article 2 Section 1A(11) against these Defendants. Therefore,  
10 dismissal with prejudice is appropriate.

11               **C. BEADLES FAILS TO STATE A CLAIM UNDER ARTICLE 15 SECTION 2 OF THE**  
12               **NEVADA CONSTITUTION.**

13       40. Article 15 Section 2 of the Nevada Constitution requires all members of the  
14 legislature, and all officers, executive, judicial and ministerial, to take an oath before  
15 performing the duties of their respective offices. The oath provides, in relevant part, that  
16 the public officer will support, protect, and defend the Constitutions of the United States  
17 and Nevada, and “will well and faithfully perform all duties of [their] office...” NEV.  
18 CONST. ART. 15 SEC. 2.

19       41. As set forth above, responding to Beadles's allegations of violations of elections  
20 laws or elections challenges are not within the duties of Defendants' offices. Plaintiff's  
21 assertions that “Defendants have thus perjured their oath of office” by not responding to  
22 his complaints does not state a claim under Article 15 of the Nevada Constitution. *See*  
23 *Compl.* at ¶75; NEV. CONST. ART. 15 SEC. 2. In his opposition, Beadles simply reiterates  
24 that the Nevada Constitution requires officers take an oath and summarily concludes “thus  
25 plaintiff can hold them accountable.” *Opp.* at 8. He further argues that “implicit in this  
26 oath is a commitment to uphold the principles of democracy, which include addressing the

1 concerns and grievances of the citizenry." *Id.* at 64, 69, 73.

2 42. As previously demonstrated, responding to Beadles's allegations of violations of  
3 elections laws or elections challenges are not within the duties of Defendants' offices.  
4 Beadles's suggestion that responding to his grievances is "implicit in this oath" has no basis  
5 in law, and therefore his claim fails as a matter of law. Moreover, this provision of the  
6 Nevada Constitution does not include a private right of action. *Mack*, 138 Nev. Adv. Op.  
7 86, 522 P.3d at 441-42.

8 43. The Court finds that Beadles failed to state a claim upon which relief can be granted  
9 under Article 15 of the Nevada Constitution. Additionally, amendment would be futile  
10 because there is no set of facts that would give rise to a claim under Article 15 of the  
11 Nevada Constitution against these Defendants. Therefore, dismissal with prejudice is  
12 appropriate.

13 **D. MANDAMUS RELIEF IS UNATTAINABLE.**

14 44. A Court may issue a writ "to compel the performance of an act which the law  
15 especially enjoins as a duty resulting from an office, trust or station..." NRS 34.160.  
16 "Mandamus is an extraordinary remedy which will not lie to control discretionary action,  
17 unless discretion is manifestly abused or is exercised arbitrarily or capriciously." *Mineral*  
18 *Cnty. v. State, Dep't of Conserv.*, 117 Nev. 235, 243, 20 P.3d 800, 805 (2001)(internal citations  
19 and quotations omitted). "A manifest abuse of discretion is a clearly erroneous  
20 interpretation of the law or a clearly erroneous application of a law or rule. *State Office of*  
21 *the Atty. Gen. v. Justice Ct. of Las Vegas Twp.*, 133 Nev. 78, 80-81, 392 P.3d 170, 172  
22 (2017)(internal citations and quotation marks omitted).

23 45. Writ relief is an extraordinary remedy that will only issue at the discretion of the  
24 Court. *State v. Eighth Jud. Dist. Ct. ex rel. Cnty. of Clark*, 118 Nev. 140, 146, 42 P.3d 233, 237  
25 (2002). "[M]andamus will never issue, unless a clear, legal right to the relief sought is  
26 shown." *State v. Daugherty*, 48 Nev. 299, 231 P. 384, 385 (1924). The Court lacks authority

1 to grant equitable relief when a party has an adequate remedy at law. *Las Vegas Valley Water*  
2 *Dist. v. Curtis Park Manor Water Users Ass'n*, 98 Nev. 275, 277, 646 P.2d 549, 550 (1982).

3 46. Here, there is no duty in law requiring any of the Defendants to respond to  
4 Beadles's petitions. NRS 293.2546(11); NAC 293.025. As such, there is no legal basis to  
5 issue a writ to compel such a response, or to compel Defendants to "rectify" Beadles's  
6 perceived grievances. Moreover, Beadles overlooked his available legal remedies to submit  
7 his petitions to the Nevada Secretary of State and the clerk of the district court as provided  
8 under Nevada's election laws. NAC 293.025.

9 47. Beadles fails to state a claim for writ of mandamus relief in his first cause of action.  
10 Additionally, amendment would be futile because Defendants have no specific legal duties  
11 to address Beadles's alleged issues or to act in the way Beadles asserts that they should. The  
12 Court hereby finds dismissal with prejudice is appropriate.

13 **E. DISCRETIONARY ACT IMMUNITY OTHERWISE PROHIBITS THE FIRST CAUSE OF**  
14 **ACTION.**

15 48. In relevant part, NRS 41.032 states that:

16 [N]o action may be brought under NRS 41.031 or against ... an  
17 officer or employee of the State or any of its agencies or political  
18 subdivisions which is:...

19 2. Based upon the exercise or performance or the failure to exercise  
or perform a discretionary function or duty ... whether or not the  
discretion involved is abused.

20 49. A two-part test is used to determine whether discretionary-function immunity under  
21 NRS 41.032 applies to shield a defendant from liability." *Clark Cnty. Sch. Dist. v. Payo*, 133  
22 Nev. 626, 631 (2017). Under the two-part test, a government defendant is not liable if the  
23 decision (1) involves an 'element of individual judgment or choice,' and (2) is 'based on  
24 considerations of social, economic, or political policy.'" *Id.* at 631-32 (citations omitted).  
25 The specific decision and the employee's subjective intent is irrelevant to whether the type  
26 of decision is susceptible to policy analysis. *Paulos v. FCHI, LLC*, 136 Nev. 18, 26, 456 P.3d

1 589, 595 (2020).

2 50. In this case, Defendants are being sued because they chose not to respond to  
3 Beadles's allegations of impropriety in the elections process following the 2022 election.  
4 As detailed above, Defendants did not have a legal duty to respond to Beadles's allegations  
5 as State law requires allegations relating to the elections process to be submitted to the  
6 Secretary of State and any challenge to the election is to be filed as a Statement of Contest  
7 with the district court. NRS 293.2546(11); NRS 293.413; NAC 293.025. Because the  
8 decision whether to respond to Beadles's "petitions" was based the alleged failure to  
9 perform a discretionary function, the Court finds that Defendants would be entitled to  
10 discretionary act immunity.

11 51. Even if Beadles could state a viable claim in his first cause of action, it would be  
12 subject to dismissal based on discretionary act immunity. The Court finds the applicability  
13 of discretionary act immunity further warrants the First Cause of Actions' dismissal with  
14 prejudice, as any amendment would be futile.

15 **II. BEADLES'S SECOND CAUSE OF ACTION**

16 52. Beadles's Second Cause of Action demands Ms. Rodriguez's removal from her  
17 appointed position as Registrar of Voters, Manager Brown's removal from his appointed  
18 position as Washoe County Manager, and Commissioner Hill's removal from her elected  
19 position as Chair of the Washoe County Board of County Commissioners. The Complaint  
20 cites NRS 283.440 and NRS 266.430 as a basis for removal. *Compl.* at ¶89.

21 **A. THE COMPLAINT FAILS TO STATE A CLAIM FOR REMOVAL UNDER NRS**  
22 **266.430.**

23 53. NRS 266.430 provides for criminal penalties and the removal of the mayor or any  
24 municipal officer of an incorporated city or town who is adjudged guilty of nonfeasance,  
25 misfeasance or malfeasance. No private citizen "may institute criminal proceedings  
26 independently." *People for Ethical Operation of Prosecutors & Law Enft v. Spitzer*, 267 Cal. Rptr.

1 3d 585 (2020), as modified (Sept. 8, 2020). "[I]n American jurisprudence ... a private  
2 citizen lacks a judicially cognizable interest in the prosecution or nonprosecution of  
3 another." *Linda R.S. v. Richard D.*, 410 U.S. 614, 619 (1973).

4 54. Beadles has no standing to pursue any criminal penalty, and NRS 266.430 is  
5 otherwise inapplicable to Commissioner Hill, Manager Brown, and Ms. Rodriguez. They  
6 are employed by Washoe County, not an incorporated city or town, and this is a civil  
7 action. As such, NRS 266.430 is inapplicable as a matter of law.

8 55. Beadles fails to state a claim for removal under NRS 266.430. Because NRS 266.430  
9 is inapplicable to Commissioner Hill, Manager Brown, and Ms. Rodriguez as a matter of  
10 law, amendment would be futile. The Court finds that dismissal of this claim with prejudice  
11 is appropriate.

12 **B. THE COMPLAINT FAILS TO STATE A CLAIM FOR REMOVAL UNDER NRS**  
13 **283.440.**

14 56. Removal "is an extreme and extraordinary measure, intended only for extreme and  
15 extraordinary occasions." *Jones v. Eighth Jud. Dist. Ct. of State*, 67 Nev. 404, 418, 219 P.2d  
16 1055, 1062 (1950). "It is fraught with seriousness and a demand for extreme caution both  
17 from the standpoint of him who prefers the charge and him who listens and pronounces  
18 judgment." *Id.*

19 57. Nevada law provides a procedure for "removal of certain public officers." NRS  
20 238.440. A public officer "who refuses or neglects to perform any official act in the manner  
21 and form prescribed by law, or who is guilty of any malpractice or malfeasance in office,  
22 may be removed therefrom..." NRS 283.440(1). The burden of proof is beyond a  
23 reasonable doubt. *Jones*, 67 Nev. at 418, 219 P.2d at 1062. Removals are summary  
24 proceedings with no right to a jury trial. *Jones*, 67 Nev. at 418, 219 P.2d at 1062.

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1 58. To state a claim for removal, a person must verify under oath that the public officer:

2 Has been guilty of charging and collecting illegal fees for  
3 services rendered or to be rendered in the officer's office;

4 Has refused or neglected to perform the official duties pertaining  
5 to the officer's office as prescribed by law; or

6 Has been guilty of any malpractice or malfeasance in office.

7 NRS 283.440(2).

8 59. Only when the complaint sets forth one of the above circumstances, is the court  
9 required to cite the party charged to appear. *See id.*

10 60. To state a claim for malfeasance to warrant removal from office, "the act of  
11 malfeasance must have a direct relation to and be connected with the performance of  
12 official duties." *Jones*, 67 Nev. at 408, 219 P.2d at 1057. "Malfeasance" is synonymous with  
13 "malpractice." *Buckingham v. Fifth Jud. Dist. Ct. in and for Mineral Cnty.*, 60 Nev. 129, 102  
14 P.2d 632, 635 (1940). "Malfeasance requires, at the very least, an allegation of knowledge  
15 that the act was wrongful, if not a greater level of intent." *Law v. Whitmer*, 136 Nev. 840,  
2020 WL 7240299 at \*19 (Nev. Dec. 8, 2020)(unpublished disposition).

16 61. To state a claim for removal based on malfeasance, "the mere words 'malpractice'  
17 and 'malfeasance' will not suffice." *Buckingham*, 60 Nev. 129, 102 P.2d at 635-36. "The  
18 wrongful act must be made to appear by the description employed[.]" *Id.* The complaint  
19 must allege an act of malfeasance having "a direct relation to and be connected with the  
20 performance of official duties." *Jones v. Eighth Jud. Dist. Ct. of State*, 67 Nev. 404, 408, 219  
21 P.2d 1055, 1057 (1950). "[T]he conduct charged must be something that the defendant did  
22 in his official capacity." *Id.*

23 62. The other basis for removal is nonfeasance. NRS 283.440(2). "Omissions to act are  
24 not acts of malfeasance..." *Buckingham*, 60 Nev. 129, 102 P.2d at 635. Acts of omission are  
25 to be analyzed under the section: "refuse or neglect to perform any official act in the  
26 manner and form as now prescribed by law..." *Id.* "Nonfeasance is the substantial failure to



1 perform a required legal duty. Misfeasance is the doing in a wrongful manner of that which  
2 the law authorizes or requires him to do." *Schumacher v. State ex rel. Furlong*, 78 Nev. 167,  
3 172, 370 P.2d 209, 211 (1962). Only nonfeasance can establish that an officer "refused or  
4 neglected" to perform an official act. *See id.*

5 63. To state a claim for nonfeasance, the Complaint must identify an act required by law  
6 to be specifically performed by the person whose removal is sought and allege the person  
7 refused or neglected to so act. *Buckingham*, 60 Nev. 129, 102 P.2d at 636 ("...the acts of  
8 omission charged against him do not come within the provisions of Section 4860, N.C.L.,  
9 for reason that the acts which it alleged were omitted were not required of a county  
10 treasurer at the time of the enactment of the said Section 4860."). Even where an official  
11 duty exists, the officer can have discretion in carrying out the duty unless specifically  
12 prescribed by law. *See Jones*, 67 Nev. at 411-12, 219 P.2d at 1058-59. Allegations describing  
13 a public officer exercising that discretion is not nonfeasance that would state a claim for  
14 removal. *Id.*

15 64. In sum, the two relevant bases for removal are if an officer (1) "refused or neglected  
16 to perform official duties... as prescribed by law;" or (2) is guilty of malfeasance. NRS  
17 283.440(2)(emph. added). The officer must have substantially failed to perform their legal  
18 duties or intentionally committed a wrongful act directly related to their duties. *Id.*; *Jones*,  
19 67 Nev. at 408, 219 P.2d at 1057; *Schumacher*, 78 Nev. at 172, 370 P.2d at 211.

20 65. Where there is no official duty to act prescribed by law, there can be no removal. *See*  
21 NRS 283.440(2); *Schumacher*, 78 Nev. at 172, 370 P.2d at 211, citing *Buckingham*, 60 Nev.  
22 129, 102 P.2d at 635. In *Buckingham*, "the particular acts of omission were not required of  
23 Buckingham as part of his duties as county treasurer and, thus, Buckingham did not refuse  
24 or neglect to perform any official act in the manner and form prescribed by law."  
25 *Schumacher*, 78 Nev. at 172, 370 P.2d at 211 (citations omitted).

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1           **i. Commissioner Hill**

2           66. Beadles does not and cannot identify any specific legal duty for Commissioner Hill.  
3   *See Compl.; Jones*, 67 Nev. at 408, 219 P.2d at 1057 (requiring a specific official duty for  
4   malfeasance); *Buckingham*, 60 Nev. 129, 102 P.2d at 635 (requiring a specific official duty  
5   for nonfeasance). Commissioner Hill was elected to the Washoe County Board of County  
6   Commissioners. The Board of County Commissioners has various powers to act on behalf  
7   of their county, with certain limitations. *See* NRS 244.146. The Board may act in a meeting  
8   with a quorum present. NRS 244.060(1). Commissioner Hill cannot act on her own; there  
9   must be a majority vote of all county commissioners. *See* NRS 241.015(1). More  
10   importantly, there are no specific official duties requiring an individual county  
11   commissioner to act regarding elections. *See* NRS Chapter 244; NRS Chapter 293. Beadles  
12   failed to allege that Commissioner Hill has committed malfeasance or nonfeasance under  
13   Nevada law because there is no official duty to act on the matters alleged in the Complaint.

14          67. The Court finds that Beadles failed to state a claim for Commissioner Hill's  
15   removal. Dismissal with prejudice is appropriate. Amendment would be futile because  
16   Commissioner Hill has no official duty to act regarding the issues set forth in Beadles's  
17   Complaint.

18           **ii. Manager Brown**

19          68. Beadles does not and cannot identify any specific legal duty for Manager Brown to  
20   act regarding issues set forth in the Complaint. *See Compl.* A county manager serves at the  
21   pleasure of the board of county commissioners. NRS 244.125(2). A county manager has  
22   no specific duty regarding elections procedures. *See* NRS 244.135. The Complaint fails to  
23   sufficiently allege that Manager Brown committed malfeasance or nonfeasance because  
24   there is no official duty to act regarding the issues therein. *See Compl.*

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1       69. The Court finds that Beadles failed to state a claim for Manager Brown's removal.  
2 Dismissal with prejudice is appropriate. Amendment would be futile because Manager  
3 Brown has no official duty to act regarding the issues set forth in Beadles's Complaint.

4               **iii. Ms. Rodriguez**

5       70. While Ms. Rodriguez has certain legal duties as the Registrar of Voters, Beadles  
6 does not sufficiently allege acts of malfeasance or omissions of nonfeasance. He alleges  
7 "Defendants have additionally failed to address, correct, or rectify the issues raised in the  
8 underlying Petitions, including but not limited to, (1) updating and resolving the voter  
9 registration lists; (2) providing proper vote counting mechanisms; (3) counting votes in  
10 secret; (4) inadequate signature verification; (5) illegal function within the election system;  
11 (6) violations of election procedures as required under Nevada law. [Exhibit 109]." *Compl.*  
12 at ¶91; *see also Compl.* at ¶¶46-51.

13       71. As an initial matter, there are no specific egregious acts of wrongdoing specific to  
14 Ms. Rodriguez that would state a claim for removal based on malfeasance. *See id*; *see*  
15 *generally Compl.* Allegations of "illegal function" and vague "violations of election  
16 procedures," are no different than simply alleging there is "malfeasance." This does not  
17 state a claim for removal based on malfeasance. *Buckingham*, 60 Nev. 129, 102 P.2d at 635-  
18 36. There is no allegation that Ms. Rodriguez herself committed an egregious act related to  
19 her duties, and therefore it is not malfeasance under NRS 283.440. *See Compl.*

20       72. Regarding nonfeasance, the Complaint falls well short of alleging Ms. Rodriguez  
21 neglected or refused to perform an official duty. A registrar of voters must cancel voter  
22 registration in certain circumstances, maintain certain voter registration records, and  
23 provide voters written notice of any changes to their voter registration. NRS 293.530. An  
24 allegation that there are issues with "updating and resolving voter registration lists" does  
25 not allege Ms. Rodriguez specifically neglected or refused to perform her duties under NRS  
26 293.530. An allegation that there are issues with "providing proper vote counting

1 mechanisms" does not allege Ms. Rodriguez specifically neglected or refused to perform an  
2 official duty as prescribed by law. Regarding public observation, the registrar of voters must  
3 allow general public observation of ballot counting unless it interferes with ballot counting.  
4 NRS 293B.353; NAC 293.311(4). Having discretion in carrying out that duty, the allegation  
5 is so vague that it does not allege Ms. Rodriguez specifically neglected or refused to so  
6 perform. *See Jones*, 67 Nev. at 411-12, 219 P.2d at 1058-59. Lastly, general allegations of  
7 "illegal function" and vague "violations of election procedures" do not allege Ms.  
8 Rodriguez specifically neglected or refused to perform an official duty as prescribed by law.

9 73. Beadles does not and cannot identify any specific act of malfeasance or nonfeasance  
10 attributable to Ms. Rodriguez. Although Beadles makes conclusory allegations about the  
11 quality of the list of registered voters, the manner and mechanisms used to count votes,  
12 and vague overarching dissatisfaction with the elections process, he has never substantiated  
13 his claims using the proper remedy, which is by submitting these complaints to the  
14 Secretary of State for investigation, a hearing if appropriate, and resolution by the Chief  
15 Officer for Elections in the State. *See* NAC 293.025; NAC 293.500-55. To circumvent that  
16 process, and instead attempt to terminate a public employee using a summary proceeding,  
17 would result in a miscarriage of justice. Moreover, Beadles fails to allege the type of  
18 "extreme and extraordinary occasions" that may warrant removal. *Jones*, 67 Nev. at 418,  
19 219 P.2d at 1062.

20 74. The Court finds that Beadles failed to state a claim for Ms. Rodriguez's removal.  
21 Dismissal with prejudice is appropriate. Amendment would be futile because, as set forth  
22 below, Ms. Rodriguez's non-elected position is not otherwise subject to removal under NRS  
23 283.440.

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1           C. EVEN IF BEADLES COULD STATE A CLAIM FOR REMOVAL UNDER NRS  
2           283.440, MANAGER BROWN AND MS. RODRIGUEZ ARE NOT "PUBLIC  
3           OFFICERS" SUBJECT TO REMOVAL UNDER NRS 283.440.

4           75. The title of NRS 283.440 states the section addresses "Removal of **certain public**  
5           **officers** for malfeasance or nonfeasance; Procedure; appeal." (emph. added). In Section 1,  
6           it states "Any person who is now **holding** or who shall hereafter **hold any office...**" NRS  
7           283.440(1)(emph. added). NRS Chapter 283 does not define "public officer" and does not  
8           define "hold any office." *See id.*

9           76. The language of NRS 283.440 is ambiguous as to whether it applies only to local  
10          elected officials, or whether it includes all public employees regardless of whether their  
11          positions are elected. *See Zohar v. Zbiegien*, 130 Nev. 733, 737, 334 P.3d 402, 405  
12          (2014)("when a statute is susceptible to more than one reasonable interpretation, it is  
13          ambiguous..."). Ambiguity is resolved "by looking at the statute's legislative history and  
14          construing the statute in a manner that conforms to reason and public policy." *Id.* A statute  
15          should not be read "so as to produce absurd or unreasonable results." *Orion Portfolio Servs.*  
16          *2, LLC v. Cnty. of Clark ex rel. Univ. Med. Ctr. of S. Nev.*, 126 Nev. 397, 403, 245 P.3d 527, 531  
17          (2010).

18          77. Legislative history for NRS 283.440 confirms that the removal provisions apply only  
19          to elected officials. *See Exhibit 1 to Motion to Dismiss, Min. of the Meeting of the Assembly*  
20          *Comm. on Gov. Affairs*, at 13-20, 80th Leg. (Nev. April 1, 2019); *Exhibit 2 to Motion to*  
21          *Dismiss, Min. of the Meeting of the Senate Comm. on Gov. Affairs*, at 13-24, 80th Leg. (Nev.  
22          May 3, 2019). NRS 283.440 was recently amended by Assembly Bill 397 in 2019, to allow  
23          for removal based on Title VII violations. *See id.*

24          78. When first introducing Assembly Bill 397, Assemblywoman Teresa Benitez-  
25          Thompson explained that the bill would allow for removal of "a local elected official" for  
26          sexual harassment or discrimination. *Ex. 1 to Motion to Dismiss* at 13. "This bill seeks to  
            establish accountability for elected officials by giving the Nevada Equal Rights

1 Commission the ability to make a recommendation to impeach an elected official when he  
2 or she has demonstrated egregious behavior. *Id.* at 14 (emph. added). Answering a  
3 question, she explained, "The intent of the legislation, Assemblyman Ellison, is to allow  
4 NERC to flow through their normal process: bring in the elected official, and as she said,  
5 give them an additional tool of recommendation up to impeachment." *Id.* at 19 (emph.  
6 added). AB 397 addressed the deficit in remedies for an employee who is a victim of  
7 harassment perpetrated by an elected official "because there is no way to remove the  
8 elected person." *Ex. 2 to Motion to Dismiss* at 13 (emph. added). When the harassment is  
9 perpetrated by an non-elected employee, there are generally internal procedures to remove  
10 or reprimand that employee. Assemblywoman Teresa Benitez-Thompson's intern explained  
11 "The intent of A.B. 397 is to ensure elected officials are abiding by the virtue of their office  
12 and maintaining the public trust..." *Id.* at 16. The Court finds this shows that the intent of  
13 NRS 283.440 is to provide a procedure only for elected officials, and not for non-elected  
14 government employees.

15 79. Additionally, Nevada courts have never applied NRS 283.440 to a public employee,  
16 even an appointed high-level employee. *See Jones*, 67 Nev. 404, 219 P.2d 1055 (involving an  
17 elected District Attorney); *Mason v. Gammick*, 133 Nev. 1047, 2017 WL 2945616 (June 26,  
18 2017)(unpublished disposition)(involving an elected District Attorney); *Buckingham*, 60  
19 Nev. 129, 102 P.2d 632 (involving elected County Clerk and County Treasurer); *Schumacher*,  
20 78 Nev. 167, 370 P.2d 209 (involving an elected County Assessor); *Gay v. Dist. Ct. of Tenth*  
21 *Jud. Dist.in and for Clark Cnty.*, 41 Nev. 330, 171 P. 156 (1918)(involving an elected Sheriff);  
22 *Adler v. Sheriff, Clark Cnty.*, 92 Nev. 436, 552 P.2d 334 (1976)(involving an elected Sheriff);  
23 *Hawkins v. Eighth Jud. Dist. Ct., Clark Cnty.*, 67 Nev. 248, 216 P.2d 601, 605 (1950)(involving  
24 an elected District Attorney); *State of Nevada v. Culverwell*, 890 F.Supp. 933 (D. Nev.  
25 1995)(involving elected County Commissioners and City Councilmembers). The Court  
26 finds this persuasive to show that "Certain public officers" subject to removal under NRS

1 283.440 means elected officials.

2 80. The limited application to elected officials produced a reasonable result. *See Orion*  
3 *Portfolio Servs. 2, LLC*, 126 Nev. at 403, 245 P.3d at 531. An appointed position, or general  
4 public employee, may be removed or terminated by their employer. Public employees also  
5 often have various collective bargaining rights and agreements. *See* NRS Chapter 288. The  
6 Court finds that it would be unreasonable and absurd to read NRS 283.440 to allow a  
7 person who disapproves of any government employee ability to unilaterally seek removal  
8 of that employee. *See Orion Portfolio Servs. 2, LLC*, 126 Nev. at 403, 245 P.3d at 531. It was  
9 reasonable, however, for the Nevada Legislature to create a procedure for an elected  
10 official's removal, and it did so in enacting NRS 283.440. Consistent with the legislative  
11 intent, NRS 283.440 may not be used as a mechanism for a member of the public to remove a  
12 public employee with whom they are dissatisfied.

13 81. The Court finds that NRS 283.440 applies only to public employees who hold  
14 elected positions.

15 82. Here, neither Manager Brown nor Ms. Rodriguez are elected officials, and thus  
16 neither are subject to removal proceedings under NRS 283.440. *See* NRS 244.135(1). The  
17 County Manager, Manager Brown, is appointed by the Board of County Commissioners.  
18 NRS 244.125(1). The Registrar of Voters, Ms. Rodriguez, is appointed by the Board of  
19 County Commissioners. NRS 244.164(1). Manager Brown and Ms. Rodriguez serve at the  
20 pleasure of the Washoe County Board of County Commissioners. *Id.*; NRS 244.125(2). As  
21 such, they can be removed from their positions only by the Washoe County Board of  
22 County Commissioners.

23 83. Even if Beadles could otherwise state a claim for Manager Brown or Ms.  
24 Rodriguez's removal under NRS 283.440, neither are not elected officials and they cannot  
25 be removed from their employment under NRS 283.440. This further supports the Court's  
26 finding that dismissal with prejudice is appropriate, as amendment would be futile.

1       **E. MONETARY DAMAGES AND EQUITABLE RELIEF ARE UNATTAINABLE FOR**  
2       **REMOVAL ACTIONS.**

3       84. In a removal action under NRS 283.440, "[t]he remedy is removal from  
4 office. Nothing in the statutes allows for recovery of damages by the complainant against  
5 the officer." *Armstrong v. Reynolds*, 2:17-cv-02528-APG-CWH, 2019 WL 1062364 at \*8 (D.  
6 Nev. Mar. 6, 2019), *aff'd in part, rev'd in part and remanded*, 22 F.4th 1058 (9th Cir. 2022).  
7 There is no private claim for malfeasance. *Id.*

8       85. Here, Beadles improperly seeks injunctive relief regarding elections  
9 procedures in his removal claim. Even if the claim for removal were viable, injunctive relief  
10 and monetary damages are unavailable. Removal is the only available remedy for that  
11 claim.

12       **III. THE OFFICE OF THE REGISTRAR OF VOTERS IS NOT A SUABLE**  
13       **ENTITY.**

14       86. The State of Nevada waived immunity from civil actions on behalf of itself and the  
15 political subdivisions of the State, subject to certain limitations. NRS 41.031. However,  
16 "In the absence of statutory authorization, a department of the municipal government may  
17 not, in the department name, sue or be sued." *Wayment v. Holmes*, 112 Nev. 232, 237-38,  
18 912 P.2d 816, 819 (1996). A department of a county is not a suable entity because it is not  
19 political subdivision of the State of Nevada. *Id.*; see also *Schneider v. Elko Cnty. Sheriff's*  
20 *Dep't*, 17 F. Supp. 2d 1162, 1165 (D. Nev. 1998)(dismissing suit against a county sheriff's  
21 department for lack of capacity to be sued). A county department is "immune from suit"  
22 because it is not a suable entity. *Wayment*, 112 Nev. at 239, 912 P.2d at 820.

23       87. Even if Beadles could state viable claims in this action, the ROV is not a suable  
24 entity. The Court finds that dismissal of all claims against the ROV with prejudice is  
25 appropriate, as amendment would be futile.

26       //



1 **IV. BEADLES'S MISCELLANEOUS RELIEF IS UNATTAINABLE.**

2 88. Nevada law prohibits awards of punitive damages against government entities and  
3 employees. NRS 41.035(1). "An award may not include any amount as exemplary or  
4 punitive damages." *Id.*

5 89. As a matter of law, even if Beadles had any viable claim against Defendants, he  
6 would not be entitled to recover punitive damages. Therefore, the Court dismisses with  
7 prejudice Beadles's request for punitive damages.

8 90. The Court "cannot recognize a remedy absent an underlying cause of action."  
9 *Badillo v. American Brands, Inc.*, 117 Nev. 34, 41, 16 P.3d 435, 440 (2001). "Altering common  
10 law rights, creating new causes of action, and providing new remedies for wrongs is  
11 generally a legislative, not a judicial, function." *Id.* 117 Nev. at 42, 16 P.3d at 440.

12 91. Here, Beadles asks this Court to award him various relief that not connected to any  
13 cause of action. *Compl.* at p. 16. As set forth above, the Court finds dismissal with prejudice  
14 is appropriate for both causes of action. There is no legally tenable avenue for Beadles to  
15 obtain the relief requested. Therefore, the Court dismisses with prejudice Beadles's requests  
16 for relief.

17 **JUDGMENT**

18 Therefore, based on the above Findings and Fact and Conclusions of Law made by  
19 this Court, and good cause appearing, the following Judgment is entered by the Court:

20 **IT IS HEREBY ORDERED** that Defendants' Motion to Dismiss is **GRANTED**.

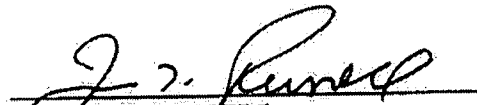
21 **IT IS HEREBY FURTHER ORDERED** that this case is **DISMISSED WITH**  
22 **PREJUDICE**.

23 Dated November 20, 2027.

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26

  
JAMES T. RUSSELL  
DISTRICT JUDGE

1 Submitted on 10/20/23 by:

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LINDSAY L. LIDDELL

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Deputy District Attorney

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One South Sierra Street

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lliddell@da.washoecounty.gov

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(775) 337-5700

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REPRESENTING DEFENDANTS

11

JAMIE RODRIGUEZ, WASHOE

12

COUNTY REGISTRAR OF VOTERS,

13

ERIC BROWN, ALEXIS HILL,

14

and WASHOE COUNTY

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1 LINDSAY L. LIDDELL  
Deputy District Attorney  
Nevada State Bar Number 14079  
2 ELIZABETH HICKMAN  
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5 lliddell@da.washoecounty.gov  
ehickman@da.washoecounty.gov  
6 REPRESENTING DEFENDANTS  
JAMIE RODRIGUEZ, WASHOE  
7 COUNTY REGISTRAR OF VOTERS,  
ERIC BROWN, ALEXIS HILL,  
8 and WASHOE COUNTY

9  
10 FIRST JUDICIAL DISTRICT COURT OF NEVADA  
CARSON CITY

11 \* \* \*

12 ROBERT BEADLES, an individual,

13 Plaintiff,

Case No. 23-OC-00105 1B

14 vs.

Dept No. D1

15 JAMIE RODRIGUEZ, in her official  
16 capacity as Registrar of Voters and in her  
personal capacity; the WASHOE COUNTY  
17 REGISTRAR OF VOTERS, a government  
agency; ERIC BROWN in his official  
18 capacity as WASHOE COUNTY  
MANAGER and in his personal capacity,  
19 ALEXIS HILL in her official capacity as  
CHAIRWOMAN OF WASHOE  
20 COUNTY BOARD OF  
COMMISSIONERS and in her personal  
21 capacity; WASHOE COUNTY, a political  
subdivision of the State of Nevada, and  
22 DOES I-X; and ROE CORPORATIONS I-  
X.

23 Defendants.  
24

25 NOTICE OF ENTRY OF ORDER

26 ///

1 TO: ALL INTERESTED PERSONS

2 PLEASE TAKE NOTICE that on November 20, 2023, the Court in the above  
3 entitled matter filed its Order Denying Plaintiffs Motion to Change Venue. A copy of the  
4 Order is attached hereto.

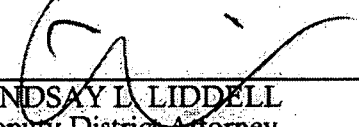
5 AFFIRMATION PURSUANT TO NRS 239B.030

6 The undersigned does hereby affirm that the preceding document does not contain  
7 the social security number of any person.

8 Dated this 21st day of November, 2023.

CHRISTOPHER J. HICKS  
District Attorney

9  
10 By

  
LINDSAY L. LIDDELL  
Deputy District Attorney  
One South Sierra Street  
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lliddell@da.washoecounty.gov  
(775) 337-5700

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15 ATTORNEY FOR DEFENDANTS  
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**Robert Beadles**  
beadlesmail@gmail.com

S. Haldeman  
S. Haldeman

REC'D & FILED

2023 NOV 28 PM 2:17

WILLIAM SCOTT HOEN  
CLERK

BY \_\_\_\_\_ DEPUTY

**FIRST JUDICIAL DISTRICT COURT OF NEVADA  
CARSON CITY**

\*\*\*

ROBERT BEADLES, an individual,

Plaintiff,

Case No. 23-OC-00105 1B

vs.

Dept No. D1

JAMIE RODRIGUEZ, in her official  
capacity as Registrar of Voters and in her  
personal capacity; the WASHOE COUNTY  
REGISTRAR OF VOTERS, a government  
agency; ERIC BROWN in his official  
capacity as WASHOE COUNTY  
MANAGER and in his personal capacity,  
ALEXIS HILL in her official capacity as  
CHAIRWOMAN OF WASHOE  
COUNTY BOARD OF  
COMMISSIONERS and in her personal  
capacity; WASHOE COUNTY, a political  
subdivision of the State of Nevada, and  
DOES I-X; and ROE CORPORATIONS I-  
X.

Defendants.

**ORDER DENYING PLAINTIFF'S MOTION TO CHANGE VENUE**

**PROCEDURAL HISTORY**

On July 25, 2023, Plaintiff Robert Beadles ("Beadles") filed a Complaint against the Washoe County Registrar of Voters Jamie Rodriguez ("Ms. Rodriguez"), the Washoe County Registrar of Voters, Washoe County Manager Eric Brown ("Manager Brown"),

1 Chairperson of the Washoe County Board of County Commissioners Alexis Hill  
2 ("Commissioner Hill"), and Washoe County (collectively "Defendants") in Second  
3 Judicial District Court case number CV23-01283. That Complaint contained two causes of  
4 action arising under federal law, and two causes of action arising under Nevada law. On  
5 August 3, 2023, Defendants removed that case to the United States District Court District  
6 of Nevada, case number 3:23-cv-00382-ART-CSD. Beadles subsequently voluntarily  
7 dismissed this case.

8 On August 4, 2023, Beadles filed the instant case, alleging the same State law causes  
9 of action, against Defendants in the Second Judicial District Court, case number CV23-  
10 01341. Following briefing on a Motion to Change Venue, on September 13, 2023, the  
11 Second Judicial District Court granted the Motion and transferred the case to this Court.  
12 Shortly thereafter, Beadles filed another Motion to Change Venue requesting this Court  
13 transfer the case to Lyon County, Nevada.

#### 14 FINDINGS OF FACT

15 Having reviewed the filings in this case, and having considered, without limitation,  
16 all evidence submitted by the parties to the Court, as well as the parties' written arguments,  
17 the Court makes the following findings of fact:

18 1. A District Judge in Washoe County determined on September 13, 2023, that  
19 transferring venue to Carson City neutralized any impartiality that may have existed in  
20 Washoe County while maintaining a venue that is convenient for the parties and witnesses.

21 *Order Granting Change of Venue.*

22 2. This transfer to Carson mitigated any prejudice caused by pre-trial publicity  
23 or the status of the parties in Carson City.

24 3. The same media sources available to Carson City are available to residents of  
25 Lyon County.

26

1           4.     In the present case, there has been some media coverage of both the  
2 Complaint and Defendants' response. However, it has not been so one-sided and pervasive  
3 that it warrants a change of venue.

4           5.     Coverage of this lawsuit by news sources such as the Reno Gazette Journal  
5 or Nevada Appeal and news channels including KOLO, KRNV, or KTVN may extend to  
6 people throughout Northern Nevada -- almost certainly citizens of Carson City and Lyon  
7 County receive some of their news through these sources. However, the limited number of  
8 stories detailing the positions of both parties, primarily occurring in mid-August of 2023,  
9 do not support the allegation that Carson City has been so prejudiced against Beadles that a  
10 fair trial could not be obtained.

11           6.     Carson City has approximately 58,000 people. Lyon County is  
12 approximately the same size. Carson City is far more convenient for all witnesses than  
13 Lyon County.

14           7.     Since the elections in 2020, allegations of election fraud have been in  
15 forefront of the consciousness of communities across the nation, and communities within  
16 Northern Nevada are no exception.

17           8.     Commissioner Hill is an elected member of the Washoe County Board of  
18 County Commission. Manager Brown and Ms. Rodriguez are appointed public officials in  
19 Washoe County. Beadles is a member of the Washoe County Republican Central  
20 Committee and a major donor to various conservative candidates and causes.

21           9.     Although recognizable in local politics in Washoe County, there is nothing  
22 about the status of either Defendants or Beadles that makes them particularly well known  
23 in Carson City, which is the current venue of this case.

24           10.    This lawsuit alleging election fraud in Washoe County is undeniably political  
25 in nature. However, the lawsuit alleges corruption specific to Washoe County, and the  
26 transfer to Carson City mitigated any potential impartiality.



1 CONCLUSIONS OF LAW

2 11. NRS 13.050(2)(b) permits a Court to change the place of a civil trial when  
3 "there is reason to believe that an impartial trial cannot be had" in the county where the  
4 complaint was filed.

5 12. The primary purpose of entertaining a change of venue on the grounds of  
6 impartiality is to avoid a biased jury pool. *See e.g., Nat'l Collegiate Athletic Ass'n v. Tarkanian*,  
7 113 Nev. 610, 613-14, 939 P.2d 1049, 1051-52 (1997); *Sicor, Inc. v. Hutchison*, 127 Nev. 904,  
8 266 P.3d 608 (2011). Two causes of action are identified in Beadles's Complaint: (1) an  
9 alleged violation of constitutional rights regarding unanswered "petitions," "equitable and  
10 injunctive relief sought or writ of mandamus," and (2) an action to remove Defendants  
11 under NRS 283.440. The first cause of action is an equitable claim. "[T]he right to a jury  
12 trial does not extend to equitable matters." *Awada v. Shuffle Master, Inc.*, 123 Nev. 613, 618,  
13 173 P.3d 707, 710 (2007). Likewise, there is no right to a jury trial for a writ of mandamus.  
14 NRS 34.220. The second cause of action, a removal proceeding, is a summary proceeding  
15 without the right to a jury. *Jones v. Eighth Jud. Dist. Ct. of State*, 67 Nev. 404, 418, 219 P.2d  
16 1055, 1062 (1950). Because neither cause of action provides Beadles the right to a jury trial,  
17 his concerns relating to the impartiality of a jury made up of Carson City residents are  
18 immaterial.

19 13. Judges are presumed to be unbiased. *Millen v. Eighth Jud. Dist. Ct. ex. Rel.*  
20 *Cnty. of Clark*, 122 Nev. 1245, 1254, 148 P.3d 694, 701 (2006). Additionally, "the bias and  
21 prejudice of the judge is not a ground for change of venue, unless expressly made so by  
22 statute." *State v. Second Jud. Dist. Ct. in & for Washoe Cnty., Dep't 2*, 52 Nev. 379, 287 P. 957,  
23 960 (1930). Plaintiff's allegations of some unidentified conflict do not support a change of  
24 venue.

25 14. In evaluating a pre-voir dire change of venue motion, the Court considers  
26 five factors: "(1) the nature and extent of pretrial publicity; (2) the size of the community;

1 (3) the nature and gravity of the lawsuit; (4) the status of the plaintiff and defendant in the  
2 community; and (5) the existence of political overtones in the case." *Nat'l Collegiate Athletic*  
3 *Ass'n*, 113 Nev. at 613-14, 939 P.2d. at 1051-52 (citing *People v. Hamilton*, 48 Cal.3d 1142,  
4 774 P.2d 730 (1989)).

5 15. Although there has been media coverage of this case, the nature and extent  
6 of the pretrial publicity in Carson City does not justify a change of venue. It has not been  
7 particularly one-sided, nor has it been pervasive or so inflammatory that it could prejudice  
8 the entire community. The first *Tarkanian* factor does not support a change of venue.

9 16. Both Carson City and Lyon County have populations of nearly 60,000.  
10 There is no evidence that an impartial jury, if required, would not be able to be seated in a  
11 community the size of Carson City. As such, the second *Tarkanian* factor does not support  
12 a change of venue.

13 17. The First Judicial District Court has been specifically designated to hear  
14 elections matters. See NRS 293.127565(4); NRS 293.12795(3); NRS 293.174; NRS  
15 293.127565; NRS 293.200(9)(a); NRS 293.252(7)(b). It is also designated as an alternative  
16 venue to hear actions against the State of Nevada and its departments. NRS 41.031(2). This  
17 Court has ample experience with elections and government defendant cases. The claims in  
18 this case alleging election fraud are well suited to be heard in this Court. Further, the  
19 nature and gravity of this case would be weighed no differently in Carson City than it  
20 would be in Lyon County, given the allegations relate solely to Washoe County. The third  
21 *Tarkanian* factor does not support a change of venue.

22 18. The Defendants are elected and appointed public employees in Washoe  
23 County. Beadles is a member of the Washoe County Republican Central Committee and a  
24 major donor to various conservative candidates and causes. Although their status may  
25 have been significant to the ability to seat an impartial jury in Washoe County, there is no  
26

1 evidence they are particularly well known outside Washoe County. The fourth *Tarkanian*  
2 factor does not support a change of venue.

3 19. Last, factor five contemplates the existence of political overtones in the case.  
4 This lawsuit alleging election fraud in Washoe County is undeniably political in nature.  
5 However, the lawsuit alleges corruption specific to Washoe County, and the transfer to  
6 Carson City mitigated any potential impartiality. The overarching political nature of the  
7 lawsuit realleges similar claims of election fraud that have been presented in communities  
8 across the nation over the last three years, and that broad political overtone will not be  
9 mitigated by moving this case to a different venue. The fifth *Tarkanian* factor does not  
10 support a change of venue.

11 20. None of the five *Tarkanian* factors support a change of venue. There is no reason  
12 to believe that an impartial trial cannot be had in Carson City.

13 Therefore, based on the above Findings of Fact and Conclusions of Law made by  
14 this Court, and good cause appearing:

15 **IT IS HEREBY ORDERED** that Plaintiff's Motion to Change Venue is **DENIED**.

16

17 Dated: November 20, 2027

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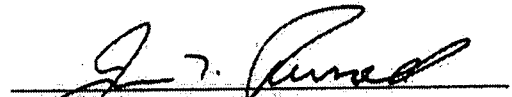
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JAMES T. RUSSELL  
DISTRICT JUDGE

**“Exhibit 161”**

1 IN THE FIRST JUDICIAL DISTRICT COURT

2 CARSON CITY, NEVADA

3 BEFORE THE HONORABLE JAMES TODD RUSSELL

4 -oOo-

5  
6 ROBERT BEADLES, ) 23 OC 00105 1B  
7 ) Dpt. No. 1  
8 Plaintiff, )  
9 vs. )  
10 JAMIE RODRIGUEZ, )  
11 Defendant. )  
12

13 TRANSCRIPT OF PROCEEDINGS  
14 MOTIONS HEARING  
15 MONDAY, NOVEMBER 20, 2023

16 APPEARANCES:

17 For the Plaintiff: ROBERT BEADLES  
18 IN PRO PER

19 For the Defendant: LINDSAY LIDDELL, ESQ.  
20 Washoe County DA's Office  
21 1 S. Sierra St., South Tower,  
22 4th Floor  
23 Reno, Nevada 89501

24 Reported by: NICOLE J. HANSEN, CCR #446,  
RPR, CRR, RMR

- o o -

RENO, NEVADA; MONDAY, NOVEMBER 20, 2023, 1:30 P.M.

- o o o -

THE COURT: For the record, this is Case  
Number 23 OC 0105: Robert Beadles. Is that correct?

MR. BEADLES: Yes. Thank you.

THE COURT: Versus Jamie Rodriguez, the Washoe County Registrar of Voters, Eric Brown, Washoe County Manager; Alexis Hill, Chairman of the Washoe County Board of Commissioners in Washoe County.

Mr. Beadles, you're here representing  
yourself; correct?

MR. BEADLES: Thank you. Court.

MS. LIDDELL: Your Honor, Lyndsay Liddell, from the District Attorneys Office, on behalf of the defendants. I also have with me Beth Hickman, Deputy District Attorney, and we have Registrar of Voters, Jamie Rodriguez; Washoe County Commissioner Alexis Hill, and Washoe County Manager Eric Brown.

THE COURT: Thank you. Good afternoon. This is the time set for hearing three motions. The first motion we're going to hear and consider is the motion to change venue filed by Mr. Beadles. In respect to this matter, we're going to request that this matter be

1 transferred to Lyon County. Originally, this matter  
2 originated in Washoe County. The Washoe County District  
3 Court sent it down here rather than Lyon County, where  
4 you originally wanted it to go. You filed a motion to  
5 move it to Lyon County. It's your motion if you want to  
6 go ahead and start.

7 MR. BEADLES: What are the other two motions  
8 before --

9 THE COURT: The other two motions are motions  
10 to dismiss the complaint and motions for sanctions.

11 MR. BEADLES: It's definitely important.  
12 There's also a motion for leave. Does that need to be  
13 heard?

14 THE COURT: For what?

15 MR. BEADLES: For leave. There was motion of  
16 leave to submit the limited motion for reconsideration of  
17 the change of venue location.

18 THE COURT: Well, that's not in front of me,  
19 so.

20 MR. BEADLES: Okay.

21 THE COURT: It's a motion filed for change of  
22 venue, so it's your motion, sir.

23 MR. BEADLES: Yes. Thank you, Your Honor.  
24 Would you like me to stand?

1 THE COURT: Most people do when they argue.

2 MR. BEADLES: I wasn't sure.

3 THE COURT: I know you're kind of not an  
4 attorney. Did you go to law school?

5 MR. BEADLES: No, sir. No, Your Honor, I did  
6 not go to law school. I have an honorary Juris Doctorate  
7 that is about three seconds old considering the amount of  
8 time you've been up there presiding, so forgive me if I  
9 do things a little bit out of procedures.

10 So with the change of venue, first let me  
11 start bring by saying I need you to rule first on the  
12 change of venue prior to any other motions. So as Bates  
13 versus State 83456 States: The 14th Amendment's due  
14 process clause guarantees the right to a fair trial  
15 before a fair tribunal. The 14th Amendment in Article 1,  
16 Section 8, Subsection 2 of the Nevada Constitution states  
17 that I shall not be deprived of life, liberty or property  
18 without the process of law nor denied to any person  
19 within its jurisdiction the equal protection of the laws.  
20 As per Roethlisberger versus McNulty NRS 13.050  
21 Subsection 2B, a district court may, on motion of  
22 stipulation, change the place of the proceeding when  
23 there is reason to believe that an impartial proceeding  
24 cannot be had therein.



1                   THE COURT: And why don't you think Carson  
2 City can be impartial?

3                   MR. BEADLES: Well, I was hoping you would  
4 let me make my record and I can go through all of that.  
5 But I can jump through this if you'd like, but I need  
6 about 20 minutes to make any entire argument.

7                   THE COURT: Move on because we're going  
8 through this. I want you to tell me on the record how  
9 you feel this court cannot be impartial in this matter.

10                  MR. BEADLES: Okay.

11                  THE COURT: I've read your briefs, so don't  
12 re-read the briefs. I'm telling everybody that.

13                  MR. BEADLES: No, I don't intend to.

14                  THE COURT: That's not the purpose of this  
15 hearing. The purpose of this hearing is for you to  
16 direct yourself to your points that you feel and believe  
17 support your position that basically your motion for  
18 change of venue is proper.

19                  Again, I read your brief and everything else,  
20 and you allege that Lyon County is more convenient than  
21 Reno, that basically they have different newspapers,  
22 different newscasts and different things in respect to  
23 that. So I've gone through that and I've read all of  
24 that in regards to that. So again, I want you to -- I'm

1     trying to focus you a little bit on what's important to  
2     the court.

3                 I want you to know -- because I don't know  
4     you. I don't know any of these people. I've never met  
5     any of these people. I've never met you. I've never  
6     read a newspaper article concerning this matter. I have  
7     never watched a TV inquiry or anything in respect to this  
8     matter, so I knew nothing about this case until I  
9     reviewed all of the stuff filed in Washoe County. So I  
10    just want you to know that.

11                MR. BEADLES: Okay. Well, I appreciate you  
12    readings my pleadings, Your Honor. So as the case law  
13    states, as well as the NRS, it says: When there is a  
14    reason to believe impartial proceeding cannot be had  
15    therein or when the convenience of the witnesses and the  
16    ends of justice would be promoted by the change. And  
17    that's why we're here, Your Honor.

18                So throughout the defense's objections to all  
19    of my change of venues, everything that I've said,  
20    everything that I've pled, they simply argue with  
21    feelings not facts. Just a simple look to if you look to  
22    the for instance, Judge Drakulich, she granted my motion  
23    to change venue, okay. And she granted it from Washoe  
24    but to here instead of to Lyon County. And what she

1 cited, the reasons for is called the Tarkanian case. And  
2 I'm sure you're familiar with the Tarkanian case. And if  
3 you read it -- can I read what she said?

4 THE COURT: That's fine. Go ahead.

5 MR. BEADLES: Okay. So in her ruling, she  
6 says the first factor -- and there's five factors in the  
7 Tarkanian case that the Supreme Court here in Nevada as  
8 well as other cases, they all cite these five reasons to  
9 approve the change of venue as I know you're aware.

10 And so she says what the first factor the  
11 nature and extent of the pretrial publicly favors a  
12 change of venue. So she says right there. I already hit  
13 the first factor. Then she goes on to say exhibits filed  
14 in support of the motion that tend to show significant  
15 media presence surrounding the case including pieces of  
16 media published on the defendant's platform and pieces  
17 published in highly trafficked local press.

18 The court agrees with the plaintiff that the  
19 issues that are central to this case have been broadly  
20 covered by local media outlets and widely distributed to  
21 the Washoe County voting population by computer network  
22 applications such as email and Facebook which favors a  
23 change in venue.

24 Further, the information generated by the

1 parties is arguably polarizing and at times inflammatory  
2 which also favors a change of venue. And then she cites  
3 Sicor Incorporated versus Hutchison which also uses the  
4 Tarkanian factors.

5 THE COURT: What does that have to do with  
6 Carson City?

7 MR. BEADLES: Getting there, Your Honor. I  
8 was just going to read everything that she talks about.

9 THE COURT: I know the file. I know the five  
10 factors. I reviewed the five factors. So again, what  
11 does it have to do again, with the Carson city versus in  
12 Lyon County, it would probably be not much different than  
13 Carson City in my opinion, but you go ahead.

14 MR. BEADLES: Sure. So I can go through them  
15 with you if you like. So if you like to Exhibit 132.  
16 Now, all of these -- if you have exhibits in front of  
17 you, but basically all of these papers, all of these  
18 online articles, everything that was published in Washoe,  
19 was also sent here to Carson City.

20 THE COURT: Well, also in Lyon County as  
21 well.

22 MR. BEADLES: So again, if you -- okay. So  
23 they're trying to say that the Record Courier is the  
24 newspaper there in Lyon County. And they say that the

1 stuff that was in Washoe and the very inflammatory  
2 articles that were written in Washoe that made it way to  
3 Carson also made it to Lyon County. But a simple look to  
4 their own websites, a very simple, easy look where you go  
5 right to the Record Courier's own website and search for  
6 anything with my name, do you know how many results come  
7 back? Zero. Not a single one.

8 So all of the stuff that was said in Washoe  
9 made its way to Carson but doesn't appear to have made it  
10 wait to Lyon County. And then if you look at the DMA  
11 map, which is called a Designated Market Area Map right  
12 here, this is what all of the TV stations, they put this  
13 out to the broadcasters. So if you're an ad buyer and  
14 you want to target a specific audience in a specific  
15 area, this is what you would look to find out: Okay.  
16 Look. I want to start advertising to, I don't know,  
17 Carson City. What places are going to do that?

18 This right here clearly shows you that  
19 everything that was broadcast in Washoe that Judge  
20 Drakulich said is by far overwhelming, and that's why I  
21 got my change of venue, guess what? It was all put right  
22 here as well into a population nine to ten times smaller  
23 than Washoe County. So you've got a city of 58,000  
24 people versus 500,000 people. You've got nine times more

1 media penetration here than you do in Washoe. And she  
2 moved it from Washoe to get away from that. But all of  
3 the stuff that she moved me away from is here but nine  
4 times worse.

5 And then you've got additionally, you've got  
6 relationships. All of these people here. All of these  
7 defendants, they all have relationships right her in  
8 Carson City with lobbyists, with people named in these  
9 lawsuits, people in my exhibits. We've got the Attorney  
10 General Aaron Ford named in this. We've got Cisco  
11 Aguilar named in this. Those are two of the highest  
12 ranking officials based right here in Carson city. We've  
13 got the Governor named. We've got additionally the  
14 Secretary of State named in another lawsuit. I'm suing  
15 both of them for violating our First Amendment rights  
16 under SB 406 all stationed here.

17 You've got Hill's husband, Defendant Hill,  
18 who is Matthew Tua based right here, who is the Deputy  
19 Director of the Department of Administration for Nevada,  
20 and he has tremendous influence in his office. His  
21 buildings just right around the corner. Defendants Hill.  
22 Guess who just ran or who did their campaign kickoff  
23 party for Commissioner Hill? Who just hosted her  
24 campaign kickoff? The Attorney General Aaron Ford and

1 Cisco Aguilar. All based right here.

2 You've got Defendant Rodriguez, who went in  
3 front of the Legislature right here to argue and to  
4 witness testify for AB 397, which is in this case.  
5 Granted it's completely taken out of context, but it's in  
6 this case, and Rodriguez is one of the witnesses that  
7 testified before the Legislature. I can't stress enough  
8 all of the reasons that Judge Drakulich granted my change  
9 of venue, all of those reasons are here just magnified  
10 nine times worse.

11 Additionally, she found on Tarkanian factors  
12 one and four that undoubtedly, I meet that criteria in  
13 Washoe. But again, I make the same -- I have the same  
14 issues here just magnified by nine times. All right. I  
15 don't have any of these issues in Lyon County. I don't  
16 have any of these issues in White Pine. These  
17 relationships that exist with people that can be named in  
18 this case, the people that are named in the case and all  
19 of the people that can put their thumbs on the scale of  
20 justice here, they're all from here. I already had this  
21 issue with Washoe County. So now, I will basically went  
22 from the frying pan to the fire literally. So all of the  
23 things that can happen that would persuade and keep  
24 justice from happening could happen, if you keep this in

1 the same venue right now.

2 If you look, I literally hit all five factors  
3 of Tarkanian. And if you allow me to elaborate further,  
4 if you look at Exhibit 132, you'll see that the media is  
5 colluding with the defense. You'll see that Mark  
6 Robison, with the RGJ, who is the only media that's  
7 allowed to be here, I guess, they're the only ones that  
8 were granted the ability to be here, he sent me a text  
9 message. He says: Hey. I'm doing a followup story to  
10 the District Attorney's reply today. I wanted to give  
11 you the opportunity to respond regarding what you think  
12 of it, and I wanted to check whether you've decided yet  
13 on their offer for you to withdraw your complaint. A  
14 text reply is fine or feel free to email me or call me on  
15 my landline.

16 I respond back: I find it highly suspicious  
17 that a document that has yet to be filed with the court  
18 I'm hearing about from you. Is this the DA's Office now  
19 using the press to attack me personally as well? Of  
20 course he didn't respond to that. And I also said it's  
21 curious how you received the Rule 11 letter before me.  
22 Who sent it to you? He wouldn't respond. So that right  
23 there goes to show you they're willing to break the Civil  
24 Rules of Procedure, they're willing to possibly break



1 laws. This was a drafted a drafted document. This  
2 wasn't something is that was filed in the court that they  
3 can say oh, it's public record. It's not public record.  
4 It's not public record for 21 days. Yet as soon as they  
5 draft it, they hit the send button right to the medial.  
6 Come on. They're working right here with the media. And  
7 all of these people again, they're based right in this  
8 area, the concentration of all of the media from Washoe  
9 is directed to a population nine times smaller than  
10 Washoe County. And then they've got all of these -- Go  
11 ahead.

12 THE COURT: Okay. Anything else you want to  
13 tell me?

14 MR. BEADLES: Seriously? Okay. So if you  
15 look at Sicor versus Hutchison, another case that the  
16 Honorable Judge Drakulich cited is why my case must be --

17 THE COURT: I understand what Judge Drakulich  
18 did. I really do. I understand Washoe County was  
19 involved. She's the judge in Washoe County, the populous  
20 in Washoe County. Again, I've never met you. I've never  
21 heard of you. I've never heard one word about any of  
22 this in respect to this matter. And I'm the one that  
23 basically has to make a determination on this not anybody  
24 else in Carson City or anybody else. It's up to me to

1     make a determination where will I feel you can get an  
2     impartial determination on your complaint in Carson City.

3             MR. BEADLES:   So again, Your Honor, and if  
4     you've never heard of me, that's great, you know.  God  
5     love you for it, right?  But the problem is most people  
6     have.  And so when you go to Washoe County --

7             THE COURT:   Well, that's only if you have a  
8     right to a jury trial in regards to certain aspects in  
9     respect to this matter.  Most of these -- the complaint  
10    most of the issues in the complaint, you don't have a  
11    right to a jury trial.

12            MR. BEADLES:   I disagree, Your Honor.  
13    There's hundreds of arguments there that I can receive  
14    relief either from a jury yourself.  They're all listed  
15    there that again Judge Drakulich, she straight up told us  
16    that I'm entitled to a jury trial.  Otherwise, she never  
17    would have moved it here.

18            So you already have press and you already  
19    have the Second Judicial District Court moving it here  
20    because they believe that I'm entitled to a jury.  But  
21    she cited the law.  She just misapplied it.  That's the  
22    issue.  That's why we're here.

23            So if you look to Sicor versus Hutchison  
24    again, that's another case that the Supreme Court uses

1 just like the Tarkanian factors. I overwhelmingly meet  
2 all five of those factors that are cited in numerous  
3 Supreme Court cases. My case is far more justified in  
4 receiving a change of venue than even the ones that were  
5 granted by the Supreme Court. Things such as Lincoln  
6 County Water Direct verses Wilson or Patricio Bellizzi  
7 versus Hill. My case is far more relevant and in need of  
8 a change of venue than those were.

9 If you look to just simply Caperton versus  
10 A.T. Massey Coal Company, it says even the probability of  
11 bias can violate the due process claws undermining public  
12 confidence in the judiciary's ability to adjudicate  
13 impartiality.

14 Lastly, you've got Martinez versus Superior  
15 Court citing Maine versus Superior Court saying a motion  
16 for change of venue must be granted where there is a  
17 reasonable likelihood that in the absence of such relief  
18 an impartial trial are cannot be had.

19 Your Honor, just all of these documents here  
20 that have all been bombarded right to a population nine  
21 times smaller than Washoe County, that alone plus all of  
22 the defendants connections with all of the people based  
23 right here in Carson City, we don't have any of these  
24 issues.

1 THE COURT: Do you know what the population  
2 of Lyon County is?

3 MR. BEADLES: It's about the same as here.

4 THE COURT: Yeah.

5 MR. BEADLES: But the problem is is it's the  
6 problem for the defendants is it's further out. And so  
7 the Record Courier, none of this has been in their  
8 papers.

9 THE COURT: It has the same Reno Gazette  
10 Journal out in Lyon County.

11 MR. BEADLES: Actually, if you look at my  
12 pleadings, I clearly show that's not the case. That's  
13 not the case. If the RGJ --

14 THE COURT: Thank you. You can sit down.

15 MR. BEADLES: Your Honor, my family fought  
16 and died for this country and so many others have as  
17 well. And one of the fundamental principles is a free  
18 and fair trial being unbiased.

19 THE COURT: I've read your briefs. I read it  
20 all in respect to this matter. Again, we have a lot to  
21 go through today, so I'm cutting you a little short.

22 Liddell, tell me about his arguments  
23 primarily in regards to Carson City and everything.

24 MS. LIDDELL: Thank you, Your Honor. It's

1 defense position that the second motion to change venue  
2 should be denied. Mr. Beadles has not shown by Carson  
3 City specifically cannot hold an impartial proceeding in  
4 this case.

5 I also wanted to clarify and ask this court  
6 to take judicial notice of the nature of the Record  
7 Courier. Having grown up in Minden-Gardnerville, that is  
8 the newspaper for Minden-Gardnerville, Douglas County  
9 area not Lyon County. So any evidence regarding that is  
10 irrelevant. The RGJ reaches Mason Valley News, Dayton  
11 Courier, which are all in Lyon County.

12 Mr. Beadles has not shown why a motion to  
13 change venue should be granted again at all or why Lyon  
14 County itself would be an inappropriate venue to hear  
15 this case. And I also wanted to clarify that Judge  
16 Drakulich's order did not find that any of these claims  
17 in the case must be heard by a jury. Defendants filed a  
18 motion to dismiss which could dispose of the entire case  
19 by a court without a jury if it's successful.

20 Other than that, I think the motion should be  
21 denied. Mr. Beadles is engaging in performative  
22 litigation attempting to legitimize his political  
23 theories here today. He claims that media bias warrants  
24 a change of venue, but there's no media presence today.

1 The RGJ is the only media entity that requested media  
2 presence, but even though they received it, they did not  
3 show up today. The attention that we see here today  
4 stems from Mr. Beadles not the media. Thank you, Your  
5 Honor.

6 THE COURT: Mr. Beadles, any additional  
7 comment?

8 MR. BEADLES: Yes.

9 THE COURT: And again, we're just on the  
10 motion for change of venue.

11 MR. BEADLES: I understand that. So she says  
12 that Judge Drakulich didn't grant my motion to change  
13 venue and that she didn't state that I am able to receive  
14 a trial, but the whole purpose of a change of venue would  
15 be to ensure that I was able to get an unbiased trial.  
16 So I'm confused right there from she was saying.

17 THE COURT: Well, certain causes of action  
18 under the law are entitled to jury trials. Other causes  
19 of actions are not in respect to that, so it depends on  
20 the nature of the complaint in respect to that. So I  
21 think that's what she was pointing out.

22 So anything else you want to tell me?

23 MR. BEADLES: So she also states that the  
24 Record Courier is based all over the place. But when you

1 go there and you type in my name, none of that stuff pops  
2 up. When you go here, it all pops up. Every issue that  
3 Judge Drakulich used to show that this case should be  
4 moved from Washoe, it all applies here just nine times  
5 more. Just look at the population size. I understand  
6 you haven't heard my name, but many people have. And so  
7 it's going to make it very difficult for a free and fair  
8 and unbiased trial as my constitutional rights grant me.  
9 This is a violation of my due process if I'm not able to  
10 get a venue that is free and fair and unbiased.

11 I mean, when you look at the pleadings, I  
12 gave all of the statistics, I give all of the data  
13 clearly showing that all of the factors that affect your  
14 decision there, you know, are affected here as well. And  
15 again, before we hear any other motion, I want you to  
16 rule on this one.

17 THE COURT: I intend to rule on this one  
18 first.

19 MR. BEADLES: Because this is paramount. And  
20 it seems like you're already swaying to throw it out.

21 THE COURT: Listen. I've gone through. I've  
22 read everything. I've read the cases. I've done all of  
23 that.

24 I have a question for Ms. Liddell. In

1        regards to your order that you provided in this  
2        particular case, which I read and also your order as  
3        well, on page three, line nine, if you'll take a look at  
4        it, I think there's a typo. You indicate: However, the  
5        limited number of storage detailing positions of both  
6        parties primarily occurring in mid-August of 2023 do  
7        support the allegation Carson City. I think you meant to  
8        say do not.

9                MS. LIDDELL: That is correct, Your Honor.  
10       That was a typo. Thank you for catching that. I'd be  
11       happy to resubmit a new proposed order on that.

12               MR. BEADLES: I think she's being truthful,  
13       Your Honor.

14               THE COURT: Huh?

15               MR. BEADLES: I think she was being truthful.

16               THE COURT: Well, it's in the order of the  
17       court in this particular case in regards to the motion to  
18       change of venue, I deny the motion for the following  
19       reason. It's clear to the court as I've indicated I have  
20       no knowledge of this case. I have no knowledge of --

21               A VOICE: Then you shouldn't rule on it.

22               THE COURT: If anybody says anything, they  
23       can go outside. So nor have I read, heard anything about  
24       this concerning this case before it was transferred to



1 me.

2 Carson City is a far more convenient for the  
3 witnesses than Lyon County; has essentially the same  
4 identical news stations, newspapers as Lyon county.  
5 There's no grounds under the law on my review or basis  
6 for this court to transfer venue. Motion to change venue  
7 to Lyon County is denied.

8 MR. BEADLES: Well, then, I make a motion to  
9 stay the case at this point so I can appeal your  
10 decision.

11 THE COURT: It's not an appealable issue, I  
12 don't believe. Go ahead.

13 MS. LIDDELL: Your Honor, it is actually an  
14 appealable issue. However, an oral pronouncement of  
15 judgment is not appealable. A written judgment is the  
16 only thing that has effect, and that's the only thing  
17 that can be appealed.

18 So to the extent that Mr. Beadles is going to  
19 appeal the venue order, he'd have to wait for a written  
20 order. So as of now, there is no written order and the  
21 court can proceed on hearing the motion for to dismiss  
22 and the motions for sanctions. I have a case cite on  
23 that issue if the court would like.

24 THE COURT: Why don't you give me the case

1 cite.

2 MS. LIDDELL: It's Russ versus Clark County  
3 School District, and it's 103 Nevada 686. And the direct  
4 cite is page 689, and that's a 1987 case.

5 THE COURT: He's going to pull it up for me.  
6 Let's go on then. At least we can have some argument on  
7 the motion to dismiss. That's what I'd like to hear  
8 about now.

9 MR. BEADLES: I don't believe that I can get  
10 a fair trial here in this court. I believe that my due  
11 process and constitutional rights are being violated by  
12 moving forward before I intend to appeal obviously the  
13 change of venue, which I feel that --

14 THE COURT: I'll take a look at the case and  
15 everything else. And it's the County's motion to  
16 dismiss. I'll listen to that so you can sit down.

17 Go ahead.

18 MS. LIDDELL: Thank you, Your Honor. From  
19 the outset, Mr. Beadles has used this case to grandstand  
20 about claims of election fraud that have no basis in law.  
21 We ask this court to impose a legal duty from these  
22 defendants to both respond to his election grievances and  
23 comply with his demands. There is no such legal duty  
24 under Nevada law.

1           He also asked this court to engage in an  
2       unprecedented breach of the removal statute and remove  
3       two appointed County employees. And he asked this court  
4       to allow him to unilaterally disenfranchise Commissioner  
5       Hill's voters without any basis to do so. These  
6       outlandish basic claims jeopardize the public faith in  
7       our democracy.

8           The reality is that Mr. Beadles only has two  
9       causes of action in this case. The first turns on  
10      whether these defendants have a duty to respond to his  
11      grievances not to resolve them and not to change election  
12      procedures as Mr. Beadles would like, but whether they  
13      just have a duty to respond. They do not.

14           The second is whether Commissioner Hill,  
15      Manager Brown and Registrar of Voters Jamie Rodriguez can  
16      be removed from their positions. But Mr. Beadles does  
17      not and cannot identify specific acts of malfeasance or  
18      nonfeasance specific to each defendant and a legal duty  
19      that each of them have that would even state a claim for  
20      removal. As such, as it's the defendant's position that  
21      the complaint should be dismissed with prejudice. Thank  
22      you, Your Honor.

23           THE COURT: Mr. Beadles?

24           MR. BEADLES: For the record, I object to

1     this entire proceeding going forward without my change of  
2     venue being addressed, but I mean she's making this  
3     entire case right now about the duty to respond to a  
4     petition. 95 percent of everything that she put all in  
5     all of her pleadings and all of the responses is talking  
6     about this duty to respond. Okay. That's great.

7             I can prove that they have a duty to respond,  
8     but she's overlooking numerous things. So this case  
9     absolutely cannot be dismissed for. There are as you see  
10    with these exhibits with all of these pleadings, with my  
11    original complaint, I list numerous allegations that I  
12    can seek relief from.

13            Let's start with something very, very simple  
14    I think we all can agree on. They're called court  
15    orders. I have court orders right here that were granted  
16    in June. All right? This states: The plaintiffs will  
17    be permitted to observe during the processing and  
18    counting of ballots and in accordance with Nevada law and  
19    regulations in Washoe County's existing procedures to the  
20    same extent as eligible observers. If Washoe County is  
21    processing or counting ballots, observations shall be  
22    allowed. Court orders right here. So this alone  
23    destroys everything that they're talking about.

24            I'm going to give you six more examples, and

1 I could give you hundreds. But this case cannot be  
2 dismissed would that would literally mean that this court  
3 and the court that issued this court order is an illusion  
4 of justice. It would mean that their court orders mean  
5 absolutely nothing. It would mean than in Exhibit 23 and  
6 Exhibit 24 when they are caught counting all of the votes  
7 in secret blatantly telling us they don't care, this is  
8 how they do it on all on video, all transcribed with  
9 witnesses -- it's Exhibits 23 and 24 -- it clearly she  
10 gives the middle finger right to the court orders right  
11 to the courts. So if the courts have no duty and no  
12 ability to enforce their own court orders, then I guess  
13 you're right. This case is meaningless because so is the  
14 justice system.

15 However, I have court orders right here that  
16 say they have that do that. That is in my lawsuit. It's  
17 also in Exhibit 109, which was issued the exact same time  
18 as the complaint that talks about them counting all of  
19 the votes in secret, breaking numerous, numerous NRS's.  
20 Right?

21 Then so you have the court orders that they  
22 broke when they counted all of the votes in secret. Then  
23 you have all of the NRS's and the NAC and all of the  
24 other authorities they grant public observation rights.

1 They broke those laws. So to say that I couldn't get  
2 relief, I mean it's something as simple as Your Honor  
3 saying: You know what? I'm going to enjoin the  
4 defendants to make sure that they follow the law. I'm  
5 going to enjoin the defendants to make sure that they  
6 follow court orders. Those to me are allegations, causes  
7 of actions that I can receive relief from.

8 Additionally, we have the defendants. They  
9 use their position to enrich themselves and others. Take  
10 a look at Commissioner -- sorry -- Manager Brown using  
11 his position of power to get his wife out of DUI. We  
12 have all of this evidence. We have witnesses. We have  
13 so much. We have video evidence. Since when is that not  
14 malpractice or malfeasance? It could mean an officer  
15 removed from under NRS 283.440. That is a classic  
16 definition.

17 You've got Commissioner Hill. She sits on  
18 all of these undisclosed boards. Yet, in her official  
19 role as County Commissioner as the chair of it, she's  
20 voting these same organizations hundreds of millions of  
21 dollars while not disclosing she sits on their boards.  
22 How is that not malpractice or malfeasance under NRS  
23 283.440 which of course, you have the authority to grant  
24 remedy for.

1                   Again, you have heard that also you have  
2                   Rodriguez again that broke the court orders. So that  
3                   right there is removable under NRS, 283440. You have  
4                   again Rodriguez. She has a duty as the Registrar of  
5                   Votes and where I gave them over 11,000 violations based  
6                   solely on if you had the tax records and you had to voter  
7                   records, right? So you've got both of them, right?  
8                   You've got tax records right here which you know Mike  
9                   Clark, when he was the County Assessor, he says they're  
10                  99.9 percent pristine. All right. So we've got the tax  
11                  records, and then we've got the voter records. And when  
12                  you put them side by side just using the County's own  
13                  data, just their data not mine, not numbers from the sky,  
14                  just their data, it shows that there's over 11,000 people  
15                  that must be removed from the rolls according to the law.

16                 This information, all of this data, all of  
17                 this information was given to the Registrar of Voters,  
18                 was given to the County Manager, was given to Hill. They  
19                 said that they would respond back. It's been months and  
20                 months and months. They're never responded back.

21                 Surely, you have the ability that you can  
22                 enjoin them to do their job and clean the rolls as the  
23                 laws command that they do. You've got the defendants are  
24                 deliberately breaking the laws but not adequately

1 performing signature verification. So you have laws that  
2 state that signature verification is supposed to be done  
3 in our elections. It's very simple. It's right there in  
4 the rule book in the NRS says you're supposed to do A, B,  
5 C and D.

6 Then we've got witnesses that work for the  
7 County under the Registrar of Voters who were instructed  
8 by the Registrar of Votes to do what? Not do signature  
9 verification. That is the only safeguard we have in our  
10 he elections. Do you know that? The only safeguard we  
11 have. Because they're not doing anything else. So the  
12 only thing they can really do to make sure that a vote is  
13 actually legitimate or not is to check the signature.  
14 So --

15 THE COURT: Let me stop you for one second  
16 only because I've a read the case that basically Ms.  
17 Liddell cited. It doesn't concern venue. It concerns  
18 basically a --

19 MR. BEADLES: Your Honor, I could give you  
20 examples of how she misquotes the law numerous times.

21 MS. LIDDELL: It's not specific to venue.  
22 It's specific to whether an oral pronouncement from the  
23 bench is appealable. But I'd be happy to get the court  
24 some information regarding venue motions.



1                   THE COURT:  You indicated a denial of a  
2                   change of venue then you believe isn't appealable; is  
3                   that correct?

4                   MS. LIDDELL:  I do believe that.  Yes.  
5                   That's my understanding.

6                   THE COURT:  I think you're probably correct  
7                   in regards to that.  So my intent in this particular  
8                   matter -- again, I'm just trying to help you out a little  
9                   bit, my intent in this matter basically is to go ahead  
10                  and issue a formal order denying change of venue.

11                  Then should we stop this and go back and let  
12                  the Supreme Court determine whether or not venue is  
13                  proper or not before we go forward?  Or is it more  
14                  convenient for me to go ahead and basically rule on any  
15                  of the other motions which the Supreme Court would then  
16                  say once a change of venue motion was made, I have  
17                  jurisdiction to make that determination.

18                  MS. LIDDELL:  Yes, Your Honor.  That's an  
19                  interesting question.  I think it would be appropriate at  
20                  this point especially for convenience that the parties  
21                  and the court so as to conserve judicial resources to  
22                  just proceed today and go ahead and issue rulings on the  
23                  pending motions.

24                  And then if for some reason the Nevada

1 Supreme Court reversed the venue order, the order denying  
2 the motion to change venue, then yes, as the court said  
3 that if the court should not have had venue --

4 THE COURT: Then they would set aside  
5 whatever.

6 MS. LIDDELL: They would just go ahead and --  
7 yes. Exactly. Thank you.

8 THE COURT: I just wanted to clarify. Let me  
9 ask you this. Obviously, somebody did help you draft all  
10 after your briefs.

11 MR. BEADLES: No, Your Honor. You're looking  
12 at him.

13 THE COURT: Okay. Again, you did a very good  
14 job from that standpoint. You cited a lot of stuff. I  
15 was just curious.

16 MR. BEADLES: I have mountains. I have  
17 mountains more I could go.

18 THE COURT: No, I just curious if you had any  
19 attorney help you.

20 MR. BEADLES: No, Your Honor. You're looking  
21 at him.

22 THE COURT: Okay. Well, go ahead with your  
23 arguments and that because my intent then would be  
24 probably to go ahead and rule on the motion in respect to

1 dismiss or not dismiss in respect to that. That would at  
2 least save some judicial economy from what would happen  
3 if I didn't do that, then it would go up, come back down  
4 and then have to go over everything else. So I think  
5 it's judicious to go ahead at this point in time.

6 MR. BEADLES: For the record again, I object.

7 THE COURT: I understand that.

8 MR. BEADLES: So again, the signature  
9 verification is the only way that we have to ensure that  
10 are votes are legitimately counted., right? If they're  
11 not checking the signatures, that means that Mickey Mouse  
12 and Donald Duck and everybody else that's written on the  
13 envelope can just pass as legitimate votes.

14 The Registrar of Voters told the workers not  
15 to do signature verification. That right there again, is  
16 breaking the law. Countless NRS's. All of this is laid  
17 out in 160 different exhibits for you as well as the  
18 initial filings and pleadings in Exhibit 109 as well as  
19 Supplemental Exhibit 16 through 22. All of the issues  
20 with the voter rolls, 1 through 23 exhibits. You'll be  
21 able to see all of the correspondence I've had back and  
22 forth with them where they said they would do their job.  
23 They obviously didn't.

24 Exhibit 111. This is very interesting. So I

1 don't know if you've had a chance to look at Exhibit 111,  
2 but that comes directly from the District Attorney's  
3 Office. Basically, all of the claims that I'm seeking  
4 remedy for in their own words, they state they can do.  
5 They can grant it. So that right there, their entire  
6 lawsuit or -- sorry -- their entire defense is trash.  
7 It's garbage. We have to move this case forward because  
8 literally I have their own internal documents that were  
9 shared with the Commissioners that literally state that  
10 most of the things that I'm asking for, they can grant  
11 remedy to themselves yet they failed to do. They refuse  
12 to do. You of course can enjoin them to do it.

13 Exhibit 111 clearly shows about six or seven  
14 different items that they could do if they were forced to  
15 or even if they just decided to do what the people  
16 wanted. Again, all of this stuff overcomes the 12E5  
17 motion because all I have to do is basically just state a  
18 claim that is short, concise, right, that shows I'm able  
19 to get remedy which I've clearly done. Not just these  
20 few instances. I can go all day.

21 Number seven. I've literally shown using the  
22 County's own certified data this is what they swore under  
23 penalty of perjury whether they put their John Hancock  
24 to, what they said is true, right. This is what they

1 broadcast to the world their election certified results.  
2 Well, the funny thing is, just taking somebody with a  
3 sixth-grade math level, they can look at the precincts of  
4 1,286 precincts between Clark County and Washoe County  
5 and guess what? They all voted identically the same.  
6 How in the Hell does that happen in a fair and free  
7 election?

8 I take this to them. What do they do? They  
9 ridicule me, they slander me in the press but they never  
10 ever address it. Surely, Your Honor, you can look at the  
11 petitions. You can look at all of the things I've given  
12 to them, all of the proof and all of the evidence that's  
13 come from people way smarter than me. These are  
14 mathematicians. But you o need a sixth grader to figure  
15 this out. Only every single precinct in the two largest  
16 counties separated on opposite sides of the state voted  
17 identically the same. How in the Hell does that happen  
18 in a fair election? Especially when Carson City; nothing  
19 like that. The other 15 counties, nothing like that.  
20 Just in Washoe. Just in Clark. All identically the  
21 same. Surely you can have them look into it and say:  
22 Beadles, you're a madman. You're crazy. Look. They  
23 didn't vote the same or Oh, my God. They did. We should  
24 probably look into this. You of course have the power to

1 do this. These simple examples I just gave you show this  
2 case has to go forward. I overcome 12E5 all day long. I  
3 overcome the Rule 11. I've overcome their motion for  
4 sanctions. All of it. I just needed one claim. I've  
5 literally just given you seven just like that. I can go  
6 all day with hundreds more if you want, Your Honor.

7 THE COURT: Okay. That's fine. Thank you.  
8 Again, I've gone through. I read the briefs and I've  
9 gone through and checked the law. I've gone through all  
10 of the different statutes, I've gone through the  
11 constitutional requirements. I've looked at all of the  
12 different articles cited, I looked at your first cause of  
13 action basically was a claim under Article 1 Section 10  
14 of the Nevada Constitution.

15 Your second cause of action primarily was a  
16 claim primarily under Article 15, Section 2 of the Nevada  
17 Constitution; also a mandamus claim in respect to that in  
18 regards to that. Your second cause of action primarily  
19 is a complaint for removal under NRS 266.430.  
20 Additionally, it claims removal under NRS 283.440 in  
21 respect to this matter.

22 I've gone through and I've read again all of  
23 the allegations against these individuals in respect to  
24 this particular matter. And based upon my review of all

1 of those documents and everything else, so that this can  
2 all go up to the Supreme Court at once and go ahead and  
3 basically on that basis, I think Mr. Beadles' complaint  
4 fails to state any claims upon which relief can be  
5 granted. I know he's got a lot of smoke, mirrors and all  
6 kinds of fancy numbers and everything else.

7 MR. BEADLES: Then I move to disqualify you  
8 right now. I move to disqualify you right now to tie  
9 your hands to do anything else.

10 THE COURT: None of it makes any sense for  
11 any violation under the Nevada Constitution or Nevada  
12 law. Based upon that, I'm dismissing his complaint  
13 pursuant to NRCP 12B5 with prejudice so that it can go to  
14 the Supreme Court. They can review all of his actions  
15 and review everything just as I did, and I find no basis.

16 Now, onto the motion for sanctions. I think  
17 you believe in what you've done and you have some --

18 MR. BEADLES: Then your court orders mean  
19 absolutely nothing. You literally just dismissed the  
20 case where there was court orders demanding my rights be  
21 met and they didn't do that. I don't understand how  
22 you're doing what you're doing and --

23 THE COURT: That's fine, but I --

24 MR. BEADLES: -- still wearing a robe.

1 THE COURT: But I am going to go ahead and  
2 award attorneys fees to Washoe County. I'm doing that  
3 under NRS 18.0102 B under Brunzell versus Golden Gate  
4 National Bank case. I'd like the defendants to provide  
5 us a detailed accounting of their attorney's fees and  
6 costs they spent in respect to this particular matter in  
7 regards to that. I will sign both orders: An order for  
8 change of order also the order to dismiss. In respect to  
9 that, you'll file additional motion for the attorney's  
10 fees in respect to this particular matter. We'll go  
11 forward on that basis.

12 MS. LIDDELL: Thank you, Your Honor.

13 THE COURT: Thank you.

14 (The hearing concluded at 2:07 p.m.)

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STATE OF NEVADA )  
CARSON CITY ) ss.

I, NICOLE J. HANSEN, Certified Court  
Reporter in and for the State of Nevada, do hereby  
certify:

That the foregoing proceedings were taken by  
me at the time and place therein set forth; that the  
proceedings were recorded stenographically by me and  
thereafter transcribed via computer under my supervision;  
that the foregoing is a full, true and correct  
transcription of the proceedings to the best of my  
knowledge, skill and ability.

I further certify that I am not a relative  
nor an employee of any attorney or any of the parties,  
nor am I financially or otherwise interested in this  
action.

I declare under penalty of perjury under the  
laws of the State of Nevada that the foregoing statements  
are true and correct.

Dated this November 24, 2023.

Nicole J. Hansen  
-----  
Nicole J. Hansen, CCR #446, RPR,  
CRR, RMR

**“Exhibit 162”**

**“Exhibit 163”**

1 THE BAILIFF: All rise, please.

2 THE COURT: Please be seated. You can be  
3 seated. For the record, this is case number 230C00105,  
4 Robert Beadles, is that correct?

5 MR. BEADLES: It is. Thank you.

6 THE COURT: Versus Jaime Rodriguez, Washoe  
7 County Registrar of Voters, Eric Brown, Washoe County  
8 Manager, Alexis Hill, Chairman of the Washoe County  
9 Board of Commissioners in Washoe County. Mr. Beadles  
10 is here representing yourself, correct?

11 MR. BEADLES: Indeed. Thank you.

12 MS. LIDDELL: Your Honor, Lindsay Liddell  
13 from the District Attorney's office on behalf of the  
14 defendants. I also have with me, Beth Hickman, a  
15 Deputy District Attorney, and we have Registrar of  
16 Voters Jaime Rodriguez, Washoe County Commissioner  
17 Alexis Hill, and Washoe County Manager Eric Brown with  
18 us today.

19 THE COURT: Okay. Thank you. Good  
20 afternoon. This is the time set for hearing three  
21 motions. The first motion we're going to hear and  
22 consider is the Motion to Change Venue filed by Mr.  
23 Beadles. In respect to this matter, whereby it is  
24 requested this matter be transferred to Lyon County.

1 Originally this matter originated in Washoe County.  
2 The Washoe County District Court sent it down here  
3 rather than Lyon County where you originally wanted to  
4 go. You filed a motion to move it to Lyon County.  
5 It's your motion, if you want to go ahead and start.

6 MR. BEADLES: Okay. Are we going -- what  
7 are the other two motions before --

8 THE COURT: The other two motions are Motion  
9 to Dismiss the Complaint and Motion for Sanctions.

10 MR. BEADLES: Okay. Yeah, it's definitely  
11 important. There's also a Motion for Leave. Does that  
12 need to be heard?

13 THE COURT: For what?

14 MR. BEADLES: For leave. There was a Motion  
15 of Leave to submit the limited motion for  
16 reconsideration of the change of venue location.

17 THE COURT: Well, I --

18 MR. BEADLES: Okay. No problem.

19 THE COURT: It's not in front of me, so --

20 MR. BEADLES: Okay, good. So, Change of  
21 Venue.

22 THE COURT: -- what's in front of me is the  
23 Motion that you filed for Change of Venue. So it's  
24 your motion, sir.

1 MR. BEADLES: Yes. Thank you, Your Honor.

2 Would you like me to stand?

3 THE COURT: Most people do when they argue  
4 motions.

5 MR. BEADLES: Okay, I wasn't sure.

6 THE COURT: I know you're kind of not -- not  
7 an attorney. And did you go to law school?

8 MR. BEADLES: No, sir. No, Your Honor. I  
9 did not go to law school. I have a honorary Juris  
10 Doctor that --

11 THE COURT: That's fine.

12 MR. BEADLES: -- you know, is about three  
13 seconds old, considering, you know, the amount of time  
14 you've been up there, you know, presiding. So forgive  
15 me if I -- if I do things a little bit out of  
16 procedures. So with the change of venue, the -- first  
17 let me start by saying, I would -- I need you to rule  
18 first on the Change of Venue prior to any other motions.  
19 I'm going to go ahead and hit my little  
20 start. So as Bates v. State 83456 states, "The  
21 Fourteenth Amendment's Due Process Clause 'guarantees  
22 the right to a fair trial before a fair tribunal.'" The  
23 Fourteenth Amendment, in Article I, Section 8,  
24 Subsection 2 of the Nevada Constitution states that I

1 shall not be deprived of Life, Liberty, or property  
2 without the process of law nor deny to any person  
3 within its jurisdiction the equal protection of the  
4 laws. As per Roethlisberger v. McNulty and NRS  
5 13.050, Subsection 2(b), a District Court "may, on  
6 motion or stipulation, change the place of the  
7 proceeding, when there is reason to believe that an  
8 impartial proceeding cannot be had therein."

9 THE COURT: And why don't you think Carson  
10 City can be impartial?

11 MR. BEADLES: Well, I was hoping you would  
12 let me make my record and I can go through all that,  
13 but if you -- I can jump through this if you'd like.  
14 But I need about 20 minutes to make my entire argument.

15 THE COURT: We're -- move on, because we're  
16 going through this and I want you to tell me on the  
17 record what -- how you feel this Court cannot be  
18 impartial in this matter.

19 MR. BEADLES: Okay.

20 THE COURT: I know -- I've read your briefs,  
21 so don't reread the briefs. I'm telling everybody that.

22 MR. BEADLES: No, no. And I don't intend to.

23 THE COURT: That's not the purpose of this  
24 hearing. The purpose of this hearing is for you to

1 direct yourself to your points that you feel and  
2 believe support your position that basically your  
3 Motion for Change of Venue is proper. And again, I  
4 read your brief and everything else, and you alleged  
5 that Lyon County's more convenient than Reno, that  
6 basically they have different newspapers, different  
7 newscasts, and different things in respect to that. So  
8 I've gone through that and I've read all that in  
9 regards to that. So again, I want you -- I'm trying to  
10 focus you a little bit on what's important to the  
11 Court. I want you to know why -- because I don't know  
12 you. I don't know any of these people. I've never met  
13 any of these people. I've never met you. I've never  
14 read a newspaper article concerning this matter. I  
15 have never watched a TV inquiry or anything in respect  
16 to this matter. So I knew nothing about this case  
17 until I reviewed all the stuff filed in Washoe County.  
18 So I just want you to know that.

19 MR. BEADLES: Okay. Well, I appreciate you  
20 reading my pleadings, Your Honor. So as the case law  
21 states and as well as the -- the NRS, it says, "when  
22 there's a reason to believe that an impartial pleading  
23 proceeding cannot be had therein, or when the  
24 convenience of the witnesses and the ends of justice



1 would be promoted by the change." And that's why we're  
2 here, Your Honor.

3 So throughout the defense's objections  
4 to all my change of venues, everything that I've said,  
5 everything that I've pled, they simply argue with  
6 feelings, not facts. Just a simple look to -- if you  
7 look to the -- for instance, Judge Drakulich, she  
8 granted my Motion to Change Venue, okay? And she  
9 granted it from Washoe, but to here instead of to Lyon  
10 County. And what she cited, the reasons for, is called  
11 the -- the Tarkanian case, all right? And I'm sure  
12 you're familiar with the Tarkanian case? And if you  
13 read it, can I read what she -- what she said first?

14 THE COURT: That's fine. Go ahead.

15 MR. BEADLES: Okay. So in her ruling, she  
16 says the first factor -- and there's five factors in  
17 the Tarkanian case, that the Supreme Court here in  
18 Nevada, as well as other cases, they all cite these  
19 five reasons to approve the change of venue, as -- as I  
20 know you're aware. And so she says with the first  
21 factor, "The nature and the extent to the pretrial  
22 publicity favors a change of venue." So she says right  
23 there, I already hit the first factor. Then she goes  
24 on to say, "Exhibits filed in support of the Motion

1 that tend to show significant media presence  
2 surrounding the case -- including pieces of media  
3 republished on the Defendant's platform, and pieces  
4 published in highly trafficked local press. The Court  
5 agrees with the Plaintiff, that the issues that are  
6 central to this case have been broadly covered by local  
7 media outlets and widely distributed to the Washoe  
8 County voting population by computer network  
9 applications such as email and Facebook, which favors a  
10 change in venue. Further, the information generated by  
11 the parties is arguably polarizing and it's  
12 inflammatory, which also favors a change of venue."  
13 And then she cites Sicor, Incorporated  
14 v. Hutchison, which also uses the -- the Tarkanian  
15 factors.

16 THE COURT: What does that have to do with  
17 Carson City?

18 MR. BEADLES: I'm getting there, Your Honor.  
19 I was just going to read -- everything that she talks  
20 about is the reasons why --

21 THE COURT: Well, I know the five -- I know  
22 the five factors. I've reviewed the five factors. So  
23 again, I -- what does it have to do, again, with Carson  
24 City versus -- and Lyon County would probably be not

1 much different than Carson City in my opinion, but go  
2 ahead.

3 MR. BEADLES: Sure. So yeah, I can go  
4 through them with you if you'd like. So if you look to  
5 Exhibit 132. Now, all of these -- I know if -- you  
6 have the exhibits in front of you --

7 THE COURT: Right.

8 MR. BEADLES: -- but basically all of these  
9 newspapers, all of these online articles, everything  
10 that was published in Washoe was also sent here to  
11 Carson City.

12 THE COURT: Well also in Lyon County as well.

13 MR. BEADLES: So again, if -- if you --  
14 okay. So they're trying to say that The Record Courier  
15 is the newspaper there in Lyon County. And they say  
16 that the stuff that was in Washoe and the very  
17 inflammatory articles that were written in Washoe that  
18 made its way to Carson also made it to Lyon County.  
19 But a simple look to their own websites, a very simple,  
20 easy look, where you go right to The Record Courier's  
21 own website and you search for anything with my name.  
22 You know how many results come back? Zero, not a  
23 single one. So all the stuff that was said in Washoe  
24 made its way to Carson, but doesn't appear to have made

1 its way to Lyon County.  
2 And then if you look at the DMA Map,  
3 which is what's called a Designated Market Area Map  
4 right here, this is what all the TV stations, they --  
5 they put this out to the broadcasters. So if you're an  
6 ad buyer and you want to target a specific audience in  
7 a specific area, this is what you would look to -- to  
8 find out, okay, look, I want to start advertising to, I  
9 don't know, Carson City. What -- what places are going  
10 to do that? This right here clearly shows you that  
11 everything that was broadcasted in Washoe, that Judge  
12 Drakulich said was by far overwhelming, and that's why  
13 I got my change of venue. Guess what? It was all put  
14 right here as well in -- into a population nine to 10  
15 times smaller than Washoe County. So you've got a --  
16 you've got a city of 58,000 people v. 500,000 people.  
17 You've got nine times more media penetration here than  
18 you do in Washoe. And she moved it from Washoe to get  
19 away from that. But all of the stuff that she moved me  
20 away from is here, but nine times worse.  
21 And then, you've got additionally,  
22 you've got relationships. All of these people here,  
23 all these defendants, they all have relationships right  
24 here in Carson City with lobbyists, with people named

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1 in these lawsuits, people in my exhibits. We got the  
2 Attorney General Aaron Ford named in this. We got  
3 Cisco Aguilar named in this. Those are the -- two of  
4 the highest ranking officials based right here in  
5 Carson City. We've got the Governor named. We've got,  
6 additionally, the Secretary of State named in another  
7 lawsuit. I'm suing both of them for violating our  
8 First Amendment rights under SB 406, all stationed  
9 right here. You got Hill's husband, Defendant Hill,  
10 who is Matthew Tuma, based right here, who is the  
11 Deputy Director of the Department of Administration for  
12 Nevada. And he has tremendous influence in his office,  
13 and his building's just right around the corner.  
14 Defendant Hill. Guess  
15 guess who just ran -- or who did their  
16 -- their campaign kickoff party for -- for Commissioner  
17 Hill. Who -- who just hosted their -- her campaign  
18 kickoff? The Attorney General Aaron Ford and Cisco  
19 Aguilar, all based right here. You got Defendant  
20 Rodriguez, who went in front of the legislature right  
21 here to argue and to witness and testify for AB397,  
22 which is in this case. Granted, it's completely taken  
23 out of context, but it's in this case, and Rodriguez is  
24 one of the witnesses that testified before the

1 legislature.

2 I can't stress enough all the reasons

3 that Judge Drakulich granted my change of venue -- all

4 those reasons are here, just magnified nine times

5 worse. And additionally, she found on Tarkanian

6 factors one and four that undoubtedly, I meet that

7 criteria in Washoe. But again, I -- I make that -- I

8 make the same -- I have the same issues here, just

9 magnified by nine times. All right? I don't have any

10 of these issues in Lyon County. I don't have any of

11 these issues in White Pine. These relationships that

12 exist with people that can be named in this case, the

13 people that are named in the case, and all the people

14 that can put their thumbs on the scale of justice here,

15 they're all from here. You know, I already had this

16 issue with Washoe County.

17 So now, I basically went from the

18 frying pan to the fire, literally. I'm in Nimrod's

19 fire here. So all the things that could happen, that

20 -- that would persuade and -- and keep justice from

21 happening, could happen if you keep this in the same

22 venue right now. If you look, I -- I -- I literally

23 hit all five factors of the Tarkanian, and if you allow

24 me to elaborate further --

1 If you look at Exhibit 132, you'll see  
2 that the media is colluding with the defense. You'll  
3 see that Mark Robison with the RGJ, who is the only  
4 media that's allowed to be here, I guess -- they're the  
5 only ones that were granted the ability to be here --  
6 he sends me a text message. He says, "Hey, I'm doing a  
7 follow-up story on the district attorney's reply today.  
8 I wanted to give you the opportunity to respond  
9 regarding what you think of it, and I wanted to check  
10 whether you've decided yet on their offer for you to  
11 withdraw your complaint. A text reply is fine, or feel  
12 -- feel free to email me or call me on my landline."  
13 I respond back, "I find it highly  
14 suspicious that a document that is yet to be filed in  
15 the Court I'm hearing about from you. Is this the DA's  
16 office now using the press to attack me personally as  
17 well?" Of course, he didn't respond to that. And I --  
18 and I also said, "It's curious how you received the  
19 Rule 11 letter before me. Who sent it to you?" He  
20 didn't respond.  
21 So that right there goes to show you  
22 that they're willing to break the civil rules of  
23 procedures. They're willing to possibly break laws  
24 when it comes to doxxing. This was a -- this was a

1 drafted -- a drafted document. This wasn't something  
2 that was filed in the Court, that they can say, oh,  
3 it's public record. It's not public record. It's not  
4 public record for 21 days, yet they -- as soon as they  
5 drafted it, they hit the send button right to the  
6 media. I mean, come on. They're working right here  
7 with the media, and all those people, again, they're  
8 based right in this area. The concentration of all the  
9 media from Washoe is directed to a population nine  
10 times smaller than Washoe County. And then they've got  
11 all these --

12 THE COURT: Okay. Anything else you want to  
13 tell me?

14 MR. BEADLES: Seriously? Okay. So if you  
15 look at Sicor v. Hutchinson, another case that the  
16 honorable Judge Drakulich cited, is why my case must be  
17 granted a change of --

18 THE COURT: Well, I understand what Judge  
19 Drakulich did. I really do. I understand Washoe  
20 County was involved. She's a judge in Washoe County.  
21 The populace in Washoe County -- again, I have never  
22 met you. I have -- I've never heard of you. I've  
23 never heard one word about any of this in respect to  
24 this matter, and I'm the one that basically has to make



1 a determination on this, not anybody else in Carson  
2 City or anybody else. It's up to me to make a  
3 determination whether I feel you can get an impartial  
4 determination on your -- on your complaint in Carson  
5 City, so --

6 MR. BEADLES: So -- so again, Your Honor --  
7 and if you have never heard of me, that's great. You  
8 know --

9 THE COURT: I -- I --

10 MR. BEADLES: God love you for it, right?  
11 But the problem is most people have, and so when you go  
12 to Washoe County --

13 THE COURT: Well, that's only if -- that's  
14 only if you have a right to a jury trial in regards to  
15 certain aspects in respect to this matter. Most of  
16 these -- the complaint and most of the issues in the  
17 complaint, you don't have a right to a jury trial.

18 MR. BEADLES: I disagree, Your Honor.

19 THE COURT: Well --

20 MR. BEADLES: There's -- there's hundreds of  
21 -- hundreds of arguments there that I can -- I can  
22 receive relief either from a jury, yourself -- you  
23 know, they're all listed here that --

24 THE COURT: Well --

1 MR. BEADLES: Again, Judge Drakulich, she --  
2 she straight up told us that I'm entitled to a jury  
3 trial. Otherwise, she never would have moved it here.  
4 I mean, so you already have precedent. You already  
5 have the Second Judicial Court moving it here because  
6 they believed that I'm entitled to a jury.

7 THE COURT: Okay.

8 MR. BEADLES: But she cited the law. She  
9 just misapplied it. That's -- that's the issue.  
10 That's why we're here. So if -- if you look to Sicor  
11 v. Hutchinson, again, that's another -- that is  
12 another case that the Supreme Court uses, just like the  
13 Tarkanian factors. I overwhelmingly meet all five of  
14 those factors that are cited in numerous Supreme Court  
15 cases. My case is far more justified in receiving a  
16 change of venue than even the ones that were granted by  
17 the Supreme Court, things such as Lincoln County versus  
18 -- or Lincoln County Water District v. Wilson or  
19 Patricio-Bellizzi v. Hill. My case is far more, you  
20 know, relevant and in need of a change of venue than --  
21 than those were.  
22 If you -- if you look to just simply  
23 Caperton v. A.T. Massey Coal Company, it says, "Even  
24 the probability of bias can violate the due process

1 clause, undermining public confidence in the  
2 judiciary's ability to adjudicate impartiality."  
3 Lastly, you got Martinez v. Superior Court citing  
4 Maine v. Superior Court, saying, "A motion for change  
5 of venue must be granted where there is a reasonable  
6 likelihood that in the absence of such relief, an  
7 impartial trial cannot be had." Your Honor, just all  
8 of these documents here that have all been bombarded  
9 right to a population nine times smaller than Washoe  
10 County, that alone, plus all the defendant's  
11 connections with all the people based right here in  
12 Carson City -- we don't have any of these issues.

13 THE COURT: Do you know what the population  
14 of Lyon County is?

15 MR. BEADLES: It's about the same as here.

16 THE COURT: Yeah?

17 MR. BEADLES: Yeah. But the problem is --  
18 is it's for -- the problem for the -- for the  
19 defendants is it's -- it's further out, and so the  
20 Record Courier, none of this has been in their papers.

21 THE COURT: They have the same Reno Gazette  
22 Journal out in Lyon County. Record Courier is --

23 MR. BEADLES: Actually, the -- the -- the --  
24 the breach -- if you look in my pleadings, I clearly

1 show that's not the case.

2 THE COURT: Okay.

3 MR. BEADLES: That's not the case if the RGJ  
4 was here --

5 THE COURT: Thank you. You can sit down.

6 MR. BEADLES: Your Honor, my family fought  
7 and died for this country --

8 THE COURT: Huh?

9 MR. BEADLES: -- as so many others have as  
10 well, and one of the fundamental principles of this  
11 great country is a free and fair trial being unbiased,  
12 so --

13 THE COURT: I've read it. I've read your  
14 briefs. I've read it all in respect to this matter.  
15 Again, we have a lot to go through today, and so I'm  
16 cutting you a little short.

17 Ms. Liddell, tell me about his  
18 arguments primarily in regards to Carson City and  
19 everything else.

20 MS. LIDDELL: Thank you, Your Honor. It's  
21 the defendant's position that the second motion to  
22 change venue should be denied. Mr. Beadles does not  
23 show why Carson City specifically cannot hold an  
24 impartial proceeding in this case. I also wanted to

1 clarify and ask this Court to take judicial notice of  
2 the nature of the Record Courier. Having grown up in  
3 Minden and Gardnerville, that is the newspaper for  
4 Minden and Gardnerville, Douglas County Area, not Lyon  
5 County, so any evidence regarding that is -- is  
6 irrelevant. The RGJ reaches Mason Valley News, Dayton  
7 Courier, which are all in Lyon County. Mr. Beadles has  
8 not shown why a motion to change venues should be  
9 granted, again, at all, or why Lyon County itself would  
10 be an appropriate venue to hear this case.

11 And I also wanted to clarify that Judge  
12 Drakulich's order did not find that any of these claims  
13 in the case must be heard by a jury. Defendants filed  
14 a motion to dismiss, which could dispose of the entire  
15 case by a court without a jury if it's successful.  
16 Other than that, I think the motion should be denied.  
17 Mr. Beadles is engaging in performative litigation,  
18 attempting to legitimize his political theories here  
19 today. He claims that media bias warrants a change of  
20 venue, but there's no media presence today. The RGJ is  
21 the only media entity that requested media presence,  
22 but even though they received it, they did not show up  
23 today. The attention that we see here today stems from  
24 Mr. Beadles, not the media. Thank you, Your Honor.

1           THE COURT: Mr. Beadles, any additional  
2 comment?

3           MR. BEADLES: Yes.

4           THE COURT: And again, we're just on the  
5 motion for change of venue.

6           MR. BEADLES: I understand that. So she  
7 says that the -- Judge Drakulich didn't grant my motion  
8 to change venue and that she didn't state that I am  
9 able to receive a trial, but the whole purpose of a  
10 change of venue would be to ensure that I was able to  
11 get an unbiased trial. So I'm confused right there  
12 from what she was saying.

13          THE COURT: Well, certain causes of action  
14 under law are entitled to jury trial. Other cause of  
15 actions are not in respect to that. So it depends on  
16 the nature of the complaint in respect to that. So I  
17 -- I think that's what she was pointing out. So  
18 anything else you want to tell me?

19          MR. BEADLES: So she also states that the  
20 Record Courier is based all over the place, but when  
21 you go there and you type in my name, none of that  
22 stuff pops up. When you go here, it -- it all pops up.  
23 Every issue that Judge Drakulich used to show that this  
24 case should be moved from Washoe -- you know, it -- it

1 all applies here, just nine times more. I mean, when  
2 you just look at the population size -- I understand  
3 you haven't heard of my name, but many people have, and  
4 so it's going to make it very difficult for a fair -- a  
5 free and fair and unbiased trial, as my Constitutional  
6 rights grant me. I mean, this is a violation of my due  
7 process, if I'm not able to get a venue  
8 -- that is free and fair and unbiased.  
9 I mean, when -- when you look through the pleadings, I  
10 -- I give all the statistics. I give all the data  
11 clearly showing that all the -- all the factors that  
12 affect their decision there, you know, are affected  
13 here as well. And again, before we hear any other  
14 motion, I -- I want you to -- to -- to rule on this one  
15 --

16 THE COURT: I intend to rule on this one  
17 first.

18 MR. BEADLES: -- because -- because this is,  
19 you know, paramount, and it seems like you're already  
20 swaying to -- to throw it out.

21 THE COURT: Listen, I've gone through --  
22 I've read everything. I've read the cases. I've done  
23 all that. I have a question for Ms. Liddell in regards  
24 to your order that you've provided in this particular

1 case, which I read -- and I also read your order as  
2 well -- on Page 3, Line 9, if you'll take a look at it.  
3 I think there's a typo. You indicate, "However, the  
4 limited number of stories detailing positions of both  
5 parties primarily occurring in mid-August of 2023 do  
6 support the allegation Per Se." I think you meant to  
7 say "do not"?

8 MS. LIDDELL: That is correct, Your Honor.  
9 That was a typo. Thank you for catching that. I'd be  
10 happy to resubmit a new proposed order on that.

11 MR. BEADLES: I think she's being truthful,  
12 Your Honor.

13 THE COURT: Huh? What?

14 MR. BEADLES: I think she was being truthful.

15 THE COURT: Well, it's going to be the order  
16 of the Court in this particular case in regards to the  
17 motion -- motion for change of venue, in regards to  
18 this matter, I deny the motion for the following  
19 reasons. It's clear to the Court, as I've indicated, I  
20 have no knowledge of this case. I have no knowledge of  
21 --

22 UNIDENTIFIED SPEAKER: Then you shouldn't  
23 rule on it.

24 THE COURT: If anybody says anything, they



1 can go outside.  
2 So, nor have I read, heard anything  
3 about this -- concerning this case before it was  
4 transferred to me. Carson City is far more convenient  
5 for the -- for the witnesses than Lyon County, has  
6 essentially the same identical news stations,  
7 newspapers as Lyon County. There's no grounds under  
8 the law, on my review, or basis for this Court to  
9 transfer venue. Motion to change venue to Lyon County  
10 is denied.

11 MR. BEADLES: Well then, I make a motion to  
12 -- to state a case at this point so I can appeal your  
13 decision to change the venue.

14 THE COURT: That's not an appealable issue,  
15 I don't believe. Go ahead.

16 MS. LIDDELL: Your Honor, it is actually an  
17 appealable issue. However, an oral pronouncement of  
18 judgment is not appealable. A written judgment is the  
19 only thing that has effect, and that's the only thing  
20 that can be appealed. So to the extent that Mr.  
21 Beadles is going to appeal the venue order, he'd have  
22 to wait for a written order. So as of now, there is no  
23 written order, and the Court can proceed on hearing the  
24 motion to dismiss and motion to -- for sanctions. I

1 have a case cite on that issue, if the Court would like.

2 THE COURT: Why don't you give me the case  
3 cite?

4 MS. LIDDELL: Yep. It's Rust v. Clark  
5 County School District, and it's 103 Nevada 686, and  
6 the direct cite is Page 689, and that's a 1987 case.

7 THE COURT: He's going to pull it up for me.  
8 Let's go on then. At least we can have some argument  
9 on the motion to dismiss. That's what I'd like to hear  
10 about now.

11 MR. BEADLES: Well, I don't believe that I  
12 can get a fair trial here in this court, and I believe  
13 that my due process rights and constitutional rights  
14 are being violated by -- by moving forward before I  
15 intend to appeal, you know, obviously, the change of  
16 venue, which I feel that, you know, we must have.

17 THE COURT: Well, I want to take a -- I'll  
18 take a look at the case and everything else. And it's  
19 the county's motion to dismiss. I'll listen to that,  
20 so you can sit down.  
21 Go ahead with that.

22 MS. LIDDELL: Thank you, Your Honor. From  
23 the outset, Mr. Beadles has used this case to  
24 grandstand about claims of election fraud that have no

1 basis in law. He asked this Court to impose a legal  
2 duty for these defendants to both respond to his  
3 election grievances and comply with his demands. There  
4 is no such legal duty under Nevada law. He also asked  
5 this Court to engage in an unprecedented reach of the  
6 removal statute and remove two appointed county  
7 employees, and he asked this Court to allow him to  
8 unilaterally disenfranchise Commissioner Hill's voters  
9 without any basis to do so. These outlandish, baseless  
10 claims jeopardize the public faith in our democracy.  
11 The reality is Mr. Beadles only has two  
12 causes of action in this case. The first turns on  
13 whether these defendants have a duty to respond to his  
14 grievances, not to resolve them and not to change  
15 election procedures, as Mr. Beadles would like, but  
16 whether they just have a duty to respond. They do not.  
17 The second is whether Commissioner Hill, Manager Brown,  
18 and Registrar of Voters Jamie Rodriguez can be removed  
19 from their positions, but Mr. Beadles does not and  
20 cannot identify specific acts of malfeasance or  
21 nonfeasance specific to each defendant and a legal duty  
22 that each of them have that would even state a claim  
23 for removal. As such, it's the defendant's position  
24 that the complaint should be dismissed with prejudice.

1 Thank you, Your Honor.

2 MR. BEADLES: For the record, you know, I  
3 object to this entire proceeding going forward without  
4 my change of venue being addressed, but, I mean, she's  
5 making this entire case right now about a duty to  
6 respond to a petition. 95 percent of everything that  
7 she put in all of her pleadings and all the responses  
8 is talking about this duty to respond. Okay. That's  
9 great. I can prove that they have a duty to respond,  
10 but she's overlooking numerous things that this case  
11 absolutely cannot be dismissed for. There are -- as  
12 you see with these exhibits, with all of these  
13 pleadings, with my original complaint, I list numerous  
14 allegations that I can seek relief from.  
15 Let's start with something very, very  
16 simple I think we all can -- can agree on. They're --  
17 they're called court orders. I have court orders right  
18 here that were granted in June. All right? This  
19 states, "The plaintiffs will be permitted to observe  
20 during the processing and counting of ballots and in  
21 accordance with Nevada law and regulations and Washoe  
22 County's existing procedures to the same extent as  
23 eligible observers. If Washoe County is processing or  
24 counting ballots, observations shall be allowed."

1 Court orders right here. So this alone destroys  
2 everything that they're -- they're talking about.  
3 I'm going to give you six more  
4 examples, and I could give you hundreds. All right?  
5 But this case cannot be dismissed because that would  
6 literally mean that this Court and the Court that  
7 issued this court order is an illusion of justice. It  
8 would mean that their court orders mean absolutely  
9 nothing. It would mean that in Exhibit 23 and Exhibit  
10 24, when they're caught counting all the votes in  
11 secret, blatantly telling us they don't care, this is  
12 how they do it, all on video, all transcribed, with  
13 witnesses -- it's Exhibits 23 and 24 -- it clearly --  
14 she gives the middle finger right to the Court orders,  
15 right to the Court. So if the courts have no duty and  
16 no ability to enforce their own court orders, then I  
17 guess you're right. This case is meaningless because  
18 so is the justice system.  
19 However, I have court orders right here  
20 that say they have to do that. That is in my lawsuit.  
21 It's also in Exhibit 109, which was issued at the exact  
22 same time as the complaint, that talks about them  
23 counting all of her votes in secret, breaking numerous  
24 -- numerous NRSs. Right? Then -- so you have the

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1 Court orders that they broke when they counted all the  
2 votes in secret. Then you have all the NRSs and the  
3 NAC and all the other -- all the other authorities that  
4 grant public observation rights. They broke those  
5 laws. So to -- to say that I couldn't get relief -- I  
6 mean, it's something as simple as Your Honor saying,  
7 you know what, I'm going to enjoin the defendants to  
8 make sure that they follow the law. I'm going to  
9 enjoin the defendants to make sure that they follow  
10 court orders. Those to me are allegations, causes of  
11 action, that I can receive relief from.  
12 Additionally, we have the defendants.  
13 They use their position to enrich themselves and  
14 others. Take a look at Commissioner -- sorry, County  
15 Manager Brown using his position of power to get his  
16 wife out of a DUI. We have all this evidence. We have  
17 witnesses. We have so much. We have video evidence.  
18 Since when is that not malpractice or malfeasance? It  
19 could be an officer removed from under NRS 283.440. I  
20 mean, that is a classic definition.  
21 You've got Commissioner Hill. She sits  
22 on all these undisclosed boards, yet in her official  
23 role as county -- county, you know, commissioner, as  
24 the chair of it, she's voting these same organizations

1 hundreds of millions of dollars while not disclosing  
2 she sits on their boards. How is that not malpractice  
3 or malfeasance under NRS 283.440, which of course you  
4 have the authority to grant remedy for?  
5 Again, you have her, then also you have  
6 Rodriguez, again, that broke the Court orders, so that  
7 right there is removable under NRS 283.440. You have,  
8 again, Rodriguez. She has a duty as the Registrar of  
9 Voters, and where I gave them over 11,000 violations  
10 based solely on if you have the tax records and you  
11 have the voter records. Right? So you got both of  
12 them, right? You got tax records right here, which,  
13 you know, Mike Clark, when he was the county assessor,  
14 he says they're 99.9 percent pristine. All right. So  
15 we got the tax records, and then we got the voter  
16 records. And when you put them side by side, just  
17 using the county's own data, okay, just their data, not  
18 mine, not -- not numbers from sky, just their data, it  
19 shows that there's over 11,000 people that must be  
20 removed from the rolls according to the law.  
21 These -- this information, all this  
22 data, all this information was given to the Registrar  
23 of Voters, was given to the County Manager, was given  
24 to Hill. They said that they would respond back. It's

1 been months and months and months. They've never  
2 responded back. Surely you have the ability that you  
3 can enjoin them to do their job and clean the rolls as  
4 the laws, you know, command that they do. You've got  
5 -- the defendants are deliberately breaking the laws by  
6 not adequately performing signature  
7 -- signature verification. So you have  
8 laws that state that signature verification is supposed  
9 to be done in our elections. It's very simple. It's  
10 right there in the rulebook, right there in the NRS.  
11 It's supposed to do A, B, C, and D. Then we got  
12 witnesses that work -- that work for the county under  
13 the Registrar of Voters who were instructed by the  
14 Registrar of Voters to do what? Not do signature  
15 verification. That is the only safeguard we have in  
16 our elections. Do you know that? The only safeguard  
17 we have, because they're not doing anything else, so  
18 the only thing they can really do to make sure that a  
19 vote is actually legitimate or not is to check the  
20 signature. So --

21 THE COURT: Let me stop you for one second,  
22 only because I read the case that basically Ms. Liddell  
23 cited. It doesn't concern venue. It concerns  
24 basically --



1 MR. BEADLES: Your Honor, I could give you --

2 MS. LIDDELL: I think that --

3 MR. BEADLES: -- about 50 examples of how  
4 she misquotes the law numerous times.

5 THE COURT: Let's not --

6 MR. BEADLES: I'm sorry.

7 MS. LIDDELL: It's not specific to venue.  
8 It's specific to whether an oral pronouncement from the  
9 bench is appealable, but I'd be happy to get the Court  
10 some information regarding venue motions as  
11 interlocutory appeals.

12 THE COURT: But it -- but it isn't -- and  
13 you indicated a denial of a change of venue, then, you  
14 believe is an appealable order; is that correct?

15 MS. LIDDELL: I do believe that, yes.  
16 That's my understanding.

17 THE COURT: I think you're probably correct  
18 on that, in regards to that. So if my intent in this  
19 particular matter -- and again, I'm just trying to help  
20 you out a little bit. If my intent in this matter  
21 basically is to go ahead and issue a formal order  
22 denying a change of venue, then should we stop this and  
23 go back and let the Supreme Court determine whether or  
24 not venue is proper or not before we go forward? Or is

1 it more convenient for me to go ahead and basically  
2 rule on any of the other motions, which the Supreme  
3 Court would then say, once the change of venue motion  
4 was made, I'd kind of lack jurisdiction maybe to make  
5 that determination?

6 MS. LIDDELL: Yes, Your Honor. That's an  
7 interesting question. I think it would be appropriate  
8 at this point, especially for convenience of the  
9 parties and the Court, so as to conserve judicial  
10 resources, to just proceed today and go ahead and issue  
11 rulings on the pending motions. And then if for some  
12 reason, the Nevada Supreme Court reversed the -- the  
13 venue order, the order denying the motion to change  
14 venue, then yes, as the Court said, that if the Court  
15 should not have had venue, the Court would --

16 THE COURT: Then they -- they would set  
17 aside whatever my rulings are?

18 MS. LIDDELL: They would -- they would just  
19 go ahead and set the -- yes, exactly. Thank you.

20 THE COURT: I just wanted to clarify.  
21 Let me ask you this: Obviously,  
22 somebody help -- did somebody help you draft all your  
23 briefs?

24 MR. BEADLES: No, Your Honor. You're

1 looking at him.

2 THE COURT: Okay. I -- again, you did a  
3 very good job from that standpoint. I mean, you cited  
4 a lot of stuff. I was just curious if you had --

5 MR. BEADLES: Oh, I've got mountains.

6 THE COURT: Huh?

7 MR. BEADLES: I have mountains more. I can  
8 go.

9 THE COURT: No, I was just curious if you  
10 had any attorney help you --

11 MR. BEADLES: No, Your Honor.

12 THE COURT: -- in respect to that because --

13 MR. BEADLES: You're looking at him.

14 THE COURT: Yeah. Okay. Well, go ahead  
15 with your arguments and that, because I -- my intent  
16 then would be probably to go ahead and rule on the  
17 motion in respect to dismiss or not dismiss, in respect  
18 to that. That would at least save some judicial  
19 economy from this -- what would happen if I didn't do  
20 that. Then it would go up and come back down, and then  
21 it'd have to go -- or anything else. So I think it's  
22 judicious to go ahead at this point in time, so --

23 MR. BEADLES: Okay. Just for the record  
24 again, I object.

1 THE COURT: I understand that.

2 MR. BEADLES: So again, the signature  
3 verification is the only way that we have to ensure  
4 that our votes are legitimately counted, right? If  
5 they're not checking the signatures, that means that  
6 Mickey Mouse and Donald Duck and everybody else that's  
7 written on the -- on the envelope can just pass as  
8 legitimate votes. The registrar of voters told the  
9 workers not to do signature verification. That right  
10 there again is breaking the law, countless NRSs. All  
11 this is laid out in 160 different exhibits for you, as  
12 well as the initial filings and pleadings in Exhibit  
13 109, as well as Supplemental Exhibits 16 through 22,  
14 all the issues with the voter rolls, 1 through 23  
15 exhibits. You'll be able to see all the -- the -- the  
16 correspondence I've had back and forth with them, when  
17 they said they would do their job. They obviously  
18 didn't.

19 Exhibit 111. This is very interesting.  
20 So I don't know if you've had a chance to look at  
21 Exhibit 111, but that comes directly from the District  
22 Attorney's own office. Basically, all the claims that  
23 I'm seeking remedy for, in their own words, they state  
24 they can do. They can grant it. So that right there,

1 their entire lawsuit -- or sorry, their entire defense  
2 is trashed. It's garbage. We have to move this case  
3 forward, because literally I have their own internal  
4 documents that were shared with the commissioners that  
5 literally state that most of the things that I'm asking  
6 for, they can grant remedy to themselves, yet they  
7 failed to do, they refuse to do. You, of course, could  
8 enjoin them to do it. Exhibit 111 clearly shows about  
9 six or seven different items that they could do if they  
10 were forced to, or even if they just decided to do what  
11 the people wanted.

12 Again, all this stuff overcomes a 12B5  
13 motion because all I have to do is basically just state  
14 a claim that is short, concise, right, that shows I'm  
15 able to get ready, which I've clearly done on just  
16 these few instances. I can go all day. Number 7, I  
17 have literally shown, using the county's own certified  
18 data -- this is what they've sworn under penalty of  
19 perjury, what they put their John Hancock to, what they  
20 said is true, right? This is what they broadcast to  
21 the world, their election certified results. Well, the  
22 funny thing is, just taking somebody with a sixth grade  
23 math level, they can look at the precincts of 1,286  
24 precincts between Clark County and Washoe County, and

1 guess what? They all voted identically the same. How  
2 in the hell does that happen in a fair and free  
3 election?  
4 I take this to them. What do they do?  
5 They ridicule me, they libel and slander me in the  
6 press, but they never ever address it. Surely, Your  
7 Honor, you can look at the petitions. You can look at  
8 all the things that I've given to them, all the proof  
9 and all the evidence that's come from people way  
10 smarter than me. These are mathematicians, but you  
11 only need a sixth-grader to figure this out. Every  
12 single precinct in the two largest counties, separated  
13 on opposite sides of the state, voted identically the  
14 same. How in the hell does that happen in a fair  
15 election, especially when Carson City, nothing like  
16 that. The other 15 counties, nothing like that. Just  
17 in Washoe, just in Clark, all identically the same.  
18 Surely you can have them look into it  
19 and say, you know, Beadles, you're mad, man. You're  
20 crazy. Look, they didn't vote the same, or, oh my god,  
21 he's right. They did. You should probably go look  
22 into this. You, of course, have the power to do this.  
23 These simple examples I just gave you clearly show that  
24 this case has to go forward. I overcome 12B5 all day

1 long. I overcome the Rule 11. I overcome their motion  
2 for sanctions, all of it. I just needed one claim.  
3 I've literally just given you seven, just like that. I  
4 can go all day with hundreds more if you want, Your  
5 Honor.

6 THE COURT: Okay. That's fine. Thank you.  
7 Again, I've gone through, I read the briefs, and I've  
8 gone through -- I've checked the law. I've gone  
9 through all the different statutes. I've gone through  
10 the constitutional requirements. I've looked at all  
11 the different articles cited. I've looked at -- your  
12 first cause of action basically was a claim under  
13 Article 1, Section 10 of the Nevada Constitution. Your  
14 second cause of action primarily was a claim primarily  
15 under Article 15, Section 2 of the Nevada Constitution,  
16 also a mandamus claim in respect to that -- in regards  
17 to that. Your second cause of action primarily is a  
18 complaint for removal under NRS 266.430. The claim --  
19 additionally, it claims removal under NRS 283.440 in  
20 respect to this matter.  
21 I've gone through and I -- I've read,  
22 again, all the allegations against these individuals in  
23 respect to this particular matter, and based upon my  
24 review of all those documents and everything else, so

1 that this can all go up to the Supreme Court at once,  
2 I'm going to go ahead, basically, and on that basis, I  
3 think Mr. --

4 MS. LIDDELL: Sorry, Your Honor.

5 THE COURT: -- Beadles's complaint fails to  
6 speed any claims upon which relief can be granted. I  
7 know he's got a lot of smoke, mirrors, and all kinds of  
8 fancy numbers and everything else.

9 MR. BEADLES: Well then, I move to  
10 disqualify you right now.

11 THE COURT: But none of it --

12 MR. BEADLES: I move to disqualify you right  
13 now to tie your hands to do anything else.

14 THE COURT: But none of it makes any sense  
15 for any violation under the Nevada Constitution or  
16 Nevada law. Based upon that, I'm dismissing his  
17 complaint pursuant to NRCP 12B5 with prejudice so that  
18 it can go to the Supreme Court. They can review all  
19 his actions and review everything just as I did, but I  
20 find no basis. Now, under the motion for sanctions. I  
21 don't believe I will sanction you at all in respect to  
22 this. I think you believe in what you've done, and I  
23 think you have some belief in respect to that.

24 MR. BEADLES: Then your court orders mean



1 absolutely nothing.

2 THE COURT: But --

3 MR. BEADLES: You literally just dismissed a  
4 case where there was court orders demanding my rights  
5 be met, and they didn't do that.

6 THE COURT: Okay. We're fine.

7 MR. BEADLES: I don't understand how you're  
8 doing what you're doing and still, you know --

9 THE COURT: That's fine.

10 MR. BEADLES: -- wearing a robe.

11 THE COURT: But I am going to -- but I am  
12 going to go ahead and award attorney's fees to Washoe  
13 County. I'm doing that under NRS 18.0102(b), under  
14 Brunzell v. Golden Gate National Bank case. I would  
15 like the defendants to provide us with detailed  
16 accounting of their attorney's fees and costs they  
17 spent in respect to this particular matter in regards  
18 to that. I will sign both orders, the order for change  
19 of venue, also the order to dismiss. In respect to  
20 that, you'll file additional motion for the attorney's  
21 fees in respect to this particular matter. We'll go  
22 forward on that basis.

23 MS. LIDDELL: Thank you, Your Honor.

24 THE COURT: Thank you. Court will be in

1 recess.

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