

FILED

JAN 05 2024

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *Elizabeth A. Brown*
DEPUTY CLERK

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT BEADLES,
Appellant,

No. 87683

vs.

JAIME RODRIGUEZ; WASHOE COUNTY
REGISTRAR OF VOTERS; ERIC BROWN;
ALEXIS HILL; WASHOE COUNTY,
Respondents.

RECORD ON APPEAL

VOL VI

ROBERT BEADLES
10580 N. MCCARRAN BLVD.
#115, APT. 386
RENO, NEVADA 89503

LYNDSAY L. LIDDELL, ESQ.,
DEPUTY DISTRICT ATTORNEY
ELIZABETH HICKMAN, ESQ.,
DEPUTY DISTRICT ATTORNEY
ONE SOUTH SIERRA STREET
RENO, NEVADA 89501

APPELLANT IN PROPER PERSON

ATTORNEYS FOR RESPONDENT

24. 00491

THE SUPREME COURT OF THE STATE OF NEVADA

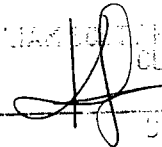
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2023 SEP 26 PM 3: 35

WILLIAM L. LERUD
CLERK
BY  CLERK

2885

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.

Case No.: 23OC001051B
~~CV23-01341~~

Dept. No.: 1

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.

CORRECTED ORDER GRANTING PLAINTIFF'S MOTION TO CHANGE VENUE¹

Currently before the Court is Defendant Robert Beadles' ("Plaintiff") *Motion to Change Venue* ("Motion") filed August 13, 2023. On August 17, 2023, Jamie Rodriguez ("Ms. 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 ("County Manager Brown") in his official

¹ This Corrected Order changes a typographical error in the title (changing "Defendant's" to "Plaintiff's").

1 capacity as Washoe County Manager and in his personal capacity; Alexis Hill (“Commissioner Hill”)
2 in her official capacity of Chairwoman of Washoe County Board of Commissioners and in her
3 personal capacity; and Washoe County, Nevada, a political subdivision of the State of Nevada
4 (collectively “Defendants”) filed an *Opposition to Motion for Change of Venue* (“Opposition”). On
5 August 24, 2023, Plaintiff filed *Reply in Support of Motion to Change Venue* (“Reply”) and submitted
6 the Motion to the Court for consideration.

7 **I. Background**

8 Plaintiff filed his *Complaint* (“Complaint”) on August 4, 2023. Therein, Plaintiff asserts the
9 following:

- 10 1. The Complaint is brought against Defendants based on their violations of Plaintiff’s state
11 Constitutional rights to due process, equal protection, voter’s rights, and the laws and
12 codes of Nevada related to the conduct of elections regarding Defendants’ non-response
13 to Plaintiff’s grievances and “general stonewalling” when presented with reports and
14 analysis on voting systems in use in Washoe County and various requests for information.
15 Complaint ¶ 33.
- 16 2. Plaintiff alleges violations of his rights and the laws of Nevada based on the Defendants
17 having never acknowledged or responded to three formal Petitions filed with the county
18 by Plaintiff. *Id.* ¶ 31.
- 19 3. Plaintiff will show that Defendants willfully committed acts of malpractice,
20 maladministration, and/or nonfeasance, and perjury in the conduct of their official duties,
21 thus having the appearance of impropriety and damaging the public’s trust. *Id.* ¶ 32.
- 22 4. Plaintiff includes Exhibit 109 that is a highlight of several supplemental statements in
23 support of the merits of the underlying Petitions. Individually and as a whole, Plaintiff
24 contends that the highlights presented in Exhibit 109 are of such a serious matter that they
25 cannot be ignored-just as the original Petitions should never have been ignored to cure the
26 problems that are self-evident, including but not limited to: unclean and grossly inaccurate
27 voter rolls, un-approved and unsecure voting systems that Defendants chose of their own
28 volition, the rush toward pioneering new technology that could impact county, state, and

1 national security, failure to train staff and election officials, failure to provide trained
2 election officials, telling staff to not verify signatures, unequal treatment of signatures at
3 the polls, counting of votes in secret, illegal function within the election system, and gross
4 violations of the Nevada Revised Statutes and Administrative Codes regarding election
5 procedures. *Id.* ¶ 33.

6 5. Exhibit 109, point 6 (a) provides “The Washoe ROV’s [Registrar of Voters] staff has seen:
7 ‘100% turnover in permanent staff and a loss of institutional knowledge.’ The Elections
8 Group 6-9-23.” The Election Group is the consulting agency initially hired by County
9 Manager Brown. *Id.* ¶ 34.

10 6. Plaintiff alleges the Registrar of Voters is in violation of Nevada law and, if left
11 uncorrected, is unprepared to run the 2024 presidential primary safely, securely, and
12 accurately as required by law unless all the issues are put on the table and addressed by
13 one or more Defendant(s) under the Court’s supervision. *Id.* ¶ 35.

14 7. Plaintiff alleges Defendant(s) ignored Plaintiffs Petitions as an annoyance and will
15 continue to do so if this Court does not intervene. *Id.* ¶ 36.

16 8. Plaintiff demands the Complaint and the underlying Petitions be heard by this honorable
17 court. *Id.* ¶ 37.

18 **II. Legal Authority**

19 The Nevada Supreme Court reviews a district court’s ruling on a motion for change of venue
20 under NRS 13.050(2) for an abuse of discretion. *Roethlisberger v. McNulty*, 127 Nev. 559, 563, 256
21 P.3d 955, 957 (2011). A district court may, on motion or stipulation, change the place of the
22 proceeding “[w]hen there is reason to believe that an impartial proceeding cannot be had therein” or
23 “[w]hen the convenience of the witnesses and the ends of justice would be promoted by the change.”
24 NRS 13.050(2)(b) and (c). “When the place of the proceeding is changed, all other matters relating
25 to the proceeding shall be had in the county to which the place of the proceeding is changed . . . and
26 the papers shall be filed or transferred accordingly.” NRS 13.050(3).

27 In evaluating a pre-voir dire change of venue motion, the Court considers five factors: “(1)
28 the nature and extent of the pretrial publicity; (2) the size of the community; (3) the nature and gravity

1 of the lawsuit; (4) the status of the plaintiff and defendant in the community; and (5) the existence of
2 political overtones in the case.” See *Nat’l Collegiate Athletic Ass’n v. Tarkanian*, 113 Nev. 610, 613-
3 14, 939 P.3d 1049, 1051-52 (1997) (citing *People v. Hamilton*, 48 Cal.3d 1142, 774 P.3d 730 (1989)).

4 **III. Analysis**

5 In Plaintiff’s Motion, Plaintiff contends that the prevailing local conditions and recent actions
6 of the Defendants severely compromise the prospect of a fair trial in this jurisdiction. Mot. at 2:1-4.
7 Plaintiff first alleges media bias in this case, arguing Defendants have been assisted by local media
8 outlets to advance an imbalanced and partial narrative concerning the case’s merits. *Id.* at 2:6-7. First,
9 Plaintiff alleges this media effort involves revealing non-public records and aims to portray the
10 Plaintiff’s claims as lacking validity, even though substantial corroborative evidence exists. *Id.* at 2:7-
11 9. Second, Plaintiff alleges improper release of non-public records as seen in the text messages with
12 Mark Robison, a reporter. *Id.* at 2:15-19. Third, Plaintiff contends he has valid reasons to assert that
13 certain court officials, inclusive of judges and clerks in Washoe County, share professional and
14 personal affiliations with the Defendants – showing the appearance of impropriety and undermining
15 the Plaintiff’s trust in obtaining an impartial trial. *Id.* at 2:20-24. For the foregoing reasons, Plaintiff
16 believes that securing an impartial trial is implausible in Washoe County. *Id.* at 3:1-2. Plaintiff seeks
17 transfer of the case to Lyon County as it is neutral and geographically convenient. *Id.* at 3:2-3.
18 Plaintiff argues transfer to Lyon County would serve the best interests of the public, benefit all parties
19 involved, and present no prejudice or evidence challenges in relation to the case.

20 In the Opposition, Defendants first argue that the Motion is entirely meritless – claiming the
21 public interest is best served by holding this case within the venue of Washoe County. Opp. at 2:13-
22 26. Defendants contend Plaintiff is advancing an imbalanced and partial narrative concerning the
23 case’s merits. *Id.* Next, Defendants argue Beadles’ causes of action bear no right to a jury trial –
24 noting that the right to a jury trial does not extend to either the equitable claim or the removal
25 proceeding. *Id.* at 3:19-4:3. Further, Defendants argue that a pre-voir dire change of venue is
26 otherwise unwarranted here in consideration of the five-factors test as enumerated in *Tarkanian*. *Id.*
27 at 4:5-10. Defendants argue the nature and extent of pretrial publicity has, to date, been minimal. *Id.*
28 at 4:21-23. Next, as to size of community, the Defendant argues that Washoe County has nearly half

1 a million people – noting no evidence that a population this size evidences potential difficulty in
2 seating a jury. Further, as to nature and gravity of the case, Defendants argue that the ongoing political
3 environment, not Beadles’ Complaint, bring the issues alleged to the forefront of the community’s
4 consciousness – alleging this is no less true for Lyon County than it is for Washoe County. *Id.* at 5:12-
5 18. As to status in the community, Defendants contend there is nothing about Beadles or Defendants’
6 status that makes venue in Washoe County necessarily biased or impartial towards either party. *Id.* at
7 5:19-25. As to the existence of political undertones, Defendant again points out that the nature of the
8 case has been presented in communities across the nature since the last major election – showing no
9 mitigation can be gained by moving this case to another venue. *Id.* at 5:26, 6:1-3. Finally, the
10 Defendants argue the Motion further evidences forum shopping – alleging how Beadles has engaged
11 in overt forum and judge shopping. *Id.* at 6:18-26, 7:1-6.

12 In the Reply, Plaintiff contends that the public interests in this case are varied and not solely
13 financial. Reply at 3:25-28. Plaintiff lists several concerns in the Reply countering the Defendants
14 assertion that a jury trial is unnecessary in this case.² *See Reply generally.* Further, Plaintiff alleges
15 the Defendants’ claim of forum-shopping is misleading and unfounded – noting how Plaintiff’s
16 request for impartiality is not forum shopping, nor can it be construed that Plaintiff’s prior actions
17 demonstrate ill intent in pursuing removal. *Id.* at 7-18. Plaintiff reiterates its allegations against the
18 Defendants – pointing to dozens of examples within the Exhibits he believes show Defendants’
19 attempts to portray him as a “right-wing conspiracy theorist.” *See Reply generally.* Finally, Plaintiff
20 argues all five prongs of *Tarkanian* have been met. *Id.* As to the nature and extent of the pretrial
21 publicity, Plaintiff argues the amount or level of publicity received (over 20 articles) supports a
22 showing of a vindictive tone portraying Beadles in the media. *Id.* at 13:9-16. Second, as to the size
23 of the community, Plaintiff argues that such a pervasive media presence in a county of 500,000 people
24 will render it “nearly impossible to find someone who hasn’t heard about this ‘crazy right-wing
25 election denier, extremist.” *Id.* at 13:18-25. As to the nature and gravity of the lawsuit, Plaintiff
26 argues this factor favors change of venue considering the preexisting relationships between the

27 ² Plaintiff lists concerns in general categories, including: (1) Right to Impartial Adjudicator is Paramount; (2) Judges,
28 Though Presumed Unbiased, Are Human; (3) Right to Jury Trial in Constitutional Violations; (4) Monetary Damages
Claim; (5) Equitable Claims; (6) Discretion of the Court; (7) Precedence on Removal Proceedings; and (8) Purpose of a
Jury.

1 defense, the Defendants, court officials, and community leaders. *Id.* at 14:1-6. Further, Plaintiff
2 argues the status of the parties within the community clearly favors a change of venue – arguing the
3 Defendants have made Beadles a public figure by sending out several emails to the entire county
4 email list. *Id.* 14:21-23. Plaintiff again points to the extensive TV and social media coverage depicting
5 Beadles as an extremist. *Id.* at 14:23-28. Finally, Plaintiff alleges the existence of political overtones
6 in the case validates Beadles’ position that a change in venue is warranted – asserting how Beadles
7 has time and time again demonstrated the issues with the election system in Washoe County, a
8 paramount issue in the case that cannot be tried in an unbiased manner without a change in venue. *Id.*
9 at 15:3-16.

10 After reviewing the pleadings and applicable law, this Court finds good reason to grant the
11 Plaintiff’s Motion and transfer venue to the First Judicial District Court in Carson City, Nevada. As
12 discussed by the parties in the pleadings, this Court looks to the five *Tarkanian* factors to determine
13 if venue should be transferred.

14 The first factor, the nature and extent of the pretrial publicity, favors a change in venue.
15 Throughout his Motion, Plaintiff cites the extent of the pretrial publicity garnered from this dispute.
16 Plaintiff points specifically to Exhibits filed in support of the Motion that tend to show significant
17 media presence surrounding the case – including pieces of media republished on a Defendant’s
18 platform, and pieces published in highly trafficked local press. Further, Defendant argues the coverage
19 has expanded to the national media, citing to coverage in the Associated Press on the matter. The
20 Court agrees with the Plaintiff that the issues that are central to this case have been broadly covered
21 by local media outlets and widely distributed to the Washoe County voting population by computer
22 network applications such as email and Facebook, which favors a change in venue. Further, the
23 information generated by the parties is arguably polarizing and at times inflammatory, which also
24 favors a change of venue.³ See *Sicor, Inc. v. Hutchinson*, 127 Nev. 904, 915, 266 P.3d 608, 616 (2011)

25 ³ See Exhibit 120. “*Election-fraud claims resurfaced in Nevada as Robert Beadles revises Washoe County lawsuit.*”
26 “[Beadles’] goal ... remains the same: to have a court address the validity of his election grievances and remove Washoe
27 County Registrar of Voters Jamie Rodriguez, County Manager Eric Brown and Alexis Hill, Washoe County Commission
28 chair ... In response to the first lawsuit, the Washoe County District Attorney’s office sent Beadles a letter on Tuesday
calling his claims the “inaccurate rantings of a conspiracy theorist”. *Reno Gazette Journal*. See also Exhibit 132: “*Robert
Beadles tests Washoe County election fraud claims in court.*” “For a year and a half, Robert Beadles has criticized Washoe
County officials in public meetings, blog posts and email over election concerns. He’s now filed a lawsuit backing up his

1 (finding that a consideration of whether the evidence “reveal[s] the kind of inflammatory or polarizing
2 material associated with a need for change of venue” is proper.) Further, Plaintiff asserts that his
3 action is directed at changes to the voting process prior to the 2024 election, which is just fourteen
4 months from now. The possibility that a trial in this case will be close in time to, or coincide with the
5 election, is real.⁴

6 The second and third *Tarkanian* factors are viewed as neutral to this Court. On its face, the
7 Washoe County population (~500,000) evidences no identifiable issues favoring either party with
8 regard to seating a fair and impartial jury in this matter, nor is the nature or gravity of the issue in this
9 case unique to Washoe County alone.

10 The fourth factor, the status of the Plaintiff and Defendants in the community, favors a change
11 in venue. The summarization of Plaintiff’s pleadings above and the multitude of Exhibits filed in this
12 case detail the manner and extent to which he has become a well-known public figure in Washoe
13 County whose primary objective is criticizing and changing the manner in which elections are
14 conducted in Washoe County. Further, each of the Defendants is a publicly elected official, whose
15 campaigns include broad outreach to the county’s voting population which will comprise a jury, if
16 one is seated in this case. There is no denying that the parties in this case have unique and far-reaching
17 popularity in northern Nevada. Accordingly, this factor favors a change of venue.

18 The fifth factor, the existence of political overtones in the case, favors denying a change of
19 venue. This Court agrees that the political overtones in the case are not unique to Washoe County and
20 are experienced in many communities across the country with respect to local election integrity.

21 On balance, and in consideration of all *Tarkanian* factors, this Court finds it proper to grant
22 the Motion. The parties are entitled to entrust the important legal issues in this case to a venue where
23 there would be few if any external influences and where the *Tarkanian* factors are neutralized. While
24 factors two, three and five are not determinative, as discussed above, factors one and four weigh

25
26 claims.” *Reno Gazette Journal*. See also Exhibit 135, Commissioner Hill’s campaign email. “Can you believe this? I’m
27 being sued ... I wouldn’t let wild conspiracy theories stand in the way of our free and fair elections. Now, MAGA
28 extremist and recent California transplant Robert Beadles is suing me. Guess what? I don’t cave to bullies! I need you
with us ... Together we can show Beadles and his army of extremists that they have no place in Washoe County.”

⁴ The *Tarkanian* court also considered a sixth factor, which was not specifically enumerated: the amount of time that
separated the release of the publicity and the trial. *Tarkanian*, 113 Nev. at 614, 939 P.2d at 1052.

1 heavily in favor of changing venue in this case. Further, the change of venue to the First Judicial
2 District considers the convenience of the parties and any witnesses that would be called to testify.


3 Based upon the foregoing and good cause appearing,

4 IT IS HEREBY ORDERED that Plaintiff Robert Beadles' *Motion to Change Venue* is
5 GRANTED.

6 IT IS HEREBY FURTHER ORDERED that venue is changed to the First Judicial District
7 Court in Carson City, Nevada for all further proceedings in the above-entitled matter.

8 IT IS SO ORDERED.

9 DATED this 14th day of September, 2023.

10 
11 _____
12 KATHLEEN M. DRAKULICH
13 DISTRICT JUDGE
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1 **CERTIFICATE OF SERVICE**

2 CASE NO. CV23-01341

3 I certify that I am an employee of the SECOND JUDICIAL DISTRICT COURT of the
4 STATE OF NEVADA, COUNTY OF WASHOE; that on the 14th day of September, 2023, I
5 electronically filed the **CORRECTED ORDER GRANTING PLAINTIFF'S MOTION TO**
6 **CHANGE VENUE** with the Clerk of the Court by using the ECF system.

7 I further certify that I transmitted a true and correct copy of the foregoing document by the
8 method(s) noted below:

9 **Electronically filed with the Clerk of the Court by using the ECF system which will send a notice**
10 **of electronic filing to the following:**

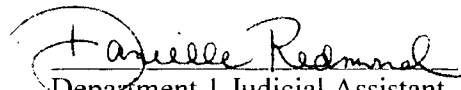
11 ROBERT BEADLES

12 LINDSAY LIDDELL, ESQ. for ALEXIS HILL, ERIC BROWN, WASHOE COUNTY,
13 JAMIE RODRIGUEZ

14 ELIZABETH HICKMAN, ESQ. for ALEXIS HILL, ERIC BROWN, WASHOE COUNTY,
15 JAMIE RODRIGUEZ

16 **Deposited to the Second Judicial District Court mailing system in a sealed envelope for postage**
17 **and mailing by Washoe County using the United States Postal Service in Reno, Nevada:**

18 **[NONE]**

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22 Department I Judicial Assistant
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6 **IN THE SECOND JUDICIAL DISTRICT COURT OF**
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24 Nevada, and DOES I-X; and ROE
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27 **ORDER GRANTING DEFENDANT'S MOTION TO CHANGE VENUE**

28 Currently before the Court is Defendant Robert Beadles' ("Plaintiff") *Motion to Change Venue* ("Motion") filed August 13, 2023. On August 17, 2023, Jamie Rodriguez ("Ms. 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 ("County Manager Brown") in his official capacity as Washoe County Manager and in his personal capacity; Alexis Hill ("Commissioner Hill")

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4 August 24, 2023, Plaintiff filed *Reply in Support of Motion to Change Venue* (“Reply”) and submitted
5 the Motion to the Court for consideration.

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8 following:

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12 certain court officials, inclusive of judges and clerks in Washoe County, share professional and
13 personal affiliations with the Defendants – showing the appearance of impropriety and undermining
14 the Plaintiff’s trust in obtaining an impartial trial. *Id.* at 2:20-24. For the foregoing reasons, Plaintiff
15 believes that securing an impartial trial is implausible in Washoe County. *Id.* at 3:1-2. Plaintiff seeks
16 transfer of the case to Lyon County as it is neutral and geographically convenient. *Id.* at 3:2-3.
17 Plaintiff argues transfer to Lyon County would serve the best interests of the public, benefit all parties
18 involved, and present no prejudice or evidence challenges in relation to the case.

19 In the Opposition, Defendants first argue that the Motion is entirely meritless – claiming the
20 public interest is best served by holding this case within the venue of Washoe County. Opp. at 2:13-
21 26. Defendants contend Plaintiff is advancing an imbalanced and partial narrative concerning the
22 case’s merits. *Id.* Next, Defendants argue Beadles’ causes of action bear no right to a jury trial –
23 noting that the right to a jury trial does not extend to either the equitable claim or the removal
24 proceeding. *Id.* at 3:19-4:3. Further, Defendants argue that a pre-voir dire change of venue is
25 otherwise unwarranted here in consideration of the five-factors test as enumerated in *Tarkanian*. *Id.*
26 at 4:5-10. Defendants argue the nation and extent of pretrial publicity has, to date, been minimal. *Id.*
27 at 4:21-23. Next, as to size of community, the Defendant argues that Washoe County has nearly half
28 a million people – noting no evidence that a population this size evidences potential difficulty in

1 seating a jury. Further, as to nature and gravity of the case, Defendants argue that the ongoing political
2 environment, not Beadles' Complaint, bring the issues alleged to the forefront of the community's
3 consciousness – alleging this is no less true for Lyon County than it is for Washoe County. *Id.* at 5:12-
4 18. As to status in the community, Defendants contend there is nothing about Beadles or Defendants'
5 status that makes venue in Washoe County necessarily biased or impartial towards either party. *Id.* at
6 5:19-25. As to the existence of political undertones, Defendant again points out that the nature of the
7 case has been presented in communities across the nature since the last major election – showing no
8 mitigation can be gained by moving this case to another venue. *Id.* at 5:26, 6:1-3. Finally, the
9 Defendants argue the Motion further evidences forum shopping – alleging how Beadles has engaged
10 in overt forum and judge shopping. *Id.* at 6:18-26, 7:1-6.

11 In the Reply, Plaintiff contends that the public interests in this case are varied and not solely
12 financial. Reply at 3:25-28. Plaintiff lists several concerns in the Reply countering the Defendants
13 assertion that a jury trial is unnecessary in this case.¹ *See Reply generally.* Further, Plaintiff alleges
14 the Defendants' claim of forum-shopping is misleading and unfounded – noting how Plaintiff's
15 request for impartiality is not forum shopping, nor can it be construed that Plaintiff's prior actions
16 demonstrate ill intent in pursuing removal. *Id.* at 7-18. Plaintiff reiterates its allegations against the
17 Defendants – pointing to dozens of examples within the Exhibits he believes show Defendants'
18 attempts to portray him as a “right-wing conspiracy theorist.” *See Reply generally.* Finally, Plaintiff
19 argues all five prongs of *Tarkanian* have been met. *Id.* As to the nature and extent of the pretrial
20 publicity, Plaintiff argues the amount or level of publicity received (over 20 articles) supports a
21 showing of a vindictive tone portraying Beadles in the media. *Id.* at 13:9-16. Second, as to the size
22 of the community, Plaintiff argues that such a pervasive media presence in a county of 500,000 people
23 will render it “nearly impossible to find someone who hasn't heard about this ‘crazy right-wing
24 election denier, extremist.” *Id.* at 13:18-25. As to the nature and gravity of the lawsuit, Plaintiff
25 argues this factor favors change of venue considering the preexisting relationships between the
26 defense, the Defendants, court officials, and community leaders. *Id.* at 14:1-6. Further, Plaintiff

27 ¹ Plaintiff lists concerns in general categories, including: (1) Right to Impartial Adjudicator is Paramount; (2) Judges,
28 Though Presumed Unbiased, Are Human; (3) Right to Jury Trial in Constitutional Violations; (4) Monetary Damages
Claim; (5) Equitable Claims; (6) Discretion of the Court; (7) Precedence on Removal Proceedings; and (8) Purpose of a
Jury.

1 argues the status of the parties within the community clearly favors a change of venue – arguing the
2 Defendants have made Beadles a public figure by sending out several emails to the entire county
3 email list. *Id.* 14:21-23. Plaintiff again points to the extensive TV and social media coverage depicting
4 Beadles as an extremist. *Id.* at 14:23-28. Finally, Plaintiff alleges the existence of political overtones
5 in the case validates Beadles’ position that a change in venue is warranted – asserting how Beadles
6 has time and time again demonstrated the issues with the election system in Washoe County, a
7 paramount issue in the case that cannot be tried in an unbiased manner without a change in venue. *Id.*
8 at 15:3-16.

9 After reviewing the pleadings and applicable law, this Court finds good reason to grant the
10 Plaintiff’s Motion and transfer venue to the First Judicial District Court in Carson City, Nevada. As
11 discussed by the parties in the pleadings, this Court looks to the five *Tarkanian* factors to determine
12 if venue should be transferred.

13 The first factor, the nature and extent of the pretrial publicity, favors a change in venue.
14 Throughout his Motion, Plaintiff cites the extent of the pretrial publicity garnered from this dispute.
15 Plaintiff points specifically to Exhibits filed in support of the Motion that tend to show significant
16 media presence surrounding the case – including pieces of media republished on a Defendant’s
17 platform, and pieces published in highly trafficked local press. Further, Defendant argues the coverage
18 has expanded to the national media, citing to coverage in the Associated Press on the matter. The
19 Court agrees with the Plaintiff that the issues that are central to this case have been broadly covered
20 by local media outlets and widely distributed to the Washoe County voting population by computer
21 network applications such as email and Facebook, which favors a change in venue. Further, the
22 information generated by the parties is arguably polarizing and at times inflammatory, which also
23 favors a change of venue.² *See Sicor, Inc. v. Hutchinson*, 127 Nev. 904, 915, 266 P.3d 608, 616 (2011)

24 ² See Exhibit 120. “Election-fraud claims resurfaced in Nevada as Robert Beadles revises Washoe County lawsuit.”
25 “[Beadles’] goal ... remains the same: to have a court address the validity of his election grievances and remove Washoe
26 County Registrar of Voters Jamie Rodriguez, County Manager Eric Brown and Alexis Hill, Washoe County Commission
27 chair ... In response to the first lawsuit, the Washoe County District Attorney’s office sent Beadles a letter on Tuesday
28 calling his claims the “inaccurate rantings of a conspiracy theorist”. *Reno Gazette Journal*. See also Exhibit 132: “Robert
Beadles tests Washoe County election fraud claims in court.” “For a year and a half, Robert Beadles has criticized Washoe
County officials in public meetings, blog posts and email over election concerns. He’s now filed a lawsuit backing up his
claims.” *Reno Gazette Journal*. See also Exhibit 135, Commissioner Hill’s campaign email. “Can you believe this? I’m
being sued ... I wouldn’t let wild conspiracy theories stand in the way of our free and fair elections. Now, MAGA

1 (finding that a consideration of whether the evidence “reveal[s] the kind of inflammatory or polarizing
2 material associated with a need for change of venue” is proper.) Further, Plaintiff asserts that his
3 action is directed at changes to the voting process prior to the 2024 election, which is just fourteen
4 months from now. The possibility that a trial in this case will be close in time to, or coincide with the
5 election, is real.³

6 The second and third *Tarkanian* factors are viewed as neutral to this Court. On its face, the
7 Washoe County population (~500,000) evidences no identifiable issues favoring either party with
8 regard to seating a fair and impartial jury in this matter, nor is the nature or gravity of the issue in this
9 case unique to Washoe County alone.

10 The fourth factor, the status of the Plaintiff and Defendants in the community, favors a change
11 in venue. The summarization of Plaintiff’s pleadings above and the multitude of Exhibits filed in this
12 case detail the manner and extent to which he has become a well-known public figure in Washoe
13 County whose primary objective is criticizing and changing the manner in which elections are
14 conducted in Washoe County. Further, each of the Defendants is a publicly elected official, whose
15 campaigns include broad outreach to the county’s voting population which will comprise a jury, if
16 one is seated in this case. There is no denying that the parties in this case have unique and far-reaching
17 popularity in northern Nevada. Accordingly, this factor favors a change of venue.

18 The fifth factor, the existence of political overtones in the case, favors denying a change of
19 venue. This Court agrees that the political overtones in the case are not unique to Washoe County and
20 are experienced in many communities across the country with respect to local election integrity.

21 On balance, and in consideration of all *Tarkanian* factors, this Court finds it proper to grant
22 the Motion. The parties are entitled to entrust the important legal issues in this case to a venue where
23 there would be few if any external influences and where the *Tarkanian* factors are neutralized. While
24 factors two, three and five are not determinative, as discussed above, factors one and four weigh
25 heavily in favor of changing venue in this case. Further, the change of venue to the First Judicial
26 District considers the convenience of the parties and any witnesses that would be called to testify.

27 extremist and recent California transplant Robert Beadles is suing me. Guess what? I don’t cave to bullies! I need you
28 with us ... Together we can show Beadles and his army of extremists that they have no place in Washoe County.”

³ The *Tarkanian* court also considered a sixth factor, which was not specifically enumerated: the amount of time that
separated the release of the publicity and the trial. *Tarkanian*, 113 Nev. at 614, 939 P.2d at 1052.

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Based upon the foregoing and good cause appearing,

IT IS HEREBY ORDERED that Plaintiff Robert Beadles' *Motion to Change Venue* is GRANTED.

IT IS HEREBY FURTHER ORDERED that venue is changed to the First Judicial District Court in Carson City, Nevada for all further proceedings in the above-entitled matter.

IT IS SO ORDERED.

DATED this 13th day of September, 2023.


KATHLEEN M. DRAKULICH
DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 CASE NO. CV23-01341

3 I certify that I am an employee of the SECOND JUDICIAL DISTRICT COURT of the
4 STATE OF NEVADA, COUNTY OF WASHOE; that on the 13th day of September, 2023, I
5 electronically filed the **ORDER GRANTING DEFENDANT'S MOTION TO CHANGE VENUE**
6 with the Clerk of the Court by using the ECF system.

7 I further certify that I transmitted a true and correct copy of the foregoing document by the
8 method(s) noted below:

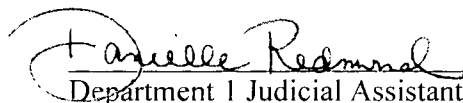
9 **Electronically filed with the Clerk of the Court by using the ECF system which will send a notice**
10 **of electronic filing to the following:**

11 ROBERT BEADLES

12 LINDSAY LIDDELL, ESQ. for ALEXIS HILL, ERIC BROWN, WASHOE COUNTY,
13 JAMIE RODRIGUEZ

14 ELIZABETH HICKMAN, ESQ. for ALEXIS HILL, ERIC BROWN, WASHOE COUNTY,
15 JAMIE RODRIGUEZ

16 **Deposited to the Second Judicial District Court mailing system in a sealed envelope for postage**
17 **and mailing by Washoe County using the United States Postal Service in Reno, Nevada:**
18 **[NONE]**

19
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21 
22 Department 1 Judicial Assistant
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FILED

SEP 22 2023

ALICIA L. LERUD, CLERK
By: Stelgark
DEPUTY CLERK

CODE 1356

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

MR. ROBERT BEADLES, an individual,

Plaintiff,

vs.

Case No. CV23-01341

Dept. No. 1

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.

CERTIFICATE OF MAILING

I hereby certify that I am an employee of the Second Judicial District Court of the
State of Nevada, County of Washoe, and that on September 22, 2023, I shipped four
boxes with Tracking Numbers 784114242893, 784114366850, 784114525362, and

1 784114714213, at the FedEx Shipment Center in Reno, Nevada, with imaged copies of
2 the original documents (electronic images are the official record of this Court) from the
3 above entitled case and Evidence binders addressed to:

4
5 First Judicial District Court
6 885 E. Musser St., Ste. 3031
7 Carson City, NV 89701

8 The undersigned does hereby affirm that pursuant to NRS 239B.030 and NRS 603A.040, the preceding
9 document does not contain the personal information of any person.

10 /s/SColabianchi
11 Deputy Clerk
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SECOND JUDICIAL DISTRICT COURT
COUNTY OF WASHOE

Case History - CV23-01341

DEPT. D1

HON. KATHLEEN DRAKULICH

Report Date & Time

9/22/2023

11:28:13AM

Case ID: CV23-01341		Case Description: Change of Venue: date sent out 9/22/2023			
Case Type: OTHER CIVIL MATTERS		Initial Filing Date: 8/4/2023			
		Parties			
PLTF		ROBERT BEADLES - @1385622			
DA		Elizabeth Hickman, Esq. - 11598			
DA		Lindsay Liddell, Esq. - 14079			
DEFT		ALEXIS HILL - @1405338			
DEFT		ERIC BROWN - @1387331			
DEFT		WASHOE COUNTY - @828			
DEFT		JAMIE RODRIGUEZ - @1405337			
		Charges			
Charge No.	Charge Code	Charge Date	Charge Description		
		Plea Information			
Charge No.	Plea Code	Plea Date	Plea Description		
		Release Information			
		Custody Status			
		Hearings			
Department	Event Description	Sched. Date & Time		Disposed Date	
1 D1	Request for Submission	9/5/2023	10:53:00	9/13/2023	
Event Extra Text: MOTION TO DISMISS FILED BY DEFENDANTS ON AUGUST 15, 2023		Disposition: \$200 9/13/2023			
		Agency Cross Reference			
Code	Agency Description	Case Reference I.D.			
		Actions			
Action Entry Date	Code	Code Description	Text		
8/4/2023	2490	Motion ...	MOTION TO REQUEST JUDGE SIMONS - Transaction 9814373 - Approved By: YVILORIA : 08-04-2023:15:03:		
8/4/2023	\$1425	\$Complaint - Civil	Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34		
8/4/2023	PAYRC	**Payment Received	A Payment of \$255.00 was made on receipt CDC722684.		
8/4/2023	4090	** Summons Issued	WC - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34		
8/4/2023	4090	** Summons Issued	RODRIGUEZ - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34		
8/4/2023	4090	** Summons Issued	BROWN - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34		

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

Case ID:	CV23-01341	Case Type:	OTHER CIVIL MATTERS	Initial Filing Date:	8/4/2023
8/4/2023	4090	** Summons Issued	HILL - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34		
8/4/2023	NEF	Proof of Electronic Service	Transaction 9814536 - Approved By: NOREVIEW : 08-04-2023:15:03:57		
8/7/2023	3161	Ord of Recusal	Transaction 9816674 - Approved By: NOREVIEW : 08-07-2023:14:26:26		
8/7/2023	NEF	Proof of Electronic Service	Transaction 9816680 - Approved By: NOREVIEW : 08-07-2023:14:27:13		
8/9/2023	4105	Supplemental ...	SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S COMPLAINT - Transaction 9821268 - Approved By:		
8/9/2023	NEF	Proof of Electronic Service	Transaction 9821695 - Approved By: NOREVIEW : 08-09-2023:14:34:52		
8/9/2023	NEF	Proof of Electronic Service	Transaction 9819971 - Approved By: NOREVIEW : 08-09-2023:08:29:31		
8/9/2023	2490	Motion ...	2nd Motion To Request Judge Simons - Transaction 9819860 - Approved By: MSALAZAR : 08-09-2023:08:28:45		
8/9/2023	1775	General Receipt	NOTICE OF RECEIPT (MEDIA MAIL) - TRANSFERRED TO EVIDENCE CLERK - Transaction 9821676 - Appro		
8/9/2023	COC	Evidence Chain of Custody Form			
8/9/2023	NEF	Proof of Electronic Service	Transaction 9821272 - Approved By: NOREVIEW : 08-09-2023:13:43:12		
8/10/2023	\$3375	\$Peremptory Challenge	Transaction 9825101 - Approved By: CSULEZIC : 08-11-2023:08:00:10		
8/10/2023	NEF	Proof of Electronic Service	Transaction 9823721 - Approved By: NOREVIEW : 08-10-2023:12:28:51		
8/10/2023	NEF	Proof of Electronic Service	Transaction 9823778 - Approved By: NOREVIEW : 08-10-2023:12:40:47		
8/10/2023	NEF	Proof of Electronic Service	Transaction 9823860 - Approved By: NOREVIEW : 08-10-2023:13:02:53		
8/10/2023	2610	Notice ...	DFX: AS WAS FILED INCORRECTLY AS A NOTICE, THIS DOCUMENT BYPASSED CLERK REVIEW AND NC		
8/10/2023	2490	Motion ...	COMPLAINT FOR EQUITABLE, INJUNCTIVE RELIEF, PETITION FOR REMOVAL OF PUBLIC OFFICIAL FRO		
8/10/2023	1312	Case Assignment Notification	RANDOMLY REASSIGNED TO D7 FROM D15 PER ORDER OF RECUSAL FILED 8/7/23 - Transaction 982371		
8/11/2023	PAYRC	**Payment Received	A Payment of \$450.00 was made on receipt DCDC723276.		
8/11/2023	1312	Case Assignment Notification	PER PEREMPTORY CHALLENGE FILED 08/11/2023 RANDOMLY REASSIGNED FROM DEPARTMENT 7 TO		
8/11/2023	1067	Affidavit of Service	DFX: CASE NUMBER IS ON LAST PAGE		
8/11/2023	NEF	Proof of Electronic Service	Transaction 9826046 - Approved By: NOREVIEW : 08-11-2023:11:56:33		
8/11/2023	NEF	Proof of Electronic Service	Transaction 9825696 - Approved By: NOREVIEW : 08-11-2023:10:16:57		
8/11/2023	NEF	Proof of Electronic Service	Transaction 9825253 - Approved By: NOREVIEW : 08-11-2023:08:00:49		
8/13/2023	2270	Mtn to Compel...	Motion to Compel Court to issue citations against defendants - Transaction 9827465 - Approved By: DSTAGGS		
8/13/2023	2030	Mtn for Change of Venue	Transaction 9827480 - Approved By: DSTAGGS : 08-14-2023:08:20:47		
8/14/2023	NEF	Proof of Electronic Service	Transaction 9827648 - Approved By: NOREVIEW : 08-14-2023:08:17:19		
8/14/2023	NEF	Proof of Electronic Service	Transaction 9827670 - Approved By: NOREVIEW : 08-14-2023:08:23:36		
8/14/2023	NEF	Proof of Electronic Service	Transaction 9829575 - Approved By: NOREVIEW : 08-14-2023:15:22:33		
8/14/2023	1075	Affidavit ...	Proof of service for all exhibits, motions, orders etc filed thru 8/11/23 - Transaction 9829570 - Approved By: NOR		
8/15/2023	CHECK	**Trust Disbursement	A Disbursement of \$450.00 on Check Number 15171		
8/15/2023	2315	Mtn to Dismiss ...	Transaction 9831148 - Approved By: YVILORIA : 08-15-2023:12:16:36		
8/15/2023	2180	Mtn for Recusal	MOTION FOR RECUSAL OF JUDGE - Transaction 9832928 - Approved By: SACORDAG : 08-16-2023:07:44:11		
8/15/2023	NEF	Proof of Electronic Service	Transaction 9831160 - Approved By: NOREVIEW : 08-15-2023:12:17:16		
8/16/2023	2645	Opposition to Mtn ...	OPPOSITION TO MOTION TO REQUEST JUDGE SIMONS - Transaction 9833100 - Approved By: YVILORIA :		
8/16/2023	NEF	Proof of Electronic Service	Transaction 9833112 - Approved By: NOREVIEW : 08-16-2023:08:33:03		
8/16/2023	NEF	Proof of Electronic Service	Transaction 9833003 - Approved By: NOREVIEW : 08-16-2023:07:44:49		
8/17/2023	2645	Opposition to Mtn ...	TO CHANGE VENUE - Transaction 9835579 - Approved By: DSTAGGS : 08-17-2023:08:42:34		
8/17/2023	NEF	Proof of Electronic Service	Transaction 9835773 - Approved By: NOREVIEW : 08-17-2023:09:33:58		

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

Case ID:	CV23-01341	Case Type:	OTHER CIVIL MATTERS	Initial Filing Date:	8/4/2023
8/17/2023	2645	Opposition to Mtn ...	OPPOSITION TO MOTION TO COMPEL COURT TO ISSUE CITATIONS AGAINST DEFENDANTS - Transactio		
8/17/2023	NEF	Proof of Electronic Service	Transaction 9835591 - Approved By: NOREVIEW : 08-17-2023:08:43:15		
8/17/2023	2645	Opposition to Mtn ...	TO REQUEST JUDGE SIMONS - Transaction 9835583 - Approved By: DSTAGGS : 08-17-2023:08:44:38		
8/17/2023	NEF	Proof of Electronic Service	Transaction 9835605 - Approved By: NOREVIEW : 08-17-2023:08:45:10		
8/21/2023	3161	Ord of Recusal	Transaction 9841736 - Approved By: NOREVIEW : 08-21-2023:13:33:21		
8/21/2023	1312	Case Assignment Notification	RANDOMLY REASSIGNED TO D1 FROM D9 PER ORDER OF RECUSAL FILED 8/21/23 - Transaction 984184		
8/21/2023	NEF	Proof of Electronic Service	Transaction 9841739 - Approved By: NOREVIEW : 08-21-2023:13:34:03		
8/21/2023	NEF	Proof of Electronic Service	Transaction 9841854 - Approved By: NOREVIEW : 08-21-2023:13:56:37		
8/24/2023	NEF	Proof of Electronic Service	Transaction 9849400 - Approved By: NOREVIEW : 08-24-2023:11:56:17		
8/24/2023	4105	Supplemental ...	SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION - Transaction 9849395 - Approved By: N		
8/24/2023	1775	General Receipt	NOTICE OF RECEIPT (MEDIA MAIL) - TRANSFERRED TO EVIDENCE CLERK - Transaction 9850146 - Appro		
8/24/2023	3795	Reply...	REPLY IN SUPPORT OF MOTION TO COMPEL ISSUANCE OF CITATIONS - Transaction 9849224 - Approved		
8/24/2023	COC	Evidence Chain of Custody Form			
8/24/2023	NEF	Proof of Electronic Service	Transaction 9849229 - Approved By: NOREVIEW : 08-24-2023:11:17:54		
8/24/2023	NEF	Proof of Electronic Service	Transaction 9850150 - Approved By: NOREVIEW : 08-24-2023:14:35:14		
8/24/2023	3795	Reply...	REPLY IN SUPPORT OF MOTION TO CHANGE VENUE - Transaction 9849224 - Approved By: NOREVIEW : 1		
8/29/2023	2645	Opposition to Mtn ...	PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS - Transaction 9856384 - Approved By: YVILORIA : 08-29		
8/29/2023	NEF	Proof of Electronic Service	Transaction 9856405 - Approved By: NOREVIEW : 08-29-2023:11:38:56		
8/31/2023	NEF	Proof of Electronic Service	Transaction 9861121 - Approved By: NOREVIEW : 08-31-2023:11:12:21		
8/31/2023	1075	Affidavit ...	Proof of Service - Transaction 9861117 - Approved By: NOREVIEW : 08-31-2023:11:11:54		
9/5/2023	NEF	Proof of Electronic Service	Transaction 9867439 - Approved By: NOREVIEW : 09-05-2023:10:53:58		
9/5/2023	NEF	Proof of Electronic Service	Transaction 9867437 - Approved By: NOREVIEW : 09-05-2023:10:53:37		
9/5/2023	3860	Request for Submission	Transaction 9867436 - Approved By: NOREVIEW : 09-05-2023:10:53:21		
9/5/2023	3795	Reply...	REPLY IN SUPPORT OF MOTION TO DISMISS - Transaction 9867433 - Approved By: NOREVIEW : 09-05-202		
9/7/2023	2490	Motion ...	MOTION IN REQUEST OF SUR-REPLY - Transaction 9873046 - Approved By: YVILORIA : 09-07-2023:10:39:4		
9/7/2023	NEF	Proof of Electronic Service	Transaction 9873074 - Approved By: NOREVIEW : 09-07-2023:10:40:29		
9/11/2023	2185	Mtn for Sanctions	Transaction 9879797 - Approved By: NOREVIEW : 09-11-2023:15:02:42		
9/11/2023	NEF	Proof of Electronic Service	Transaction 9879805 - Approved By: NOREVIEW : 09-11-2023:15:03:47		
9/13/2023	2645	Opposition to Mtn ...	OPPOSITION OF MOTION IN REQUEST OF SUR-REPLY - Transaction 9884666 - Approved By: YVILORIA : 0		
9/13/2023	S200	Request for Submission Complet			
9/13/2023	2540	Notice of Entry of Ord	Transaction 9885163 - Approved By: NOREVIEW : 09-13-2023:16:35:20		
9/13/2023	2885	Ord for Change of Venue	ORDER GRANTING DEFENDANT'S MOTION TO CHANGE VENUE - Transaction 9884298 - Approved By: NO		
9/13/2023	NEF	Proof of Electronic Service	Transaction 9884303 - Approved By: NOREVIEW : 09-13-2023:14:04:34		
9/13/2023	NEF	Proof of Electronic Service	Transaction 9884699 - Approved By: NOREVIEW : 09-13-2023:15:19:58		
9/13/2023	NEF	Proof of Electronic Service	Transaction 9885177 - Approved By: NOREVIEW : 09-13-2023:16:36:25		
9/14/2023	FIE	**Document Filed in Error			
9/14/2023	F105	Transferred	CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT -CARSON CITY		
9/14/2023	COC	Evidence Chain of Custody Form	4X THUMB DRIVES AND 12X BINDERS SENT TO 1ST JUDICIAL DISTRICT COURT		
9/14/2023	1485	Corrected Judgment or Ord	CORRECTED ORDER GRANTING PLAINTIFF'S MOTION TO CHANGE VENUE - Transaction 9885572 - Appr		

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

Case ID:	CV23-01341	Case Type:	OTHER CIVIL MATTERS	Initial Filing Date:	8/4/2023
9/14/2023	NEF	Proof of Electronic Service	Transaction 9885610 - Approved By: NOREVIEW : 09-14-2023:08:34:08		
9/14/2023	2540	Notice of Entry of Ord	Transaction 9885609 - Approved By: NOREVIEW : 09-14-2023:08:33:29		
9/14/2023	NEF	Proof of Electronic Service	Transaction 9885575 - Approved By: NOREVIEW : 09-14-2023:08:14:00		
9/18/2023	NEF	Proof of Electronic Service	Transaction 9892342 - Approved By: NOREVIEW : 09-18-2023:14:01:11		
9/18/2023	2175	Mtn for Reconsideration	LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION - Transaction 9892233 - Af		
9/21/2023	NEF	Proof of Electronic Service	Transaction 9900796 - Approved By: NOREVIEW : 09-21-2023:14:49:47		
9/21/2023	NEF	Proof of Electronic Service	Transaction 9900810 - Approved By: NOREVIEW : 09-21-2023:14:51:01		
9/21/2023	NEF	Proof of Electronic Service	Transaction 9901023 - Approved By: NOREVIEW : 09-21-2023:15:24:07		
9/21/2023	2030	Mtn for Change of Venue	DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT -CARSON CITY 9/14/23 - Transaction 990		
9/21/2023	2645	Opposition to Mtn ...	DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT -CARSON CITY 9/22/23 OPPOSITION OF		
9/21/2023	2645	Opposition to Mtn ...	dfx: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT -CARSON CITY 9/22/23 OPPOSITION TO		
9/22/2023	1356	Certificate of Mailing	Transaction 9902191 - Approved By: NOREVIEW : 09-22-2023:11:03:08		
9/22/2023	1356	Certificate of Mailing	Additional Documents Mailed to First Judicial District Court on 9/22/2023 - Transaction 9902273 - Approved By:		
9/22/2023	NEF	Proof of Electronic Service	Transaction 9902275 - Approved By: NOREVIEW : 09-22-2023:11:22:28		
9/22/2023	NEF	Proof of Electronic Service	Transaction 9902192 - Approved By: NOREVIEW : 09-22-2023:11:03:37		

1 CODE 1356

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3
4 IN THE FAMILY DIVISION
5 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
6 IN AND FOR THE COUNTY OF WASHOE
7

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10 MR. ROBERT BEADLES, an individual,

Case No. CV23-01341

11 Plaintiff,

Dept. No. 1

12 vs.

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

26 Defendants.
27 _____ /

28 CERTIFICATE OF MAILING

I hereby certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe, and that on September 22, 2023, I deposited in the County mailing system for postage and certified mailing, Certified Mail Tracking Number

1 7010 0290 0002 9306 0092 with the U.S. Postal Service in Reno, Nevada, with additional
2 imaged copies of the original documents (electronic images are the official record of this
3 Court) from the above entitled case to First Judicial District Court. The documents included
4 are: Limited Motion for Reconsideration of Change of Venue Location , Opposition to
5 Motion For Sanctions, Opposition of Motion For Sanctions, Motion For Change Of Venue,
6 Certificate of Mailings and an updated Court Docket as of September 22, 2023.

7
8 First Judicial District Court
9 885 E. Musser St., Ste. 3031
10 Carson City, NV 89701

11 The undersigned does hereby affirm that pursuant to NRS 239B.030 and NRS 603A.040, the preceding
document does not contain the personal information of any person.

12 /s/SColabianchi
13 Deputy Clerk
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FILED

SEP 22 2023

ALICIA L. LERUD, CLERK
By: Stelgbrand
DEPUTY CLERK

1 CODE 1356

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4 IN THE FAMILY DIVISION
5 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
6 IN AND FOR THE COUNTY OF WASHOE
7
8
9

10 MR. ROBERT BEADLES, an individual,

Case No. CV23-01341

11 Plaintiff,

Dept. No. 1

12 vs.
13

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

26 Defendants.
27 _____/

28 CERTIFICATE OF MAILING

I hereby certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe, and that on September 22, 2023, I shipped four boxes with Tracking Numbers 784114242893, 784114366850, 784114525362, and

1 784114714213, at the FedEx Shipment Center in Reno, Nevada, with imaged copies of
2 the original documents (electronic images are the official record of this Court) from the
3 above entitled case and Evidence binders addressed to:
4

5 First Judicial District Court
6 885 E. Musser St., Ste. 3031
7 Carson City, NV 89701

8 The undersigned does hereby affirm that pursuant to NRS 239B.030 and NRS 603A.040, the preceding
9 document does not contain the personal information of any person.

10 /s/SColabianchi
11 Deputy Clerk
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SECOND JUDICIAL DISTRICT COURT COUNTY OF WASHOE

Case History - CV23-01341

DEPT. D1

HON. KATHLEEN DRAKULICH

Report Date & Time

9/22/2023

11:28:13AM

Case ID: CV23-01341		Case Description: Change of Venue: date sent out 9/22/2023		Initial Filing Date: 8/4/2023		
Case Type: OTHER CIVIL MATTERS						
		Parties				
PLTF		ROBERT BEADLES - @1385622				
DA		Elizabeth Hickman, Esq. - 11598				
DA		Lindsay Liddell, Esq. - 14079				
DEFT		ALEXIS HILL - @1405338				
DEFT		ERIC BROWN - @1387331				
DEFT		WASHOE COUNTY - @828				
DEFT		JAMIE RODRIGUEZ - @1405337				
		Charges				
Charge No.	Charge Code	Charge Date	Charge Description			
		Plea Information				
Charge No.	Plea Code	Plea Date	Plea Description			
		Release Information				
		Custody Status				
		Hearings				
Department		Event Description		Sched. Date & Time		Disposed Date
1	DI	Request for Submission		9/5/2023	10:53:00	9/13/2023
Event Extra Text: MOTION TO DISMISS FILED BY DEFENDANTS ON AUGUST 15, 2023				Disposition: S200 9/13/2023		
		Agency Cross Reference				
Code	Agency Description		Case Reference I.D.			

Actions			Text
Action Entry Date	Code	Code Description	
8/4/2023	2490	Motion ...	MOTION TO REQUEST JUDGE SIMONS - Transaction 9814373 - Approved By: YVILORIA : 08-04-2023:15:03:
8/4/2023	\$1425	\$Complaint - Civil	Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34
8/4/2023	PAYRC	**Payment Received	A Payment of \$255.00 was made on receipt DCDC722684.
8/4/2023	4090	** Summons Issued	WC - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34
8/4/2023	4090	** Summons Issued	RODRIGUEZ - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34
8/4/2023	4090	** Summons Issued	BROWN - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34

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

Case ID:	CV23-01341	Case Type:	OTHER CIVIL MATTERS	Initial Filing Date:	8/4/2023
8/4/2023	4090	** Summons Issued	HILL - Transaction 9813859 - Approved By: CSULEZIC : 08-04-2023:11:38:34		
8/4/2023	NEF	Proof of Electronic Service	Transaction 9814536 - Approved By: NOREVIEW : 08-04-2023:15:03:57		
8/7/2023	3161	Ord of Recusal	Transaction 9816674 - Approved By: NOREVIEW : 08-07-2023:14:26:26		
8/7/2023	NEF	Proof of Electronic Service	Transaction 9816680 - Approved By: NOREVIEW : 08-07-2023:14:27:13		
8/9/2023	4105	Supplemental ...	SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S COMPLAINT - Transaction 9821268 - Approved By:		
8/9/2023	NEF	Proof of Electronic Service	Transaction 9821695 - Approved By: NOREVIEW : 08-09-2023:14:34:52		
8/9/2023	NEF	Proof of Electronic Service	Transaction 9819971 - Approved By: NOREVIEW : 08-09-2023:08:29:31		
8/9/2023	2490	Motion ...	2nd Motion To Request Judge Simons - Transaction 9819860 - Approved By: MSALAZAR : 08-09-2023:08:28:45		
8/9/2023	1775	General Receipt	NOTICE OF RECEIPT (MEDIA MAIL) - TRANSFERRED TO EVIDENCE CLERK - Transaction 9821676 - Appro		
8/9/2023	COC	Evidence Chain of Custody Form			
8/9/2023	NEF	Proof of Electronic Service	Transaction 9821272 - Approved By: NOREVIEW : 08-09-2023:13:43:12		
8/10/2023	\$3375	\$Peremptory Challenge	Transaction 9825101 - Approved By: CSULEZIC : 08-11-2023:08:00:10		
8/10/2023	NEF	Proof of Electronic Service	Transaction 9823721 - Approved By: NOREVIEW : 08-10-2023:12:28:51		
8/10/2023	NEF	Proof of Electronic Service	Transaction 9823778 - Approved By: NOREVIEW : 08-10-2023:12:40:47		
8/10/2023	NEF	Proof of Electronic Service	Transaction 9823860 - Approved By: NOREVIEW : 08-10-2023:13:02:53		
8/10/2023	2610	Notice ...	DFX: AS WAS FILED INCORRECTLY AS A NOTICE, THIS DOCUMENT BYPASSED CLERK REVIEW AND NC		
8/10/2023	2490	Motion ...	COMPLAINT FOR EQUITABLE, INJUNCTIVE RELIEF, PETITION FOR REMOVAL OF PUBLIC OFFICIAL FRO		
8/10/2023	1312	Case Assignment Notification	RANDOMLY REASSIGNED TO D7 FROM D15 PER ORDER OF RECUSAL FILED 8/7/23 - Transaction 982371		
8/11/2023	PAYRC	**Payment Received	A Payment of \$450.00 was made on receipt DCDC723276.		
8/11/2023	1312	Case Assignment Notification	PER PEREMPTORY CHALLENGE FILED 08/11/2023 RANDOMLY REASSIGNED FROM DEPARTMENT 7 TO		
8/11/2023	1067	Affidavit of Service	DFX: CASE NUMBER IS ON LAST PAGE		
8/11/2023	NEF	Proof of Electronic Service	Transaction 9826046 - Approved By: NOREVIEW : 08-11-2023:11:56:33		
8/11/2023	NEF	Proof of Electronic Service	Transaction 9825696 - Approved By: NOREVIEW : 08-11-2023:10:16:57		
8/11/2023	NEF	Proof of Electronic Service	Transaction 9825253 - Approved By: NOREVIEW : 08-11-2023:08:00:49		
8/13/2023	2270	Mtn to Compel...	Motion to Compel Court to issue citations against defendants - Transaction 9827465 - Approved By: DSTAGGS		
8/13/2023	2030	Mtn for Change of Venue	Transaction 9827480 - Approved By: DSTAGGS : 08-14-2023:08:20:47		
8/14/2023	NEF	Proof of Electronic Service	Transaction 9827648 - Approved By: NOREVIEW : 08-14-2023:08:17:19		
8/14/2023	NEF	Proof of Electronic Service	Transaction 9827670 - Approved By: NOREVIEW : 08-14-2023:08:23:36		
8/14/2023	NEF	Proof of Electronic Service	Transaction 9829575 - Approved By: NOREVIEW : 08-14-2023:15:22:33		
8/14/2023	1075	Affidavit ...	Proof of service for all exhibits, motions, orders etc filed thru 8/11/23 - Transaction 9829570 - Approved By: NOR		
8/15/2023	CHECK	**Trust Disbursement	A Disbursement of \$450.00 on Check Number 15171		
8/15/2023	2315	Mtn to Dismiss ...	Transaction 9831148 - Approved By: YVILORIA : 08-15-2023:12:16:36		
8/15/2023	2180	Mtn for Recusal	MOTION FOR RECUSAL OF JUDGE - Transaction 9832928 - Approved By: SACORDAG : 08-16-2023:07:44:11		
8/15/2023	NEF	Proof of Electronic Service	Transaction 9831160 - Approved By: NOREVIEW : 08-15-2023:12:17:16		
8/16/2023	2645	Opposition to Mtn ...	OPPOSITION TO MOTION TO REQUEST JUDGE SIMONS - Transaction 9833100 - Approved By: YVILORIA :		
8/16/2023	NEF	Proof of Electronic Service	Transaction 9833112 - Approved By: NOREVIEW : 08-16-2023:08:33:03		
8/16/2023	NEF	Proof of Electronic Service	Transaction 9833003 - Approved By: NOREVIEW : 08-16-2023:07:44:49		
8/17/2023	2645	Opposition to Mtn ...	TO CHANGE VENUE - Transaction 9835579 - Approved By: DSTAGGS : 08-17-2023:08:42:34		
8/17/2023	NEF	Proof of Electronic Service	Transaction 9835773 - Approved By: NOREVIEW : 08-17-2023:09:33:58		

Case Description: Change of Venue: date sent out 9/22/2023			
Case ID:	CV23-01341	Case Type:	OTHER CIVIL MATTERS
			Initial Filing Date: 8/4/2023
8/17/2023	2645	Opposition to Mtn ...	OPPOSITION TO MOTION TO COMPEL COURT TO ISSUE CITATIONS AGAINST DEFENDANTS - Transaction 9835591 - Approved By: NOREVIEW : 08-17-2023:08:43:15
8/17/2023	NEF	Proof of Electronic Service	TO REQUEST JUDGE SIMONS - Transaction 9835583 - Approved By: DSTAGGS : 08-17-2023:08:44:38
8/17/2023	2645	Opposition to Mtn ...	Transaction 9835605 - Approved By: NOREVIEW : 08-17-2023:08:45:10
8/17/2023	NEF	Proof of Electronic Service	Transaction 9841736 - Approved By: NOREVIEW : 08-21-2023:13:33:21
8/21/2023	3161	Ord of Recusal	RANDOMLY REASSIGNED TO D1 FROM D9 PER ORDER OF RECUSAL FILED 8/21/23 - Transaction 984184
8/21/2023	1312	Case Assignment Notification	Transaction 9841739 - Approved By: NOREVIEW : 08-21-2023:13:34:03
8/21/2023	NEF	Proof of Electronic Service	Transaction 9841854 - Approved By: NOREVIEW : 08-21-2023:13:56:37
8/21/2023	NEF	Proof of Electronic Service	Transaction 9849400 - Approved By: NOREVIEW : 08-24-2023:11:56:17
8/24/2023	NEF	Proof of Electronic Service	SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION - Transaction 9849395 - Approved By: NOREVIEW : 08-24-2023:11:56:17
8/24/2023	4105	Supplemental ...	NOTICE OF RECEIPT (MEDIA MAIL) - TRANSFERRED TO EVIDENCE CLERK - Transaction 9850146 - Approved By: NOREVIEW : 08-24-2023:11:17:54
8/24/2023	1775	General Receipt	REPLY IN SUPPORT OF MOTION TO COMPEL ISSUANCE OF CITATIONS - Transaction 9849224 - Approved By: NOREVIEW : 08-24-2023:14:35:14
8/24/2023	3795	Reply...	REPLY IN SUPPORT OF MOTION TO CHANGE VENUE - Transaction 9849224 - Approved By: NOREVIEW : 08-24-2023:14:35:14
8/24/2023	COC	Evidence Chain of Custody Form	PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS - Transaction 9856384 - Approved By: YVILORIA : 08-29-2023:11:38:56
8/24/2023	NEF	Proof of Electronic Service	Transaction 9856405 - Approved By: NOREVIEW : 08-29-2023:11:38:56
8/24/2023	NEF	Proof of Electronic Service	Transaction 9861121 - Approved By: NOREVIEW : 08-31-2023:11:12:21
8/24/2023	3795	Reply...	Proof of Service - Transaction 9861117 - Approved By: NOREVIEW : 08-31-2023:11:11:54
8/29/2023	2645	Opposition to Mtn ...	Transaction 9867439 - Approved By: NOREVIEW : 09-05-2023:10:53:58
8/29/2023	NEF	Proof of Electronic Service	Transaction 9867437 - Approved By: NOREVIEW : 09-05-2023:10:53:37
8/31/2023	NEF	Proof of Electronic Service	Transaction 9867436 - Approved By: NOREVIEW : 09-05-2023:10:53:21
8/31/2023	1075	Affidavit ...	REPLY IN SUPPORT OF MOTION TO DISMISS - Transaction 9867433 - Approved By: NOREVIEW : 09-05-2023:10:53:21
9/5/2023	NEF	Proof of Electronic Service	MOTION IN REQUEST OF SUR-REPLY - Transaction 9873046 - Approved By: YVILORIA : 09-07-2023:10:39:4
9/5/2023	NEF	Proof of Electronic Service	Transaction 9873074 - Approved By: NOREVIEW : 09-07-2023:10:40:29
9/5/2023	3860	Request for Submission	Transaction 9879797 - Approved By: NOREVIEW : 09-11-2023:15:02:42
9/5/2023	3795	Reply...	Transaction 9879805 - Approved By: NOREVIEW : 09-11-2023:15:03:47
9/7/2023	2490	Motion ...	OPPOSITION OF MOTION IN REQUEST OF SUR-REPLY - Transaction 9884666 - Approved By: YVILORIA : 09-13-2023:16:35:20
9/7/2023	NEF	Proof of Electronic Service	ORDER GRANTING DEFENDANT'S MOTION TO CHANGE VENUE - Transaction 9884298 - Approved By: NOREVIEW : 09-13-2023:16:35:20
9/11/2023	2185	Mtn for Sanctions	Transaction 9884303 - Approved By: NOREVIEW : 09-13-2023:14:04:34
9/11/2023	NEF	Proof of Electronic Service	Transaction 9884699 - Approved By: NOREVIEW : 09-13-2023:15:19:58
9/13/2023	2645	Opposition to Mtn ...	Transaction 9885177 - Approved By: NOREVIEW : 09-13-2023:16:36:25
9/13/2023	S200	Request for Submission Complet	
9/13/2023	2540	Notice of Entry of Ord	
9/13/2023	2885	Ord for Change of Venue	
9/13/2023	NEF	Proof of Electronic Service	
9/13/2023	NEF	Proof of Electronic Service	
9/13/2023	NEF	Proof of Electronic Service	
9/14/2023	FIE	**Document Filed in Error	
9/14/2023	F105	Transferred	CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT -CARSON CITY
9/14/2023	COC	Evidence Chain of Custody Form	4X THUMB DRIVES AND 12X BINDERS SENT TO 1ST JUDICIAL DISTRICT COURT
9/14/2023	1485	Corrected Judgment or Ord	CORRECTED ORDER GRANTING PLAINTIFF'S MOTION TO CHANGE VENUE - Transaction 9885572 - Approved By: NOREVIEW : 09-13-2023:16:36:25

Report Date & Time
9/22/2023
11:28:13AM

		Case Description: Change of Venue: date sent out 9/22/2023			
Case ID:	CV23-01341	Case Type:	OTHER CIVIL MATTERS	Initial Filing Date:	8/4/2023
9/14/2023	NEF	Proof of Electronic Service	Transaction 9885610 - Approved By: NOREVIEW : 09-14-2023:08:34:08		
9/14/2023	2540	Notice of Entry of Ord	Transaction 9885609 - Approved By: NOREVIEW : 09-14-2023:08:33:29		
9/14/2023	NEF	Proof of Electronic Service	Transaction 9885575 - Approved By: NOREVIEW : 09-14-2023:08:14:00		
9/18/2023	NEF	Proof of Electronic Service	Transaction 9892342 - Approved By: NOREVIEW : 09-18-2023:14:01:11		
9/18/2023	2175	Mtn for Reconsideration	LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION - Transaction 9892233 - Af		
9/21/2023	NEF	Proof of Electronic Service	Transaction 9900796 - Approved By: NOREVIEW : 09-21-2023:14:49:47		
9/21/2023	NEF	Proof of Electronic Service	Transaction 9900810 - Approved By: NOREVIEW : 09-21-2023:14:51:01		
9/21/2023	NEF	Proof of Electronic Service	Transaction 9901023 - Approved By: NOREVIEW : 09-21-2023:15:24:07		
9/21/2023	2030	Mtn for Change of Venue	DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/14/23 - Transaction 990		
9/21/2023	2645	Opposition to Mtn ...	DFX: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/22/23 OPPOSITION OF		
9/21/2023	2645	Opposition to Mtn ...	dfx: CHANGE OF VENUE TO FIRST JUDICIAL DISTRICT COURT –CARSON CITY 9/22/23 OPPOSITION TO		
9/22/2023	1356	Certificate of Mailing	Transaction 9902191 - Approved By: NOREVIEW : 09-22-2023:11:03:08		
9/22/2023	1356	Certificate of Mailing	Additional Documents Mailed to First Judicial District Court on 9/22/2023 - Transaction 9902273 - Approved By:		
9/22/2023	NEF	Proof of Electronic Service	Transaction 9902275 - Approved By: NOREVIEW : 09-22-2023:11:22:28		
9/22/2023	NEF	Proof of Electronic Service	Transaction 9902192 - Approved By: NOREVIEW : 09-22-2023:11:03:37		

1 Code:
2 Name: Robert Beadles
3 Address: 10580 N McCarran Blvd
4 #115 Apt 38b
Telephone: 714 573 7133
Email: Beadlesmail@gmail.com
Self-Represented Litigant

7 IN THE FAMILY DIVISION
8 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
9 IN AND FOR THE COUNTY OF WASHOE

10 Robert Beadles
11 Plaintiff/Petitioner,

Case No. CV23-01341

12 vs.

Dept. No. 1

13 Jamie Rodriguez et al
14 Defendant/Respondent.

16 COVER PAGE

17 Attached is Motion to Change Venue

18 (Print the name of document to be submitted to the Court)

19 Case was transferred to D1. They do not have
20 filings yet. They said to file in D2 & once
21 D2 sends all filings to D1 it will be in
22 that package.

23 This document does not contain the Social Security number of any person.

24 I declare, under penalty of perjury under the law of the State of Nevada, that the foregoing
25 is true and correct.

26 Date: 9/21/23

Your Signature: [Signature]

28 Print Your Name: Robert Beadles

1 ROBERT BEADLES
2 10580 N. McCarran Blvd. #115, Apt. 386
3 Reno, NV 89503
4 *Plaintiff, Pro Se*

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

7 MR ROBERT BEADLES, an individual,
8 Plaintiff,

Case No.: CV23-01341

Dept. No.:

9 vs.

10 JAMIE RODRIGUEZ, in her official capacity as
11 Registrar of Voters and in her personal capacity;
12 the WASHOE COUNTY REGISTRAR OF
13 VOTERS, a government agency; ERIC BROWN in
14 his official capacity as WASHOE COUNTY
15 MANAGER and in his personal capacity, ALEXIS
16 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.

17 Defendants.

18 **Plaintiff's Motion To Change Venue**
19

20
21 Plaintiff Robert Beadles ("Beadles") submits the following Motion To Change Venue.

22
23 **ISSUE:**
24

25 The Plaintiff has brought action against the Defendants for multiple alleged violations, including but
26 not limited to election law violations, breach of court orders, malfeasance, nonfeasance, professional
27 malpractice, and the removal of officers from office. The three Defendants, the Defense, and the
28

1 Plaintiff are well-known figures in both Washoe County and Carson City. In order to secure a fair
2 and unbiased trial, to which the Plaintiff is entitled under his constitutional rights, he respectfully
3 petitions this Honorable Court to change the venue to Lyon County. In Lyon County, the extent of
4 media bias and the relationships of the Defendants, the Defense, and the Plaintiff are significantly
5 less pervasive than in Carson City.

6 7 **BACKGROUND** 8

9 The Plaintiff successfully secured a change of venue from Washoe County, though not to Lyon
10 County as requested [Exhibit 154]. The same considerations that necessitated a change of venue
11 from Washoe County apply equally, if not more compellingly, in Carson City. Carson City has a
12 population of approximately 58,000 individuals, the majority of whom harbor a negative bias against
13 the Plaintiff. Media outlets that have persistently disseminated negative coverage about the Plaintiff
14 in Washoe County also reach Carson City.

15
16 Furthermore, the Defendants maintain personal and professional relationships in Carson City
17 through various esteemed institutions, including this Honorable Court, the Secretary of State, the
18 Attorney General, the Legislature, and lobbyists. Carson City serves as the epicenter of political
19 affairs in Nevada. In this setting, the Plaintiff has been erroneously portrayed as the "Godfather of
20 Election Reform" and maligned as a right-wing conspiracy theorist, characterizations that are
21 patently false.

22
23 The Plaintiff is a Constitutionalist, in the tradition of his Great Uncle, Benjamin Franklin. He has no
24 interest in propagating conspiracy theories; rather, his aim is to hold wrongdoers accountable and to
25 protect our election system from reaching a point of irreversible corruption. Through his pleadings
26 and exhibits, the Plaintiff has substantiated claims of systemic election issues and has identified
27 numerous laws violated by the Defendants. He is entitled to an unbiased trial where his evidence will
28 be evaluated strictly on its merits and ruled upon impartially by a jury.

1
2 Based on an extensive body of research, the Plaintiff is firmly convinced that he will not receive a
3 fair trial in Carson City. Accordingly, he respectfully petitions this Honorable Court to transfer the
4 venue to Lyon County, where he believes he will have the best opportunity for an unbiased trial that
5 will serve the broader interests of the people of Nevada.

6
7 It is in the public's best interest to relocate this case to Lyon County. While the Plaintiff is the named
8 party, the implications of this case extend far beyond him to impact hundreds of thousands of people,
9 including even this Honorable Judge. The principle at stake is fundamental: if there are no
10 consequences for those who break the law, then justice is compromised, and the very foundation of
11 our country—built on the sacrifices of those who fought and died to uphold the rule of law and
12 constitutional rights—is eroded. It is this sacred framework that entitles the Plaintiff to an unbiased
13 trial and the opportunity to hold alleged lawbreakers accountable for their actions.

14
15 “Not only is it important that justice be done; it is equally important that it be seen to be done.” -
16 Justice Sonia Sotomayor

17
18
19 **Judge Drakulich Summary of Plaintiffs Allegations**

20
21 **I. Background**

22 Plaintiff filed his *Complaint* (“Complaint”) on August 4, 2023. Therein, Plaintiff asserts the
23 following:

- 24 1. The Complaint is brought against Defendants based on their violations of Plaintiff’s state
25 Constitutional rights to due process, equal protection, voter’s rights, and the laws and codes
26 of Nevada related to the conduct of elections regarding Defendants’ non-response to
27 Plaintiff’s grievances and “general stonewalling” when presented with reports and analysis
28 on voting systems in use in Washoe County and various requests for information. Complaint
¶ 33.
2. 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. *Id.* ¶ 31.

- 1 3. Plaintiff will show that Defendants willfully committed acts of malpractice,
2 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. *Id.* ¶ 32.
- 3 4. Plaintiff includes Exhibit 109 that is a highlight of several supplemental statements in
4 support of the merits of the underlying Petitions. Individually and as a whole, Plaintiff
5 contends that the highlights presented in Exhibit 109 are of such a serious matter that they
6 cannot be ignored-just as the original Petitions should never have been ignored to cure the
7 problems that are self-evident, including but not limited to: unclear and grossly inaccurate
8 voter rolls, un-approved and unsecure voting systems that Defendants chose of their own
9 volition, the rush toward pioneering new technology that could impact county, state, and
10 national security, failure to train staff and election officials, failure to provide trained election
11 officials, telling staff to not verify signatures, unequal treatment of signatures at the polls,
12 counting of votes in secret, illegal function within the election system, and gross violations of
13 the Nevada Revised Statutes and Administrative Codes regarding election procedures. *Id.* ¶
14 33.
- 15 5. Exhibit 109, point 6 (a) provides "The Washoe ROV's [Registrar of Voters] staff has seen:
16 '100% turnover in permanent staff and a loss of institutional knowledge.' The Elections
17 Group 6-9-23." The Election Group is the consulting agency initially hired by County
18 Manager Brown. *Id.* ¶ 34.
- 19 6. Plaintiff alleges the Registrar of Voters is in violation of Nevada law and, if left uncorrected,
20 is unprepared to run the 2024 presidential primary safely, securely, and accurately as
21 required by law unless all the issues are put on the table and addressed by one or more
22 Defendant(s) under the Court's supervision. *Id.* ¶ 35.
- 23 7. Plaintiff alleges Defendant(s) ignored Plaintiffs Petitions as an annoyance and will continue
24 to do so if this Court does not intervene. *Id.* ¶ 36.
- 25 8. Plaintiff demands the Complaint and the underlying Petitions be heard by this honorable
26 court. *Id.* ¶ 37.

17
18 **Plaintiffs Condensed Partial List Of Allegations:**

19
20
21 "Defendants have no duty to follow the law, and no consequences for breaking it." That is their
22 defense in a sentence.

23
24 Defendants violated court orders [Exhibit 72] by counting the 2022 Washoe County Primary and
25 Gilbert Contest in Secret in secret. This act of illegality additionally violated numerous NRS as
26 shown in [Exhibit 17, and 109] all of which was caught on video for the world to see in [Exhibit 23
27 and 24]. This act of illegality was also in the plaintiffs original complaint.

1 Defendants violated NRS statutes as signature verification was not done per law, as shown in
2 [Exhibits 1-3, 18, and 109] and claimed in original complaint.

3
4 Defendants failed to meaningfully address the Illegal function within the Washoe County Election
5 System as shown in [Exhibits 1-3, 16, 60-68, 94, 104, 105, 109, 110, 112, 128-131, 146 and the
6 original complaint]

7
8
9 Defendants stole Washoe County property for self-enrichment as shown in Defendant Hills actions
10 [Exhibits 134, 135, 138-140] which is also stated in the original complaint.

11
12 Defendants have used their position for self-enrichment as shown in Defendant Brown using his
13 office to allegedly remove his wife from DUI implications [Exhibits 136, 137 and 143] as
14 additionally stated in original complaint.

15
16
17 Defendants have failed the responsibilities of conducting the voters Elections and are not ready for
18 the 2024 elections as shown in [Exhibits 22, 101, 109, 118, 119, 121, 122 and original complaint].

19
20 Defendants have failed to respond to the Plaintiffs petitions [Exhibits 1-3] which violated NV
21 Constitution, their oath of office, NRS, Nevada Voter Bill of Rights and many more rules as
22 additionally shown in original complaint.

23
24
25 Defendants are subject to removal of office per NRS 283.440 for all of the above examples and
26 additionally countless more in the original complaint and as demonstrated in [Exhibits 1-154].

27
28 **II. ARGUMENT**

1
2 **A. THE BASIS FOR THE CHANGE OF VENUE IS FOUNDED ON LEGITIMATE**
3 **CONCERNS**
4

5 "It is not only of some importance but is of fundamental importance that justice should not only be
6 done, but should manifestly and undoubtedly be seen to be done." - Sir William Blackstone
7

8 An impartial judge is like a balance beam. It must be level in order to weigh the evidence fairly." -
9 Earl Warren, Chief Justice of the Supreme Court of the United States
10

11
12 Impartiality Concerns Are Well-Founded. In fact, it is now impossible for Beadles to receive a fair
13 trial in Carson City. The defense, defendants, and media all appear to be working in concert against
14 Beadles for a trial by ambush. In [Exhibit 132], it's evident that receiving a fair trial for Beadles in
15 Carson City is now an impossibility due to their shenanigans at best. One can observe Defendant
16 Hill using the media, the DA, resorting to libel and slander against Beadles, by sending out a request
17 for financial gain for her own campaign! What's worse? We're told she used the entire Washoe
18 County email database, as she is a sitting County Commissioner with access to it! This has vast ties
19 to Carson City as well. She clearly did this to further taint the case and for financial gain [Exhibit
20 134, 135, 139 and 140].
21

22
23 Additionally, the defense was caught trying to obfuscate the truth when they state that NRS 239
24 allows them to share "public records with the media." While that is true, what the defense fails to
25 admit is the press did not ask for the *Motion For Sanctions*; the defense sent it to the media, it
26 appears, even before it was sent to the Plaintiff.¹³² Additionally, the *Motion For Sanctions*, which
27 was filed with libelous defaming mistruths, should have been NON-PUBLIC for the 21 days as
28 required by law for the Plaintiff to decide whether or not he wants to move forward with the case or

1 to dismiss it. It is clear that the Defense, the Defendants, and the media are all working against
2 Beadles unethically which was all covered here in Carson City. Even more recently in [Exhibit 154]
3 The Nevada Appeal's latest article on the Plaintiff skirts dangerously close to labeling him as right-
4 wing, violent, and harassing, and even suggests that he has paid demonstrators. All of these
5 allegations are blatant lies.

6 [https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-](https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-of-elected-officials)
7 [of-elected-officials](https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-of-elected-officials)

8
9 While the defendants try to downplay the significance of the clear biases and affiliations in Washoe
10 County, and Carson City. Beadles' concerns are neither unfounded nor without basis. It's not merely
11 the appearance of lack of impartiality that's at stake here; there is a direct blatant display of bias and
12 partiality.

13
14 **Public Interests Are Varied and Not Solely Financial.**

15
16 Although the Opposition cites financial and administrative concerns, the essence of public interest is
17 the fair administration of justice. The potential savings of taxpayer dollars cannot and should not
18 outweigh a party's right to an impartial trial. Furthermore, it is in the public's best interest that
19 Beadles receives a change of venue to Lyon County where bias is less likely. If Beadles is successful
20 in his case, many relief items could save taxpayers millions of dollars and ensure their Constitutional
21 rights are upheld by the Defendants.
22
23
24
25
26
27
28

1 **PLAINTIFF MEETS THE 5 PRONG TEST TO RECIEVE A CHANGE OF VENUE**

2
3 **Beadles meets all 5 prongs as stated above and required by Nat'l Collegiate Athletic Ass'n v.**
4 **Tarkanian**, 113 Nev. 610 (Nev. 1997) *"A motion for change of venue must be granted where there*
5 *is a reasonable likelihood that in the absence of such relief, an impartial trial cannot be held.*
6 *Martinez v. Superior Court*, 629 P.2d 502, 503 (Cal. 1981) (citing *Maine v. Superior Court*, 66

7 *Cal.Rptr.* 724 (Cal. 1968)). Courts look to five factors to determine if venue should be transferred:
8 *(1) the nature and extent of pretrial publicity; (2) the size of the community; (3) the nature and*
9 *gravity of the lawsuit; (4) the status of the plaintiff and defendant in the community; and (5) the*
10 *existence of political overtones in the case. People v. Hamilton*, 774 P.2d 730, 737 (Cal. 1989)."

11
12
13 *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), *"even a probability of bias can violate the*
14 *due process clause, undermining public confidence in the judiciary's ability to adjudicate*
15 *impartially."*

16
17
18 While Defendants might view the motion as a mere formality or strategic play, the venue can play a
19 crucial role in ensuring that justice is not only done but also seen to be done. The law is settled, and
20 the facts are clear: Beadles cannot receive an unbiased trial in Carson City.

21
22 Due to the publicity, Beadles has received from the press, defense and the defendants, working in
23 concert, he has become, or is close to becoming, a household name in much of Carson City. Within
24 this context, Beadles's reputation has been severely tarnished by the Defendants. The remedies that
25 Beadles seeks will benefit all Carson City, and Washoe County voters, and it is in their best interest
26 to have the facts heard in Lyon County. The Defense and Defendants attempt to portray Beadles as
27 some type of right-wing conspiracy theorist, which is far from the truth. Beadles is a direct
28

1 descendant of Ben Franklin, his great nephew, and wishes only to ensure that all legal votes from
2 Carson City residents are counted as per the Nevada and US Constitution demand. The defendants
3 are overtly using the media, defense, their platforms, county resources, and more to discredit Beadles
4 rather than disprove his assertions.

5
6 **20+ examples of this** are in [Exhibit 132 and 135]. This is just in the past month; if you go back
7 over the past year or more, you will find dozens more. **All of these articles paint Beadles in a bad**
8 **light; none are favorable to Beadles.** All of which are tied directly or indirectly to the defendants
9 and defense against Beadles.
10

11
12 **A few examples of which are:**

13
14 **RGJ Published 8/8/23.** The Headline reads, "Washoe DA's office calls Beadles lawsuit 'rantings of
15 a conspiracy theorist,' warns of sanctions."
16

17 **Snippets from the article include:**

18 In a letter from Deputy District Attorney Lindsay Liddell, Beadles is urged to withdraw his
19 "frivolous" court filing or else face sanctions.
20 "This case is an abuse of the judicial process," Liddell wrote in a proposed motion for sanctions also
21 emailed to Beadles. "The Beadles' Complaint is disconnected from the law and from reality. The
22 Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be
23 sanctioned, and Defendants should likewise be awarded attorneys' fees." Beadles "frivolously filed
24 the Complaint with claims not warranted by existing law, not supported by facts, and to harass" Hill,
25 Brown, and Rodriguez, the proposed motion says. Its language is harsh, calling his complaint
26 baseless, deluded, disjointed, and abusive. There's even a footnote saying that if attorneys were
27 involved in ghostwriting Beadles' lawsuit, they may be open to sanctions, too, for not disclosing
28

1 their identities. It also claims he has a specific vendetta against Hill that shows his lawsuit isn't about
2 remedying electoral legal matters but harassment. "Beadles' choice to name Commissioner Hill as a
3 defendant rather than all commissioners suggests Beadles seeks to harass Commissioner Hill with
4 this action," Liddell writes. "Some of the aforementioned statements are so vague that a pointed
5 response is difficult, but the statements are nonetheless inaccurate rantings of a conspiracy theorist
6 disconnected from any legitimate claim," Liddell wrote. The proposed motion includes an as-yet-
7 unsigned declaration by Rodriguez that Beadles' specific fraud claims are "false." "Beadles knows
8 or should know, based on the information Washoe County has thus far directly or indirectly provided
9 to him, that his delusions are not accurate, yet he presents them in a court of law," it says. "Beadles
10 is free to use his website to express himself," Liddell adds. "The Court, however, is not an
11 appropriate venue for such behavior."
12

13
14 **RGJ, dated 8/8/23.**

15 **Within the article, it states the following:**

16 "DA's Office response: Beadles lawsuit 'frivolous,' 'disconnected from reality'; warns of sanctions if
17 it's not withdrawn."
18

19
20 **RGJ again on 8/11/23.**

21 **Within the article, it states the following:**

22
23 "In response to the first lawsuit, the Washoe County District Attorney's office sent Beadles a letter
24 on Tuesday calling his claims the "inaccurate rantings of a conspiracy theorist" and warning that if
25 he didn't withdraw it, sanctions would be sought against him.
26

27 "The Beadles' Complaint is disconnected from the law and from reality," the letter said. "The
28 Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be

1 sanctioned, and Defendants should likewise be awarded attorneys' fees." "Some of the
2 aforementioned statements are so vague that a pointed response is difficult, but the statements are
3 nonetheless inaccurate rantings of a conspiracy theorist disconnected from any legitimate claim," it
4 wrote in the proposed motion for sanctions. "Beadles knows or should know, based on the
5 information Washoe County has thus far directly or indirectly provided to him, that his delusions are
6 not accurate, yet he presents them in a court of law."
7
8

9 **The global Associated Press, which directly quotes the RGJ and Defense states:**

10
11 "But Robert Beadles, a wealthy ex-California businessman and right-wing activist who has
12 embraced many Republicans' disproven claims of election fraud, is vowing to continue his legal
13 battle in state court. He has filed a new lawsuit in Washoe County District Court with similar
14 allegations of fraud and other wrongdoing." "Washoe County District Attorney Chris Hicks said in
15 the letter to Beadles Tuesday provided to The Associated Press late Thursday that his lawsuit
16 subjects him to sanctions because the sole purpose is to "harass and engage government entities and
17 officials in costly frivolous litigation." Hicks attached a draft copy of a motion he said they'd file
18 unless he withdrew it. It said that since moving to Reno, Beadles has "engaged in a scheme to
19 disrupt local and state government operations." "Beadles' lawsuit "contains various baseless and
20 delusory allegations disjointed from any viable legal claim," Deputy District Attorney Lindsay
21 Liddell wrote in the draft motion. She described it as "inaccurate rantings of a conspiracy theorist
22 disconnected from any legitimate claim." "Election officials have explained that his data is
23 inaccurate."
24
25
26
27
28

1 **The Nevada Appeal**

2 **[Exhibit 154]**

3 The Nevada Appeal's latest article on the Plaintiff and Washoe County DA Chris Hicks, skirts
4 dangerously close to labeling him as right-wing, violent, and harassing, and even suggests that he
5 has paid demonstrators. All of these allegations are blatant lies.
6
7

8 **RGJ Change Of Venue**

9 **[Exhibit 155]**

10 All of which on 9/14/23 was just stated by the RGJ:

11 "The Washoe County District Attorney's office moved to dismiss the case, writing to the judge that
12

13 "The Complaint is no more than a conspiracy theorist's wishlist – Beadles seeks to remove those
14 who do not agree with him, to control the County's election procedures, to 'strike down' election
15 laws, and use this court to legitimize his unfounded claims. That is not how the judicial system nor
16 elections systems operate in the State of Nevada."

17 "Beadles should be sanctioned for his chicanery, which amounts to a misuse of the judicial system in
18 this case," the DA's motion says. "A court of law is an inappropriate tool to pursue harassment and
19 relitigate debunked elections-related claims. Beadles's Complaint is disconnected from the law and
20 from reality."
21
22

23 "The DA's office responded that his request to move the trial location was done not in "pursuit of
24 justice but rather as another strategic attempt to have his meritless allegations heard in the forum he
25 believes will be most favorable to himself."
26
27

28 "Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and

1 for his opponent in the Republican gubernatorial primary, Joe Lombardo. Carson City District Judge
2 James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions." Gilbert
3 says he no longer believes he really won against Lombardo, who went on to be elected governor.
4 "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer.
5 Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.
6 Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a
7 "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.
8
9 As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a
10 judge."

11
12 **The plaintiff can continue to show example after example**, but just [Exhibit 132, 134, and 135]
13 alone will show the court that Beadles has no chance of a fair trial in Carson City. The defense uses
14 mistruths in their opposition to change of venue to state, *"In the present case, the nature and extent*
15 *of pretrial publicity has, to date, been minimal. Only a handful of articles have been published,*
16 *detailing both the Complaint Beadles filed and the Rule 11 letter Defendants served in Beadles's*
17 *first case. The media coverage is no more inflammatory than Beadles's own Complaint. Beadles*
18 *included demonstrate the media's efforts to take a neutral position by requesting his comment before*
19 *publishing. Highlighting the absurdity of Beadles's claim that media coverage somehow deprives*
20 *him of the ability to have a fair trial, Beadles himself is the primary source of much pretrial*
21 *publicity, as demonstrated by multiple articles quoting Beadles' public blog, "Operation Sunlight."*
22 *Although there are several news articles relevant to this case, the medial quantity and nature of*
23 *media coverage falls far short of the one-sided pervasive and prejudicial coverage that would*
24 *necessitate a change of venue. The first factor favors denying the Motion to Change Venue. The*
25 *second factor is the size of the community. Washoe County has nearly a half million people. There is*
26 *no evidence that with a population this size, it would be difficult to seat a jury that had not been*
27
28

1 *exposed to any prejudicial publicity.”*

2
3 To start, the defense says only a handful of articles have been published about Beadles. A quick
4 glance at [Exhibit 132, 134, and 135] will show that unless the Defense is an octopus with 8 arms
5 and 10 hands, it's more than a handful—and that's just in a few weeks. This does not take into
6 account the TV and online coverage as well. The defense's statement that there is “no evidence that
7 with a population this size, it would be difficult to seat a jury that had not been exposed to any
8 prejudicial publicity” is untruthful. A simple web search will show that the TV coverage of the
9 major stations, which all appear to have run libelous and slanderous stories on Beadles, reaches into
10 almost all homes in Washoe County. DAILY viewership from web searches appears to be 100,000
11 people per day viewing each of these TV stations: KOLO 8, KRNV 3, KTVN, FOX, and on News 4.
12 Their online social media reach is comparable as well. The RGJ appears to reach 140,000 homes in
13 Washoe, with a similar online presence. Moreover, the Associated Press, according to a 2022 Pew
14 Research Center report, is the most trusted news source in the United States and has a significant
15 presence in Washoe County. It's ridiculous to state that the lead person, who is fighting for free and
16 fair elections in Washoe County and who has been chastised by the defendants using the media for
17 nearly 2 years straight, can find a jury of his peers who are not already tainted due to this enormous
18 media reach that has clearly reached most, if not all, homes in Washoe County.
19
20
21

22 **It's important to show Washoe statistics as there is tremendous bleed over of people who live in**
23 **Washoe, and work in Carson who tell the tales to voters of Carson City. It's even more**
24 **relevant as these same news outlets also reach directly into Carson City. A few examples are**
25 **demonstrated for this honorable court here:**
26

27 Carson City has a population of approximately 58,000 people. The two largest newspapers in Carson
28 City are the Nevada Appeal and the RGJ. Both reaching around 10,000 readers per day via their

1 paper.

2 <https://g.co/bard/share/033350a54dfe>

3
4 Based on the research the Plaintiff was able to conduct, both newspapers have provided the same
5 level of media coverage in Carson City as in Washoe County. Faced with a population of 58,000, the
6 Plaintiff encounters the same issues in Carson City as in Washoe County.

7
8 The Nevada Appeal's latest article on the Plaintiff skirts dangerously close to labeling him as right-
9 wing, violent, and harassing, and even suggests that he has paid demonstrators. All of these
10 allegations are blatant lies.

11 [https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-](https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-of-elected-officials)
12 [of-elected-officials](https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-of-elected-officials)

13
14 Even with a population of 58,000, the RGJ appears to reach 115,000 unique visitors per month in
15 Carson City alone.

16 <https://g.co/bard/share/dbc6489cc8ef>

17
18 **As to TV viewership from Washoe County Stations into Carson city, it appears it reaches 90%**
19 **or more of Carson City Households.**

20
21 “The reach for TV viewership of KOLO 8, KRNV 3, KTVN, Fox 2 News 4 in Carson City, Nevada
22 is estimated to be around 90% of households. This means that about 9 out of 10 households in
23 Carson City watch at least one of these four TV stations on a regular basis.

24
25 This estimate is based on Nielsen ratings data for the Reno-Sparks market, which includes Carson
26 City. Nielsen ratings measure the percentage of households in a given market that are watching a
27 particular TV program at a given time.

1 According to Nielsen ratings data, the four TV stations in question have a combined average
2 viewership share of over 60% in the Reno-Sparks market. This means that on average, over 6 out of
3 10 households in the market are watching one of these four stations at any given time.

4
5 It is likely that the reach for TV viewership of these stations in Carson City is even higher than 90%,
6 since Carson City is a relatively small city and there are fewer TV stations to choose from.

7
8 It is also worth noting that Nielsen ratings data does not include viewership data for people who
9 watch TV on streaming devices or online. Therefore, the actual reach for TV viewership of these
10 stations in Carson City may be even higher than 90%."

11 <https://g.co/bard/share/731f6d61553a>

12
13 **The four TV stations in question have a significant social media presence in Carson City,**
14 **Nevada. Here is a breakdown of their follower counts on some of the most popular social**
15 **media platforms:**

16
17 Facebook:

18 KOLO 8: 10,000 followers

19 KRNK 3: 12,000 followers

20 KTVN: 15,000 followers

21 Fox 2 News 4: 18,000 followers

22 Twitter:

23 KOLO 8: 3,000 followers

24 KRNK 3: 4,000 followers

25 KTVN: 5,000 followers

26 Fox 2 News 4: 6,000 followers

27 Instagram:

28 KOLO 8: 2,000 followers

1 KRNV 3: 3,000 followers

2 KTVN: 4,000 followers

3 Fox 2 News 4: 5,000 followers

4
5 "These follower counts are just a snapshot of their social media presence, and the actual number of
6 people who see their content is likely much higher. This is because social media platforms use
7 algorithms to show users content that they are likely to be interested in. As a result, people who
8 watch these TV stations are more likely to see their social media content, even if they are not
9 following them directly.

10
11 In addition to their social media presence, these TV stations also produce a variety of digital content,
12 such as news articles, videos, and podcasts. This content is often shared on their social media
13 channels, which helps to further expand their reach.

14
15 Overall, the four TV stations in question have a significant social media footprint in Carson City,
16 Nevada. They use social media to connect with viewers, share news and information, and build
17 relationships with the community."

18 <https://g.co/bard/share/c8b8c35b9ec2>

19
20 Even the Attorney General attacked the Plaintiff personally, as seen in [Exhibit 156], where he
21 states, "Robert Beadles is an extreme conspiracy theorist—so it's no surprise that he backed Sigal
22 Chattah for AG. Folks like him and Chattah will do EVERYTHING in their power to impose their
23 extremism on Nevadans. But we're stronger than this, NV, and I know justice will prevail in Nov."
24 The Attorney General for Nevada is supporting a publication that patently lied about Beadles, calling
25 him an anti-Semite. What Ford fails to mention in his libelous comments about Beadles is that Sigal
26 is Jewish and a close friend of Beadles. Beadles is the furthest thing from an anti-Semite or racist, as
27 this slanderous and libelous article paints him as. As the highest-ranking law enforcement official in
28 Nevada, with his base in Carson City, it is clear the Attorney General is additionally providing even

1 fewer chances of a fair and unbiased trial with his libelous comments and support of even more
2 outrageous lies and libel. Exhibits 104 and 105 additionally show Sigal beat him for the Attorney
3 General race. This does not help Beadles' chance of an unbiased trial in Carson City either.

4
5 If this is not enough, Beadles is additionally suing the Secretary of State and the Governor for
6 violation of our 1st Amendment rights via the repeal of SB406. The home base for these two
7 highest-ranking individuals is also in Carson City.

8
9 **It is abundantly evident; the Plaintiff has zero chance of an unbiased trial in Carson City.**

10
11 As the Honorable Judge Drakulich acknowledged in its granting of the motion for a change of
12 venue, stated on page 7, *"There is no denying that the parties in this case have unique and far-*
13 *reaching popularity in northern Nevada. Accordingly, this factor favors a change of venue."*

14
15 The defendants have also built numerous interactions and relationships in Carson City over the
16 years. For example, Defendant Rodriguez was previously the Communications and Government
17 Affairs Agent for Washoe County. She has interacted with and built numerous relationships within
18 the Capital, Courthouse, and Legislature.

19
20 Lyon County, on the other hand, is geographically close enough not to be burdensome for justice,
21 yet it is distant enough to mitigate the media bias and personal-professional relationships that the
22 Defendants have in both Washoe and Carson City.

23
24 In the Honorable Judge Drakulich granting of the change of venue, the Plaintiff found only one
25 citation as to why Carson City was chosen: "Further, the change of venue to the First Judicial
26 District considers the convenience of the parties and any witnesses that would be called to testify."
27 However, many of the same conflicts that are present in Washoe County also apply in Carson City.

1 The Plaintiff appreciates the Honorable Judge Drakulich finding in favor of granting the change of
2 venue, but it must be sent to Lyon County, not Carson City. The Plaintiff concurs with her honorable
3 court's assessment in the first factor. However, regarding the fourth factor, the court only stated,
4 "Further, each of the Defendants is a publicly elected official, whose campaigns include broad
5 outreach to the county's voting population, which will comprise a jury if one is seated in this case.
6 There is no denying that the parties in this case have unique and far-reaching popularity in northern
7 Nevada. Accordingly, this factor favors a change of venue." The Plaintiff wishes to clarify that only
8 Defendant Hill is an "elected" official; the other two defendants are appointed. If this honorable
9 court will not move the case to Lyon County, please return it back to Judge Drakulich's custody as
10 Washoe County is preferable to relocating it to Carson City, for the sake of the appearance of justice,
11 if nothing else.

12 It's important to note that the people of Washoe County feel greatly disenfranchised by their political
13 servants. By moving this case to Carson City, where they already feel they have been sold out by
14 their political servants, this honorable court has the opportunity to act in their best interest by
15 providing them a fair shot at justice via an unbiased jury and court in Lyon County. It is truly in the
16 best interest of this honorable court, the Plaintiff, and the public to have this case heard in Lyon
17 County.

18
19 Continuing on, defense states that "*Beadles himself is the primary source of much pretrial publicity,*
20 *as demonstrated by multiple articles quoting Beadles' public blog, 'Operation Sunlight.'* This
21 statement is absurd, as it is the only place—a personal opinion blog—where Beadles can share his
22 thoughts and findings. It is a far cry from the so-called trusted media of Washoe County, which is
23 supposed to report "Truth," not opinions. Washoe citizens look to the RGJ, AP, and others for
24 "Truth." With Operation Sunlight, they go to hear Beadles' opinions and what he exposes to the
25 county. The two are not the same. It is evident that the county's citizens have been exposed to the
26 press's libelous and slanderous one-sided commentary of Beadles for the past year or two. There is
27 now no chance for a fair trial for Beadles in Carson City
28

1
2 When the facts emerge, Beadles will be vindicated. It is essential and in the best interest of all
3 Washoe voters to have the case transferred to Lyon County. The defense's arguments to the contrary
4 stem from their desire to control the entire process and deprive Beadles of his right to a fair trial.
5 NRS 13.050(2)(b) allows for a change of venue in a civil case when there is reason to believe that an
6 impartial trial cannot be had in the county where the case originated. This clearly applies to this case.
7 For additional context, NRS 174.455 similarly allows for a change of venue in a criminal case when
8 a fair and impartial trial cannot be had in the county where the case is pending. Section 66.020 of the
9 Nevada Revised Statutes, outlines the circumstances in which a court may change the place of trial.
10 According to this statute, the court may change the place of trial on motion if the justice is a material
11 witness, the party believes they cannot receive a fair trial due to the justice's bias, the party cannot
12 receive a fair trial due to the bias of the citizens in the county, the justice is disqualified, or the
13 justice is sick or unable to act.
14
15

16
17 THE NATURE AND EXTENT OF THE PRETRIAL PUBLICITY WARRANTS A CHANGE OF
18 VENUE.
19

20 As detailed above, the amount and level of publicity Beadles has received warrants a change of
21 venue. The defense attempts to persuade this Court by stating that there have only been a handful of
22 articles. This is false. There have been over 20 articles just in the past few months, all painting
23 Beadles in a negative light [Exhibit 132, 134 and 135]. Further, the tone and vindictive manner in
24 which Beadles has been portrayed must be taken into account by the Court.
25

26 B THE SIZE OF THE COMMUNITY WARRANTS A CHANCE OF VENUE

27 As stated above, the amount and type of publicity, coupled with the reach of the media, permeate
28 this community, making it impossible for Beadles to have a fair trial. Simply considering the reach

1 of the media outlets and the continued attacks on Beadles in this city of 58,000 people, it becomes
2 nearly impossible to find someone who hasn't heard about this "crazy right-wing election denier,
3 extremist" that the defendants, media, and defense have portrayed in this false light. It is likely that
4 a Carson City jury pool will have heard of Beadles and have a negative opinion about him based on
5 the extensively broad media coverage Beadles has received.

6 C THE NATURE AND GRAVITY OF THE LAWSUIT JUSTIFIES CHANGING
7 VENUE
8

9 It is clear that the defense, the media, and the defendants are all working in concert, painting Beadles
10 in a negative, false light to try this case in the court of public opinion, rather than an unbiased trial
11 where the facts and evidence can be weighed by a jury. Given the preexisting relationships between
12 the defense, the defendants, court officials, and community leaders, this case is ripe for a change of
13 venue. The defense and defendants have falsely portrayed who Beadles is and what this case is truly
14 about: County Corruption, cover-ups, and broken election systems. It will be impossible for Beadles
15 to try his case against so many biases here in Carson City, especially in seeking justice from some
16 who may be involved. Further, the Court should consider the appearance of impropriety when
17 making its decision. Even the appearance of an unfair trial should be taken into consideration by the
18 Court. "Justice must satisfy the appearance of justice." "Where a fair trial is endangered by the
19 prejudice of a community, a change of venue is essential to the preservation of the defendant's right
20 to a fair trial." Sheppard v. Maxwell, 384 U.S. 333 (1966)
21

22 D THE STATUS OF THE PLAINTIFF AND DEFENDANT IN THE COMMUNITY
23 CLEARLY FAVORS A CHANGE OF VENUE
24

25 The media has painted Beadles in a false light, portraying him as some kind of extremist who is
26 trying to destroy the rights of voters, harass officials, and pose a threat to the community. Most
27 people in this community have heard this libelous story; even if they don't recognize his face or
28 name, they have heard about him. The media, defense, and defendants have turned Beadles into a

1 public figure. The defendants have sent out several emails to the entire Washoe County email list, as
2 demonstrated in [Exhibits 134, 135, 139, 140], which greatly impacts Carson City. The media has
3 written dozens of articles, and the extensive TV and social media coverage has again depicted
4 Beadles as some sort of extremist villain, which couldn't be further from the truth. As stated above,
5 and incorporated herein, the media overlay between Washoe County and Carson City is extreme.
6 The plaintiff solely wants all legal voters' votes to be counted legitimately and for election laws to be
7 upheld. That shouldn't be controversial, yet the defendants have purposely twisted the truth of the
8 matter, thereby ruining any chance of an unbiased trial and proceedings in Carson City.
9

10 E THE EXISTANCE OF POLITICAL OVERTONES IN THE CASE VALIDATES
11 BEADLES POSITION THAT A CHANGE OF VENUE IS WARRANTED

12 The media, defense, and defendants have worked in concert to make this entire case overtly political,
13 pitting Beadles against the County of Washoe and Carson City, as some sort of bad guy vs. them
14 being the good guys. This couldn't be further from the truth. Beadles has time and time again
15 demonstrated the issues with the election system [as shown in numerous exhibits 1-154] in Washoe
16 County, and Carson City only to be libeled and slandered by them. Plaintiff has tried to resolve the
17 issues with the defendants to no avail. Thus, we are now here, in court. It is paramount this case be
18 tried in an unbiased manner, where the evidence is simply weighed and ruled upon by its merits.
19 This is now impossible due to the defense, defendants, and media working in concert. This case
20 should not be political, all political parties should embrace free and fair elections. This case will
21 absolutely affect them all positively if Plaintiff is allowed to present his evidence and prevail. What
22 the defendants have done to poison that truth is reprehensible. Beadles must be allowed his day in an
23 unbiased court as his rights entitle him to. It is the duty of this honorable court to ensure his rights
24 are not impeded further.
25
26
27
28

1 **Defense Did Not Oppose Change of Venue to Lyon County Directly**

2
3 The Defense did not oppose Lyon County directly in their Opposition to Change of Venue; rather,
4 they opposed the change of venue in general. According to Judicial Court 8th District Rule 2.20, the
5 rule in part states, "Failure of the opposing party to serve and file written opposition may be
6 construed as an admission that the motion and/or joinder is meritorious and a consent to granting the
7 same." Plaintiff realizes this is District 2, but would like to set the table for examples stating similar
8 principles as follows:

9
10 Several cases from the 9th Circuit Court of Appeals, such as Ghazali v. Moran, 46 F.3d 52 (9th Cir.
11 1995) and Brydges v. Lewis, 18 F.3d 651 (9th Cir. 1994), discuss local rules that allow a court to
12 grant a motion when the nonmoving party fails to file a response.

13
14 Other cases such as McCaleb v. Massac Cnty., Case No. 18-CV-1390-SMY-DGW (S.D. Ill. Oct. 29,
15 2018). and ARMSTRONG v. MBNA AMERICA N.A., Case No. CV 04-582-S-LMB (D. Idaho Jun.
16 8, 2005) contain language suggesting that a party's failure to respond to a motion can be construed as
17 an admission of the motion's merits.

18
19 Regulation from the Nevada Administrative Code, Section 288.240 (6) states, "If a party fails to file
20 and serve a written opposition to a motion, that failure to respond may be construed as an admission
21 that the motion is meritorious and as consent to granting the motion."

22
23 Plaintiff respectfully requests this honorable court to change the venue from Carson City to Lyon
24 County, as the Defense did not directly oppose the change of venue to Lyon County.

1 **Judge Wilson and Judge Russell Are Conflicted**

2
3 Plaintiff has it on good authority that there are several conflicts between the defendants, defense and
4 these 2 most Honorable Judges. The Plaintiff does not wish to make public record of the allegations
5 and hopes the most Honorable Judges will do what's right if conflicts exist and simply transfer this
6 case to Lyon County or recuse themselves from this case.
7

8
9 **VENUE IS A FUNDAMENTAL ASPECT OF FAIR TRIAL**

10
11 Patricio-Bellizzi v. Hill, 475 P.3d 771 (Nev. 2020) shows this Honorable Court has the ability to
12 grant Beadles' motion to change venue to Lyon County:

13 *"Respondents' demand for a change of venue was timely filed, see NRS 13.050(1)(a) (requiring a*
14 *defendant seeking a change in venue to file a demand before the time to answer has expired), and*
15 *preceded respondents' motion for a change of venue, see Nevada Transit Co. v. Harris Brothers*
16 *Lumber Co., 80 Nev. 465, 468-69, 396 P.2d 133, 134 (1964) (explaining that a motion for a change*
17 *of venue does not meet the requirement that a written demand for a change of venue be filed). While*
18 *the demand contained two typographical errors, those errors were quickly corrected. See Tunnicliff*
19 *v. Holmes, 232 P. 148, 149 (Cal. Dist. Ct. App. 1924) (concluding that a typographical error in a*
20 *demand for a change of venue did not defeat the demand). Thus, we conclude the district court did*
21 *not err in granting the motion to change venue."*
22
23
24
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III. CONCLUSION

Your Honor,

"A fair trial is not a trial by ambush. It is a trial in which both sides have an opportunity to present their case and to challenge the evidence of the other side." - John Adams, Second President of the United States.

It is clear to anyone outside looking in, there is an absolute appearance of impropriety and bias in Carson City against Beadles. For the reasons mentioned above and those presented in the original motion, I respectfully demand that the Court grant his Motion to Change Venue to Lyon County to ensure the fair and impartial administration of justice his rights entitle me.

Lastly, it is greatly in the public's best interest to have this case moved to Lyon County, where they feel their voices will be heard. While I recognize that this is my pro se case, there are hundreds of thousands of people behind me who all want the facts to be weighed on their merits and ruled upon impartially by an honorable court and jury.

You have the chance to give them that. Thank you in advance for doing what's right, not what is easy.

"Not only is it important that justice be done; it is equally important that it be seen to be done." -

Justice Sonia Sotomayor

Link to media metrics:

<https://g.co/bard/share/5f1633ac5e67>

<https://g.co/bard/share/c8b8c35b9ec2>

<https://g.co/bard/share/731f6d61553a>

<https://g.co/bard/share/dbc6489cc8ef>

1 <https://g.co/bard/share/033350a54dfe>

2 Dated: 9/21/23

3
4 Respectfully submitted,

5
6 By: 

7 ROBERT BEADLES, Plaintiff Pro Se

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

17 The undersigned does hereby affirm that the preceding document does not contain the Social
18 Security Number of any person.

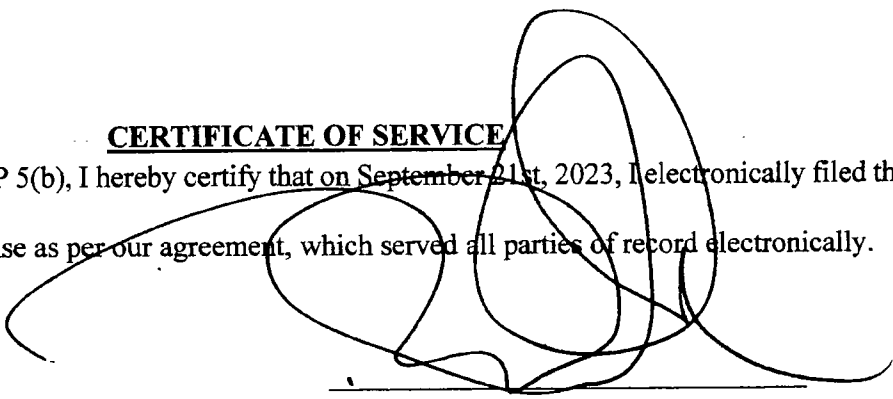
19 DATED: September 21st, 2023.

20
21 Robert Beadles, Plaintiff

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on September 21st, 2023, I electronically filed the foregoing with the Defense as per our agreement, which served all parties of record electronically.

A large, stylized handwritten signature in black ink, appearing to read 'Robert Beadles', is written over the signature line and extends upwards into the text area.

Robert Beadles, Plaintiff

Exhibit Glossary

Exhibit 154 Nevada Appeal Article-DA and Beadles 5 pg.

Exhibit 155 RGJ-Change Of Venue 3 pg.

Exhibit 156 AG Ford attacks Beadles on Twitter 1 pg.

Exhibit 157 Condensed List of Plaintiff's Rights and Defendants Violations for Ease of
Use 5 pg

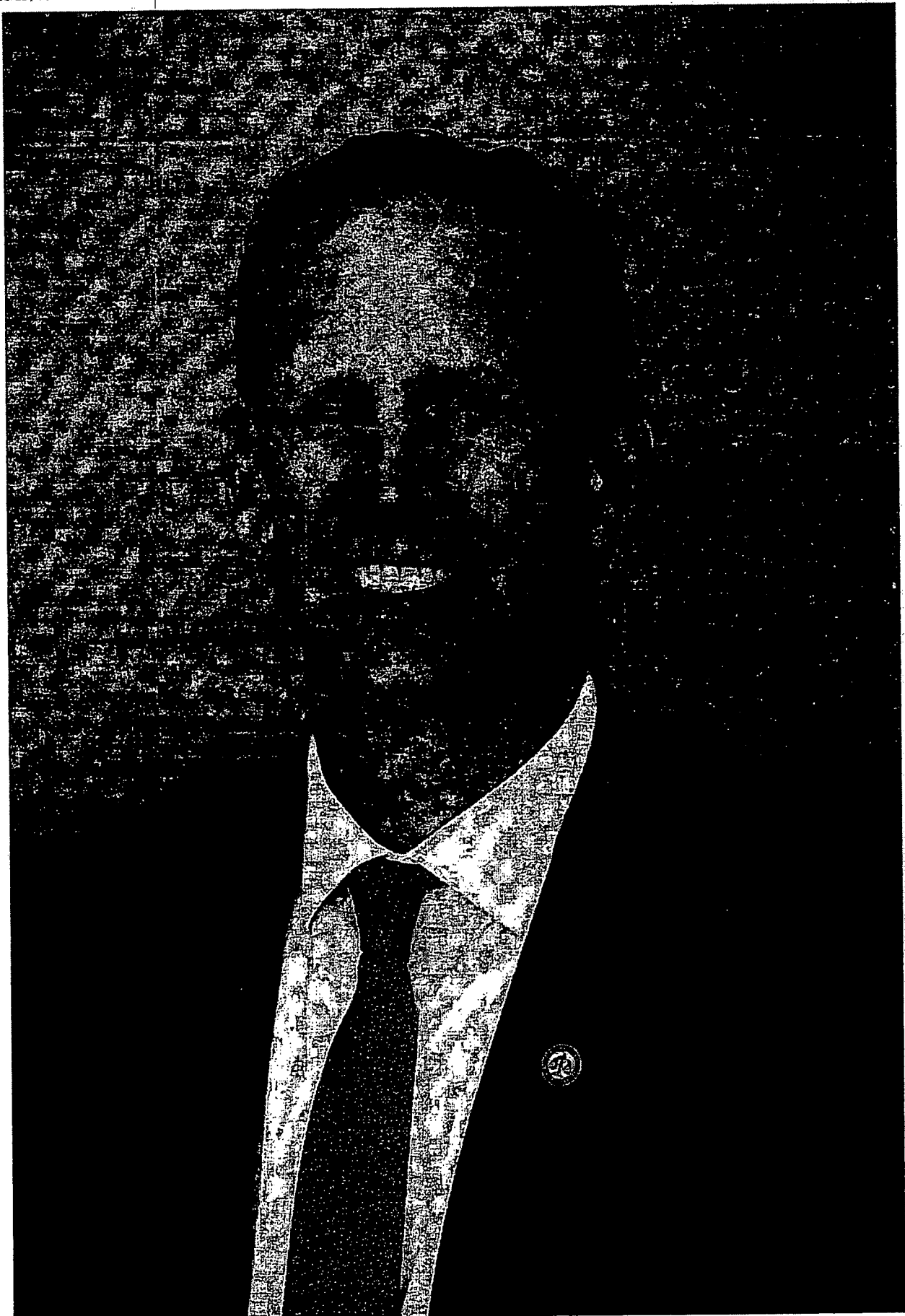
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“Exhibit 154”

9/15/23, 12:29 PM

Washoe DA concerned about public harassment of elected officials | Serving Carson City for over 150 years

Washoe DA concerned about public harassment of elected officials



Washoe County District Attorney Chris Hicks

By Ray Hagar Nevada Newsmakers

Tuesday, August 22, 2023

Discuss

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Email, Facebook, Twitter

For more Nevada Newsmakers click here

Local government bodies across the nation have increasingly faced vocal and aggressive opposition from right-wing groups since the 2020 election, according to published reports.

That unrest and ire has made its way to Washoe County, making the issue of threats and violence against public officials all too real for Chris Hicks, the Washoe County district attorney.

Hicks' increased awareness comes as the Washoe County Commission has been facing "paid and organized" disruptors at its public meetings, said Commission Chair Alexis Hill. They want to cause chaos and put fear into commissioners, Hill added.

"We're seeing kind of an uptick in those kind of threats," Hicks recently told host Sam Shad on Nevada Newsmakers. "So, yes, I have an overall concern for public officials."

Hicks knows first-hand about threats. A Sun Valley man was recently sentenced to five years in prison for making graphic threats on a podcast against Hicks and Washoe County Sheriff Darin Balaam.

Nicholas Vietti, on his podcast "Battle Born Marine," used explicit language, saying he would murder Hicks and sell his wife into sexual slavery with a drug cartel, according to court records.

He was charged with two counts of intimidating a public officer, Hicks said.

Hicks told host Sam Shad that the threats against him and his family were "alarming and scary."

In a victim impact statement to the court, Hicks said the sexual violence threats against his wife were so horrifying that they made him question his career choice of more than two decades.

"I do worry about individuals who have radical views or who are fixated on public officials, maybe frankly, because of information that's out there that's not even accurate," he said.

Vietti, who was sentenced in June, had ill feelings toward Balaam and Hicks since 2015, blaming them for the results of a child-support case, according to reports.

"The individual fixated on me and Sheriff Balaam ... if you walked down the path that got him there, it would make little sense," he said.

Hicks, in his role as district attorney, is now dealing with another case about attacks on public officials.

Robert Beadles, a member of the Washoe County Republican Central Committee and a major donor to various conservative candidates and causes, filed a lawsuit in state court to remove the county's registrar of voters, county manager and chairwoman of the Washoe commission.

Beadles, a reportedly wealthy transplant from California, also wants the court to address his election grievances that include voter registration lists, vote counting and signature verification, according to the Reno Gazette Journal.

Hicks' office is defending the county officials.

The harassment and/or legal action against the Washoe officials is part of an ongoing national issue, according to various reports.

Local officials in 44 counties in 15 states have faced efforts to change rules on voting since the 2020 election, according to Reuters news service.

All of them were led by Trump loyalists or Republican Party activists driven by false voter-fraud theories, Reuters reported.

Washoe's former registrar resigned in June after facing harassment over recent elections. Reuters reported that 10 of the top election officials in Nevada's 17 counties have resigned, retired or not sought re-election since the 2020 election, called "rigged" by former President Donald Trump.

Hicks said he was limited in what he could say about the lawsuit that Beadles brought against the county officials, adding, "We'll represent them diligently and zealously, especially when we don't we think it is a lawsuit that is righteous in any way."

Hicks discounted claims of election fraud in Washoe County.

"You know, I have not seen anything that would suggest to me there was fraud," he said. "I believe no election system is perfect. I think the county is doing a good job of self-examination to make sure that they're always improving. But I have not seen anything that would suggest there was mass fraud."

He also dismissed the call by some activists to return to paper ballots.

However, one Nevada county, Nye County, saw its commissioners OK a return to paper ballots in 2022. The rural county has less than 35,000 voters.

"I think that's ripe for error and it's taking a step back," Hicks said about paper ballots. "I think we have innovative ways to move forward. I don't know what the future looks like for elections, but it sure seems to me that technology should be able to present some ways that you could do voter identification and voting digitally."

Hicks is open to consider a system of voter identification through photos, adding, "But overall, we want an efficient and fair process. That's what everybody wants. And I think that that's what we're doing in Washoe County."

MARIJUANA LOUNGES

Hicks had little problem with Washoe commissioners denying the opening of legal marijuana lounges in the county, even though the sale of medical and recreational marijuana is legal in Washoe.

Hicks shares commissioners' concerns about people driving after consuming marijuana in the lounges. No studies have yet been published about any possible increase of DUI arrests because of marijuana, Hicks said.

However, there have been several DUI arrests where people have tested positive for both alcohol and cannabis consumption, Hicks said.

"We are seeing a lot of combinations of alcohol and marijuana on board with people getting DUIs or getting in wrecks and hurting somebody," he said. "And, you know, using common sense, you can draw a correlation between the two."

Shad asked what was the difference with people leaving a marijuana lounge after ingesting cannabis and people leaving a bar after drinking alcohol.

"I'm not saying we should close all the bars, but let's be realistic: If there weren't bars, there would be less DUIs," Hicks said.

More like this story

- Legislature shares blame for fentanyl scourge, Washoe sheriff says
- Aguilar criticizes Nye vote-counting plan
- Nevada needs 'crack down' on black-market marijuana, judiciary chairman says
- Ford: Chatters remark 'racist,' won't debate her
- Clerks complete recount of Nevada Republican governor's race

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“Exhibit 155”

ELECTIONS

Beadles' election lawsuit against Washoe officials gets change of venue to Carson City

**Mark Robison**

Reno Gazette Journal

Robert Beadles successfully argued for a change of venue in his election lawsuit against Washoe County.

Judge Kathleen Drakulich on Thursday granted his motion and ordered the case be heard in Carson City's First Judicial District Court, rather than Lyon County as Beadles had requested.

She found a venue change was called for because of significant media coverage and the fact that jurors would likely know of the parties, who are all public figures: Beadles as well as those he's suing – Washoe County Registrar of Voters Jamie Rodriguez, Manager Eric Brown and Commission Chair Alexis Hill.

Brief case summary

Beadles – a big donor to conservative candidates and member of the Washoe County Republican Party's central committee – claims that his rights and Nevada law have been violated because the defendants did not respond sufficiently to his grievances about how Washoe County's elections have been run.

He wants Rodriguez, Brown and Hill removed from their jobs, paper ballots to be used in every election and punitive damages, among other claims for relief.

He has submitted about 150 exhibits for court review that he says support his belief in "gross inaccuracies and improper maintenance of voter rolls," voting machines that altered intended votes, improper signature verification and more. He claims these kept the county from running fair elections.

The Nevada Secretary of State's office, which oversees claims of election violations, has said it found no evidence of widespread fraud in the 2020 or 2022 elections.

The Washoe County District Attorney's office moved to dismiss the case, writing to the judge that "The Complaint is no more than a conspiracy theorist's wishlist – Beadles seeks to remove those who do not agree with him, to control the County's election procedures, to 'strike down' election laws, and use this court to legitimize his unfounded claims. That is not how the judicial system nor elections systems operate in the State of Nevada."

In a filing last week, the DA's office also sought sanctions.

"Beadles should be sanctioned for his chicanery, which amounts to a misuse of the judicial system in this case," the DA's motion says. "A court of law is an inappropriate tool to pursue harassment and relitigate debunked elections-related claims. Beadles's Complaint is disconnected from the law and from reality."

Why the judge changed venues

Beadles moved for a change of venue because, he wrote in a motion where he represents himself, "Securing an impartial trial in Washoe County is implausible."

He claims the District Attorney's office collaborated with the media in a way that gave "rise to the perception of a trial by ambush" and that judges and court clerks had professional and personal affiliations with Rodriguez, Brown and Hill that "breed an appearance of impropriety."

The DA's office responded that his request to move the trial location was done not in "pursuit of justice but rather as another strategic attempt to have his meritless allegations heard in the forum he believes will be most favorable to himself."

Beadles requested that the case be moved to Lyon County. Last year, Lyon County renamed the campus housing its sheriff's office, jail and courts to the Donald J. Trump Justice Complex. The former president faces multiple indictments related to unproven claims of voter fraud and his attempts to hold onto power after his loss to Joe Biden in the 2022 election.

Drakulich used a five-factor test to decide whether to grant a change of venue.

The test stems, in part, from a 30-year-old lawsuit by former University of Nevada, Las Vegas basketball coach Jerry Tarkanian against the National Collegiate Athletic Association for trying to sanction him. The NCAA claimed potential jurors in Clark County would be biased in favor of "Tark," as he was called.

Using this test regarding venue changes, courts look at pretrial publicity, community size, the nature and gravity of the lawsuit, the status of the parties in the community, and political overtones to the case.

Drakulich found that two of the five factors applied here: pretrial publicity and how well-known Beadles and the defendants are in the community.

"The parties are entitled to entrust the important legal issues in this case to a venue where there would be few if any external influences and where the Tarkanian factors are neutralized," she wrote.

She added that the Carson City court was picked for the convenience of Beadles, the defendants and any witnesses.

Election-fraud case in Carson City

Carson City District Court heard an election fraud case last year with some of the same claims that Beadles makes in his lawsuit against Washoe County.

Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and for his opponent in the Republican gubernatorial primary, Joe Lombardo.

Carson City District Judge James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions."

Gilbert says he no longer believes he really won against Lombardo, who went on to be elected governor. "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer.

Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.

Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.

As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a judge.

Mark Robison covers local government for the Reno Gazette-Journal. Email comments to mrobison@rgj.com or comment on Mark's Greater Reno Facebook page.

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“Exhibit 156”



Aaron D. Ford

Robert Beadles is an extreme conspiracy theorist — so it's no surprise that he backed Sigal Chattah for AG. Folks like him & Chattah will do EVERYTHING in their power to impose their extremism on Nevadans.

But we're stronger than this, NV, and I know justice will prevail in Nov.

 KUNR Public Radio

Who is Robert Beadles?

He's aiming to be a power player in Washoe County and NV GOP politics. Beadles also regularly shared conspiracy theories and cited antisemitic propaganda in online spaces.

Our story with @TheNVIndy and @apnreports:

bit.ly/3CFq383

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“Exhibit 157”

Condensed List of Plaintiff's Rights and Defendants Violations for Ease of Use.

DEFENDANTS ARE SUBJECT TO MANDAMUS AND ENJOINER

The Defendants, while acting in their official capacities, knowingly and negligently made non-discretionary decisions listed below that have violated their oaths to uphold the law and serve the people, along with Plaintiff's various rights.

Accuracy in elections is based on clean voter rolls and voters casting one ballot, and having votes properly counted and reported. Additionally incorporate Exhibits 16-22 and it's stated laws, NRS, authorities, responsibilities, duties and plaintiffs' rights into this document.

Plaintiff's rights are enumerated in:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Due process, Nev. Const. Art 1 Sec 8 (2)

Free speech, Nev. Const. Art 1 Sec. 9

Redress of grievances, Nev. Const. Art 1 Sec 10

Rights retained by people, Nev. Const. Art 1 Sec 20

Right to vote, Nev. Const. Art 2 Sec 1

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Equal access, Nev. Const. Art 2 Sec 1A (9)

Unified, statewide standard in counting/recounting and accuracy, Nev. Const. Art 2 Sec 1A (10)

Resolution of election complaints, Nev Const. Art 2 Sec 1A (11)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Specific torts, violations of rights and laws: wanton, malicious, oppression, and willful disregard.

Hill/Brown/Rodriguez:

Failure to uphold Oath of Office, and bias toward Plaintiff:

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Public trust: NRS 281A.020

Unclean voter rolls:

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Counting votes accurately, Nev. Const. Art 2 Sec 1A (10)

Unsafe equipment:

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Undue outsourcing:

See Misuse of funds: NRS 284.440 and NRS 204.020.

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Contracts:

See Brown.

Wasted tax dollars, reckless spending:

See Misuse of funds: NRS 284.440 and NRS 204.020.

Ignoring petitions and related evidence, bias:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Free speech, Nev. Const. Art 1, Sec. 9

Redress of grievances, Nev. Const. Art 1 Sec 10

Resolution of election complaints, Nev Const. Art 2 Sec 1A (11)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

NRS 197.220 Other violations by officers

Pattern of abuse, inclusive of all rights violations:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Hill and Brown:

Impeding (Plaintiff's Board rep.) Herman's agenda item:

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Due process, Nev. Const. Art 1 Sec 8 (2)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

*Taxation without Representation, Nev. Const. Art 1 Sec 1 (implied)

Brown:

Inefficiency and lack of due process assistance in elections and related hires, contracts:

Due process, Nev. Const. Art 1 Sec 8 (2)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Rodriguez:

Counting votes in secret, failure to adhere to Standard Operating Procedures and election Laws

of Nevada:

Due process, Nev. Const. Art 1 Sec 8 (2)

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Statewide standard in counting and recounting, Nev. Const. Art 2 Sec 1A (10)

“Proper proofs” and “regulate the manner of holding and making returns”, Nev. Const.

Art 4 Sec 6

Public servant’s Oath of Office, Nev. Const. Art 15 Sec 2

Public trust: NRS 281A.020

Submitting false reports and certifications:

NRS 293B.275 Record of attendance at instructional meetings: Certification; effect.

The county or city clerk shall keep a record of attendance of those election officers receiving instruction in their duties in connection with the mechanical voting system. **The clerk shall certify that the record is a list of election officers who have been instructed pursuant to NRS 293B.260.** The list, when so certified, is prima facie evidence that the election officers have been properly instructed in their duties.

NAC 293.458 Electronic transfer of information to Secretary of State; certification; authorized access. (NRS 293.124, 293.675)

1. Each county clerk shall, at least once each business day, electronically transfer the information contained in the computerized database established pursuant to NAC 293.454 to the statewide voter registration list. Each transfer must comply with such technical requirements as may be prescribed by the Secretary of State.

2. When a county clerk electronically transfers information to the statewide voter registration list pursuant to subsection 1, **the county clerk must certify that:**

- (a) The information is accurate and complies with relevant state and federal law; and
- (b) The county clerk has complied with such applicable technical requirements for security as may be prescribed by the Secretary of State to ensure the confidentiality of the personally identifiable information transferred pursuant to subsection 1.

3. Each county clerk shall ensure that only authorized personnel may access the

computerized database established pursuant to NAC 293.454.

NRS 197.130 False report by public officer.

NRS 197.140 Public officer making false certificate.

Breach of nonpartisan hiring:

NRS 293.217 Creation of boards

NRS 293C.220

NRS 293C.640(3)

NAC 293.352(2)

Breach of Fiduciary Duty:

Nev. Const. Art 8 Section 8 Municipal corporations formed under general laws.

COUNTY OF WASHOE, a Legal Subdivision of the State of Nevada, able to hold debts and debentures, tax and spend, create criminal offenses and penalties, more

Officer bound to fiscal responsibility?

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Private Corporations: NRS 78.138(7)(b)

(1) The director's or officer's act or failure to act constituted a breach of his or her fiduciary duties as a director or officer; and

(2) Such breach involved intentional misconduct, fraud or a knowing violation of law.

Removal Of Officer From Office For Nonfeasance, Malfeasance, and Malpractice:

NRS 283.440

1 Code:
2 Name: Robert Beadles
3 Address: 10580 N McCarran Blvd
4 #115, Apt 386
Telephone: 916 573 7133
Email: Beadlesmail@gmail.com
Self-Represented Litigant

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

10 Robert Beadles
11 Plaintiff/Petitioner,

Case No. CV23-01341

12 vs.

Dept. No. 1

13 Jamie Rodriguez et al.
14 Defendant/Respondent.

COVER PAGE

17 Attached is Opposition to motion For Sanctions
18 (Print the name of document to be submitted to the Court)

19 \$ Exhibits. Case has been transferred to
20 Judicial District 1 but is not in ~~their~~ their
21 system yet. They said to file in Judicial 2
22 so it will be part of package once DZ sends to D1

23 This document does not contain the Social Security number of any person.

24 I declare, under penalty of perjury under the law of the State of Nevada, that the foregoing
25 is true and correct.

26 Date: 9/21/23

Your Signature: [Signature]

27 Print Your Name: Robert Beadles
28

1 ROBERT BEADLES
2 10580 N. McCarran Blvd. #115, Apt. 386
3 Reno, NV 89503
4 *Plaintiff, Pro Se*

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

7 MR ROBERT BEADLES, an individual,
8 Plaintiff,

Case No.: CV23-01341

Dept. No.:

9 vs.

10 JAMIE RODRIGUEZ, in her official capacity as
11 Registrar of Voters and in her personal capacity;
12 the WASHOE COUNTY REGISTRAR OF
13 VOTERS, a government agency; ERIC BROWN in
14 his official capacity as WASHOE COUNTY
15 MANAGER and in his personal capacity, ALEXIS
16 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.

17 Defendants.

18
19 **OPPOSITION OF MOTION FOR SANCTIONS**

20 Plaintiff Robert Beadles (Beadles), hereby moves to Oppose the Defenses Motion For Sanctions.
21

22
23 **I. BACKGROUND**

24 Plaintiff has filed numerous pleadings, all refuting the false allegations in the Defendant's
25 Motion for Sanctions. In the Plaintiff's Opposition to Motion to Dismiss, his Motion for Sur-
26

1 Reply, his Response in Support of Motion to Compel Issuance of Citations, his Reply in Support
2 of Motion to Change Venue, and his Original Complaint, he addresses these outright falsehoods
3 littered throughout the Defendant's Motion for Sanctions.

4
5 In addition, the Plaintiff specifically asked the Honorable 2nd District Court to rule first on the
6 Opposition to Motion to Dismiss, before ruling on the Motion for Sanctions. It did not seem
7 proper to burden the Honorable Court with a rehash of all the prior information contained within
8 those documents merely to add to an opposition of the Motion for Sanctions. Typically, a Motion
9 to Dismiss is first ruled upon prior to ruling on a Motion for Sanctions, as demonstrated in
10 Emerson v. Eighth Judicial Dist. Court of State, ex rel. Cnty. of Clark, 127 Nev. 672 (Nev.,
11 2011)
12

13 The court held that the district court retains jurisdiction to impose sanctions after a case is
14 dismissed. "In this petition for extraordinary writ relief, we consider whether the district court
15 can impose sanctions after it enters an order dismissing a case with prejudice pursuant to a
16 stipulation of the parties under NRCP 41(a)(1)(ii). In resolving this issue, we initially address
17 whether the district court has jurisdiction to impose sanctions after a stipulated dismissal. We
18 conclude that the district court retains jurisdiction after a case is dismissed to consider sanctions
19 for attorney misconduct that occurred prior to the dismissal."
20

21
22 Based on the previously filed motions and arguments contained herein, this Court must deny
23 Defendants Motion for Sanctions.
24

25 II. INTRODUCTION

26 Plaintiff respectfully demands this Honorable Court first rules on his Motion For Change Of
27

1 Venue, prior to Ruling on any pleadings regarding Motions To Dismiss, Motions For Sanctions
2 and related.

3
4 The Plaintiff filed these pleadings and exhibits with the utmost respect for this Honorable Court.
5 Every allegation the Plaintiff has made, he believes to be true. It is up to this Honorable Court
6 and jury to decide who is telling the truth, the Plaintiff or Defendant. The Defense's entire case
7 can be wrapped up in one sentence that slaps the taste of freedom and justice from the mouth of
8 every Nevadan.

9
10 The Defense claims, in essence, that the Defendants have no duty to follow the law, and no
11 consequences for breaking it.

12
13 That is their case in a sentence.

14
15 It spits in the face of what so many gave their lives for: a government of laws, not of men or
16 women.

17
18 The Plaintiff respectfully demands this Honorable Court to incorporate all previously filed
19 pleadings, and exhibits into this pleading. The Plaintiff additionally respectfully demands this
20 Honorable Court to dismiss the Defense's Motion to Dismiss and their Motion for Sanctions. The
21 Plaintiff believes he has adequately met the notice pleading requirements to defeat their motions
22 with the evidence and facts he has presented in his previously filed pleadings.

23
24 **III. Plaintiff Has The Right To Bring Forward This Action**

25
26 For clarity, the Plaintiff will provide a few examples illustrating his capability to present claims

1 against the defendants. He will also demonstrate that he has presented legitimate claims. To
2 avoid repetition and to reduce the page and word count, the Plaintiff will reference sections
3 within this document.

4
5 The Defense essentially argues that the Defendants have no obligation to adhere to the NRS or
6 The NV Constitution and that there are no consequences for violating them. They attempt to
7 claim that the Secretary of State is responsible for all election-related matters. This is inaccurate;
8 the Secretary of State is not overseeing the Washoe County Elections – the Defendants are. The
9 Plaintiff will guide this honorable court through the Nevada Voter Bill of Rights, item by item,
10 demonstrating that it is the defendants who administer the duties outlined therein and are
11 therefore responsible for addressing the issues they generate. The Nevada Voter Bill of Rights
12 was codified into law based on the ballot measure "Question 4", which passed on 11/3/2020.

13
14 NRS 293.2546 Legislative declaration of voters' rights. The Legislature hereby declares that
15 each voter has the right:

16
17 1. To receive and cast a ballot that:

18 (a) Is written in a format that allows the clear identification of candidates;

19
20 DEFENDANTS prep the machines and ballot printing.

21
22 (b) Accurately records the voter's preference in the selection of candidates.

23
24 DEFENDANTS do the tallying.

25
26 2. To have questions concerning voting procedures answered and to have an

1 explanation of the procedures for voting posted in a conspicuous place at the polling place.

2

3 DEFENDANTS respond to inquiries.

4

5 3. To vote without being intimidated, threatened or coerced.

6

7 DEFENDANTS control, patrol polling locations.

8

9 4. To vote during any period for early voting or on election day if the voter is waiting in
10 line to vote or register to vote at a polling place at which the voter is entitled to vote or register to
11 vote at the time that the polls close and the voter has not already cast a vote in that election.

12

13 DEFENDANTS control this process at the polls.

14

15 5. To return a spoiled ballot and is entitled to receive another ballot in its place.

16

17 DEFENDANTS replace ballots.

18

19 6. To request assistance in voting, if necessary.

20

21 DEFENDANTS provide voter assistance.

22

23 7. To a sample ballot which is accurate, informative and delivered in a timely manner
24 as provided by law.

25

26 DEFENDANTS create and distributes ballots.

27

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8. To receive instruction in the use of the equipment for voting during early voting or on election day.

DEFENDANTS provide voter assistance.

9. To have nondiscriminatory equal access to the elections system, including, without limitation, a voter who is elderly, disabled, a member of a minority group, employed by the military or a citizen who is overseas.

DEFENDANTS provide equal access to in-person polls, field registration.

10. To have a uniform, statewide standard for counting and recounting all votes accurately.

DEFENDANTS choose most systems and tests and approves such systems.

11. To have complaints about elections and election contests resolved fairly, accurately and efficiently.

Logically, one would expect that the DEFENDANTS, who are in charge of most every aspect of the County's election process, would be the ones to address the complaints about the elections and resolve the issues fairly, accurately, and efficiently. Further demonstrating this are [Exhibits 23-24, and 126]. Plaintiff and voters brought the issues of the DEFENDANTS violating the court order [Exhibit 72] to the DEFENDANTS, who did nothing to address the issues. If the DEFENDANTS are not accountable for the elections they conduct, nor have the responsibility

1 per the NV Constitution and Nevada Voter Bill of Rights to address the complaints and remedy
2 them, it is clear that there are no legitimate elections in Nevada. Further demonstrating the roles,
3 responsibilities, and NRS holding the DEFENDANTS accountable are [Exhibits 16-22, 109, and
4 157]. This further demonstrates the ability for the Plaintiff to bring action forward. If the Public
5 cannot hold government accountable for its actions, who will?
6
7

8 **NRS 283.440 Is Available for Plaintiff to Use**

9 The Defense frivolously claims the Plaintiff has no ability to remove Defendants from Office via
10 NRS 283.440.
11
12

13 NRS 283.440 reads very clearly, it says that any person in any office can be removed by the
14 statute. The statute additionally states who it does not apply to. The defendants are not on the list
15 of officers, or offices that are safe from removal via NRS 283.440. Additionally, the statute reads
16 that anyone can bring a cause of action against a public official as it does not implicitly state they
17 cannot.
18

19
20 Nev. Rev. Stat. § 357.080 is an example in where, “ a private plaintiff may bring an action
21 pursuant to this chapter for a violation of NRS 357.040 on his or her own account and that of the
22 State or a political subdivision, or both the State and a political subdivision.” Showing further
23 just one more example in where the NRS allows for private citizens to bring action against public
24 officials.
25
26
27

1 Furthermore, the defense even goes as far to cite Madsen v. Brown, 701 P.2d 1086, 1093 (Utah
2 1985) which is a case in where private citizens successfully removed the Mayor from office,
3 using the same process that we do here in Nevada.
4

5 As shown through the NRS, caselaw, and defenses own admission, the Plaintiff has the right to
6 use NRS 283.440 to remove defendants from office.
7

8
9 **THE PLAINTIFF BROUGHT FORWARD LEGITAMATE CLAIMS THIS**
10 **HONORABLE COURT CAN GRANT REMEDY FOR.**
11

12 To reduce the length of this document, kindly refer to pages 9-15, where the Plaintiff provides
13 numerous instances of valid claims presented for which this honorable court can provide relief.
14

15 In these three examples, the Plaintiff establishes his standing through violated court orders
16 [Exhibit 72], petitions that were neither addressed nor resolved as evident in [Exhibits 1-3], and
17 his status as a legally registered voter, to mention a few instances proving his standing. He has
18 illustrated that, according to the NV Constitution, the NRS, and Question 4 (which instituted the
19 Voter Bill of Rights), the defendants are obligated to respond to and rectify the Plaintiff's
20 grievances. Moreover, they should be held liable for their breaches of the law. The Plaintiff has
21 also shown that he can invoke NRS 283.440 to oust officers from their positions and that he has
22 presented genuine causes of action for which this honorable court can offer a remedy.
23
24
25
26
27

1 In the following sections, the Plaintiff will address the Defense's allegations directly from their
2 Motion For Sanctions, further demonstrating the Defendants' breach of laws and responsibilities,
3 the Plaintiff's ability to bring action, and his standing. All of this underscores why this critically
4 important case for the Plaintiff and all Nevadan voters must move forward.

5
6 **IV.THE DEFENSES FALSE CLAIMS PLAINTIFF DID NOT VIOLATE RULE 11**
7

8 Plaintiff incorporates all previous pleadings and exhibits into this response.
9

10 **The Plaintiff Refutes Defenses Claims**
11

12
13 From Defendants Motion For sanctions, page 4 and 5 they state:

14 When a party files a complaint, they certify that to the best of his knowledge, information and
15 belief formed after an inquiry reasonable under the circumstances:

16 1. This case is not being presented for any improper purpose, such as to harass, cause
17 unnecessary delay, or needlessly increase the cost of litigation”

18
19 2. The claims, defenses, and other legal contentions are warranted by existing law or by a
20 nonfrivolous argument for extending, modifying, or reversing existing law or for establishing
21 new law;

22
23 3-4. The factual contentions have evidentiary support or, if specifically so identified, will likely
24 have evidentiary support after a reasonable opportunity for further investigation or discovery;
25 and the denials of factual contentions are warranted on the evidence or, if specifically so
26 identified, are reasonably based on a belief or lack of information.

1
2 The plaintiff will now address these 4 points proving he "to the best of the person's knowledge,
3 information, and belief, formed after an inquiry reasonable under the circumstances"

4
5 1 of 12(b)(5). This case is not being presented for any improper purpose, such as to harass,
6 cause unnecessary delay, or needlessly increase the cost of litigation"

7
8 The defense is trying to mislead this honorable court. The real reason for this lawsuit, has
9 nothing to do with harassing the defendants and everything to do with holding the defendants
10 accountable for violating the law(s) as shown below in just a few of many examples.

11 At this point in the case, the Court must take everything the Plaintiff states as truth due to NRC
12 12(b)(5). The Defense is trying to end the case using this rule and also want a penalty based on
13 it. Even if the Defendants didn't mention this rule in their penalty request, the Court has to
14 consider the Complaint's words as true when making a decision on the Defendants' request.
15

16
17 Examples of Violations and Allegations the Plaintiff brings forth against the Defendants:
18

19 Defendants violated court orders [Exhibit 72] by counting the 2022 Washoe County Primary and
20 Gilbert Contest in Secret in secret. This act of illegality additionally violated numerous NRS as
21 shown in [Exhibit 17, and 109] all of which was caught on video for the world to see in [Exhibit
22 23 and 24]. This act of illegality was also in the plaintiffs original complaint page 6, item 33,
23 page 8, item 49, page 12, item 80, page 14, item 91, etc.
24
25
26
27

1 Defendants violated NRS statutes as signature verification was not done per law, as shown in
2 [Exhibits 1-3, 18, and 109] and claimed in original complaint page 5, item 33, page 8 items 50
3 and 53, page 12, item 80, page 14, item 9, etc.

4
5 Defendants failed to meaningfully address the Illegal function within the Washoe County
6 Election System as shown in [Exhibits 1-3, 16, 60-68, 94, 104, 105, 109, 110, 112, 128-131, 146]
7 and the original complaint on page 6, item 33, page 12, item 80, page 14, item 91, etc.

8
9
10 Defendants stole Washoe County property for self-enrichment as shown in Defendant Hills
11 actions [Exhibits 134, 135, 138-140] which is also stated in the original complaint on page 2,
12 item 7 and 8, page 4, item 27, page 5, item 32, page 8, item 55, page 9, item 57, 58, and 59, page
13 10, item 66, page 11, item 68, page 13, item 85, 87, 89, and 90, page 14, item 92 and 93, page
14 14, item 95, 98 and 99, page 15, item 100, 101 vi, and vii, page 16, xvii, and xviii, etc.

15
16
17 Defendants have used their position for self-enrichment as shown in Defendant Brown using his
18 office to allegedly remove his wife from DUI implications [Exhibits 136, 137 and 143] as
19 additionally stated in original complaint on page 2, item 7 and 8, page 4, item 27, page 5, item
20 32, page 8, item 55, page 9, item 57, 58, and 59, page 10, item 66, page 11, item 68, page 13,
21 item 85, 87, 89, and 90, page 14, item 92 and 93, page 14, item 95, 98 and 99, page 15, item
22 100, 101 vi, and vii, page 16, xvii, and xviii, etc.

23
24
25
26 Defendants have failed the responsibilities of conducting the voters Elections and are not ready

1 for the 2024 elections as shown in [Exhibits 22, 101, 109, 118, 119, 121, 122 and original
2 complaint page 6, item 35].

3
4 Defendants have failed to respond to the Plaintiffs petitions [Exhibits 1-3] which violated NV
5 Constitution, their oath of office, NRS, Nevada Voter Bill of Rights and many more rules as
6 additionally shown in original complaint pages 3-15, etc.

7
8 Defendants are subject to removal of office per NRS 283.440 for all of the above examples and
9 additionally countless more in the original complaint on page 2, item 7 and 8, page 4, item 27,
10 page 5, item 32, page 8, item 55, page 9, item 57, 58, and 59, page 10, item 66, page 11, item 68,
11 page 13, item 85, 87, 89, and 90, page 14, item 92 and 93, page 14, item 95, 98 and 99, page 15,
12 item 100, 101 vi, and vii, page 16, xvii, and xviii, etc. and as demonstrated in [Exhibits 1-3, 23-
13 24, 97, 101, 109, 118, 119, 121, 123, 134-140, 143, 149, etc].

14
15
16
17 The defendants are to be enjoined from further violations of NRS 293.530, NRS 293.2546(11),
18 NRS 293B.033, NRS 293.269927, NRS 293.740, NRS 293B.063, NRS 293B.104, NRS
19 293B.1045(1), NAC 293B.110(1)(b), NRS 293.269931(1), NRS 293.3606(1), NRS 293.363(1),
20 NRS 293B.353, NRS 293B.354, NRS 293B.380(2)(a), NAC 293.311(4), NRS 293.423, NRS
21 293.269927(4)(b), NRS 293.277(3), NRS 293.285(1)(b)(4), NRS 293.3075(4), NRS
22 293.3585(1)(d), NRS 293.403(2), NRS 293.404(2), Nev. Const. Art. 2 Sec.1A § 1(b); as per
23 original complaint pages 15 and 16, item viii.

1 Defendants have additionally failed to address, correct, or rectify the issues raised in the underlying
2 Petitions, including but not limited to, (1) updating and resolving the voter registration lists; (2)
3 providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature
4 verification; (5) illegal function within the election system; (6) violations of election procedures
5 as required under Nevada law. [Exhibits 16-22, and 109]. Plaintiff seeks an injunction regarding
6 the foregoing per original complaint page 12, item 80, page 14 item 91, etc.
7

8
9 The defendants have created a national security incident in where our elections are in clear
10 violation of law as per [Exhibits 16-22, and 109] and the original complaint page 5, item 33,
11 page 8, item 53, etc.
12

13 The Plaintiff's pleadings and accompanying exhibits 1-156 are in compliance with the notice
14 pleading requirements pursuant to Nevada law. The Plaintiff contends that the material submitted
15 thus far establishes sufficient grounds to invoke the full spectrum of due process protections,
16 including, but not limited to, discovery, oral arguments, and a jury trial. This will further
17 substantiate the Plaintiff's entitlement to the remedies and relief sought in this case.
18

19
20 2 of 12(b)(5). The claims, defenses, and other legal contentions are warranted by
21 existing law or by a nonfrivolous argument for extending, modifying, or reversing
22 existing law or for establishing new law;
23

24 Plaintiff incorporates all previous pleadings and exhibits into this response. The NRS states the
25 law, and in many cases, penalties for breaking it. All claims brought forward are attached to the
26 NRS or Constitution of Nevada. As demonstrated above, breaking court orders, counting votes in
27

1 secret, acts of Malpractice, Malfeasance, Nonfeasance are addressed in the NRS through
2 numerous statutes as well as NRS 283.440. In the numerous exhibits and in [Exhibits 16-22], for
3 a few examples, clearly show a duty to follow the law and penalties for not doing so.

4
5 NRS 283.440 reads very clearly, it says that any person in any office can be removed by the
6 statute. The statute additionally states who it does not apply to. The defendants are not on the list
7 of officers, or offices that are safe from removal via NRS 283.440. Additionally, the statute reads
8 that anyone can bring a cause of action against a public official as it does not implicitly state they
9 can not.

10
11 Nev. Rev. Stat. § 357.080 is an example in where, " a private plaintiff may bring an action
12 pursuant to this chapter for a violation of NRS 357.040 on his or her own account and that of the
13 State or a political subdivision, or both the State and a political subdivision." Showing further
14 another example in where the NRS allows for private citizens to bring action against public
15 officials.

16
17 Furthermore, the defense even goes as far to cite Madsen v. Brown, 701 P.2d 1086, 1093 (Utah
18 1985) which is a case in where private citizens successfully removed the Mayor from office,
19 using the same process that we do here in Nevada.

20
21 A simple example is counting votes in secret. Disallowing the public their right to observation is
22 a violation of the Washoe County court's orders in [Exhibit 72] and the Nevada Revised Statutes
23 and Nevada Administrative Code: N.R.S. 293.269931 § 1, 293.3606 § 1, 293.363 § 1, and N.R.S.
24 293B.353, 293B.354, 293B.380 § 2(a), and N.A.C. 293.311 § 4.

25
26 The Plaintiff did not intend to present his entire case within the original complaint. Instead, he
27

1 provided sufficient allegations to meet the requirements of notice pleading. The Plaintiff plans to
2 further his case through discovery, oral arguments, and trial, as allowed by due process. It's
3 unrealistic to encapsulate an entire case within a single complaint; concise statements addressing
4 the issues are more appropriate. For example, in lines 90, 91, 92, and 93 on pages 13-14 of his
5 original complaint, the Plaintiff states, 'Defendants, and each of them, have failed to fulfill the
6 duties of their respective offices as alleged herein.

7
8 "Defendants have additionally failed to address, correct, or rectify the issues raised in the
9 underlying Petitions, including but not limited to, (1) updating and resolving the voter registration
10 lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate
11 signature verification; (5) illegal function within the election system; (6) violations of election
12 procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an injunction regarding
13 the foregoing."

14
15
16 "Defendants through their acts of malpractice, malfeasance, and or nonfeasance have failed to
17 perform their duties and have harmed and will continue to harm plaintiff."

18
19 "Granting the requested relief will serve public interest. "

20 {Exhibit 109} that was filed with the original complaint, which shows an abbreviated summary of
21 [Exhibits 16-22] and sets the table for [Exhibits 1-135]
22

23
24 Those are just a few examples of how claims were made, and each of which throughout the
25 pleadings and exhibits lists violations and remedies sought. All of which the Plaintiff believes to
26 be true and accurate. What Plaintiff has alleged thus far, and shown evidence of, should be more
27

1 than enough to meet the notice pleading requirements and likely secure victory for Plaintiff on
2 both causes of actions with what has been submitted thus far alone.

3
4 The Plaintiff's pleadings and accompanying exhibits are in compliance with the notice pleading
5 requirements pursuant to Nevada law. The Plaintiff contends that the material submitted thus far
6 establishes sufficient grounds to invoke the full spectrum of due process protections, including,
7 but not limited to, discovery, oral arguments, and a jury trial. This will further substantiate the
8 Plaintiff's entitlement to the remedies and relief sought in this case.
9

10
11 3 and 4 of 12(b)(5). The factual contentions have evidentiary support or, if specifically so
12 identified, will likely have evidentiary support after a reasonable opportunity for further
13 investigation or discovery; and the denials of factual contentions are warranted on the
14 evidence or, if specifically so identified, are reasonably based on a belief or lack of
15 information.
16

17
18 The Plaintiff's pleadings and accompanying exhibits are in compliance with the notice pleading
19 requirements pursuant to Nevada law. The Plaintiff contends that the material submitted thus far
20 establishes sufficient grounds to invoke the full spectrum of due process protections, including,
21 but not limited to, discovery, oral arguments, and a jury trial. This will further substantiate the
22 Plaintiff's entitlement to the remedies and relief sought in this case. Just the examples on pages 4-
23 7 of this document should sufficiently show plaintiff meets the requirements of prongs 3 and 4 of
24 the 12(b)(5) motion.
25
26
27

1 Below, the Plaintiff will briefly refute the defendants' allegations in pages 4-6 of their Motion
2 For Sanctions:
3

4 **Opposition to Page 4, Defendants Motion For Sanctions**

5 It states, "Compl. at p. 20. Beadles seems to acknowledge his Complaint violates Rule 11, stating
6 in his complaint:

7 Plaintiff comes before the court pro se because many BAR-certified attorneys are being targeted,
8 dis-barred, sanctioned, etc. for simply bringing an elections-related lawsuit forward. Plaintiff
9 hereby represents himself pro se to save his lawyers from attacks on their livelihoods.

10 Compl. at ¶15(2).
11

12 The Plaintiff respectfully refutes the Defendant's insinuations, which appear designed to mislead
13 this Court. The Plaintiff contends that attorneys advancing election-related claims face undue
14 scrutiny and stigmatization, often enduring harsher treatment than those defending individuals
15 accused of serious criminal offenses, such as child trafficking. This adverse environment
16 particularly impacts conservative attorneys questioning the integrity of electoral processes,
17 subjecting them to an elevated risk of professional disciplinary actions, including disbarment. To
18 mitigate this risk to counsel, the Plaintiff has elected to proceed pro se. The pervasive media bias
19 against conservatives who question electoral fairness or integrity serves as additional
20 substantiation for this choice. For a specific illustration of this, the Court is directed to Exhibit
21 132, which demonstrates how the media has treated the Plaintiff.
22

23 **Defendants Argument on Page 5-6 of their Motion For Sanctions**
24

25 It states, "A frivolous action is one that is "both baseless and made without a reasonable and
26 competent inquiry." Id., citing Townsend v. Holman Consulting Corp., 929 F.2d 1358, 1362 (9th
27

1 Cir. 1990). The determination of frivolity is two-pronged: (1) the court must determine whether
2 the pleading is "well grounded in fact and is warranted by existing law or a good faith argument
3 for the extension, modification or reversal of existing law," and (2) whether the party made a
4 reasonable and competent inquiry. Id."

5
6 The Plaintiff respectfully submits that the instant Complaint is both 'well-grounded in fact and
7 warranted by existing law,' or at the very least, constitutes a 'good faith argument for the
8 extension, modification, or reversal of existing law.' To support this contention, the Plaintiff
9 invites this Honorable Court to review the pleadings and the 157 exhibits submitted. These
10 materials establish that the Plaintiff has been engaged in a diligent investigation of the matters at
11 issue for over two years. During this period, the Plaintiff has attempted to address these concerns
12 directly with the Defendants, only to be met with a lack of meaningful remedy or relief.
13 Consequently, this legal action represents the Plaintiff's final recourse for obtaining the remedy
14 and relief to which he is entitled.

15
16 Given the gravity of the situation and the comprehensive nature of the Plaintiff's prior
17 investigative efforts, the Plaintiff respectfully requests that this Honorable Court deny the
18 Defendants' Motion to Dismiss and Motion for Sanctions. This will enable the judicial process to
19 proceed, ensuring that the Plaintiff's constitutional and procedural rights to due process are duly
20 upheld.

21
22 **Plaintiff Did Address Defenses Motion For Sanctions & Rule 11 Letter**

23
24 The Defense claims Plaintiff did not address their Motion for Sanctions or Rule 11 Violation.
25 The Plaintiff did, in fact, address their Motion and Rule 11 Letter. The Plaintiff asked the
26 Honorable District 2 Court to first rule on his Opposition to Motion to Dismiss. On page 2, II.

1 Introduction, Plaintiff asked the Honorable Court to first rule on the Motion for Change of
2 Venue, and when the Plaintiff prevails, to strike the Defendant's Motion for Sanctions as moot. It
3 did not and does not seem appropriate to simply restate the same things over and over again from
4 the previous pleadings into a separate pleading to again address the same issues refuted in the
5 Plaintiff's Opposition to Motion to Dismiss, Response in Support of Issuance of Citations,
6 Motion for Sur-Reply, etc. After having said that, Plaintiff will briefly refute the Defense's
7 claims in their headings in their Motion for Sanctions.

8
9 (Below, the arguments labeled as I, II, III, VX, A, B, C, D, etc., represent sections from the
10 Defense's motion for sanctions. The Plaintiff addresses and refutes each of these arguments
11 in the subsequent content)

12
13
14 **A. BEADLES DID NOT FILE COMPLAINTS TO HARASS DEFENDANTS**

15
16 Plaintiff has tried to work with the Defendants, exposing numerous irregularities and
17 impossibilities in a fair election system. Defendants have worked against the Plaintiff, the
18 Plaintiff has thus exhausted all other remedies and is now here in this Honorable Court to seek
19 remedy, not to harass. A look to pages 3-7 on this document show this lawsuit is the furthest
20 from an attempt of the Plaintiff to harass the defendants. The Plaintiff has legitimate concerns
21 backed by proof and evidence as demonstrated in the numerous pleadings and 156 exhibits
22 submitted thus far. The Plaintiff has simply run out of options for relief and thus filed this
23 lawsuit.

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1 i. **RELIEF IS ATTAINABLE**

2
3 Plaintiff incorporates all previous pleadings and exhibits into this response. Plaintiff believes all
4 relief requested can be granted by this Honorable Court and/or Defendants. A simple example is
5 in the original complaint on pages 15-16, under relief item viii, the Plaintiff merely asks this
6 Honorable Court to enjoin the Defendants to follow those laws. Additionally, NRS 283.440
7 shows allowable relief by removing the three Defendants from office. Plaintiff believes most, if
8 not all, remedies can be granted by this Honorable Court and its actions.
9

10 ii. **CLAIMS CAN BE MADE AGAINST THE ROV**

11
12 Plaintiff incorporates all previous pleadings and exhibits into this response. As shown in the
13 previous pleadings, the ROV is a position listed by Washoe County as Class Code 60009314.
14 This is also listed by NRS 244.164 as the same position as an Elected County Clerk.
15 Additionally, Jaimie Rodriguez is sued in her personal capacity as well. The position and in her
16 person are all suable entities.
17

18 iii. **DEFENSE MISUNDERSTOOD NRS 266.430**

19
20 Plaintiff incorporates all previous pleadings and exhibits into this response. The Defense has
21 misinterpreted Plaintiff's complaint relative to NRS 266.430.
22 The Defense posits that "No private citizen "may institute criminal proceedings independently."
23 At no time does the Plaintiff claim relief or demand of the Court that NRS 266.430 be applied to
24 the Defendants. The Plaintiff merely offers NRS 266.430 in the context of severity of the
25 penalties should the Defendants be found negligent pursuant to NRS 283.440, not to prosecute
26

1 them in this civil proceeding.

2
3 iv. **ELECTION PETITIONS ARE NOT BASELESS**
4

5 Plaintiff incorporates all previous pleadings and exhibits into this response. Defendants have a
6 duty and obligation to respond to Petitions of elections pursuant to the Voter's Bill of Rights Nev.
7 Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11). Defendants, and each of them, have failed and
8 refused to respond to or address the allegations made in the Petitions and continue to fail and refuse
9 to respond to or address the same since the filing of the Petitions. Plaintiff's rights to have
10 legitimate grievances regarding matters of elections and the officials who conduct them responded
11 to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants,
12 and each of them. By failing to address the Petitions, Defendants have each violated their oath to
13 office, Nevada Revised Statutes and Administrative Codes, and violated the Plaintiff's
14 constitutional rights [See pages 4-7 in this document]. The defense is misleading this court; the
15 plaintiff did not contest a candidate's election, the Plaintiff brought forward complaints about the
16 entire Washoe County Election process. The two are not the same. Not even remotely. As to using
17 the Secretary of State's forms and processes in filing election violations, the Plaintiff did that as
18 well, [Exhibit 127], confirmed by the Secretary of State himself in [Exhibit 120], where he states
19 he received over 700 complaints. Shown in [Exhibit 126], the defendants lie directly to the
20 Secretary of State, as [Exhibits 23 and 24] confirm with video and transcript proof. The Secretary
21 of State is either in on the lies or is of no use to the Plaintiff because the information he receives
22 from the defendants is false. Either way this honorable court looks at it, the Plaintiff must seek
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1 relief from this Honorable Court as neither the defendants nor Secretary of State are providing
2 relief or remedy to him.

3
4
5 The defense's argument here again is that the defendants are above the law and have no duty to
6 follow it or face consequences for breaking it.

7
8
9 v. REMOVAL OF OFFICERS ARE BASED IN LAW

10
11 Plaintiff incorporates all previous pleadings and exhibits into this response. NRS 283.440 is quite
12 clear; it states any person, in any office, can be removed. It further states who it doesn't apply to.
13 The Defendants are not listed as offices excluded from this statute and action.

14
15 Bostock v. Clayton County, 140 S. Ct. 1731 (2020), "The people are entitled to rely on the law as
16 written, without fearing that courts might disregard its plain terms based on some extratextual
17 consideration. See, e.g., *Carcieri v. Salazar*, 555 U.S. 379, 387, 129 S.Ct. 1058, 172 L.Ed.2d 791
18 (2009); *Connecticut Nat.*"

19
20
21 *Caminetti v. United States*, 242 U.S. 470 (1917), "Where the language is plain and admits of no
22 more than one meaning the duty of interpretation does not arise and the rules which are to aid
23 doubtful meanings need no discussion."

24
25
26 The defense, once again, states that the Defendants have no duties to follow the laws and are

1 immune to consequences for breaking them. The Defendants broke the Plaintiff's court orders,
2 failed to address his petitions, broke numerous NRS, and committed gross acts of malfeasance,
3 nonfeasance, and malpractice. Including, but not limited to, stealing county property for personal
4 gain, using position for enrichment, covering up election crimes, defying orders by this very
5 Court's jurisdiction, and so much more that will be presented at trial. Each allegation if found
6 true, would warrant removal from office as per NRS 283.440. The previous pleadings and
7 exhibits clearly show many allegations and evidence, which are facts for a jury to decide, not for
8 the defense to omit.

10 As mentioned above, Nev. Rev. Stat. § 357.080 is an example in where, "a private plaintiff may
11 bring an action pursuant to this chapter for a violation of NRS 357.040 on his or her own account
12 and that of the State or a political subdivision, or both the State and a political subdivision."

13 Showing further another example in where the NRS allows for private citizens to bring action
14 against public officials.

16 Furthermore, the defense even goes as far to cite Madsen v. Brown, 701 P.2d 1086, 1093 (Utah
17 1985) which is a case in where private citizens successfully removed the Mayor from office,
18 using the same process that we do here in Nevada.

20 **vi. PUNITIVE DAMAGES ARE AVAILABLE FOR STATE CLAIMS**

22 Plaintiff incorporates all previous pleadings and exhibits into this response. Nev. Rev. Stat. §
23 42.005 allows for the award of punitive damages in cases where the defendant has been found
24 guilty of fraud, among other things. The issues Plaintiff raises fall within the liability and
25 responsibility of Washoe County to ultimately pay restitution. See "Punitive" below.

1
2 NRS 41.031(1), "The State of Nevada further waives the immunity from
3 liability and action of all political subdivisions of the State, and their
4 liability must be determined in the same manner, except as otherwise
5 provided in NRS 41.032 to 41.038, inclusive, subsection 3 and any
6 statute which expressly provides for governmental immunity, if the
7 claimant complies with the limitations of NRS 41.032 to 41.036,
8 inclusive."
9

10
11 The state has limited the immunity it affords local government.
12

13 NRS 41.032, "Except as provided in NRS 278.0233 no action may be
14 brought under NRS 41.031 or against an immune contractor or an
15 officer or employee of the State or any of its agencies or political
16 subdivisions which is: 1. Based upon an act or omission of an
17 officer, employee or immune contractor, exercising due care, in the
18 execution of a statute or regulation, whether or not such statute or
19 regulation is valid, if the statute or regulation has not been declared
20 invalid by a court of competent jurisdiction; or 2. Based upon the
21 exercise or performance or the failure to exercise or perform a
22 discretionary function or duty on the part of the State or any of its
23 agencies or political subdivisions or of any officer, employee or immune
24 contractor of any of these, whether or not the discretion involved is
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26
27

1 abused.

2
3 Plaintiff alleges that, in accordance with NRS 41.032, one or more Defendants: 1) did not
4 exercise due care in the execution of a statute or regulation, 2) committed non-discretionary acts
5 that harmed Plaintiff, which acts are not immune.
6

7 NRS 41.0349, based on any act or omission relating to the person's
8 public duty or employment, the State or political subdivision shall
9 indemnify the person unless: (4) The act or omission of the person was
10 wanton or malicious."
11

12 NRS 42.005 states, "Except as otherwise provided in NRS 42.007, in an
13 action for the breach of an obligation not arising from contract, where it
14 is proven by clear and convincing evidence that the defendant has been
15 guilty of oppression, fraud or malice, express or implied, the plaintiff,
16 in addition to the compensatory damages, may recover damages for the
17 sake of example and by way of punishing the defendant."
18

19
20 NRS 42.005 provides that, "the plaintiff, in addition to the compensatory damages, may recover
21 damages."
22

23
24 *Smith v. Wade*, 461 U.S. 32 (1983), states in part:

25 "In addition to actual damages, the law permits the jury, under certain circumstances,
26 to award the injured person punitive and exemplary damages, in order to punish the
27

1 wrongdoer for some extraordinary misconduct, and to serve as an example or warning
2 to others not to engage in such conduct.” “If you find the issues in favor of the plaintiff,
3 and if the conduct of one or more of the defendants is shown to be a reckless or callous
4 disregard of, or indifference to, the rights or safety of others, then you may assess
5 punitive or exemplary damages in addition to any award of actual damages.”

6 “. . . The amount of punitive or exemplary damages assessed against any defendant
7 may be such sum as you believe will serve to punish that defendant and to deter him
8 and others from like conduct.” see *Procunier v. Navarette*, 434 U. S. 555 (1978) at 643
9 (emphasis added).
10

11 Hence, the Supreme Court ruled that punitive damages are allowed in this honorable court and as
12 it pertains to this litigation.
13

14 Additionally, in Nevada:

15 *Bongiovi v. Sullivan*, 122 Nev. 556 (Nev. 2006), “The punitive damages award was not error
16 Punitive damages are designed not to compensate the plaintiff for harm suffered but, instead, to
17 punish and deter the defendant's culpable conduct.”
18

19
20 **vii. BEADLES RELIEF REQUESTS ARE LEGITIMATE, AND HILL IS NOT**
21 **BEING SINGLED OUT**
22

23
24 Plaintiff incorporates all previous pleadings and exhibits into this response. The defense states
25 that requesting the defendants to use paper ballots somehow is invalidating the NRS, this is
26

1 untrue. There is no NRS Plaintiff is aware of that specifically says the county cannot use paper
2 ballots. What the Plaintiff does find is the defendants' ability to do the following:

3
4 County has discretion in the selection of election systems, hiring practices, and numbers of
5 precinct polls and locations: County may choose not to use any election system. (N.R.S.
6 293.269925, 293.3075(6), 293.506, and 293B.110, exception N.R.S. 293.2955(1, 4)
7

8
9 Pursuant to N.R.S. 293B.105 General authority. "The board of county commissioners of any
10 county or the city council or other governing body of any city may purchase and adopt for use at
11 elections any mechanical voting system and mechanical recording device. The system or device
12 may be used at any or all elections held in the county or city, for voting, registering and counting
13 votes cast."

14 Further proof the defendants could use paper ballots is counties have local control pursuant to
15 Nev. Const. Art. 4 Sec 20 as follows:

16
17 "The legislature shall not pass local or special laws in any of the following
18 enumerated cases—that is to say:

19 Regulating the election of county and township officers;

20 Providing for opening and conducting elections of state, county, or
21 township officers, and designating the places of voting;"
22

23 The defense then states the vote tally base cannot be public. This again would defy logic and the
24 NRS listed above in the ability for the public to have the ability to observe the counting of
25 ballots. The defendants currently provide a certified cast vote total and certified election results;
26 they should also show where the data came from via the vote tally database.
27

1

2 The defense also states asking for the remedy of halting QR codes is somehow frivolous. That
3 again defies logic; how in the world is a human to identify QR codes with our election system to
4 ensure they are proper or legitimate? Plaintiff cannot read QR codes, nor would he expect
5 anyone else to. The defendants have the ability to grant all of these remedies.

6

7 The defense again fails to acknowledge another reason the three defendants and the County as a
8 whole are being sued is these are the required people needed to grant remedies. Defendant Hill is
9 the Chair of the County Commission, Defendant Brown is the County Manager; those are the
10 two people needed to set items on the Board of County Commissioners agenda to vote on these
11 items. That's another reason why the county was sued as well, to make sure the other four
12 commissioners can vote on some of the items requested for remedies in these proceedings.
13 Defendant Rodriguez would be the one to implement the changes.

14

15 The defense continues to mislead this court, stating Plaintiff is singling out Hill by not naming
16 the other commissioners, yet Hill is the one needed for the item to be added to the agenda. She
17 was the only commissioner as well who has been served all the petitions and broke the court
18 orders. Commissioner Herman and Clark will testify that they both agreed to look into all of the
19 Plaintiff's complaints but have been stopped by Defendant Hill and Defendant Brown.
20 Commissioner Andriola and Garcia were just added to office this year. Thus, the proper
21 defendants are all named in this lawsuit; Defendant Hill is not being singled out, she is properly
22 named in this suit.

23

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26

27

1 **E. BEADLES DID NOT DISREGARD RULE 11 NOTICE**

2
3 Plaintiff incorporates all previous pleadings and exhibits into this response. The Plaintiff is not
4 utilizing this honorable court to harass the defendants; rather, he seeks to hold them accountable
5 for the alleged crimes and violations. The Plaintiff's arguments, evidence, and exhibits meet the
6 requirements for notice pleading. The defense is attempting to prevent the case from advancing
7 and thereby revealing the allegations as factual by filing an inappropriate Motion for Sanctions
8 and Rule 11 letter. The Plaintiff has no intention of dismissing this case; instead, he wishes for
9 the evidence to be evaluated on its merits, allowing this honorable court and jury to arrive at
10 unbiased facts.
11

12
13
14 **F. SANCTIONS AND DISMISSAL AGAINST PLAINTIFF ARE NOT**
15 **APPROPRIATE**
16

17 Plaintiff incorporates all previous pleadings and exhibits into this response. The Plaintiff's
18 complaint and pleadings are neither frivolous nor filed for an improper purpose. Rather, they are
19 grounded in legal basis, warranted by existing law, and within the jurisdiction of this honorable
20 court and the defendants to grant most, if not all, of the remedies sought. The Plaintiff
21 unequivocally denies that his pleadings are frivolous or for an improper purpose. The fact of the
22 matter is that the Plaintiff is exercising his rights to hold the defendants accountable for their
23 alleged violations and crimes committed against both the Plaintiff and the County, especially
24 where all other attempts at redress have failed. The Plaintiff has no intention of dismissing this
25
26
27

1 crucial case. It is time for the defendants to understand that they are not above the law and must
2 be held accountable.

3
4 **V. SANCTIONS AGAINST DEFENSE ARE APPROPRIATE**

5
6 Plaintiff incorporates all previous pleadings and exhibits into this response. In this critical legal
7 matter, the Defense's actions, led by Ms. Liddell, have not only shown a blatant disregard for
8 ethical norms but have also shaken the very foundation of justice and impartiality that the legal
9 system is built upon. The Defense's consistent pattern of behavior, as demonstrated through both
10 public statements and private communications, unequivocally demands sanctions and referral to
11 the BAR for acts unbecoming an officer of the court.
12

13
14 **A. Manipulation of Public Opinion:**

15 The Defense's calculated attempt to sway the Court of Public Opinion is an affront to the
16 principles of fairness and objectivity that underpin the judicial process. This is no more evident
17 than in the audacious assertion by the Washoe County District Attorney's office that the
18 Plaintiff's claims were nothing more than the "inaccurate rantings of a conspiracy theorist", "The
19 Beadles' Complaint is disconnected from the law and from reality," the letter said. "The
20 Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be
21 sanctioned, and Defendants should likewise be awarded attorneys' fees." [Exhibit 132]. By
22 casting such prejudiced aspersions, the Defense, in collusion with the DA's office, not only
23 breaches Rule 3.6 (a) but also impairs the Plaintiff's ability to receive a fair trial. This calculated
24 strategy to manipulate public perception constitutes an act unbecoming of an officer of the court.
25
26

1
2 B. Coordinated Media Collusion:

3 The Defense's unholy alliance with both the Reno Gazette-Journal and the District Attorney's
4 office paints a damning picture of their commitment to disrupting the integrity of the legal
5 process. Their coordinated statements, strategically placed within media coverage, serve as a
6 double-edged sword aimed at both poisoning the well of public opinion and prejudicing potential
7 jurors. These extrajudicial utterances, as vividly demonstrated in the press, flout Rule 3.6 (a),
8 undermining the court's authority and furthering the spectacle-fueled narrative that is anathema
9 to justice.
10

11
12 3. Premature Revelation of Confidential Information:

13 Adding to this distressing saga is the Defense's cavalier approach to the confidentiality of court
14 proceedings. In reading the text messages between Mark Robison and Beadles [exhibit 132], you
15 can see the defense sent the Motion For Sanctions directly to him, without Robison doing an
16 NRS information request. The defense said the Motion to Change Venue is a public document;
17 that is again untrue, as Beadles had 21 days to weigh whether he wanted to move forward with
18 the Federal Lawsuit. Instead, he was informed about it by the press 21 days early, before it
19 became public record. By improperly disseminating the Motion for Sanctions to an external
20 party, the Defense has trampled on the sanctity of the litigation process [Exhibit 132]. This
21 premature sharing of confidential information not only signals a disregard for professional
22 standards but also poses a grave risk to the fairness of the proceedings.
23
24

25
26 4. Manipulating the Honorable Court: Distortion and Concealment of Facts
27

1
2 It is irrefutable that Ms. Liddell's submissions to this esteemed court have been marred by a
3 consistent pattern of deliberate omission, distortion, and deception, undermining the very essence
4 of justice and the integrity of this honorable legal process. An egregious illustration of this
5 practice is her Motion To Dismiss, which starkly exposes the Defense's attempt to evade
6 accountability and obfuscate the truth.
7

8
9 Strategic Misdirection:

10 An unmistakable characteristic of Ms. Liddell's submissions is her orchestrated attempt to divert
11 attention from the crux of the matter. Her Motion To Dismiss employs an 11-page analysis to
12 assert that the defendants bear no obligation to address wrongdoing or be held accountable to the
13 public [Exhibit 109]. Yet, within this intricate web of legalese, she begrudgingly concedes the
14 plaintiff's valid claims for relief in a mere sentence. On page 12, lines 16-21, Ms. Liddell
15 acknowledges the plaintiff's meticulous enumeration of issues, such as inadequate signature
16 verification and illegal functions within the election system [Exhibit 109]. This conscious
17 manipulation of the truth encapsulates the Defense's disregard for transparent discourse.
18
19

20 Deceptive Assertions:

21 A recurrent theme throughout the Defense's motions for sanctions and dismissal is the repeated
22 and misleading claim that the plaintiff fails to present claims for relief or causes of action.
23 Paradoxically, within the same context, Ms. Liddell inadvertently acknowledges the existence of
24 compelling evidence that demonstrates the defendants' violations. This duplicitous approach
25 serves only to perpetuate confusion and hinder the pursuit of justice.
26
27

1
2 Defendants Own Words:

3 Defendants Brown and Rodriguez, in their own words, show the merits of the Plaintiff's
4 complaint to be true. The Defense ignores the damning truth by her own clients and further
5 perpetuates the sanctionable actions of pushing forward with her meritless claims that the
6 Plaintiff's case is frivolous and filing the Motion to Dismiss and Motion for Sanctions. The
7 Defendants' own words, and even fellow commissioners Garcia and Herman, in their own words,
8 grant immediate credibility to all of Plaintiff's grievances and his complaint. For proof, see
9 [Exhibits 101, 102, 111, 118-122, and 149]. The Defense is guilty of everything she is accusing
10 the Plaintiff of.
11

12
13 Unacceptable Collusion:

14 Additionally, the disconcerting alignment between Ms. Liddell and the County District Attorney
15 raises alarm. This alliance, manifest in shielding county officers from accountability, raises
16 concerns about impartiality and the fair administration of justice. Such a partnership, cloaked in
17 the guise of legal defense, subverts the principles that this court stands for.
18

19
20 The evident practice of manipulating, distorting, and concealing facts within Ms. Liddell's
21 submissions casts a shadow on the Defense's approach to this case. The disservice rendered to
22 this honorable court and to the pursuit of justice through such tactics is deeply concerning. To
23 uphold the sanctity of this legal process and ensure a just outcome, the plaintiff beseeches this
24 court to scrutinize these unethical actions, impose fitting sanctions, and consider referral to the
25 BAR for Ms. Liddell. Transparency, truth, and accountability must prevail over any strategy that
26

1 erodes the foundations of justice. Furthermore, the plaintiff fervently urges the court to deny the
2 Motion to Dismiss in light of the Defense's manipulative conduct. The importance of
3 maintaining the integrity of the legal profession and the pursuit of truth cannot be overstated,
4 especially when faced with actions as egregious as those undertaken by the Defense.

5
6 Its appalling to have the County DA cover for County officers all at the expense of the citizens
7 and voters of Washoe County.

8
9
10 The Defense's cumulative actions form a deeply troubling tableau that speaks volumes about
11 their commitment to a fair and just legal process. Their extrajudicial statements, media
12 entanglement, and premature disclosure of confidential documents are not merely isolated
13 missteps, but a systematic attempt to warp the legal landscape to their advantage. The Plaintiff,
14 in seeking sanctions against the Defense and a BAR referral for Ms. Liddell, implores the Court
15 to reaffirm its role as a bastion of justice. It is imperative that those who bear the title of officer
16 of the court adhere to the highest ethical standards. The Defense's actions have eroded trust in the
17 legal system, and only by taking firm action can we begin to restore faith in the pursuit of truth
18 and justice. Additionally, the Plaintiff vehemently urges the Court to deny the Motion to
19 Dismiss, as any ruling should not be swayed by the Defense's unethical conduct. The gravity of
20 their actions cannot be overstated; their deeds are a stain on the legal profession and warrant
21 swift and resolute condemnation.

22
23
24
25 Plaintiff hereby respectfully demands this honorable court to sanction the defense, namely Ms.
26 Liddell, and refer these gross violations to the BAR.

1
2 **V. THE "MATH" NOR SOLOMON, NOR BEADLES WERE EVER DEBUNKED**

3 Plaintiff incorporates all previous pleadings and exhibits into this response. The Plaintiff wishes
4 to be crystal clear: no one has ever successfully "debunked" Mr. Solomon or the Plaintiff. In fact,
5 dozens of PhDs have tried; all have failed. The Defense falsely claims it's accepted and concluded
6 that Solomon is wrong. That is false as well. The defense cherry picks words and phrases in an
7 attempt to mislead this honorable court. The defense fails to quote entire sentences or paragraphs
8 showing the Grand Canyon sized holes in her case. The Defense states in Gilbert v. Lombardo that
9 Solomon was debunked; that too is false. The truth is, Gilbert's Counsel, Craig Mueller, failed—
10 either through incompetence or betrayal—to demonstrate both prongs of 293.410, which reads:
11
12

13 **NRS 293.410 Statement of contest must not be dismissed for deficiencies of form; grounds for contest.**

14 1. A statement of contest shall not be dismissed by any court for want of form if the grounds of contest are
alleged with sufficient certainty to inform the defendant of the charges the defendant is required to meet.

15 2. An election may be contested upon any of the following grounds:

16 (a) That the election board or any member thereof was guilty of malfeasance.

(b) That a person who has been declared elected to an office was not at the time of election eligible to that office.

(c) That:

(1) **Illegal or improper votes were cast and counted;**

(2) Legal and proper votes were not counted; or

(3) A combination of the circumstances described in subparagraphs (1) and (2) occurred,

18 **if in an amount that is equal to or greater than the margin between the contestant and the defendant, or**
19 **otherwise in an amount sufficient to raise reasonable doubt as to the outcome of the election.**

20 Mueller, on his own, left out most of Gilbert's evidence, then, without Gilbert being able to read,
21 decided to file the election contest. In the contest, he only showed that "illegal votes" were cast
22 but without showing that the amount was equal or greater than the margin between Gilbert and
23 Lombardo. Solomon showed the illegal votes were cast via the state's own certified election
24 results and showed that it was enough to prove Gilbert was the actual winner. Mueller failed to
25 add the "restoration" (the proof the votes were equal or greater than the margin) to the Election
26

1 Contest, thus the case was dismissed, and sanctions were granted. Quoting directly from page 5
2 of [Exhibit 147], it clearly states, "*even if his claim regarding mathematical or geometric*
3 *'impossibility' was true, Mr. Gilbert still did not have any competent evidence to demonstrate*
4 *that he won the 2022 Primary as would be required to prevail under NRS 293.410(2).*"

5
6 Additionally, quoting directly from page 6 in [Exhibit 148], "*Mueller alternatively contends that*
7 *the district court misconstrued NRS 293.410 as requiring evidence of 'restoration.'* Admittedly,
8 *NRS 293.410 does not use the term 'restoration.'* But it is evident from the record that the district
9 *court used that term synonymously with the statutory language 'change[d] the result of the*
10 *election' and that had the statement of contest not been premised on the concept of 'restoration'*
11 *and used that term, the district court would not have used that term in its orders. To this end, in*
12 *granting Governor Lombardo's motion for summary judgment, the district court made its stance*
13 *as clear as possible that it was not basing its decision on 'restoration' but that it was 'relying*
14 *upon the fact that [the court did not] have any information, if all of the math [in the Solomon*
15 *Report] is correct, that there's a difference in voting of 1 or 1,000 or 10,000 or any other*
16 *number.'*"

17
18
19
20 Solomon's "math" was never debunked, nor disproven, as shown in the Plaintiff's Opposition to
21 Motion to Dismiss. Instead, Gilbert's counsel failed to do his job and present all the evidence.
22 That is one of many reasons Gilbert has been in litigation against Mueller since the spoiled
23 outcome of the election contest. The defense continues to mislead this court; Solomon has never
24 been disproven. He is, in fact, a witness to what happened in the Washoe County elections; he
25 simply found that there is an impossible, illegal function within the election system. The defense
26

1 wants to state that because the Plaintiff fails to state who put it there, how it happened, it's not a
2 problem, nothing to see here, move along. It's like a witness finding a murder victim who has
3 been stabbed, with a knife in the victim's back; the witness doesn't know who stabbed the person,
4 only that the person is dead, there's a knife in the victim's back, and that it's the authorities' job,
5 not the witness's nor the plaintiff's, to do law enforcement's job and solve the "who done it." The
6 facts are simple: the certified election results show that in the two largest counties, separated on
7 opposite sides of the state, all the precincts voted identically, while the other 15 counties and
8 Carson City did not. The defense tries to discount the additional comparison showing that the
9 multi-billion-dollar artificial intelligence platform known as Google's Bard additionally
10 concurred that, by looking at the county's own certified election data, the Washoe County
11 elections are rigged [Exhibit 129]. The outcome of this "illegal function" cost numerous
12 candidates their elections and all legal voters their right to suffrage. Those are the facts. It's not
13 the Plaintiff's job to tell this honorable court who did it, but rather that it happened, and here's the
14 proof [Exhibits 104, 105]. As stated in the Plaintiff's Opposition to Motion to Dismiss, the
15 defendants have the power to stop using all electronic voting and tabulation machines. The
16 defense is trying to mislead this court and say they don't have the power when NRS clearly
17 shows they do, and that is one of many remedies the Plaintiff seeks. Our votes are our only voice
18 in determining the change we want to see in our county. Our voices are being stolen from us all.
19 This honorable court has the ability to right this wrong going forward. The remedy sought is
20 straightforward: the defendants will cease using all election voting and tabulation machines and
21 will use paper ballots, counted by hand, and reported, by person, in the voters' precincts.
22
23
24

25 NRS 244.194: Boards of county commissioners may rent, lease or otherwise acquire voting or counting devices in
26 whatever manner will best serve local interests.

1 NRS 293B.105 General authority. The board of county commissioners of any county or the city council or other
2 governing body of any city may purchase and adopt for use at elections any mechanical voting system and
mechanical recording device. The system or device may be used at any or all elections held in the county or city, for
voting, registering, and counting votes cast.

3 293B.110 Adoption of different systems or devices for different precincts or districts. A mechanical voting system
4 or mechanical recording device may be adopted for some of the precincts or districts in the same county or city,
while the remainder of the precincts or districts in that county or city may be furnished with paper ballots or any
other mechanical voting system or mechanical recording device.

5 N.R.S. 293.269925 Establishment of procedures for processing and counting mail ballots. 1. The county clerk shall
6 establish procedures for the processing and counting of mail ballots.

7 In the first three NRS cited, the language indicates that the defendants "may" use machines,
8 suggesting they have discretion in this matter. In contrast, NRS 293.269925 mandates that the
9 Registrar of Voters (ROV) "shall" create procedures for counting ballots, which—as evidenced
10 by the 2022 Nye County Elections—can be conducted manually.

11
12 Plaintiff needs to be crystal clear here; the "math" has never been debunked. In fact, what the
13 defense is trying to obfuscate is the fact that the County's Own Certified Election Results show
14 that every precinct voted nearly exactly the same. This is mathematically impossible.
15 Additionally, the "math" needed to demonstrate this involves simple addition, subtraction, and
16 multiplication—all of which are used daily around the world and have yet to be "debunked". It
17 doesn't take an "expert" to show the elections are rigged, and the defense is trying to hide that
18 from this honorable court.
19
20

21 VI. OPERATION SUNLIGHT POSTS

22
23 Plaintiff incorporates all previous pleadings and exhibits into this response. Plaintiff has tried
24 numerous times to work with the Defendants; he has shown them numerous issues within the
25 Washoe Election system, only for them to use the media to libel and slander him instead of
26 examining the issues presented and repairing them. Plaintiff does not regret any "names" he has
27

1 called the defendants. They are, in his opinion, either utterly incompetent or corrupt; there is no
2 middle ground in his opinion. The names he calls the defendants in his blog accurately depict
3 what he observes, as do all Washoe residents who are shown their actions. A few examples
4 would be the Plaintiff's name "Comrade Hill-Insky." The Plaintiff has shown the numerous
5 violations by Defendant Hill in [Exhibit 150 WC BCC Rules of Procedure 2022]. In these Rules,
6 Hill cherry-picks what rules to follow and what rules not to. For example, she removed public
7 comment from all Washoe Residents without a vote of the board [Exhibit 151]. "I made this
8 decision to ensure our agenda items would be heard in a timely matter, instead of asking our very
9 busy community members to wait sometimes six hours ... to be heard," Alexis Hill said. She then
10 defies the rules set forth in Section 5.5, where she refuses to add Commissioner Clark and
11 Herman's items to the agenda, disenfranchising every Washoe resident. These are two examples
12 where she silences all Washoe residents from their ability to address the commission and then
13 their representation by Commissioners Clark and Herman. I could write a book on Defendant
14 Hill alone and her acts of dictatorship that defy what our country was founded on and what the
15 rules state her power is.

16
17 As to Defendant Brown, "Eric BrownStain", it's simple: in the Plaintiff's opinion, everything he
18 touches turns to crap for the Washoe residents. A few examples are his unexplainable budgets,
19 the unexplainable losses of tens of millions in county funds, the cover-up of election issues,
20 hiring firms without notifying the entire commissioners board to solicit feedback, enriching his
21 family through his position, and so much more.

22
23 As to Defendant Rodriguez, she is not qualified to be the ROV; nor, if she was, is she doing it
24 competently, as shown throughout the section below, "Rodriguez Just Perjured Herself." Plaintiff
25 again states he wouldn't trust her to clean his toilet, let alone the voter rolls. If the facts and this
26 case are allowed to move forward, Plaintiff believes this honorable court and jury will all be in

1 agreement.

2 As to Operation Sunlight, it is a personal opinion blog—where the Plaintiff can share his
3 thoughts and findings. It is a far cry from the so-called "trusted" media of Washoe County, which
4 is "supposed" to report "truth," not opinions. Washoe citizens look to the RGJ, AP, and others for
5 "truth." At Operation Sunlight, they go to hear Beadles' opinions and what he exposes to and
6 within the county. The two are not the same. It is evident that the county's citizens have been
7 exposed to the press's libelous and slanderous one-sided commentary of Beadles for the past
8 years, via the traditional media in conspiracy with the defense and defendants. The defense is
9 deflecting what the so-called media is doing versus what Operation Sunlight does. Together, in
10 conspiracy, they have called the Plaintiff everything from an anti-Semite to racist to right-wing
11 conspiracy theorist, and much more, which are disgusting and unequivocally false.
12

13
14
15 Public officials should be held accountable by law, and where that fails, at least in the court of
16 public appeals. Plaintiff does not regret expressing his 1st Amendment rights.
17

18 19 **VII. DEFENDANT RODRIGUEZ JUST PERJURED HERSELF**

20
21 In the defense's Exhibit # 8, Plaintiff's [Exhibit 149], Plaintiff believes the Defendant just
22 officially perjured herself in this honorable court. Here are four easily viewable examples:
23

24 Example 1: She, under penalty of perjury, states the voter rolls are not unclean and not grossly
25 inaccurate. Simply looking to [Exhibits 1-15, and 21] obliterates that falsehood, under oath. In
26 email conversations between Defendant Rodriguez and Plaintiff, he shared over 11,000 voters
27

1 that are registered to illegal addresses that, according to the NRS, are not permissible to register
2 to vote from. This is confirmed by the county's own tax assessor records as shown in [Exhibit
3 15]. Meaning, there are over 11,000 illegal voters in this one example alone. Races are lost by
4 single-digit votes; imagine 11,000 illegal votes in this one example alone! Defendant Hill is
5 aware of this gross violation of law and has done nothing to remedy, except appear to perjure
6 herself under oath.
7
8
9

10 Example 2: Defendant Rodriguez states in her affidavit that she did not "fail[ed] to train staff and
11 election officials." Here again, simply looking to [Exhibit 22, and video testimonies from the
12 Defendant's boss, Defendant Eric Brown, and County Commissioner Garcia in Exhibits 118,
13 119, and 122] states the exact opposite of that mistruth. They have had 100% churn in election
14 workers, are not prepared for the 2024 elections, and failed to properly train workers and must
15 take down the ROV office down to the studs, and start over as told in [Exhibit 101].
16 Additionally, it's proven it's a mistruth in the 85-page scathing report from the "Election Group"
17 as per [Exhibit 97].
18
19
20

21 Example 3: Defendant states there is no "unequal treatment of signatures at the polls." This is
22 clearly refuted by an election worker affidavit in [Exhibit 2], additionally explained in [Exhibit
23 18]. In where the Washoe County election worker was instructed by the ROV to not conduct
24 signature verification, breaking numerous NRS.
25
26
27

1
2 Example 4: Defendant Rodriguez states there is no "illegal function within the election system."

3 This mistruth is again refuted in [Exhibits 94 and 110], where Defendant was present in the in-
4 person meeting with Plaintiff, where he demonstrated that there is, in FACT, an illegal function
5 within the Washoe County Election system.
6

7 Plaintiff asks this honorable court to hold the defendant accountable by law and punish her for
8 perjury and high crimes. She is stating under oath these atrocities that DID and ARE happening
9 are not. It is one more glaring example of the defendants' attempts to cover up these atrocious
10 crimes against all Nevadan voters and why this lawsuit must be allowed to move forward
11 pursuant to NRCP 12(b)(5).
12
13

14 **VIII. THIS HONORABLE COURT HAS THE AUTHORITY TO GRANT REMEDIES**
15

16 Plaintiff incorporates all previous pleadings and exhibits into this response.
17

18 Here are a few examples demonstrating how this honorable court can provide remedies to the
19 Plaintiff.
20

21 State of Nev. v. Culverwell, 890 F. Supp. 933 (D. Nev. 1995) shows this honorable court is the
22 right venue and has the ability to rule on cause of action 2, Removal of Officer From Office,
23 NRS 283.440.
24

25
26 *Bongiovi v. Sullivan*, 122 Nev. 556 (Nev. 2006 states punitive damages are available to Plaintiff.
27

1
2 *Smith v. Wade*, 461 U.S. 32 (1983), additionally shows that the trial judge instructed the jury that
3 respondent could recover only if petitioner was guilty of "gross negligence" or "egregious failure
4 to protect" respondent. The judge also charged the jury that it could award punitive damages in
5 addition to actual damages if petitioner's conduct was shown to be "a reckless or callous
6 disregard of, or indifference to, the rights or safety of others."
7

8 This court has the ability to enforce and make changes to the Washoe County Election system as
9 shown in *Am. Civil Liberties Union of Nev. v. The Cnty. of Nye*, No. 85507 (Nev. Oct. 21,
10 2022) and *Long v. Swackhamer*, 538 P.2d 587 (Nev. 1975). In both cases, the plaintiffs were
11 granted remedies in changing or enforcing election NRS. In the ACLU case, the court granted a
12 writ of mandamus to compel the county to refrain from livestreaming the hand-count read-aloud
13 process and to make available to voters all three methods for proving voter identity. These are
14 just two of many examples showing this honorable courts ability to grant remedies sought.
15

16 The original complaint and Exhibits [16-22] show NRS that were violated by defendants, most,
17 if not all, of which this honorable court has the ability to enjoin defendants from further
18 violation. Additionally, NRS exist that allow this honorable court to punish defendants for
19 violation of NRS. A few examples are found in NRS 197, NRS 199, NRS 281, and NRS 281A.
20

21 Another example is [Exhibit 72]. The Honorable 2nd District Court granted Plaintiff court orders
22 directing the defendants to allow the public to be present during the entire election process,
23 especially including the counting of the people's votes. The defendants blatantly and spitefully
24 violated these honorable court orders, as evidenced in the video with transcripts in [Exhibits 23-
25
26
27

1 24]. There must be penalties for the defendants for blatantly and spitefully violating the
2 honorable court's orders. This is not exaggeration; watch the video and read the transcript for
3 yourself. Their actions are deliberate and criminal.

4
5 If this honorable court requires further guidance regarding specific remedies, especially where
6 statutory remedies are not available, it may be useful to note that the Nevada Supreme Court has
7 held, "courts of equity have the power to fashion remedies to fit the circumstances of each case."
8 This indicates that the court is not confined to remedies explicitly outlined in statute or common
9 law.

10
11 In *Bedore v. Familian*, the Nevada Supreme Court states that "district courts have full discretion
12 to fashion and grant equitable remedies." See *Bedore v. Familian*, 122 Nev. 5 (Nev. 2006).
13 Additional citations include *Alaska Plastics*, 621 P.2d at 274-75; *Hammes v. Frank*, 579 N.E.2d
14 1348, 1355 (Ind. Ct. App. 1991) (stating that "[t]he trial court has full discretion to fashion
15 equitable remedies that are complete and fair to all parties involved"); *Maddox*, 669 P.2d at 237;
16 *Vorachek v. Citizens State Bank of Lankin*, 421 N.W.2d 45, 54-55 (N.D. 1988); and *Delaney*,
17 564 P.2d at 288-89.

18
19 The remedies sought by the plaintiff would provide him relief; however, these remedies are
20 intended for the betterment of all voters. All voters would benefit from this honorable court
21 granting the remedies the plaintiff is seeking. Currently, the majority of Americans believe our
22 elections are broken or fraudulent, as most of the polls indicate [Exhibit 152]. What's worse is
23 most voters from all political categories "believe it is at least somewhat likely that state and
24 federal officials are ignoring evidence of widespread election fraud" [Exhibit 153]. This
25
26
27

1 honorable court has the ability to grant remedies that could finally instill a sense of justice and
2 accountability where it has been greatly lacking.

3
4 **IX. LEAVE TO AMEND**

5 Plaintiff incorporates all previous pleadings and exhibits into this response. Due to the numerous
6 violations exposed by the Defendants in this case, if the Defendants' motion to dismiss is
7 granted, the Plaintiff respectfully demands that leave to amend be granted under NRCP 15(a),
8 which states that it should be "freely given when justice so requires".

9
10 7963 Laurena Ave. Trust v. Bank of N.Y. Mellon, No. 69052 (Nev. Oct. 17, 2016)

11
12 *"(quoting NRCP 15(a)); see also Nutton v. Sunset Station, Inc., 131 Nev., Adv. Op. 34, 357 P.3d*
13 *966, 973, 975 (Ct. App. 2015) ("[R]ule 15's policy of favoring amendments to pleadings should*
14 *be applied with extreme liberality and amendment is to be liberally granted where . . . the*
15 *plaintiff may be able to state a claim" sufficient to survive NRCP 12(b)(5) dismissal (quotation*
16 *omitted) "*

17
18 **X. CONCLUSION**

19
20
21 Your Honor,

22
23 Please notice on page 3 of the Motion for Sanctions, the defense now claims the Plaintiff has
24 other causes of action, when in previous documents they state there were only two. The defense
25 continues to mislead this honorable court in every motion and pleading they file. Their entire
26 defense can be summed up in one sentence:
27

1 "Defendants have no duty to follow the law, and no consequences for breaking it."

2 That is their defense in a nutshell.

3
4 Then they present mistruth after mistruth, trying to build their defense off their foundation of no
5 accountability. It's appalling that this is the District Attorney's Office using this defense, and
6 defending the very people harming the public.

7
8 The facts, evidence, pleadings, and exhibits presented thus far should adequately meet all notice
9 pleading requirements, and once this case moves forward, the facts are for the jury to find. They
10 will find the defendants have committed malpractice, malfeasance, nonfeasance, and more.

11 Plaintiff would never bring this case forward if he was not 100% certain of the defendants' guilt
12 against all Washoe residents and voters.

13
14 In addition, the sitting Vice Chair of the County Commission, Commissioner Herman, and sitting
15 County Commissioner Clark will testify under penalty of perjury, attesting to the truth of most, if
16 not all, of my allegations. This further demonstrates the need for this case to move forward and
17 for the Defense's motions for Dismissal and Sanctions to be dismissed.

18
19 I have demonstrated that the claims presented are legitimate and must move forward, that this
20 honorable court has the authority to grant remedy, and that it is in the best interest of all parties,
21 the entire County, State, and Nation for this case to move forward.

22
23 Right is right, wrong is wrong. Please do the right thing and dismiss the defense's Motion to
24 Dismiss and Motion for Sanctions and move this case forward.

1 "In a government of laws, existence of the government will be imperiled if it fails to observe the
2 law scrupulously. Our government is the potent, the omnipresent teacher. For good or for ill, it
3 teaches the whole people by its example. Crime is contagious. If the Government becomes a
4 lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it
5 invites anarchy." Justice Louis Brandeis -Olmstead v. United States, 1928.

6
7 Thank you in advance for doing what's right, not easy.

8
9 Dated: 9/21/23

10 Respectfully submitted,
11

12 By: 

13 ROBERT BEADLES, Plaintiff Pro Se
14
15

16
17 **AFFIRMATION PURSUANT TO NRS 239B.030**

18 The undersigned does hereby affirm that the preceding document does not contain the
19 Social Security Number of any person.

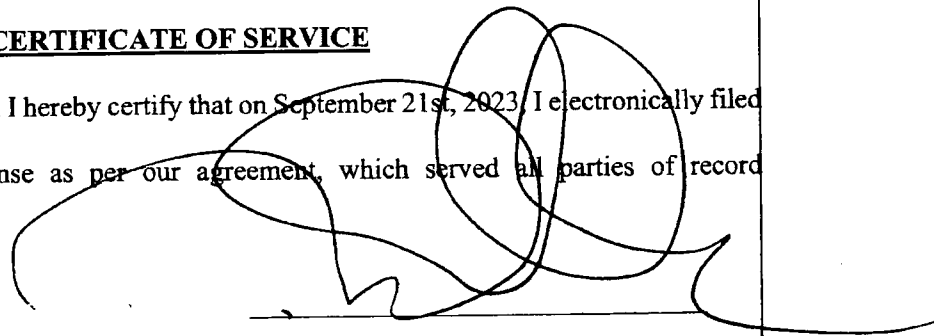
20 DATED: September 21st, 2023.
21

22 
23 Robert Beadles, Plaintiff
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on September 21st, 2023, I electronically filed the foregoing with the Defense as per our agreement, which served all parties of record electronically.

A large, stylized handwritten signature in black ink, appearing to read 'Robert Beadles', is written over the signature line and extends into the margin.

Robert Beadles, Plaintiff

Exhibit Glossary

Exhibit 154 Nevada Appeal Article-DA and Beadles 5 pg.

Exhibit 155 RGJ-Change Of Venue 3 pg.

Exhibit 156 AG Ford attacks Beadles on Twitter 1 pg.

Exhibit 157 Condensed List of Plaintiff's Rights and Defendants Violations for Ease of
Use 5 pg

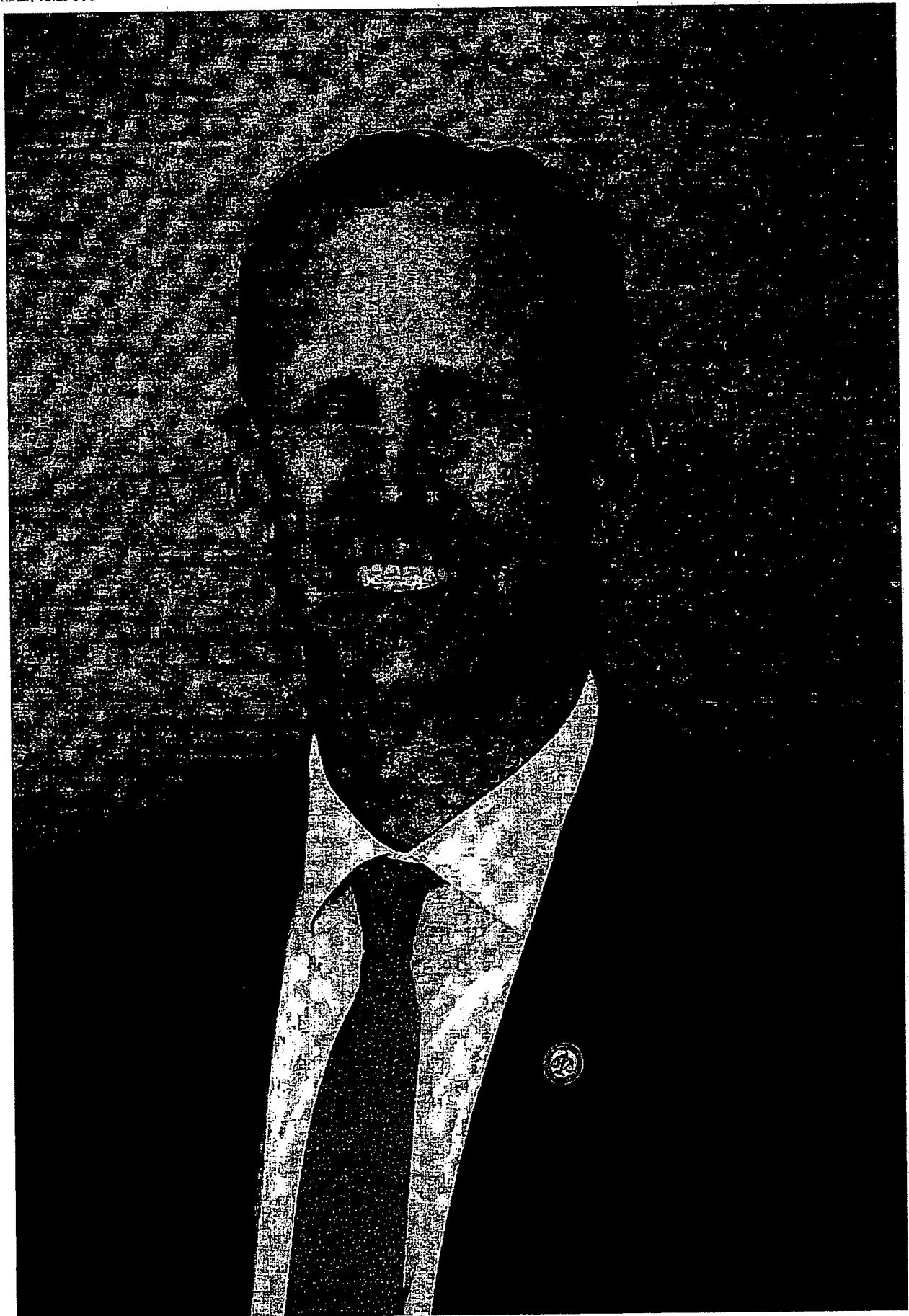
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“Exhibit 154”

9/15/23, 12:29 PM

Washoe DA concerned about public harassment of elected officials | Serving Carson City for over 150 years

Washoe DA concerned about public harassment of elected officials



Washoe County District Attorney Chris Hicks

By Ray Hagar Nevada Newsmakers

Tuesday, August 22, 2023

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Local government bodies across the nation have increasingly faced vocal and aggressive opposition from right-wing groups since the 2020 election, according to published reports.

That unrest and ire has made its way to Washoe County, making the issue of threats and violence against public officials all too real for Chris Hicks, the Washoe County district attorney.

Hicks' increased awareness comes as the Washoe County Commission has been facing "paid and organized" disruptors at its public meetings, said Commission Chair Alexis Hill. They want to cause chaos and put fear into commissioners, Hill added.

"We're seeing kind of an uptick in those kind of threats," Hicks recently told host Sam Shad on Nevada Newsmakers. "So, yes, I have an overall concern for public officials."

Hicks knows first-hand about threats. A Sun Valley man was recently sentenced to five years in prison for making graphic threats on a podcast against Hicks and Washoe County Sheriff Darin Balaam.

Nicholas Vietti, on his podcast "Battle Born Marine," used explicit language, saying he would murder Hicks and sell his wife into sexual slavery with a drug cartel, according to court records.

He was charged with two counts of intimidating a public officer, Hicks said.

Hicks told host Sam Shad that the threats against him and his family were "alarming and scary."

In a victim impact statement to the court, Hicks said the sexual violence threats against his wife were so horrifying that they made him question his career choice of more than two decades.

"I do worry about individuals who have radical views or who are fixated on public officials, maybe frankly, because of information that's out there that's not even accurate," he said.

Vietti, who was sentenced in June, had ill feelings toward Balaam and Hicks since 2015, blaming them for the results of a child-support case, according to reports.

"The individual fixated on me and Sheriff Balaam ... if you walked down the path that got him there, it would make little sense," he said.

Hicks, in his role as district attorney, is now dealing with another case about attacks on public officials.

Robert Beadles, a member of the Washoe County Republican Central Committee and a major donor to various conservative candidates and causes, filed a lawsuit in state court to remove the county's registrar of voters, county manager and chairwoman of the Washoe commission.

Beadles, a reportedly wealthy transplant from California, also wants the court to address his election grievances that include voter registration lists, vote counting and signature verification, according to the Reno Gazette Journal.

Hicks' office is defending the county officials.

The harassment and/or legal action against the Washoe officials is part of an ongoing national issue, according to various reports.

Local officials in 44 counties in 15 states have faced efforts to change rules on voting since the 2020 election, according to Reuters news service.

All of them were led by Trump loyalists or Republican Party activists driven by false voter-fraud theories, Reuters reported.

Washoe's former registrar resigned in June after facing harassment over recent elections. Reuters reported that 10 of the top election officials in Nevada's 17 counties have resigned, retired or not sought re-election since the 2020 election, called "rigged" by former President Donald Trump.

Hicks said he was limited in what he could say about the lawsuit that Beadles brought against the county officials, adding, "We'll represent them diligently and zealously, especially when we don't we think it is a lawsuit that is righteous in any way."

Hicks discounted claims of election fraud in Washoe County.

"You know, I have not seen anything that would suggest to me there was fraud," he said. "I believe no election system is perfect. I think the county is doing a good job of self-examination to make sure that they're always improving. But I have not seen anything that would suggest there was mass fraud."

He also dismissed the call by some activists to return to paper ballots.

However, one Nevada county, Nye County, saw its commissioners OK a return to paper ballots in 2022. The rural county has less than 35,000 voters.

"I think that's ripe for error and it's taking a step back," Hicks said about paper ballots. "I think we have innovative ways to move forward. I don't know what the future looks like for elections, but it sure seems to me that technology should be able to present some ways that you could do voter identification and voting digitally."

Hicks is open to consider a system of voter identification through photos, adding, "But overall, we want an efficient and fair process. That's what everybody wants. And I think that that's what we're doing in Washoe County."

MARIJUANA LOUNGES

Hicks had little problem with Washoe commissioners denying the opening of legal marijuana lounges in the county, even though the sale of medical and recreational marijuana is legal in Washoe.

Hicks shares commissioners' concerns about people driving after consuming marijuana in the lounges. No studies have yet been published about any possible increase of DUI arrests because of marijuana, Hicks said.

However, there have been several DUI arrests where people have tested positive for both alcohol and cannabis consumption, Hicks said.

"We are seeing a lot of combinations of alcohol and marijuana on board with people getting DUIs or getting in wrecks and hurting somebody," he said. "And, you know, using common sense, you can draw a correlation between the two."

Shad asked what was the difference with people leaving a marijuana lounge after ingesting cannabis and people leaving a bar after drinking alcohol.

"I'm not saying we should close all the bars, but let's be realistic: If there weren't bars, there would be less DUIs," Hicks said.

More like this story

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- Aguilar criticizes Nye vote-counting plan
- Nevada needs 'crack down' on black-market marijuana, judiciary chairman says
- Ford: Chattah remark 'racist,' won't debate her
- Clerks complete recount of Nevada Republican governor's race

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“Exhibit 155”

ELECTIONS

Beadles' election lawsuit against Washoe officials gets change of venue to Carson City

**Mark Robison**

Reno Gazette Journal

Robert Beadles successfully argued for a change of venue in his election lawsuit against Washoe County.

Judge Kathleen Drakulich on Thursday granted his motion and ordered the case be heard in Carson City's First Judicial District Court, rather than Lyon County as Beadles had requested.

She found a venue change was called for because of significant media coverage and the fact that jurors would likely know of the parties, who are all public figures: Beadles as well as those he's suing – Washoe County Registrar of Voters Jamie Rodriguez, Manager Eric Brown and Commission Chair Alexis Hill.

Brief case summary

Beadles – a big donor to conservative candidates and member of the Washoe County Republican Party's central committee – claims that his rights and Nevada law have been violated because the defendants did not respond sufficiently to his grievances about how Washoe County's elections have been run.

He wants Rodriguez, Brown and Hill removed from their jobs, paper ballots to be used in every election and punitive damages, among other claims for relief.

He has submitted about 150 exhibits for court review that he says support his belief in “gross inaccuracies and improper maintenance of voter rolls,” voting machines that altered intended votes, improper signature verification and more. He claims these kept the county from running fair elections.

The Nevada Secretary of State's office, which oversees claims of election violations, has said it found no evidence of widespread fraud in the 2020 or 2022 elections.

The Washoe County District Attorney's office moved to dismiss the case, writing to the judge that "The Complaint is no more than a conspiracy theorist's wishlist – Beadles seeks to remove those who do not agree with him, to control the County's election procedures, to 'strike down' election laws, and use this court to legitimize his unfounded claims. That is not how the judicial system nor elections systems operate in the State of Nevada."

In a filing last week, the DA's office also sought sanctions.

"Beadles should be sanctioned for his chicanery, which amounts to a misuse of the judicial system in this case," the DA's motion says. "A court of law is an inappropriate tool to pursue harassment and relitigate debunked elections-related claims. Beadles's Complaint is disconnected from the law and from reality."

Why the judge changed venues

Beadles moved for a change of venue because, he wrote in a motion where he represents himself, "Securing an impartial trial in Washoe County is implausible."

He claims the District Attorney's office collaborated with the media in a way that gave "rise to the perception of a trial by ambush" and that judges and court clerks had professional and personal affiliations with Rodriguez, Brown and Hill that "breed an appearance of impropriety."

The DA's office responded that his request to move the trial location was done not in "pursuit of justice but rather as another strategic attempt to have his meritless allegations heard in the forum he believes will be most favorable to himself."

Beadles requested that the case be moved to Lyon County. Last year, Lyon County renamed the campus housing its sheriff's office, jail and courts to the Donald J. Trump Justice Complex. The former president faces multiple indictments related to unproven claims of voter fraud and his attempts to hold onto power after his loss to Joe Biden in the 2022 election.

Drakulich used a five-factor test to decide whether to grant a change of venue.

The test stems, in part, from a 30-year-old lawsuit by former University of Nevada, Las Vegas basketball coach Jerry Tarkanian against the National Collegiate Athletic Association for trying to sanction him. The NCAA claimed potential jurors in Clark County would be biased in favor of "Tark," as he was called.

Using this test regarding venue changes, courts look at pretrial publicity, community size, the nature and gravity of the lawsuit, the status of the parties in the community, and political overtones to the case.

Drakulich found that two of the five factors applied here: pretrial publicity and how well-known Beadles and the defendants are in the community.

"The parties are entitled to entrust the important legal issues in this case to a venue where there would be few if any external influences and where the Tarkanian factors are neutralized," she wrote.

She added that the Carson City court was picked for the convenience of Beadles, the defendants and any witnesses.

Election-fraud case in Carson City

Carson City District Court heard an election fraud case last year with some of the same claims that Beadles makes in his lawsuit against Washoe County.

Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and for his opponent in the Republican gubernatorial primary, Joe Lombardo.

Carson City District Judge James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions."

Gilbert says he no longer believes he really won against Lombardo, who went on to be elected governor. "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer.

Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.

Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.

As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a judge.

Mark Robison covers local government for the Reno Gazette-Journal. Email comments to mrobison@rgj.com or comment on Mark's Greater Reno Facebook page.

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“Exhibit 156”



Aaron D. Ford

Robert Beadles is an extreme conspiracy theorist — so it's no surprise that he backed Sigal Chattah for AG. Folks like him & Chattah will do EVERYTHING in their power to impose their extremism on Nevadans.

But we're stronger than this, NV, and I know justice will prevail in Nov.

 KUNR Public Radio

Who is Robert Beadles?

He's aiming to be a power player in Washoe County and NV GOP politics. Beadles also regularly shared conspiracy theories and cited antisemitic propaganda in online spaces.

Our story with @TheNVIndy and @apmreports:

bit.ly/3CFq383

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Alicia L. Lerud
Clerk of the Court
Transaction # 9900704 : yvitoria

“Exhibit 157”

Condensed List of Plaintiff's Rights and Defendants Violations for Ease of Use.

DEFENDANTS ARE SUBJECT TO MANDAMUS AND ENJOINER

The Defendants, while acting in their official capacities, knowingly and negligently made non-discretionary decisions listed below that have violated their oaths to uphold the law and serve the people, along with Plaintiff's various rights.

Accuracy in elections is based on clean voter rolls and voters casting one ballot, and having votes properly counted and reported. Additionally incorporate Exhibits 16-22 and it's stated laws, NRS, authorities, responsibilities, duties and plaintiffs' rights into this document.

Plaintiff's rights are enumerated in:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Due process, Nev. Const. Art 1 Sec 8 (2)

Free speech, Nev. Const. Art 1 Sec. 9

Redress of grievances, Nev. Const. Art 1 Sec 10

Rights retained by people, Nev. Const. Art 1 Sec 20

Right to vote, Nev. Const. Art 2 Sec 1

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Equal access, Nev. Const. Art 2 Sec 1A (9)

Unified, statewide standard in counting/recounting and accuracy, Nev. Const. Art 2 Sec 1A (10)

Resolution of election complaints, Nev Const. Art 2 Sec 1A (11)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Specific torts, violations of rights and laws: wanton, malicious, oppression, and willful disregard.

Hill/Brown/Rodriguez:

Failure to uphold Oath of Office, and bias toward Plaintiff:

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Public trust: NRS 281A.020

Unclean voter rolls:

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Counting votes accurately, Nev. Const. Art 2 Sec 1A (10)

Unsafe equipment:

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Undue outsourcing:

See Misuse of funds: NRS 284.440 and NRS 204.020.

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Contracts:

See Brown.

Wasted tax dollars, reckless spending:

See Misuse of funds: NRS 284.440 and NRS 204.020.

Ignoring petitions and related evidence, bias:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Free speech, Nev. Const. Art 1, Sec. 9

Redress of grievances, Nev. Const. Art 1 Sec 10

Resolution of election complaints, Nev Const. Art 2 Sec 1A (11)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

NRS 197.220 Other violations by officers

Pattern of abuse, inclusive of all rights violations:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Hill and Brown:

Impeding (Plaintiff's Board rep.) Herman's agenda item:

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Due process, Nev. Const. Art 1 Sec 8 (2)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

*Taxation without Representation, Nev. Const. Art 1 Sec 1 (implied)

Brown:

Inefficiency and lack of due process assistance in elections and related hires, contracts:

Due process, Nev. Const. Art 1 Sec 8 (2)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Rodriguez:

Counting votes in secret, failure to adhere to Standard Operating Procedures and election Laws

of Nevada:

Due process, Nev. Const. Art 1 Sec 8 (2)

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Statewide standard in counting and recounting, Nev. Const. Art 2 Sec 1A (10)

“Proper proofs” and “regulate the manner of holding and making returns”, Nev. Const.

Art 4 Sec 6

Public servant’s Oath of Office, Nev. Const. Art 15 Sec 2

Public trust: NRS 281A.020

Submitting false reports and certifications:

NRS 293B.275 Record of attendance at instructional meetings: Certification; effect. The county or city clerk shall keep a record of attendance of those election officers receiving instruction in their duties in connection with the mechanical voting system. **The clerk shall certify that the record is a list of election officers who have been instructed pursuant to NRS 293B.260**. The list, when so certified, is prima facie evidence that the election officers have been properly instructed in their duties.

NAC 293.458 Electronic transfer of information to Secretary of State; certification; authorized access. (NRS 293.124, 293.675)

1. Each county clerk shall, at least once each business day, electronically transfer the information contained in the computerized database established pursuant to NAC 293.454 to the statewide voter registration list. Each transfer must comply with such technical requirements as may be prescribed by the Secretary of State.

2. When a county clerk electronically transfers information to the statewide voter registration list pursuant to subsection 1, **the county clerk must certify that:**

- (a) The information is accurate and complies with relevant state and federal law; and
- (b) The county clerk has complied with such applicable technical requirements for security as may be prescribed by the Secretary of State to ensure the confidentiality of the personally identifiable information transferred pursuant to subsection 1.

3. Each county clerk shall ensure that only authorized personnel may access the

computerized database established pursuant to NAC 293.454.

NRS 197.130 False report by public officer.

NRS 197.140 Public officer making false certificate.

Breach of nonpartisan hiring:

NRS 293.217 Creation of boards

NRS 293C.220

NRS 293C.640(3)

NAC 293.352(2)

Breach of Fiduciary Duty:

Nev. Const. Art 8 Section 8 Municipal corporations formed under general laws.

COUNTY OF WASHOE, a Legal Subdivision of the State of Nevada, able to hold debts and debentures, tax and spend, create criminal offenses and penalties, more

Officer bound to fiscal responsibility?

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Private Corporations: NRS 78.138(7)(b)

(1) The director's or officer's act or failure to act constituted a breach of his or her fiduciary duties as a director or officer; and

(2) Such breach involved intentional misconduct, fraud or a knowing violation of law.

Removal Of Officer From Office For Nonfeasance, Malfeasance, and Malpractice:

NRS 283.440

1 ROBERT BEADLES
2 10580 N. McCarran Blvd. #115, Apt. 386
3 Reno, NV 89503
4 *Plaintiff, Pro Se*

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

7
8 MR ROBERT BEADLES, an individual,
9 Plaintiff,

Case No.: CV23-01341

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 **OPPOSITION OF MOTION FOR SANCTIONS**

25 Plaintiff Robert Beadles (Beadles), hereby moves to Oppose the Defenses Motion For Sanctions.

26 **I. BACKGROUND**

27 Plaintiff has filed numerous pleadings, all refuting the false allegations in the Defendant's
Motion for Sanctions. In the Plaintiff's Opposition to Motion to Dismiss, his Motion for Sur-

1 Reply, his Response in Support of Motion to Compel Issuance of Citations, his Reply in Support
2 of Motion to Change Venue, and his Original Complaint, he addresses these outright falsehoods
3 littered throughout the Defendant's Motion for Sanctions.

4
5 In addition, the Plaintiff specifically asked the Honorable 2nd District Court to rule first on the
6 Opposition to Motion to Dismiss, before ruling on the Motion for Sanctions. It did not seem
7 proper to burden the Honorable Court with a rehash of all the prior information contained within
8 those documents merely to add to an opposition of the Motion for Sanctions. Typically, a Motion
9 to Dismiss is first ruled upon prior to ruling on a Motion for Sanctions, as demonstrated in
10 Emerson v. Eighth Judicial Dist. Court of State, ex rel. Cnty. of Clark, 127 Nev. 672 (Nev.,
11 2011)
12

13 The court held that the district court retains jurisdiction to impose sanctions after a case is
14 dismissed. "In this petition for extraordinary writ relief, we consider whether the district court
15 can impose sanctions after it enters an order dismissing a case with prejudice pursuant to a
16 stipulation of the parties under NRCP 41(a)(1)(ii). In resolving this issue, we initially address
17 whether the district court has jurisdiction to impose sanctions after a stipulated dismissal. We
18 conclude that the district court retains jurisdiction after a case is dismissed to consider sanctions
19 for attorney misconduct that occurred prior to the dismissal."
20
21

22 Based on the previously filed motions and arguments contained herein, this Court must deny
23 Defendants Motion for Sanctions.
24

25 II. INTRODUCTION

26 Plaintiff respectfully demands this Honorable Court first rules on his Motion For Change Of
27

1 Venue, prior to Ruling on any pleadings regarding Motions To Dismiss, Motions For Sanctions
2 and related.

3
4 The Plaintiff filed these pleadings and exhibits with the utmost respect for this Honorable Court.
5 Every allegation the Plaintiff has made, he believes to be true. It is up to this Honorable Court
6 and jury to decide who is telling the truth, the Plaintiff or Defendant. The Defense's entire case
7 can be wrapped up in one sentence that slaps the taste of freedom and justice from the mouth of
8 every Nevadan.

9
10 The Defense claims, in essence, that the Defendants have no duty to follow the law, and no
11 consequences for breaking it.

12
13 That is their case in a sentence.

14
15 It spits in the face of what so many gave their lives for: a government of laws, not of men or
16 women.

17
18 The Plaintiff respectfully demands this Honorable Court to incorporate all previously filed
19 pleadings, and exhibits into this pleading. The Plaintiff additionally respectfully demands this
20 Honorable Court to dismiss the Defense's Motion to Dismiss and their Motion for Sanctions. The
21 Plaintiff believes he has adequately met the notice pleading requirements to defeat their motions
22 with the evidence and facts he has presented in his previously filed pleadings.

23
24 **III. Plaintiff Has The Right To Bring Forward This Action**

25
26 For clarity, the Plaintiff will provide a few examples illustrating his capability to present claims

1 against the defendants. He will also demonstrate that he has presented legitimate claims. To
2 avoid repetition and to reduce the page and word count, the Plaintiff will reference sections
3 within this document.

4
5 The Defense essentially argues that the Defendants have no obligation to adhere to the NRS or
6 The NV Constitution and that there are no consequences for violating them. They attempt to
7 claim that the Secretary of State is responsible for all election-related matters. This is inaccurate;
8 the Secretary of State is not overseeing the Washoe County Elections – the Defendants are. The
9 Plaintiff will guide this honorable court through the Nevada Voter Bill of Rights, item by item,
10 demonstrating that it is the defendants who administer the duties outlined therein and are
11 therefore responsible for addressing the issues they generate. The Nevada Voter Bill of Rights
12 was codified into law based on the ballot measure "Question 4", which passed on 11/3/2020.

13
14 NRS 293.2546 Legislative declaration of voters' rights. The Legislature hereby declares that
15 each voter has the right:

16
17 1. To receive and cast a ballot that:

18 (a) Is written in a format that allows the clear identification of candidates;

19
20 DEFENDANTS prep the machines and ballot printing.

21
22 (b) Accurately records the voter's preference in the selection of candidates.

23
24 DEFENDANTS do the tallying.

25
26 2. To have questions concerning voting procedures answered and to have an

1 explanation of the procedures for voting posted in a conspicuous place at the polling place.

2

3 DEFENDANTS respond to inquiries.

4

5 3. To vote without being intimidated, threatened or coerced.

6

7 DEFENDANTS control, patrol polling locations.

8

9 4. To vote during any period for early voting or on election day if the voter is waiting in
10 line to vote or register to vote at a polling place at which the voter is entitled to vote or register to
11 vote at the time that the polls close and the voter has not already cast a vote in that election.

12

13 DEFENDANTS control this process at the polls.

14

15 5. To return a spoiled ballot and is entitled to receive another ballot in its place.

16

17 DEFENDANTS replace ballots.

18

19 6. To request assistance in voting, if necessary.

20

21 DEFENDANTS provide voter assistance.

22

23 7. To a sample ballot which is accurate, informative and delivered in a timely manner
24 as provided by law.

25

26 DEFENDANTS create and distributes ballots.

27

1
2 8. To receive instruction in the use of the equipment for voting during early voting or
3 on election day.

4
5 DEFENDANTS provide voter assistance.

6
7 9. To have nondiscriminatory equal access to the elections system, including, without
8 limitation, a voter who is elderly, disabled, a member of a minority group, employed by the
9 military or a citizen who is overseas.

10
11 DEFENDANTS provide equal access to in-person polls, field registration.

12
13 10. To have a uniform, statewide standard for counting and recounting all votes
14 accurately.

15
16 DEFENDANTS choose most systems and tests and approves such systems.

17
18 11. To have complaints about elections and election contests resolved fairly, accurately
19 and efficiently.

20
21 Logically, one would expect that the DEFENDANTS, who are in charge of most every aspect of
22 the County's election process, would be the ones to address the complaints about the elections
23 and resolve the issues fairly, accurately, and efficiently. Further demonstrating this are [Exhibits
24 23-24, and 126]. Plaintiff and voters brought the issues of the DEFENDANTS violating the court
25 order [Exhibit 72] to the DEFENDANTS, who did nothing to address the issues. If the
26 DEFENDANTS are not accountable for the elections they conduct, nor have the responsibility
27

1 per the NV Constitution and Nevada Voter Bill of Rights to address the complaints and remedy
2 them, it is clear that there are no legitimate elections in Nevada. Further demonstrating the roles,
3 responsibilities, and NRS holding the DEFENDANTS accountable are [Exhibits 16-22, 109, and
4 157]. This further demonstrates the ability for the Plaintiff to bring action forward. If the Public
5 cannot hold government accountable for its actions, who will?
6
7

8 **NRS 283.440 Is Available for Plaintiff to Use**

9 The Defense frivolously claims the Plaintiff has no ability to remove Defendants from Office via
10 NRS 283.440.
11

12
13 NRS 283.440 reads very clearly, it says that any person in any office can be removed by the
14 statute. The statute additionally states who it does not apply to. The defendants are not on the list
15 of officers, or offices that are safe from removal via NRS 283.440. Additionally, the statute reads
16 that anyone can bring a cause of action against a public official as it does not implicitly state they
17 cannot.
18

19
20 Nev. Rev. Stat. § 357.080 is an example in where, " a private plaintiff may bring an action
21 pursuant to this chapter for a violation of NRS 357.040 on his or her own account and that of the
22 State or a political subdivision, or both the State and a political subdivision." Showing further
23 just one more example in where the NRS allows for private citizens to bring action against public
24 officials.
25
26
27

1 Furthermore, the defense even goes as far to cite Madsen v. Brown, 701 P.2d 1086, 1093 (Utah
2 1985) which is a case in where private citizens successfully removed the Mayor from office,
3 using the same process that we do here in Nevada.

4
5 As shown through the NRS, caselaw, and defenses own admission, the Plaintiff has the right to
6 use NRS 283.440 to remove defendants from office.

7
8
9 **THE PLAINTIFF BROUGHT FORWARD LEGITAMATE CLAIMS THIS**
10 **HONORABLE COURT CAN GRANT REMEDY FOR.**

11
12 To reduce the length of this document, kindly refer to pages 9-15, where the Plaintiff provides
13 numerous instances of valid claims presented for which this honorable court can provide relief.

14
15 In these three examples, the Plaintiff establishes his standing through violated court orders
16 [Exhibit 72], petitions that were neither addressed nor resolved as evident in [Exhibits 1-3], and
17 his status as a legally registered voter, to mention a few instances proving his standing. He has
18 illustrated that, according to the NV Constitution, the NRS, and Question 4 (which instituted the
19 Voter Bill of Rights), the defendants are obligated to respond to and rectify the Plaintiff's
20 grievances. Moreover, they should be held liable for their breaches of the law. The Plaintiff has
21 also shown that he can invoke NRS 283.440 to oust officers from their positions and that he has
22 presented genuine causes of action for which this honorable court can offer a remedy.

1 In the following sections, the Plaintiff will address the Defense's allegations directly from their
2 Motion For Sanctions, further demonstrating the Defendants' breach of laws and responsibilities,
3 the Plaintiff's ability to bring action, and his standing. All of this underscores why this critically
4 important case for the Plaintiff and all Nevadan voters must move forward.

5
6 **IV.THE DEFENSES FALSE CLAIMS PLAINTIFF DID NOT VIOLATE RULE 11**

7
8 Plaintiff incorporates all previous pleadings and exhibits into this response.

9
10 **The Plaintiff Refutes Defenses Claims**

11
12
13 From Defendants Motion For sanctions, page 4 and 5 they state:

14 When a party files a complaint, they certify that to the best of his knowledge, information and
15 belief formed after an inquiry reasonable under the circumstances:

16 1. This case is not being presented for any improper purpose, such as to harass, cause
17 unnecessary delay, or needlessly increase the cost of litigation”

18
19 2. The claims, defenses, and other legal contentions are warranted by existing law or by a
20 nonfrivolous argument for extending, modifying, or reversing existing law or for establishing
21 new law;

22
23 3-4. The factual contentions have evidentiary support or, if specifically so identified, will likely
24 have evidentiary support after a reasonable opportunity for further investigation or discovery;
25 and the denials of factual contentions are warranted on the evidence or, if specifically so
26 identified, are reasonably based on a belief or lack of information.

1
2 The plaintiff will now address these 4 points proving he "to the best of the person's knowledge,
3 information, and belief, formed after an inquiry reasonable under the circumstances"

4
5 1 of 12(b)(5). This case is not being presented for any improper purpose, such as to harass,
6 cause unnecessary delay, or needlessly increase the cost of litigation"

7
8 The defense is trying to mislead this honorable court. The real reason for this lawsuit, has
9 nothing to do with harassing the defendants and everything to do with holding the defendants
10 accountable for violating the law(s) as shown below in just a few of many examples.

11 At this point in the case, the Court must take everything the Plaintiff states as truth due to NRCP
12 12(b)(5). The Defense is trying to end the case using this rule and also want a penalty based on
13 it. Even if the Defendants didn't mention this rule in their penalty request, the Court has to
14 consider the Complaint's words as true when making a decision on the Defendants' request.
15

16
17 Examples of Violations and Allegations the Plaintiff brings forth against the Defendants:

18
19 Defendants violated court orders [Exhibit 72] by counting the 2022 Washoe County Primary and
20 Gilbert Contest in Secret in secret. This act of illegality additionally violated numerous NRS as
21 shown in [Exhibit 17, and 109] all of which was caught on video for the world to see in [Exhibit
22 23 and 24]. This act of illegality was also in the plaintiffs original complaint page 6, item 33,
23 page 8, item 49, page 12, item 80, page 14, item 91, etc.
24
25
26
27

1 Defendants violated NRS statutes as signature verification was not done per law, as shown in
2 [Exhibits 1-3, 18, and 109] and claimed in original complaint page 5, item 33, page 8 items 50
3 and 53, page 12, item 80, page 14, item 9, etc.

4
5 Defendants failed to meaningfully address the Illegal function within the Washoe County
6 Election System as shown in [Exhibits 1-3, 16, 60-68, 94, 104, 105, 109, 110, 112, 128-131, 146]
7 and the original complaint on page 6, item 33, page 12, item 80, page 14, item 91, etc.

8
9
10 Defendants stole Washoe County property for self-enrichment as shown in Defendant Hills
11 actions [Exhibits 134, 135, 138-140] which is also stated in the original complaint on page 2,
12 item 7 and 8, page 4, item 27, page 5, item 32, page 8, item 55, page 9, item 57, 58, and 59, page
13 10, item 66, page 11, item 68, page 13, item 85, 87, 89, and 90, page 14, item 92 and 93, page
14 14, item 95, 98 and 99, page 15, item 100, 101 vi, and vii, page 16, xvii, and xviii, etc.

15
16
17 Defendants have used their position for self-enrichment as shown in Defendant Brown using his
18 office to allegedly remove his wife from DUI implications [Exhibits 136, 137 and 143] as
19 additionally stated in original complaint on page 2, item 7 and 8, page 4, item 27, page 5, item
20 32, page 8, item 55, page 9, item 57, 58, and 59, page 10, item 66, page 11, item 68, page 13,
21 item 85, 87, 89, and 90, page 14, item 92 and 93, page 14, item 95, 98 and 99, page 15, item
22 100, 101 vi, and vii, page 16, xvii, and xviii, etc.

23
24
25
26 Defendants have failed the responsibilities of conducting the voters Elections and are not ready

1 for the 2024 elections as shown in [Exhibits 22, 101, 109, 118, 119, 121, 122 and original
2 complaint page 6, item 35].
3

4 Defendants have failed to respond to the Plaintiffs petitions [Exhibits 1-3] which violated NV
5 Constitution, their oath of office, NRS, Nevada Voter Bill of Rights and many more rules as
6 additionally shown in original complaint pages 3-15, etc.
7

8 Defendants are subject to removal of office per NRS 283.440 for all of the above examples and
9 additionally countless more in the original complaint on page 2, item 7 and 8, page 4, item 27,
10 page 5, item 32, page 8, item 55, page 9, item 57, 58, and 59, page 10, item 66, page 11, item 68,
11 page 13, item 85, 87, 89, and 90, page 14, item 92 and 93, page 14, item 95, 98 and 99, page 15,
12 item 100, 101 vi, and vii, page 16, xvii, and xviii, etc. and as demonstrated in [Exhibits 1-3, 23-
13 24, 97, 101, 109, 118, 119, 121, 123, 134-140, 143, 149, etc].
14
15

16 The defendants are to be enjoined from further violations of NRS 293.530, NRS 293.2546(11),
17 NRS 293B.033, NRS 293.269927, NRS 293.740, NRS 293B.063, NRS 293B.104, NRS
18 293B.1045(1), NAC 293B.110(1)(b), NRS 293.269931(1), NRS 293.3606(1), NRS 293.363(1),
19 NRS 293B.353, NRS 293B.354, NRS 293B.380(2)(a), NAC 293.311(4), NRS 293.423, NRS
20 293.269927(4)(b), NRS 293.277(3), NRS 293.285(1)(b)(4), NRS 293.3075(4), NRS
21 293.3585(1)(d), NRS 293.403(2), NRS 293.404(2), Nev. Const. Art. 2 Sec.1A § 1(b); as per
22 original complaint pages 15 and 16, item viii.
23
24
25
26
27

1 Defendants have additionally failed to address, correct, or rectify the issues raised in the underlying
2 Petitions, including but not limited to, (1) updating and resolving the voter registration lists; (2)
3 providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature
4 verification; (5) illegal function within the election system; (6) violations of election procedures
5 as required under Nevada law. [Exhibits 16-22, and 109]. Plaintiff seeks an injunction regarding
6 the foregoing per original complaint page 12, item 80, page 14 item 91, etc.
7

8
9 The defendants have created a national security incident in where our elections are in clear
10 violation of law as per [Exhibits 16-22, and 109] and the original complaint page 5, item 33,
11 page 8, item 53, etc.
12

13 The Plaintiff's pleadings and accompanying exhibits 1-156 are in compliance with the notice
14 pleading requirements pursuant to Nevada law. The Plaintiff contends that the material submitted
15 thus far establishes sufficient grounds to invoke the full spectrum of due process protections,
16 including, but not limited to, discovery, oral arguments, and a jury trial. This will further
17 substantiate the Plaintiff's entitlement to the remedies and relief sought in this case.
18

19
20 2 of 12(b)(5). The claims, defenses, and other legal contentions are warranted by
21 existing law or by a nonfrivolous argument for extending, modifying, or reversing
22 existing law or for establishing new law;
23

24 Plaintiff incorporates all previous pleadings and exhibits into this response. The NRS states the
25 law, and in many cases, penalties for breaking it. All claims brought forward are attached to the
26 NRS or Constitution of Nevada. As demonstrated above, breaking court orders, counting votes in
27

1 secret, acts of Malpractice, Malfeasance, Nonfeasance are addressed in the NRS through
2 numerous statutes as well as NRS 283.440. In the numerous exhibits and in [Exhibits 16-22], for
3 a few examples, clearly show a duty to follow the law and penalties for not doing so.

4
5 NRS 283.440 reads very clearly, it says that any person in any office can be removed by the
6 statute. The statute additionally states who it does not apply to. The defendants are not on the list
7 of officers, or offices that are safe from removal via NRS 283.440. Additionally, the statute reads
8 that anyone can bring a cause of action against a public official as it does not implicitly state they
9 can not.

10
11 Nev. Rev. Stat. § 357.080 is an example in where, " a private plaintiff may bring an action
12 pursuant to this chapter for a violation of NRS 357.040 on his or her own account and that of the
13 State or a political subdivision, or both the State and a political subdivision." Showing further
14 another example in where the NRS allows for private citizens to bring action against public
15 officials.

16
17 Furthermore, the defense even goes as far to cite Madsen v. Brown, 701 P.2d 1086, 1093 (Utah
18 1985) which is a case in where private citizens successfully removed the Mayor from office,
19 using the same process that we do here in Nevada.

20
21 A simple example is counting votes in secret. Disallowing the public their right to observation is
22 a violation of the Washoe County court's orders in [Exhibit 72] and the Nevada Revised Statutes
23 and Nevada Administrative Code: N.R.S. 293.269931 § 1, 293.3606 § 1, 293.363 § 1, and N.R.S.
24 293B.353, 293B.354, 293B.380 § 2(a), and N.A.C. 293.311 § 4.

25
26 The Plaintiff did not intend to present his entire case within the original complaint. Instead, he

1 provided sufficient allegations to meet the requirements of notice pleading. The Plaintiff plans to
2 further his case through discovery, oral arguments, and trial, as allowed by due process. It's
3 unrealistic to encapsulate an entire case within a single complaint; concise statements addressing
4 the issues are more appropriate. For example, in lines 90, 91, 92, and 93 on pages 13-14 of his
5 original complaint, the Plaintiff states, 'Defendants, and each of them, have failed to fulfill the
6 duties of their respective offices as alleged herein.

7
8 "Defendants have additionally failed to address, correct, or rectify the issues raised in the
9 underlying Petitions, including but not limited to, (1) updating and resolving the voter registration
10 lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate
11 signature verification; (5) illegal function within the election system; (6) violations of election
12 procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an injunction regarding
13 the foregoing."

14
15
16 "Defendants through their acts of malpractice, malfeasance, and or nonfeasance have failed to
17 perform their duties and have harmed and will continue to harm plaintiff."

18
19 "Granting the requested relief will serve public interest. "
20 {Exhibit 109} that was filed with the original complaint, which shows an abbreviated summary of
21 [Exhibits 16-22] and sets the table for [Exhibits 1-135]

22
23
24 Those are just a few examples of how claims were made, and each of which throughout the
25 pleadings and exhibits lists violations and remedies sought. All of which the Plaintiff believes to
26 be true and accurate. What Plaintiff has alleged thus far, and shown evidence of, should be more

1 than enough to meet the notice pleading requirements and likely secure victory for Plaintiff on
2 both causes of actions with what has been submitted thus far alone.
3

4 The Plaintiff's pleadings and accompanying exhibits are in compliance with the notice pleading
5 requirements pursuant to Nevada law. The Plaintiff contends that the material submitted thus far
6 establishes sufficient grounds to invoke the full spectrum of due process protections, including,
7 but not limited to, discovery, oral arguments, and a jury trial. This will further substantiate the
8 Plaintiff's entitlement to the remedies and relief sought in this case.
9

10
11 3 and 4 of 12(b)(5). The factual contentions have evidentiary support or, if specifically so
12 identified, will likely have evidentiary support after a reasonable opportunity for further
13 investigation or discovery; and the denials of factual contentions are warranted on the
14 evidence or, if specifically so identified, are reasonably based on a belief or lack of
15 information.
16
17

18 The Plaintiff's pleadings and accompanying exhibits are in compliance with the notice pleading
19 requirements pursuant to Nevada law. The Plaintiff contends that the material submitted thus far
20 establishes sufficient grounds to invoke the full spectrum of due process protections, including,
21 but not limited to, discovery, oral arguments, and a jury trial. This will further substantiate the
22 Plaintiff's entitlement to the remedies and relief sought in this case. Just the examples on pages 4-
23 7 of this document should sufficiently show plaintiff meets the requirements of prongs 3 and 4 of
24 the 12(b)(5) motion.
25
26
27

1 Below, the Plaintiff will briefly refute the defendants' allegations in pages 4-6 of their Motion
2 For Sanctions:

3
4 **Opposition to Page 4, Defendants Motion For Sanctions**

5 It states, "Compl. at p. 20. Beadles seems to acknowledge his Complaint violates Rule 11, stating
6 in his complaint:

7 Plaintiff comes before the court pro se because many BAR-certified attorneys are being targeted,
8 dis-barred, sanctioned, etc. for simply bringing an elections-related lawsuit forward. Plaintiff
9 hereby represents himself pro se to save his lawyers from attacks on their livelihoods.

10 Compl. at ¶15(2).

11
12 The Plaintiff respectfully refutes the Defendant's insinuations, which appear designed to mislead
13 this Court. The Plaintiff contends that attorneys advancing election-related claims face undue
14 scrutiny and stigmatization, often enduring harsher treatment than those defending individuals
15 accused of serious criminal offenses, such as child trafficking. This adverse environment
16 particularly impacts conservative attorneys questioning the integrity of electoral processes,
17 subjecting them to an elevated risk of professional disciplinary actions, including disbarment. To
18 mitigate this risk to counsel, the Plaintiff has elected to proceed pro se. The pervasive media bias
19 against conservatives who question electoral fairness or integrity serves as additional
20 substantiation for this choice. For a specific illustration of this, the Court is directed to Exhibit
21 132, which demonstrates how the media has treated the Plaintiff.

22
23 **Defendants Argument on Page 5-6 of their Motion For Sanctions**

24
25 It states, "A frivolous action is one that is "both baseless and made without a reasonable and
26 competent inquiry." Id., citing Townsend v. Holman Consulting Corp., 929 F.2d 1358, 1362 (9th

1 Cir. 1990). The determination of frivolity is two-pronged: (1) the court must determine whether
2 the pleading is "well grounded in fact and is warranted by existing law or a good faith argument
3 for the extension, modification or reversal of existing law," and (2) whether the party made a
4 reasonable and competent inquiry. Id."

5
6 The Plaintiff respectfully submits that the instant Complaint is both 'well-grounded in fact and
7 warranted by existing law,' or at the very least, constitutes a 'good faith argument for the
8 extension, modification, or reversal of existing law.' To support this contention, the Plaintiff
9 invites this Honorable Court to review the pleadings and the 157 exhibits submitted. These
10 materials establish that the Plaintiff has been engaged in a diligent investigation of the matters at
11 issue for over two years. During this period, the Plaintiff has attempted to address these concerns
12 directly with the Defendants, only to be met with a lack of meaningful remedy or relief.
13 Consequently, this legal action represents the Plaintiff's final recourse for obtaining the remedy
14 and relief to which he is entitled.

15
16 Given the gravity of the situation and the comprehensive nature of the Plaintiff's prior
17 investigative efforts, the Plaintiff respectfully requests that this Honorable Court deny the
18 Defendants' Motion to Dismiss and Motion for Sanctions. This will enable the judicial process to
19 proceed, ensuring that the Plaintiff's constitutional and procedural rights to due process are duly
20 upheld.

21
22 **Plaintiff Did Address Defenses Motion For Sanctions & Rule 11 Letter**

23
24 The Defense claims Plaintiff did not address their Motion for Sanctions or Rule 11 Violation.
25 The Plaintiff did, in fact, address their Motion and Rule 11 Letter. The Plaintiff asked the
26 Honorable District 2 Court to first rule on his Opposition to Motion to Dismiss. On page 2, II.

1 Introduction, Plaintiff asked the Honorable Court to first rule on the Motion for Change of
2 Venue, and when the Plaintiff prevails, to strike the Defendant's Motion for Sanctions as moot. It
3 did not and does not seem appropriate to simply restate the same things over and over again from
4 the previous pleadings into a separate pleading to again address the same issues refuted in the
5 Plaintiff's Opposition to Motion to Dismiss, Response in Support of Issuance of Citations,
6 Motion for Sur-Reply, etc. After having said that, Plaintiff will briefly refute the Defense's
7 claims in their headings in their Motion for Sanctions.

8
9 (Below, the arguments labeled as I, II, III, VX, A, B, C, D, etc., represent sections from the
10 Defense's motion for sanctions. The Plaintiff addresses and refutes each of these arguments
11 in the subsequent content)

12
13
14 **A. BEADLES DID NOT FILE COMPLAINTS TO HARASS DEFENDANTS**

15
16 Plaintiff has tried to work with the Defendants, exposing numerous irregularities and
17 impossibilities in a fair election system. Defendants have worked against the Plaintiff; the
18 Plaintiff has thus exhausted all other remedies and is now here in this Honorable Court to seek
19 remedy, not to harass. A look to pages 3-7 on this document show this lawsuit is the furthest
20 from an attempt of the Plaintiff to harass the defendants. The Plaintiff has legitimate concerns
21 backed by proof and evidence as demonstrated in the numerous pleadings and 156 exhibits
22 submitted thus far. The Plaintiff has simply run out of options for relief and thus filed this
23 lawsuit.

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1 **C. PLAINTIFF FILED NO FALSE STATEMENTS**

2
3 Plaintiff incorporates all previous pleadings and exhibits into this response. Plaintiff believes
4 every allegation he has made to be true and correct. The Defense is purposely omitting the facts.
5 A few of many examples: the Defendants were under a court order [Exhibit 72], they broke it.
6 That's illegal. The Defendants counted our votes in secret [Exhibits 23, and 24], as caught on
7 video; that's illegal. The Defendants tried to cover these crimes. The Defense's argument is that
8 the Defendants are above the law, that they have no duty to obey laws, and no consequences for
9 breaking them. It's appalling and disgusting that this is the argument they bring forth to this
10 Honorable Court. [Exhibits 1-157] and previously filed pleadings show dozens, if not over a
11 hundred, violations of law the Defendants are in violation of. If they are not accountable in this
12 Court, then there is no longer justice in Nevada, and everything our founders and armed forces
13 fought and died for was for nothing. The evidence presented in the exhibits and in the pleadings
14 far exceeds the bar for notice pleading requirements in the State of Nevada.

15
16
17
18 **D. CLAIMS ARE BASED IN LAW**

19
20 To save further redundancy, please see pages 13-16 in this document, "The claims, defenses,
21 and other legal contentions are warranted by existing law or by a nonfrivolous argument
22 for extending, modifying, or reversing existing law or for establishing new law"
23
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1 **i. RELIEF IS ATTAINABLE**

2
3 Plaintiff incorporates all previous pleadings and exhibits into this response. Plaintiff believes all
4 relief requested can be granted by this Honorable Court and/or Defendants. A simple example is
5 in the original complaint on pages 15-16, under relief item viii, the Plaintiff merely asks this
6 Honorable Court to enjoin the Defendants to follow those laws. Additionally, NRS 283.440
7 shows allowable relief by removing the three Defendants from office. Plaintiff believes most, if
8 not all, remedies can be granted by this Honorable Court and its actions.
9

10 **ii. CLAIMS CAN BE MADE AGAINST THE ROV**

11
12 Plaintiff incorporates all previous pleadings and exhibits into this response. As shown in the
13 previous pleadings, the ROV is a position listed by Washoe County as Class Code 60009314.
14 This is also listed by NRS 244.164 as the same position as an Elected County Clerk.
15 Additionally, Jaimie Rodriguez is sued in her personal capacity as well. The position and in her
16 person are all suable entities.
17

18 **iii. DEFENSE MISUNDERSTOOD NRS 266.430**

19
20 Plaintiff incorporates all previous pleadings and exhibits into this response. The Defense has
21 misinterpreted Plaintiff's complaint relative to NRS 266.430.
22 The Defense posits that "No private citizen "may institute criminal proceedings independently."
23 At no time does the Plaintiff claim relief or demand of the Court that NRS 266.430 be applied to
24 the Defendants. The Plaintiff merely offers NRS 266.430 in the context of severity of the
25 penalties should the Defendants be found negligent pursuant to NRS 283.440, not to prosecute
26

1 them in this civil proceeding.

2
3 iv. **ELECTION PETITIONS ARE NOT BASELESS**^②
4

5 Plaintiff incorporates all previous pleadings and exhibits into this response. Defendants have a
6 duty and obligation to respond to Petitions of elections pursuant to the Voter's Bill of Rights Nev.
7 Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11). Defendants, and each of them, have failed and
8 refused to respond to or address the allegations made in the Petitions and continue to fail and refuse
9 to respond to or address the same since the filing of the Petitions. Plaintiff's rights to have
10 legitimate grievances regarding matters of elections and the officials who conduct them responded
11 to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants,
12 and each of them. By failing to address the Petitions, Defendants have each violated their oath to
13 office, Nevada Revised Statutes and Administrative Codes, and violated the Plaintiff's
14 constitutional rights [See pages 4-7 in this document]. The defense is misleading this court; the
15 plaintiff did not contest a candidate's election, the Plaintiff brought forward complaints about the
16 entire Washoe County Election process. The two are not the same. Not even remotely. As to using
17 the Secretary of State's forms and processes in filing election violations, the Plaintiff did that as
18 well, [Exhibit 127], confirmed by the Secretary of State himself in [Exhibit 120], where he states
19 he received over 700 complaints. Shown in [Exhibit 126], the defendants lie directly to the
20 Secretary of State, as [Exhibits 23 and 24] confirm with video and transcript proof. The Secretary
21 of State is either in on the lies or is of no use to the Plaintiff because the information he receives
22 from the defendants is false. Either way this honorable court looks at it, the Plaintiff must seek
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1 relief from this Honorable Court as neither the defendants nor Secretary of State are providing
2 relief or remedy to him.

3
4
5 The defense's argument here again is that the defendants are above the law and have no duty to
6 follow it or face consequences for breaking it.

7
8
9 v. REMOVAL OF OFFICERS ARE BASED IN LAW

10
11 Plaintiff incorporates all previous pleadings and exhibits into this response. NRS 283.440 is quite
12 clear; it states any person, in any office, can be removed. It further states who it doesn't apply to.
13 The Defendants are not listed as offices excluded from this statute and action.

14
15 Bostock v. Clayton County, 140 S. Ct. 1731 (2020), "The people are entitled to rely on the law as
16 written, without fearing that courts might disregard its plain terms based on some extratextual
17 consideration. See, e.g., *Carcieri v. Salazar*, 555 U.S. 379, 387, 129 S.Ct. 1058, 172 L.Ed.2d 791
18 (2009); *Connecticut Nat.*"

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20
21 *Caminetti v. United States*, 242 U.S. 470 (1917), "Where the language is plain and admits of no
22 more than one meaning the duty of interpretation does not arise and the rules which are to aid
23 doubtful meanings need no discussion."

24
25
26 The defense, once again, states that the Defendants have no duties to follow the laws and are

1 immune to consequences for breaking them. The Defendants broke the Plaintiff's court orders,
2 failed to address his petitions, broke numerous NRS, and committed gross acts of malfeasance,
3 nonfeasance, and malpractice. Including, but not limited to, stealing county property for personal
4 gain, using position for enrichment, covering up election crimes, defying orders by this very
5 Court's jurisdiction, and so much more that will be presented at trial. Each allegation if found
6 true, would warrant removal from office as per NRS 283.440. The previous pleadings and
7 exhibits clearly show many allegations and evidence, which are facts for a jury to decide, not for
8 the defense to omit.

10 As mentioned above, Nev. Rev. Stat. § 357.080 is an example in where, "a private plaintiff may
11 bring an action pursuant to this chapter for a violation of NRS 357.040 on his or her own account
12 and that of the State or a political subdivision, or both the State and a political subdivision."
13 Showing further another example in where the NRS allows for private citizens to bring action
14 against public officials.

16 Furthermore, the defense even goes as far to cite Madsen v. Brown, 701 P.2d 1086, 1093 (Utah
17 1985) which is a case in where private citizens successfully removed the Mayor from office,
18 using the same process that we do here in Nevada.

20 vi. **PUNITIVE DAMAGES ARE AVAILABLE FOR STATE CLAIMS**

22 Plaintiff incorporates all previous pleadings and exhibits into this response. Nev. Rev. Stat. §
23 42.005 allows for the award of punitive damages in cases where the defendant has been found
24 guilty of fraud, among other things. The issues Plaintiff raises fall within the liability and
25 responsibility of Washoe County to ultimately pay restitution. See "Punitive" below.

1
2 NRS 41.031(1), "The State of Nevada further waives the immunity from
3 liability and action of all political subdivisions of the State, and their
4 liability must be determined in the same manner, except as otherwise
5 provided in NRS 41.032 to 41.038, inclusive, subsection 3 and any
6 statute which expressly provides for governmental immunity, if the
7 claimant complies with the limitations of NRS 41.032 to 41.036,
8 inclusive."
9

10
11 The state has limited the immunity it affords local government.
12

13 NRS 41.032, "Except as provided in NRS 278.0233 no action may be
14 brought under NRS 41.031 or against an immune contractor or an
15 officer or employee of the State or any of its agencies or political
16 subdivisions which is: 1. Based upon an act or omission of an
17 officer, employee or immune contractor, exercising due care, in the
18 execution of a statute or regulation, whether or not such statute or
19 regulation is valid, if the statute or regulation has not been declared
20 invalid by a court of competent jurisdiction; or 2. Based upon the
21 exercise or performance or the failure to exercise or perform a
22 discretionary function or duty on the part of the State or any of its
23 agencies or political subdivisions or of any officer, employee or immune
24 contractor of any of these, whether or not the discretion involved is
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27

abused.

Plaintiff alleges that, in accordance with NRS 41.032, one or more Defendants: 1) did not exercise due care in the execution of a statute of regulation, 2) committed non-discretionary acts that harmed Plaintiff, which acts are not immune.

NRS 41.0349, based on any act or omission relating to the person's public duty or employment, the State or political subdivision shall indemnify the person unless: (4) The act or omission of the person was wanton or malicious."

NRS 42.005 states, "Except as otherwise provided in NRS 42.007, in an action for the breach of an obligation not arising from contract, where it is proven by clear and convincing evidence that the defendant has been guilty of oppression, fraud or malice, express or implied, the plaintiff, in addition to the compensatory damages, may recover damages for the sake of example and by way of punishing the defendant."

NRS 42.005 provides that, "the plaintiff, in addition to the compensatory damages, may recover damages."

Smith v. Wade, 461 U.S. 32 (1983), states in part:

"In addition to actual damages, the law permits the jury, under certain circumstances, to award the injured person punitive and exemplary damages, in order to punish the

1 wrongdoer for some extraordinary misconduct, and to serve as an example or warning
2 to others not to engage in such conduct.” “If you find the issues in favor of the plaintiff,
3 and if the conduct of one or more of the defendants is shown to be a reckless or callous
4 disregard of, or indifference to, the rights or safety of others, then you may assess
5 punitive or exemplary damages in addition to any award of actual damages.”

6 “. . . The amount of punitive or exemplary damages assessed against any defendant
7 may be such sum as you believe will serve to punish that defendant and to deter him
8 and others from like conduct.” *see Procunier v. Navarette*, 434 U. S. 555 (1978) at 643
9 (emphasis added).
10

11 Hence, the Supreme Court ruled that punitive damages are allowed in this honorable court and as
12 it pertains to this litigation.
13

14 Additionally, in Nevada:

15 *Bongiovi v. Sullivan*, 122 Nev. 556 (Nev. 2006), “The punitive damages award was not error
16 Punitive damages are designed not to compensate the plaintiff for harm suffered but, instead, to
17 punish and deter the defendant's culpable conduct.”
18

19
20 vii. **BEADLES RELIEF REQUESTS ARE LEGITIMATE, AND HILL IS NOT**
21 **BEING SINGLED OUT**
22

23
24 Plaintiff incorporates all previous pleadings and exhibits into this response. The defense states
25 that requesting the defendants to use paper ballots somehow is invalidating the NRS, this is
26

1 untrue. There is no NRS Plaintiff is aware of that specifically says the county cannot use paper
2 ballots. What the Plaintiff does find is the defendants' ability to do the following:

3
4 County has discretion in the selection of election systems, hiring practices, and numbers of
5 precinct polls and locations: County may choose not to use any election system. (N.R.S.
6 293.269925, 293.3075(6), 293.506, and 293B.110, exception N.R.S. 293.2955(1, 4)

7
8 Pursuant to N.R.S. 293B.105 General authority. "The board of county commissioners of any
9 county or the city council or other governing body of any city may purchase and adopt for use at
10 elections any mechanical voting system and mechanical recording device. The system or device
11 may be used at any or all elections held in the county or city, for voting, registering and counting
12 votes cast."

13
14 Further proof the defendants could use paper ballots is counties have local control pursuant to
15 Nev. Const. Art. 4 Sec 20 as follows:

16
17 "The legislature shall not pass local or special laws in any of the following
18 enumerated cases—that is to say:

19 Regulating the election of county and township officers;

20 Providing for opening and conducting elections of state, county, or
21 township officers, and designating the places of voting;"

22
23 The defense then states the vote tally base cannot be public. This again would defy logic and the
24 NRS listed above in the ability for the public to have the ability to observe the counting of
25 ballots. The defendants currently provide a certified cast vote total and certified election results;
26 they should also show where the data came from via the vote tally database.

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The defense also states asking for the remedy of halting QR codes is somehow frivolous. That again defies logic; how in the world is a human to identify QR codes with our election system to ensure they are proper or legitimate? Plaintiff cannot read QR codes, nor would he expect anyone else to. The defendants have the ability to grant all of these remedies.

The defense again fails to acknowledge another reason the three defendants and the County as a whole are being sued is these are the required people needed to grant remedies. Defendant Hill is the Chair of the County Commission, Defendant Brown is the County Manager; those are the two people needed to set items on the Board of County Commissioners agenda to vote on these items. That's another reason why the county was sued as well, to make sure the other four commissioners can vote on some of the items requested for remedies in these proceedings. Defendant Rodriguez would be the one to implement the changes.

The defense continues to mislead this court, stating Plaintiff is singling out Hill by not naming the other commissioners, yet Hill is the one needed for the item to be added to the agenda. She was the only commissioner as well who has been served all the petitions and broke the court orders. Commissioner Herman and Clark will testify that they both agreed to look into all of the Plaintiff's complaints but have been stopped by Defendant Hill and Defendant Brown. Commissioner Andriola and Garcia were just added to office this year. Thus, the proper defendants are all named in this lawsuit; Defendant Hill is not being singled out, she is properly named in this suit.

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1 crucial case. It is time for the defendants to understand that they are not above the law and must
2 be held accountable.

3
4 **V. SANCTIONS AGAINST DEFENSE ARE APPROPRIATE**

5
6 Plaintiff incorporates all previous pleadings and exhibits into this response. In this critical legal
7 matter, the Defense's actions, led by Ms. Liddell, have not only shown a blatant disregard for
8 ethical norms but have also shaken the very foundation of justice and impartiality that the legal
9 system is built upon. The Defense's consistent pattern of behavior, as demonstrated through both
10 public statements and private communications, unequivocally demands sanctions and referral to
11 the BAR for acts unbecoming an officer of the court.
12

13
14 **A. Manipulation of Public Opinion:**

15 The Defense's calculated attempt to sway the Court of Public Opinion is an affront to the
16 principles of fairness and objectivity that underpin the judicial process. This is no more evident
17 than in the audacious assertion by the Washoe County District Attorney's office that the
18 Plaintiff's claims were nothing more than the "inaccurate rantings of a conspiracy theorist", "The
19 Beadles' Complaint is disconnected from the law and from reality," the letter said. "The
20 Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be
21 sanctioned, and Defendants should likewise be awarded attorneys' fees." [Exhibit 132]. By
22 casting such prejudiced aspersions, the Defense, in collusion with the DA's office, not only
23 breaches Rule 3.6 (a) but also impairs the Plaintiff's ability to receive a fair trial. This calculated
24 strategy to manipulate public perception constitutes an act unbecoming of an officer of the court.
25
26

1
2 B. Coordinated Media Collusion:

3 The Defense's unholy alliance with both the Reno Gazette-Journal and the District Attorney's
4 office paints a damning picture of their commitment to disrupting the integrity of the legal
5 process. Their coordinated statements, strategically placed within media coverage, serve as a
6 double-edged sword aimed at both poisoning the well of public opinion and prejudicing potential
7 jurors. These extrajudicial utterances, as vividly demonstrated in the press, flout Rule 3.6 (a),
8 undermining the court's authority and furthering the spectacle-fueled narrative that is anathema
9 to justice.
10

11
12 3. Premature Revelation of Confidential Information:

13 Adding to this distressing saga is the Defense's cavalier approach to the confidentiality of court
14 proceedings. In reading the text messages between Mark Robison and Beadles [exhibit 132], you
15 can see the defense sent the Motion For Sanctions directly to him, without Robison doing an
16 NRS information request. The defense said the Motion to Change Venue is a public document;
17 that is again untrue, as Beadles had 21 days to weigh whether he wanted to move forward with
18 the Federal Lawsuit. Instead, he was informed about it by the press 21 days early, before it
19 became public record. By improperly disseminating the Motion for Sanctions to an external
20 party, the Defense has trampled on the sanctity of the litigation process [Exhibit 132]. This
21 premature sharing of confidential information not only signals a disregard for professional
22 standards but also poses a grave risk to the fairness of the proceedings.
23
24

25
26 4. Manipulating the Honorable Court: Distortion and Concealment of Facts
27

1
2 It is irrefutable that Ms. Liddell's submissions to this esteemed court have been marred by a
3 consistent pattern of deliberate omission, distortion, and deception, undermining the very essence
4 of justice and the integrity of this honorable legal process. An egregious illustration of this
5 practice is her Motion To Dismiss, which starkly exposes the Defense's attempt to evade
6 accountability and obfuscate the truth.
7

8
9 Strategic Misdirection:

10 An unmistakable characteristic of Ms. Liddell's submissions is her orchestrated attempt to divert
11 attention from the crux of the matter. Her Motion To Dismiss employs an 11-page analysis to
12 assert that the defendants bear no obligation to address wrongdoing or be held accountable to the
13 public [Exhibit 109]. Yet, within this intricate web of legalese, she begrudgingly concedes the
14 plaintiff's valid claims for relief in a mere sentence. On page 12, lines 16-21, Ms. Liddell
15 acknowledges the plaintiff's meticulous enumeration of issues, such as inadequate signature
16 verification and illegal functions within the election system [Exhibit 109]. This conscious
17 manipulation of the truth encapsulates the Defense's disregard for transparent discourse.
18
19

20 Deceptive Assertions:

21 A recurrent theme throughout the Defense's motions for sanctions and dismissal is the repeated
22 and misleading claim that the plaintiff fails to present claims for relief or causes of action.

23 Paradoxically, within the same context, Ms. Liddell inadvertently acknowledges the existence of
24 compelling evidence that demonstrates the defendants' violations. This duplicitous approach
25 serves only to perpetuate confusion and hinder the pursuit of justice.
26

1
2 Defendants Own Words:

3 Defendants Brown and Rodriguez, in their own words, show the merits of the Plaintiff's
4 complaint to be true. The Defense ignores the damning truth by her own clients and further
5 perpetuates the sanctionable actions of pushing forward with her meritless claims that the
6 Plaintiff's case is frivolous and filing the Motion to Dismiss and Motion for Sanctions. The
7 Defendants' own words, and even fellow commissioners Garcia and Herman, in their own words,
8 grant immediate credibility to all of Plaintiff's grievances and his complaint. For proof, see
9 [Exhibits 101, 102, 111, 118-122, and 149]. The Defense is guilty of everything she is accusing
10 the Plaintiff of.
11

12
13 Unacceptable Collusion:

14 Additionally, the disconcerting alignment between Ms. Liddell and the County District Attorney
15 raises alarm. This alliance, manifest in shielding county officers from accountability, raises
16 concerns about impartiality and the fair administration of justice. Such a partnership, cloaked in
17 the guise of legal defense, subverts the principles that this court stands for.
18

19
20 The evident practice of manipulating, distorting, and concealing facts within Ms. Liddell's
21 submissions casts a shadow on the Defense's approach to this case. The disservice rendered to
22 this honorable court and to the pursuit of justice through such tactics is deeply concerning. To
23 uphold the sanctity of this legal process and ensure a just outcome, the plaintiff beseeches this
24 court to scrutinize these unethical actions, impose fitting sanctions, and consider referral to the
25 BAR for Ms. Liddell. Transparency, truth, and accountability must prevail over any strategy that
26

1 erodes the foundations of justice. Furthermore, the plaintiff fervently urges the court to deny the
2 Motion to Dismiss in light of the Defense's manipulative conduct. The importance of
3 maintaining the integrity of the legal profession and the pursuit of truth cannot be overstated,
4 especially when faced with actions as egregious as those undertaken by the Defense.

5
6 Its appalling to have the County DA cover for County officers all at the expense of the citizens
7 and voters of Washoe County.
8

9
10 The Defense's cumulative actions form a deeply troubling tableau that speaks volumes about
11 their commitment to a fair and just legal process. Their extrajudicial statements, media
12 entanglement, and premature disclosure of confidential documents are not merely isolated
13 missteps, but a systematic attempt to warp the legal landscape to their advantage. The Plaintiff,
14 in seeking sanctions against the Defense and a BAR referral for Ms. Liddell, implores the Court
15 to reaffirm its role as a bastion of justice. It is imperative that those who bear the title of officer
16 of the court adhere to the highest ethical standards. The Defense's actions have eroded trust in the
17 legal system, and only by taking firm action can we begin to restore faith in the pursuit of truth
18 and justice. Additionally, the Plaintiff vehemently urges the Court to deny the Motion to
19 Dismiss, as any ruling should not be swayed by the Defense's unethical conduct. The gravity of
20 their actions cannot be overstated; their deeds are a stain on the legal profession and warrant
21 swift and resolute condemnation.
22
23

24
25 Plaintiff hereby respectfully demands this honorable court to sanction the defense, namely Ms.
26 Liddell, and refer these gross violations to the BAR.

1
2 **V. THE "MATH" NOR SOLOMON, NOR BEADLES WERE EVER DEBUNKED**

3 Plaintiff incorporates all previous pleadings and exhibits into this response. The Plaintiff wishes
4 to be crystal clear: no one has ever successfully "debunked" Mr. Solomon or the Plaintiff. In fact,
5 dozens of PhDs have tried; all have failed. The Defense falsely claims it's accepted and concluded
6 that Solomon is wrong. That is false as well. The defense cherry picks words and phrases in an
7 attempt to mislead this honorable court. The defense fails to quote entire sentences or paragraphs
8 showing the Grand Canyon sized holes in her case. The Defense states in Gilbert v. Lombardo that
9 Solomon was debunked; that too is false. The truth is, Gilbert's Counsel, Craig Mueller, failed—
10 either through incompetence or betrayal—to demonstrate both prongs of 293.410, which reads:
11
12

13 **NRS 293.410 Statement of contest must not be dismissed for deficiencies of form; grounds for contest.**

14 1. A statement of contest shall not be dismissed by any court for want of form if the grounds of contest are
alleged with sufficient certainty to inform the defendant of the charges the defendant is required to meet.

15 2. An election may be contested upon any of the following grounds:

16 (a) That the election board or any member thereof was guilty of malfeasance.

(b) That a person who has been declared elected to an office was not at the time of election eligible to that office.

(c) That:

(1) **Illegal or improper votes were cast and counted;**

(2) Legal and proper votes were not counted; or

(3) A combination of the circumstances described in subparagraphs (1) and (2) occurred,

18 **if in an amount that is equal to or greater than the margin between the contestant and the defendant, or
otherwise in an amount sufficient to raise reasonable doubt as to the outcome of the election.**

19
20 Mueller, on his own, left out most of Gilbert's evidence, then, without Gilbert being able to read,
21 decided to file the election contest. In the contest, he only showed that "illegal votes" were cast
22 but without showing that the amount was equal or greater than the margin between Gilbert and
23 Lombardo. Solomon showed the illegal votes were cast via the state's own certified election
24 results and showed that it was enough to prove Gilbert was the actual winner. Mueller failed to
25 add the "restoration" (the proof the votes were equal or greater than the margin) to the Election
26

1 Contest, thus the case was dismissed, and sanctions were granted. Quoting directly from page 5
2 of [Exhibit 147], it clearly states, "*even if his claim regarding mathematical or geometric*
3 *'impossibility' was true, Mr. Gilbert still did not have any competent evidence to demonstrate*
4 *that he won the 2022 Primary as would be required to prevail under NRS 293.410(2).*"

5
6 Additionally, quoting directly from page 6 in [Exhibit 148], "*Mueller alternatively contends that*
7 *the district court misconstrued NRS 293.410 as requiring evidence of 'restoration.'* Admittedly,
8 *NRS 293.410 does not use the term 'restoration.'* But it is evident from the record that the district
9 court used that term synonymously with the statutory language '*change[d] the result of the*
10 *election'* and that had the statement of contest not been premised on the concept of '*restoration*'
11 and used that term, the district court would not have used that term in its orders. To this end, in
12 granting Governor Lombardo's motion for summary judgment, the district court made its stance
13 as clear as possible that it was not basing its decision on '*restoration*' but that it was '*relying*
14 *upon the fact that [the court did not] have any information, if all of the math [in the Solomon*
15 *Report] is correct, that there's a difference in voting of 1 or 1,000 or 10,000 or any other*
16 *number.*"

17
18
19
20 Solomon's "math" was never debunked, nor disproven, as shown in the Plaintiff's Opposition to
21 Motion to Dismiss. Instead, Gilbert's counsel failed to do his job and present all the evidence.
22 That is one of many reasons Gilbert has been in litigation against Mueller since the spoiled
23 outcome of the election contest. The defense continues to mislead this court; Solomon has never
24 been disproven. He is, in fact, a witness to what happened in the Washoe County elections; he
25 simply found that there is an impossible, illegal function within the election system. The defense
26

1 wants to state that because the Plaintiff fails to state who put it there, how it happened, it's not a
2 problem, nothing to see here, move along. It's like a witness finding a murder victim who has
3 been stabbed, with a knife in the victim's back; the witness doesn't know who stabbed the person,
4 only that the person is dead, there's a knife in the victim's back, and that it's the authorities' job,
5 not the witness's nor the plaintiff's, to do law enforcement's job and solve the "who done it." The
6 facts are simple: the certified election results show that in the two largest counties, separated on
7 opposite sides of the state, all the precincts voted identically, while the other 15 counties and
8 Carson City did not. The defense tries to discount the additional comparison showing that the
9 multi-billion-dollar artificial intelligence platform known as Google's Bard additionally
10 concurred that, by looking at the county's own certified election data, the Washoe County
11 elections are rigged [Exhibit 129]. The outcome of this "illegal function" cost numerous
12 candidates their elections and all legal voters their right to suffrage. Those are the facts. It's not
13 the Plaintiff's job to tell this honorable court who did it, but rather that it happened, and here's the
14 proof [Exhibits 104, 105]. As stated in the Plaintiff's Opposition to Motion to Dismiss, the
15 defendants have the power to stop using all electronic voting and tabulation machines. The
16 defense is trying to mislead this court and say they don't have the power when NRS clearly
17 shows they do, and that is one of many remedies the Plaintiff seeks. Our votes are our only voice
18 in determining the change we want to see in our county. Our voices are being stolen from us all.
19 This honorable court has the ability to right this wrong going forward. The remedy sought is
20 straightforward: the defendants will cease using all election voting and tabulation machines and
21 will use paper ballots, counted by hand, and reported, by person, in the voters' precincts.

22
23
24
25 NRS 244.194: Boards of county commissioners may rent, lease or otherwise acquire voting or counting devices in
26 whatever manner will best serve local interests.

1 NRS 293B.105 General authority. The board of county commissioners of any county or the city council or other
2 governing body of any city may purchase and adopt for use at elections any mechanical voting system and
mechanical recording device. The system or device may be used at any or all elections held in the county or city, for
voting, registering, and counting votes cast.

3 293B.110 Adoption of different systems or devices for different precincts or districts. A mechanical voting system
4 or mechanical recording device may be adopted for some of the precincts or districts in the same county or city,
while the remainder of the precincts or districts in that county or city may be furnished with paper ballots or any
other mechanical voting system or mechanical recording device.

5 N.R.S. 293.269925 Establishment of procedures for processing and counting mail ballots. 1. The county clerk shall
6 establish procedures for the processing and counting of mail ballots.

7 In the first three NRS cited, the language indicates that the defendants "may" use machines,
8 suggesting they have discretion in this matter. In contrast, NRS 293.269925 mandates that the
9 Registrar of Voters (ROV) "shall" create procedures for counting ballots, which—as evidenced
10 by the 2022 Nye County Elections—can be conducted manually.

11
12
13 Plaintiff needs to be crystal clear here; the "math" has never been debunked. In fact, what the
14 defense is trying to obfuscate is the fact that the County's Own Certified Election Results show
15 that every precinct voted nearly exactly the same. This is mathematically impossible.
16 Additionally, the "math" needed to demonstrate this involves simple addition, subtraction, and
17 multiplication—all of which are used daily around the world and have yet to be "debunked". It
18 doesn't take an "expert" to show the elections are rigged, and the defense is trying to hide that
19 from this honorable court.

20 21 22 **VI. OPERATION SUNLIGHT POSTS**

23 Plaintiff incorporates all previous pleadings and exhibits into this response. Plaintiff has tried
24 numerous times to work with the Defendants; he has shown them numerous issues within the
25 Washoe Election system, only for them to use the media to libel and slander him instead of
26 examining the issues presented and repairing them. Plaintiff does not regret any "names" he has
27

1 called the defendants. They are, in his opinion, either utterly incompetent or corrupt; there is no
2 middle ground in his opinion. The names he calls the defendants in his blog accurately depict
3 what he observes, as do all Washoe residents who are shown their actions. A few examples
4 would be the Plaintiff's name "Comrade Hill-Insky." The Plaintiff has shown the numerous
5 violations by Defendant Hill in [Exhibit 150 WC BCC Rules of Procedure 2022]. In these Rules,
6 Hill cherry-picks what rules to follow and what rules not to. For example, she removed public
7 comment from all Washoe Residents without a vote of the board [Exhibit 151]. "I made this
8 decision to ensure our agenda items would be heard in a timely matter, instead of asking our very
9 busy community members to wait sometimes six hours ... to be heard," Alexis Hill said. She then
10 defies the rules set forth in Section 5.5, where she refuses to add Commissioner Clark and
11 Herman's items to the agenda, disenfranchising every Washoe resident. These are two examples
12 where she silences all Washoe residents from their ability to address the commission and then
13 their representation by Commissioners Clark and Herman. I could write a book on Defendant
14 Hill alone and her acts of dictatorship that defy what our country was founded on and what the
15 rules state her power is.

16
17 As to Defendant Brown, "Eric BrownStain", it's simple: in the Plaintiff's opinion, everything he
18 touches turns to crap for the Washoe residents. A few examples are his unexplainable budgets,
19 the unexplainable losses of tens of millions in county funds, the cover-up of election issues,
20 hiring firms without notifying the entire commissioners board to solicit feedback, enriching his
21 family through his position, and so much more.

22
23 As to Defendant Rodriguez, she is not qualified to be the ROV; nor, if she was, is she doing it
24 competently, as shown throughout the section below, "Rodriguez Just Perjured Herself." Plaintiff
25 again states he wouldn't trust her to clean his toilet, let alone the voter rolls. If the facts and this
26 case are allowed to move forward, Plaintiff believes this honorable court and jury will all be in

1 agreement.

2
3 As to Operation Sunlight, it is a personal opinion blog—where the Plaintiff can share his
4 thoughts and findings. It is a far cry from the so-called "trusted" media of Washoe County, which
5 is "supposed" to report "truth," not opinions. Washoe citizens look to the RGJ, AP, and others for
6 "truth." At Operation Sunlight, they go to hear Beadles' opinions and what he exposes to and
7 within the county. The two are not the same. It is evident that the county's citizens have been
8 exposed to the press's libelous and slanderous one-sided commentary of Beadles for the past
9 years, via the traditional media in conspiracy with the defense and defendants. The defense is
10 deflecting what the so-called media is doing versus what Operation Sunlight does. Together, in
11 conspiracy, they have called the Plaintiff everything from an anti-Semite to racist to right-wing
12 conspiracy theorist, and much more, which are disgusting and unequivocally false.
13

14
15 Public officials should be held accountable by law, and where that fails, at least in the court of
16 public appeals. Plaintiff does not regret expressing his 1st Amendment rights.
17

18
19 **VII. DEFENDANT RODRIGUEZ JUST PERJURED HERSELF**
20

21 In the defense's Exhibit # 8, Plaintiff's [Exhibit 149], Plaintiff believes the Defendant just
22 officially perjured herself in this honorable court. Here are four easily viewable examples:
23

24 Example 1: She, under penalty of perjury, states the voter rolls are not unclean and not grossly
25 inaccurate. Simply looking to [Exhibits 1-15, and 21] obliterates that falsehood, under oath. In
26 email conversations between Defendant Rodriguez and Plaintiff, he shared over 11,000 voters
27

1 that are registered to illegal addresses that, according to the NRS, are not permissible to register
2 to vote from. This is confirmed by the county's own tax assessor records as shown in [Exhibit
3 15]. Meaning, there are over 11,000 illegal voters in this one example alone. Races are lost by
4 single-digit votes; imagine 11,000 illegal votes in this one example alone! Defendant Hill is
5 aware of this gross violation of law and has done nothing to remedy, except appear to perjure
6 herself under oath.
7
8
9

10 Example 2: Defendant Rodriguez states in her affidavit that she did not "fail[ed] to train staff and
11 election officials." Here again, simply looking to [Exhibit 22, and video testimonies from the
12 Defendant's boss, Defendant Eric Brown, and County Commissioner Garcia in Exhibits 118,
13 119, and 122] states the exact opposite of that mistruth. They have had 100% churn in election
14 workers, are not prepared for the 2024 elections, and failed to properly train workers and must
15 take down the ROV office down to the studs, and start over as told in [Exhibit 101].
16 Additionally, it's proven it's a mistruth in the 85-page scathing report from the "Election Group"
17 as per [Exhibit 97].
18
19
20

21 Example 3: Defendant states there is no "unequal treatment of signatures at the polls." This is
22 clearly refuted by an election worker affidavit in [Exhibit 2], additionally explained in [Exhibit
23 18]. In where the Washoe County election worker was instructed by the ROV to not conduct
24 signature verification, breaking numerous NRS.
25
26
27

1
2 Example 4: Defendant Rodriguez states there is no "illegal function within the election system."

3 This mistruth is again refuted in [Exhibits 94 and 110], where Defendant was present in the in-
4 person meeting with Plaintiff, where he demonstrated that there is, in FACT, an illegal function
5 within the Washoe County Election system.
6

7 Plaintiff asks this honorable court to hold the defendant accountable by law and punish her for
8 perjury and high crimes. She is stating under oath these atrocities that DID and ARE happening
9 are not. It is one more glaring example of the defendants' attempts to cover up these atrocious
10 crimes against all Nevadan voters and why this lawsuit must be allowed to move forward
11 pursuant to NRCP 12(b)(5).
12
13

14 **VIII. THIS HONORABLE COURT HAS THE AUTHORITY TO GRANT REMEDIES**
15

16 Plaintiff incorporates all previous pleadings and exhibits into this response.
17

18 Here are a few examples demonstrating how this honorable court can provide remedies to the
19 Plaintiff.
20

21 State of Nev. v. Culverwell, 890 F. Supp. 933 (D. Nev. 1995) shows this honorable court is the
22 right venue and has the ability to rule on cause of action 2, Removal of Officer From Office,
23 NRS 283.440.
24

25
26 *Bongioli v. Sullivan*, 122 Nev. 556 (Nev. 2006) states punitive damages are available to Plaintiff.
27

1
2 *Smith v. Wade*, 461 U.S. 32 (1983), additionally shows that the trial judge instructed the jury that
3 respondent could recover only if petitioner was guilty of "gross negligence" or "egregious failure
4 to protect" respondent. The judge also charged the jury that it could award punitive damages in
5 addition to actual damages if petitioner's conduct was shown to be "a reckless or callous
6 disregard of, or indifference to, the rights or safety of others."
7

8 This court has the ability to enforce and make changes to the Washoe County Election system as
9 shown in *Am. Civil Liberties Union of Nev. v. The Cnty. of Nye*, No. 85507 (Nev. Oct. 21,
10 2022) and *Long v. Swackhamer*, 538 P.2d 587 (Nev. 1975). In both cases, the plaintiffs were
11 granted remedies in changing or enforcing election NRS. In the ACLU case, the court granted a
12 writ of mandamus to compel the county to refrain from livestreaming the hand-count read-aloud
13 process and to make available to voters all three methods for proving voter identity. These are
14 just two of many examples showing this honorable courts ability to grant remedies sought.
15

16
17 The original complaint and Exhibits [16-22] show NRS that were violated by defendants, most,
18 if not all, of which this honorable court has the ability to enjoin defendants from further
19 violation. Additionally, NRS exist that allow this honorable court to punish defendants for
20 violation of NRS. A few examples are found in NRS 197, NRS 199, NRS 281, and NRS 281A.
21

22 Another example is [Exhibit 72]. The Honorable 2nd District Court granted Plaintiff court orders
23 directing the defendants to allow the public to be present during the entire election process,
24 especially including the counting of the people's votes. The defendants blatantly and spitefully
25 violated these honorable court orders, as evidenced in the video with transcripts in [Exhibits 23-
26

1 24]. There must be penalties for the defendants for blatantly and spitefully violating the
2 honorable court's orders. This is not exaggeration; watch the video and read the transcript for
3 yourself. Their actions are deliberate and criminal.

4
5 If this honorable court requires further guidance regarding specific remedies, especially where
6 statutory remedies are not available, it may be useful to note that the Nevada Supreme Court has
7 held, "courts of equity have the power to fashion remedies to fit the circumstances of each case."
8 This indicates that the court is not confined to remedies explicitly outlined in statute or common
9 law.

10
11 In *Bedore v. Familian*, the Nevada Supreme Court states that "district courts have full discretion
12 to fashion and grant equitable remedies." See *Bedore v. Familian*, 122 Nev. 5 (Nev. 2006).

13 Additional citations include *Alaska Plastics*, 621 P.2d at 274-75; *Hammes v. Frank*, 579 N.E.2d
14 1348, 1355 (Ind. Ct. App. 1991) (stating that "[t]he trial court has full discretion to fashion
15 equitable remedies that are complete and fair to all parties involved"); *Maddox*, 669 P.2d at 237;
16 *Vorachek v. Citizens State Bank of Lankin*, 421 N.W.2d 45, 54-55 (N.D. 1988); and *Delaney*,
17 564 P.2d at 288-89.

18
19
20 The remedies sought by the plaintiff would provide him relief; however, these remedies are
21 intended for the betterment of all voters. All voters would benefit from this honorable court
22 granting the remedies the plaintiff is seeking. Currently, the majority of Americans believe our
23 elections are broken or fraudulent, as most of the polls indicate [Exhibit 152]. What's worse is
24 most voters from all political categories "believe it is at least somewhat likely that state and
25 federal officials are ignoring evidence of widespread election fraud" [Exhibit 153]. This
26

1 honorable court has the ability to grant remedies that could finally instill a sense of justice and
2 accountability where it has been greatly lacking.

3
4 **IX. LEAVE TO AMEND**

5 Plaintiff incorporates all previous pleadings and exhibits into this response. Due to the numerous
6 violations exposed by the Defendants in this case, if the Defendants' motion to dismiss is
7 granted, the Plaintiff respectfully demands that leave to amend be granted under NRCP 15(a),
8 which states that it should be "freely given when justice so requires".

9
10 7963 Laurena Ave. Trust v. Bank of N.Y. Mellon, No. 69052 (Nev. Oct. 17, 2016)

11
12 *"(quoting NRCP 15(a)); see also Nutton v. Sunset Station, Inc., 131 Nev., Adv. Op. 34, 357 P.3d*
13 *966, 973, 975 (Ct. App. 2015) ("[R]ule 15's policy of favoring amendments to pleadings should*
14 *be applied with extreme liberality and amendment is to be liberally granted where . . . the*
15 *plaintiff may be able to state a claim" sufficient to survive NRCP 12(b)(5) dismissal (quotation*
16 *omitted)'"*

17
18 **X. CONCLUSION**

19
20
21 Your Honor,

22
23 Please notice on page 3 of the Motion for Sanctions, the defense now claims the Plaintiff has
24 other causes of action, when in previous documents they state there were only two. The defense
25 continues to mislead this honorable court in every motion and pleading they file. Their entire
26 defense can be summed up in one sentence:

1 "Defendants have no duty to follow the law, and no consequences for breaking it."

2 That is their defense in a nutshell.

3
4 Then they present mistruth after mistruth, trying to build their defense off their foundation of no
5 accountability. It's appalling that this is the District Attorney's Office using this defense, and
6 defending the very people harming the public.

7
8 The facts, evidence, pleadings, and exhibits presented thus far should adequately meet all notice
9 pleading requirements, and once this case moves forward, the facts are for the jury to find. They
10 will find the defendants have committed malpractice, malfeasance, nonfeasance, and more.

11 Plaintiff would never bring this case forward if he was not 100% certain of the defendants' guilt
12 against all Washoe residents and voters.

13
14 In addition, the sitting Vice Chair of the County Commission, Commissioner Herman, and sitting
15 County Commissioner Clark will testify under penalty of perjury, attesting to the truth of most, if
16 not all, of my allegations. This further demonstrates the need for this case to move forward and
17 for the Defense's motions for Dismissal and Sanctions to be dismissed.

18
19 I have demonstrated that the claims presented are legitimate and must move forward, that this
20 honorable court has the authority to grant remedy, and that it is in the best interest of all parties,
21 the entire County, State, and Nation for this case to move forward.

22
23 Right is right, wrong is wrong. Please do the right thing and dismiss the defense's Motion to
24 Dismiss and Motion for Sanctions and move this case forward.

1 "In a government of laws, existence of the government will be imperiled if it fails to observe the
2 law scrupulously. Our government is the potent, the omnipresent teacher. For good or for ill, it
3 teaches the whole people by its example. Crime is contagious. If the Government becomes a
4 lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it
5 invites anarchy." Justice Louis Brandeis -Olmstead v. United States, 1928.

6
7 Thank you in advance for doing what's right, not easy.

8
9 Dated: 9/21/23

10 Respectfully submitted,

11
12 By: 

13 ROBERT BEADLES, Plaintiff Pro Se
14
15

16
17 **AFFIRMATION PURSUANT TO NRS 239B.030**

18 The undersigned does hereby affirm that the preceding document does not contain the
19 Social Security Number of any person.

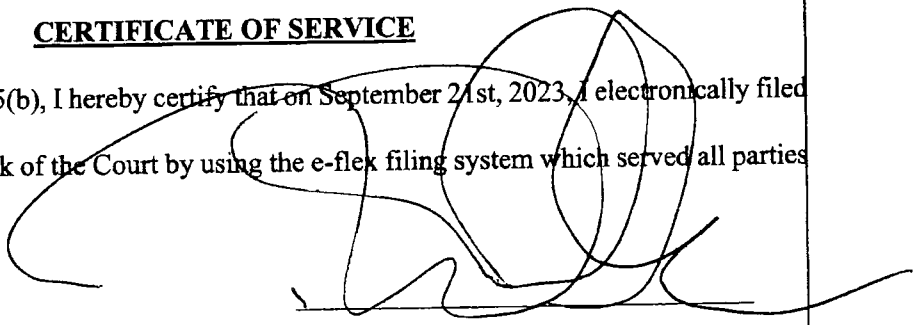
20 DATED: September 21st, 2023.

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23 Robert Beadles, Plaintiff
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on September 21st, 2023, I electronically filed the foregoing with the Clerk of the Court by using the e-flex filing system which served all parties of record electronically.

A large, stylized handwritten signature in black ink, appearing to read 'Robert Beadles', is written over the signature line.

Robert Beadles, Plaintiff

Exhibit Glossary

Exhibit 154 Nevada Appeal Article-DA and Beadles 5 pg.

Exhibit 155 RGJ-Change Of Venue 3 pg.

Exhibit 156 AG Ford attacks Beadles on Twitter 1 pg.

Exhibit 157 Condensed List of Plaintiff's Rights and Defendants Violations for Ease of Use 5 pg

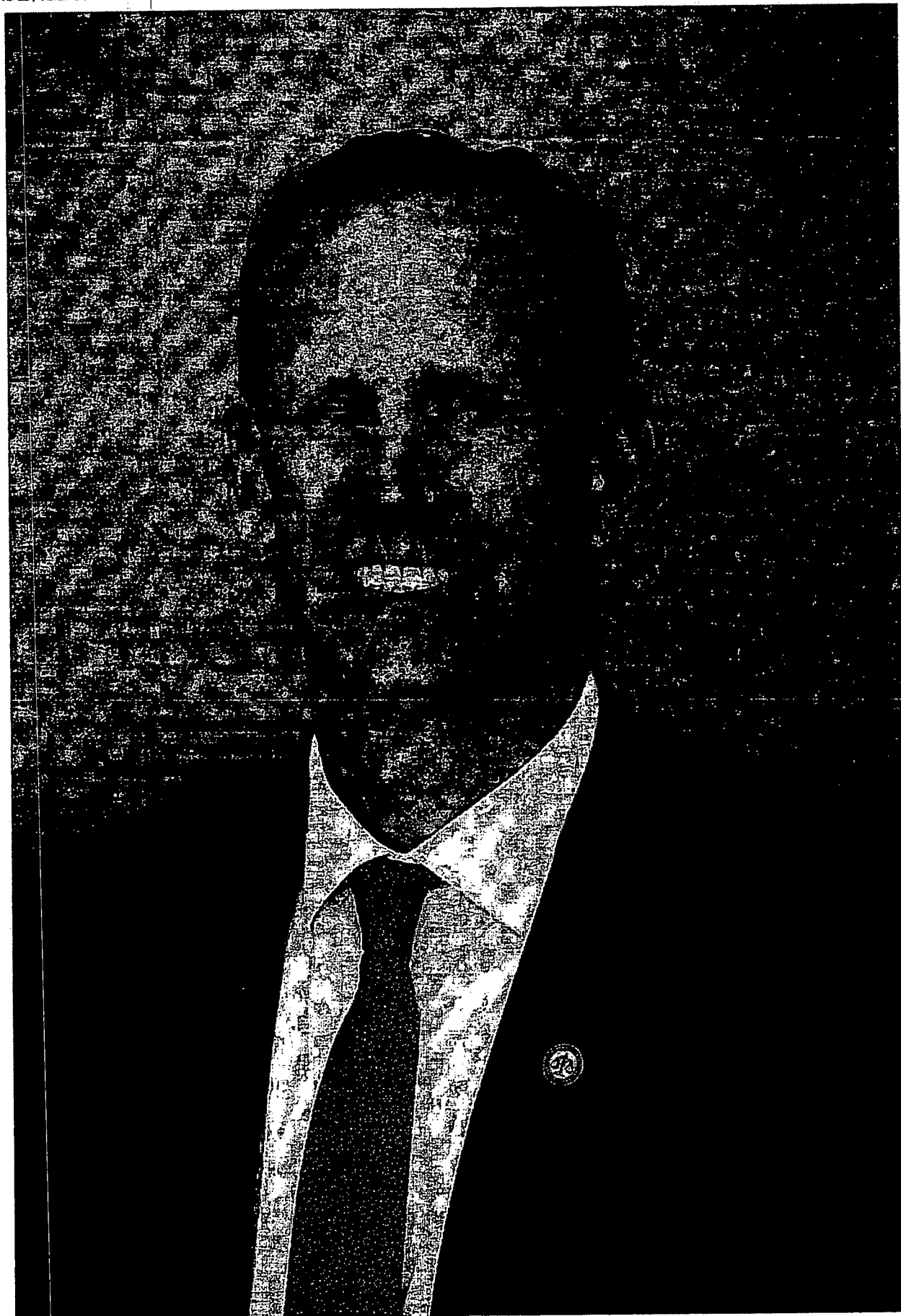
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“Exhibit 154”

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Washoe DA concerned about public harassment of elected officials | Serving Carson City for over 150 years

Washoe DA concerned about public harassment of elected officials



Washoe County District Attorney Chris Hicks

By Ray Hagar Nevada Newsmakers

Tuesday, August 22, 2023

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Local government bodies across the nation have increasingly faced vocal and aggressive opposition from right-wing groups since the 2020 election, according to published reports.

That unrest and ire has made its way to Washoe County, making the issue of threats and violence against public officials all too real for Chris Hicks, the Washoe County district attorney.

Hicks' increased awareness comes as the Washoe County Commission has been facing "paid and organized" disruptors at its public meetings, said Commission Chair Alexis Hill. They want to cause chaos and put fear into commissioners, Hill added.

"We're seeing kind of an uptick in those kind of threats," Hicks recently told host Sam Shad on Nevada Newsmakers. "So, yes, I have an overall concern for public officials."

Hicks knows first-hand about threats. A Sun Valley man was recently sentenced to five years in prison for making graphic threats on a podcast against Hicks and Washoe County Sheriff Darin Balaam.

Nicholas Vietti, on his podcast "Battle Born Marine," used explicit language, saying he would murder Hicks and sell his wife into sexual slavery with a drug cartel, according to court records.

He was charged with two counts of intimidating a public officer, Hicks said.

Hicks told host Sam Shad that the threats against him and his family were "alarming and scary."

In a victim impact statement to the court, Hicks said the sexual violence threats against his wife were so horrifying that they made him question his career choice of more than two decades.

"I do worry about individuals who have radical views or who are fixated on public officials, maybe frankly, because of information that's out there that's not even accurate," he said.

Vietti, who was sentenced in June, had ill feelings toward Balaam and Hicks since 2015, blaming them for the results of a child-support case, according to reports.

"The individual fixated on me and Sheriff Balaam ... if you walked down the path that got him there, it would make little sense," he said.

Hicks, in his role as district attorney, is now dealing with another case about attacks on public officials.

Robert Beadles, a member of the Washoe County Republican Central Committee and a major donor to various conservative candidates and causes, filed a lawsuit in state court to remove the county's registrar of voters, county manager and chairwoman of the Washoe commission.

Beadles, a reportedly wealthy transplant from California, also wants the court to address his election grievances that include voter registration lists, vote counting and signature verification, according to the Reno Gazette Journal.

Hicks' office is defending the county officials.

The harassment and/or legal action against the Washoe officials is part of an ongoing national issue, according to various reports.

Local officials in 44 counties in 15 states have faced efforts to change rules on voting since the 2020 election, according to Reuters news service.

All of them were led by Trump loyalists or Republican Party activists driven by false voter-fraud theories, Reuters reported.

Washoe's former registrar resigned in June after facing harassment over recent elections. Reuters reported that 10 of the top election officials in Nevada's 17 counties have resigned, retired or not sought re-election since the 2020 election, called "rigged" by former President Donald Trump.

Hicks said he was limited in what he could say about the lawsuit that Beadles brought against the county officials, adding, "We'll represent them diligently and zealously, especially when we don't we think it is a lawsuit that is righteous in any way."

Hicks discounted claims of election fraud in Washoe County.

"You know, I have not seen anything that would suggest to me there was fraud," he said. "I believe no election system is perfect. I think the county is doing a good job of self-examination to make sure that they're always improving. But I have not seen anything that would suggest there was mass fraud."

He also dismissed the call by some activists to return to paper ballots.

However, one Nevada county, Nye County, saw its commissioners OK a return to paper ballots in 2022. The rural county has less than 35,000 voters.

"I think that's ripe for error and it's taking a step back," Hicks said about paper ballots. "I think we have innovative ways to move forward. I don't know what the future looks like for elections, but it sure seems to me that technology should be able to present some ways that you could do voter identification and voting digitally."

Hicks is open to consider a system of voter identification through photos, adding, "But overall, we want an efficient and fair process. That's what everybody wants. And I think that that's what we're doing in Washoe County."

MARIJUANA LOUNGES

Hicks had little problem with Washoe commissioners denying the opening of legal marijuana lounges in the county, even though the sale of medical and recreational marijuana is legal in Washoe.

Hicks shares commissioners' concerns about people driving after consuming marijuana in the lounges. No studies have yet been published about any possible increase of DUI arrests because of marijuana, Hicks said.

However, there have been several DUI arrests where people have tested positive for both alcohol and cannabis consumption, Hicks said.

"We are seeing a lot of combinations of alcohol and marijuana on board with people getting DUIs or getting in wrecks and hurting somebody," he said. "And, you know, using common sense, you can draw a correlation between the two."

Shad asked what was the difference with people leaving a marijuana lounge after ingesting cannabis and people leaving a bar after drinking alcohol.

"I'm not saying we should close all the bars, but let's be realistic: If there weren't bars, there would be less DUIs," Hicks said.

More like this story

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- Aguilar criticizes Nye vote-counting plan
- Nevada needs 'crack down' on black-market marijuana, judiciary chairman says
- Ford: Chattah remark 'racist,' won't debate her
- Clerks complete recount of Nevada Republican governor's race

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“Exhibit 155”

ELECTIONS

Beadles' election lawsuit against Washoe officials gets change of venue to Carson City

**Mark Robison**

Reno Gazette Journal

Robert Beadles successfully argued for a change of venue in his election lawsuit against Washoe County.

Judge Kathleen Drakulich on Thursday granted his motion and ordered the case be heard in Carson City's First Judicial District Court, rather than Lyon County as Beadles had requested.

She found a venue change was called for because of significant media coverage and the fact that jurors would likely know of the parties, who are all public figures: Beadles as well as those he's suing – Washoe County Registrar of Voters Jamie Rodriguez, Manager Eric Brown and Commission Chair Alexis Hill.

Brief case summary

Beadles – a big donor to conservative candidates and member of the Washoe County Republican Party's central committee – claims that his rights and Nevada law have been violated because the defendants did not respond sufficiently to his grievances about how Washoe County's elections have been run.

He wants Rodriguez, Brown and Hill removed from their jobs, paper ballots to be used in every election and punitive damages, among other claims for relief.

He has submitted about 150 exhibits for court review that he says support his belief in “gross inaccuracies and improper maintenance of voter rolls,” voting machines that altered intended votes, improper signature verification and more. He claims these kept the county from running fair elections.

The Nevada Secretary of State's office, which oversees claims of election violations, has said it found no evidence of widespread fraud in the 2020 or 2022 elections.

The Washoe County District Attorney's office moved to dismiss the case, writing to the judge that "The Complaint is no more than a conspiracy theorist's wishlist – Beadles seeks to remove those who do not agree with him, to control the County's election procedures, to 'strike down' election laws, and use this court to legitimize his unfounded claims. That is not how the judicial system nor elections systems operate in the State of Nevada."

In a filing last week, the DA's office also sought sanctions.

"Beadles should be sanctioned for his chicanery, which amounts to a misuse of the judicial system in this case," the DA's motion says. "A court of law is an inappropriate tool to pursue harassment and relitigate debunked elections-related claims. Beadles's Complaint is disconnected from the law and from reality."

Why the judge changed venues

Beadles moved for a change of venue because, he wrote in a motion where he represents himself, "Securing an impartial trial in Washoe County is implausible."

He claims the District Attorney's office collaborated with the media in a way that gave "rise to the perception of a trial by ambush" and that judges and court clerks had professional and personal affiliations with Rodriguez, Brown and Hill that "breed an appearance of impropriety."

The DA's office responded that his request to move the trial location was done not in "pursuit of justice but rather as another strategic attempt to have his meritless allegations heard in the forum he believes will be most favorable to himself."

Beadles requested that the case be moved to Lyon County. Last year, Lyon County renamed the campus housing its sheriff's office, jail and courts to the Donald J. Trump Justice Complex. The former president faces multiple indictments related to unproven claims of voter fraud and his attempts to hold onto power after his loss to Joe Biden in the 2022 election.

Drakulich used a five-factor test to decide whether to grant a change of venue.

The test stems, in part, from a 30-year-old lawsuit by former University of Nevada, Las Vegas basketball coach Jerry Tarkanian against the National Collegiate Athletic Association for trying to sanction him. The NCAA claimed potential jurors in Clark County would be biased in favor of "Tark," as he was called.

Using this test regarding venue changes, courts look at pretrial publicity, community size, the nature and gravity of the lawsuit, the status of the parties in the community, and political overtones to the case.

Drakulich found that two of the five factors applied here: pretrial publicity and how well-known Beadles and the defendants are in the community.

"The parties are entitled to entrust the important legal issues in this case to a venue where there would be few if any external influences and where the Tarkanian factors are neutralized," she wrote.

She added that the Carson City court was picked for the convenience of Beadles, the defendants and any witnesses.

Election-fraud case in Carson City

Carson City District Court heard an election fraud case last year with some of the same claims that Beadles makes in his lawsuit against Washoe County.

Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and for his opponent in the Republican gubernatorial primary, Joe Lombardo.

Carson City District Judge James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions."

Gilbert says he no longer believes he really won against Lombardo, who went on to be elected governor. "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer.

Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.

Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.

As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a judge.

Mark Robison covers local government for the Reno Gazette-Journal. Email comments to mrobison@rgj.com or comment on Mark's Greater Reno Facebook page.

FILED
Electronically
CV23-01341
2023-09-21 02:27:11 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 9900677 : yvilorla

“Exhibit 156”



Aaron D. Ford

Robert Beadles is an extreme conspiracy theorist — so it's no surprise that he backed Sigal Chattah for AG. Folks like him & Chattah will do EVERYTHING in their power to impose their extremism on Nevadans.

But we're stronger than this, NV, and I know justice will prevail in Nov.

 KUNR Public Radio

Who is Robert Beadles?

He's aiming to be a power player in Washoe County and NV GOP politics. Beadles also regularly shared conspiracy theories and cited antisemitic propaganda in online spaces.

Our story with @TheNVIndy and @apmreports:

bit.ly/3CFq383

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Clerk of the Court
Transaction # 9900677 : yvilorla

“Exhibit 157”

Condensed List of Plaintiff's Rights and Defendants Violations for Ease of Use.

DEFENDANTS ARE SUBJECT TO MANDAMUS AND ENJOINER

The Defendants, while acting in their official capacities, knowingly and negligently made non-discretionary decisions listed below that have violated their oaths to uphold the law and serve the people, along with Plaintiff's various rights.

Accuracy in elections is based on clean voter rolls and voters casting one ballot, and having votes properly counted and reported. Additionally incorporate Exhibits 16-22 and it's stated laws, NRS, authorities, responsibilities, duties and plaintiffs' rights into this document.

Plaintiff's rights are enumerated in:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Due process, Nev. Const. Art 1 Sec 8 (2)

Free speech, Nev. Const. Art 1 Sec. 9

Redress of grievances, Nev. Const. Art 1 Sec 10

Rights retained by people, Nev. Const. Art 1 Sec 20

Right to vote, Nev. Const. Art 2 Sec 1

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Equal access, Nev. Const. Art 2 Sec 1A (9)

Unified, statewide standard in counting/recounting and accuracy, Nev. Const. Art 2 Sec 1A (10)

Resolution of election complaints, Nev Const. Art 2 Sec 1A (11)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Specific torts, violations of rights and laws: wanton, malicious, oppression, and willful disregard.

Hill/Brown/Rodriguez:

Failure to uphold Oath of Office, and bias toward Plaintiff:

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Public trust: NRS 281A.020

Unclean voter rolls:

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Counting votes accurately, Nev. Const. Art 2 Sec 1A (10)

Unsafe equipment:

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Undue outsourcing:

See Misuse of funds: NRS 284.440 and NRS 204.020.

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Contracts:

See Brown.

Wasted tax dollars, reckless spending:

See Misuse of funds: NRS 284.440 and NRS 204.020.

Ignoring petitions and related evidence, bias:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Free speech, Nev. Const. Art 1, Sec. 9

Redress of grievances, Nev. Const. Art 1 Sec 10

Resolution of election complaints, Nev Const. Art 2 Sec 1A (11)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

NRS 197.220 Other violations by officers

Pattern of abuse, inclusive of all rights violations:

Enjoying and defending life and liberty, Nev. Const. Art 1 Sec 1

Hill and Brown:

Impeding (Plaintiff's Board rep.) Herman's agenda item:

Right to alter or reform government, Nev. Const. Art 1 Sec 2

Due process, Nev. Const. Art 1 Sec 8 (2)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

*Taxation without Representation, Nev. Const. Art 1 Sec 1 (implied)

Brown:

Inefficiency and lack of due process assistance in elections and related hires, contracts:

Due process, Nev. Const. Art 1 Sec 8 (2)

Public servant's Oath of Office, Nev. Const. Art 15 Sec 2

Rodriguez:

Counting votes in secret, failure to adhere to Standard Operating Procedures and election Laws

of Nevada:

Due process, Nev. Const. Art 1 Sec 8 (2)

Accuracy in elections, Nev. Const. Art 2 Sec 1A (1)(b)

Statewide standard in counting and recounting, Nev. Const. Art 2 Sec 1A (10)

“Proper proofs” and “regulate the manner of holding and making returns”, Nev. Const. Art 4 Sec 6

Public servant’s Oath of Office, Nev. Const. Art 15 Sec 2

Public trust: NRS 281A.020

Submitting false reports and certifications:

NRS 293B.275 Record of attendance at instructional meetings: Certification; effect. The county or city clerk shall keep a record of attendance of those election officers receiving instruction in their duties in connection with the mechanical voting system. **The clerk shall certify that the record is a list of election officers who have been instructed pursuant to NRS 293B.260.** The list, when so certified, is prima facie evidence that the election officers have been properly instructed in their duties.

NAC 293.458 Electronic transfer of information to Secretary of State; certification; authorized access. (NRS 293.124, 293.675)

1. Each county clerk shall, at least once each business day, electronically transfer the information contained in the computerized database established pursuant to NAC 293.454 to the statewide voter registration list. Each transfer must comply with such technical requirements as may be prescribed by the Secretary of State.
2. When a county clerk electronically transfers information to the statewide voter registration list pursuant to subsection 1, **the county clerk must certify that:**
 - (a) The information is accurate and complies with relevant state and federal law; and
 - (b) The county clerk has complied with such applicable technical requirements for security as may be prescribed by the Secretary of State to ensure the confidentiality of the personally identifiable information transferred pursuant to subsection 1.
3. Each county clerk shall ensure that only authorized personnel may access the

computerized database established pursuant to NAC 293.454.

NRS 197.130 False report by public officer.

NRS 197.140 Public officer making false certificate.

Breach of nonpartisan hiring:

NRS 293.217 Creation of boards

NRS 293C.220

NRS 293C.640(3)

NAC 293.352(2)

Breach of Fiduciary Duty:

Nev. Const. Art 8 Section 8 Municipal corporations formed under general laws.

COUNTY OF WASHOE, a Legal Subdivision of the State of Nevada, able to hold debts and debentures, tax and spend, create criminal offenses and penalties, more

Officer bound to fiscal responsibility?

NRS 197.110 Misconduct of public officer. (2) "for the private benefit or gain of the public officer or another"

NRS 197.210 Fraudulent appropriation of property. "who fraudulently appropriates to his or her own use or to the use of another person," [i.e. the voter]

Private Corporations: NRS 78.138(7)(b)

(1) The director's or officer's act or failure to act constituted a breach of his or her fiduciary duties as a director or officer; and

(2) Such breach involved intentional misconduct, fraud or a knowing violation of law.

Removal Of Officer From Office For Nonfeasance, Malfeasance, and Malpractice:

NRS 283.440

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

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

MR ROBERT BEADLES, an individual,

Plaintiff,

Case No.: CV23-01341

Dept. No.: 1

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.

LIMITED MOTION FOR RECONSIDERATION OF CHANGE OF VENUE LOCATION

Plaintiff Robert Beadles (Beadles), hereby moves this honorable court to reconsider the change
of venue location.

ISSUE

The Plaintiff has brought action against the Defendants for multiple alleged violations, including
but not limited to election law violations, breach of court orders, malfeasance, nonfeasance,
professional malpractice, and the removal of officers from office. The three Defendants, the
Defense, and the Plaintiff are well-known figures in both Washoe County and Carson City. In

order to secure a fair and unbiased trial, to which the Plaintiff is entitled under his constitutional rights, he respectfully petitions this Honorable Court to change the venue to Lyon County. In Lyon County, the extent of media bias and the relationships of the Defendants, the Defense, and the Plaintiff are significantly less pervasive than in Carson City.

In addition, Defendants did not object to Plaintiff's request for venue change to Lyon County specifically. Lyon County is a convenient forum for the Parties. As such, the Court should grant Plaintiff's request based on the non-objection by Defendants.

I. ARGUMENT

There is tremendous bleed over of people who live in Washoe, and work in Carson who tell the tales to voters of Carson City. It's even more relevant as these same news outlets also reach directly into Carson City. A few examples are demonstrated for this honorable court here:

Carson City has a population of approximately 58,000 people. The two largest newspapers in Carson City are the Nevada Appeal and the RGJ. Both reaching around 10,000 readers per day via their paper.

<https://g.co/bard/share/033350a54dfe>

Based on the research the Plaintiff was able to conduct, both newspapers have provided the same level of media coverage in Carson City as in Washoe County. Faced with a population of 58,000, the Plaintiff encounters the same issues in Carson City as in Washoe County.

The Nevada Appeal's latest article on the Plaintiff skirts dangerously close to labeling him as right-wing, violent, and harassing, and even suggests that he has paid demonstrators. All of these

allegations are blatant lies.

<https://www.nevadaappeal.com/news/2023/aug/22/washoe-da-concerned-about-public-harassment-of-elected-officials>

Even with a population of 58,000, the RGJ appears to reach 115,000 unique visitors per month in Carson City alone.

<https://g.co/bard/share/dbc6489cc8ef>

As to TV viewership from Washoe County Stations into Carson city, it appears it reaches 90% or more of Carson City Households.

“The reach for TV viewership of KOLO 8, KRNV 3, KTVN, Fox 2 News 4 in Carson City, Nevada is estimated to be around 90% of households. This means that about 9 out of 10 households in Carson City watch at least one of these four TV stations on a regular basis.

This estimate is based on Nielsen ratings data for the Reno-Sparks market, which includes Carson City. Nielsen ratings measure the percentage of households in a given market that are watching a particular TV program at a given time.

According to Nielsen ratings data, the four TV stations in question have a combined average viewership share of over 60% in the Reno-Sparks market. This means that on average, over 6 out of 10 households in the market are watching one of these four stations at any given time.

It is likely that the reach for TV viewership of these stations in Carson City is even higher than 90%, since Carson City is a relatively small city and there are fewer TV stations to choose from.

It is also worth noting that Nielsen ratings data does not include viewership data for people who

watch TV on streaming devices or online. Therefore, the actual reach for TV viewership of these stations in Carson City may be even higher than 90%.”

<https://g.co/bard/share/731f6d61553a>

The four TV stations in question have a significant social media presence in Carson City, Nevada. Here is a breakdown of their follower counts on some of the most popular social media platforms:

Facebook:

KOLO 8: 10,000 followers

KRNV 3: 12,000 followers

KTVN: 15,000 followers

Fox 2 News 4: 18,000 followers

Twitter:

KOLO 8: 3,000 followers

KRNV 3: 4,000 followers

KTVN: 5,000 followers

Fox 2 News 4: 6,000 followers

Instagram:

KOLO 8: 2,000 followers

KRNV 3: 3,000 followers

KTVN: 4,000 followers

Fox 2 News 4: 5,000 followers

“These follower counts are just a snapshot of their social media presence, and the actual number of people who see their content is likely much higher. This is because social media platforms use algorithms to show users content that they are likely to be interested in. As a result, people who

watch these TV stations are more likely to see their social media content, even if they are not following them directly.

In addition to their social media presence, these TV stations also produce a variety of digital content, such as news articles, videos, and podcasts. This content is often shared on their social media channels, which helps to further expand their reach.

Overall, the four TV stations in question have a significant social media footprint in Carson City, Nevada. They use social media to connect with viewers, share news and information, and build relationships with the community.”

<https://g.co/bard/share/c8b8c35b9ec2>

Additionally, the Defendants maintain personal and professional relationships in Carson City through various esteemed institutions, including the District 1 Honorable Court, the Secretary of State, the Attorney General, the Legislature, and lobbyists. Carson City serves as the epicenter of political affairs in Nevada. In this setting, the Plaintiff has been erroneously portrayed as the "Godfather of Election Reform" and maligned as a right-wing conspiracy theorist, characterizations that are patently false.

Even the Attorney General attacked the Plaintiff personally, as seen in [Exhibit 156], where he states, "Robert Beadles is an extreme conspiracy theorist—so it's no surprise that he backed Sigal Chattah for AG. Folks like him and Chattah will do EVERYTHING in their power to impose their extremism on Nevadans. But we're stronger than this, NV, and I know justice will prevail in Nov." The Attorney General for Nevada is supporting a publication that patently lied about Beadles, calling him an anti-Semite. What Ford fails to mention in his libelous comments about Beadles is that Sigal is Jewish and a close friend of Beadles. Beadles is the furthest thing from an anti-Semite or racist, as this slanderous and libelous article paints him as. As the highest-ranking

law enforcement official in Nevada, with his base in Carson City, it is clear the Attorney General is additionally providing even fewer chances of a fair and unbiased trial with his libelous comments and support of even more outrageous lies and libel. This does not help Beadles' chance of an unbiased trial in Carson City either.

If this is not enough, Beadles is additionally suing the Secretary of State and the Governor for violation of our 1st Amendment rights via the repeal of SB406. The home base for these two highest-ranking individuals is also in Carson City.

It is abundantly evident; the Plaintiff has zero chance of an unbiased trial in Carson City.

The RGJ Change Of Venue article that was released.

[Exhibit 155]

All of which on 9/14/23 was just stated by the RGJ:

“The Washoe County District Attorney’s office moved to dismiss the case, writing to the judge that “The Complaint is no more than a conspiracy theorist’s wishlist – Beadles seeks to remove those who do not agree with him, to control the County’s election procedures, to ‘strike down’ election laws, and use this court to legitimize his unfounded claims. That is not how the judicial system nor elections systems operate in the State of Nevada.”

“Beadles should be sanctioned for his chicanery, which amounts to a misuse of the judicial system in this case,” the DA’s motion says. “A court of law is an inappropriate tool to pursue harassment and relitigate debunked elections-related claims. Beadles’s Complaint is disconnected from the law and from reality.”

"The DA's office responded that his request to move the trial location was done not in "pursuit of justice but rather as another strategic attempt to have his meritless allegations heard in the forum he believes will be most favorable to himself."

"Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and for his opponent in the Republican gubernatorial primary, Joe Lombardo. Carson City District Judge James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions." Gilbert says he no longer believes he really won against Lombardo, who went on to be elected governor. "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer. Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.

Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.

As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a judge."

As this honorable Court acknowledged in its granting of the motion for a change of venue, stated on page 7, "There is no denying that the parties in this case have unique and far-reaching popularity in northern Nevada. Accordingly, this factor favors a change of venue."

The Defendants have also built numerous interactions and relationships in Carson City over the years. For example, Defendant Rodriguez was previously the Communications and Government Affairs Agent for Washoe County. She has interacted with and built numerous relationships within the Capital, Courthouse, and Legislature.

Lyon County, on the other hand, is geographically close enough not to be burdensome for justice, yet it is distant enough to mitigate the media bias and personal-professional relationships that the Defendants have in both Washoe and Carson City.

In the Court's granting of the change of venue, the Plaintiff found only one citation as to why Carson City was chosen: "Further, the change of venue to the First Judicial District considers the convenience of the parties and any witnesses that would be called to testify." However, many of the same conflicts that are present in Washoe County also apply in Carson City.

It's important to note that the people of Washoe County feel greatly disenfranchised by their political servants. By moving this case to Carson City, where they already feel they have been sold out, this honorable court has the opportunity to act in their best interest by providing them a fair shot at justice via an unbiased jury and court in Lyon County. It is truly in the best interest of all Parties and the public to have this case heard in Lyon County.

Additional Legal Argument

The Defense did not oppose Lyon County as the jurisdiction for the change of venue in their Opposition to Change of Venue; rather, they opposed the change of venue in general. According to Judicial Court 8th District Rule 2.20, the rule in part states, "Failure of the opposing party to serve and file written opposition may be construed as an admission that the motion and/or joinder is meritorious and a consent to granting the same." Plaintiff realizes this is District 2, but would like to set the table for examples stating similar principles as follows:

Several cases from the 9th Circuit Court of Appeals, such as Ghazali v. Moran, 46 F.3d 52 (9th Cir. 1995) and Brydges v. Lewis, 18 F.3d 651 (9th Cir. 1994), discuss local rules that allow a

court to grant a motion when the nonmoving party fails to file a response.

Other cases such as *McCaleb v. Massac Cnty.*, Case No. 18-CV-1390-SMY-DGW (S.D. Ill. Oct. 29, 2018). and *ARMSTRONG v. MBNA AMERICA N.A.*, Case No. CV 04-582-S-LMB (D. Idaho Jun. 8, 2005) contain language suggesting that a party's failure to respond to a motion can be construed as an admission of the motion's merits.

Smith v. Hanchett, 475 P.3d 61 (Nev. 2020)

In this Nevada Supreme Court case it states that a party's failure to oppose a motion may constitute an admission that the motion is meritorious.

"Respondent has filed a motion to dismiss the appeal in its entirety pursuant to NRAP 3E(i) and NRAP 14, or in the alternative, to dismiss the first and fourth issues on appeal on the ground that appellant's consistent failure to comply with the rules of appellate procedure warrant dismissal. Appellant has not opposed the motion. A party's failure to oppose a motion may constitute an admission that the motion was meritorious and consent to grant the motion. *Walls v. Brewster*, 112 Nev. 175, 178, 912 P.2d 261, 263 (1996). The motion is therefore granted, and this court"

Regulation from the Nevada Administrative Code, Section 288.240 (6) states, "If a party fails to file and serve a written opposition to a motion, that failure to respond may be construed as an admission that the motion is meritorious and as consent to granting the motion."

Plaintiff respectfully requests this honorable court to change the venue from Carson City to Lyon County, as the Defense did not directly oppose the change of venue to Lyon County.

Lyon County is a convenient forum for the Parties

Lyon County is a convenient forum as it is close to Reno. It is only approximately an additional 30 minutes to Yerington compared to traveling to the Courthouse in Carson City from Reno. Courts can hold hearings remotely. Further, for the reasons stated above, Lyon County provides the best forum for a fair trial. Whether the Parties are traveling to Yerington or Carson City for a hearing, either way, the Parties will have to devote a given morning to attend any such hearing. Your Honor, it is in the best interest of the public and all parties involved to change the venue. The goal is to maximize the likelihood of conducting a fair and unbiased trial, while also distancing the proceedings from the negative media bias directed toward the Plaintiff and mitigating potential conflicts between the parties and Carson City's Honorable Court.

"The right to a fair trial is the cornerstone of our system of justice. It is essential that trials be conducted fairly and impartially, without any outside influence." -Justice Thomas

CONCLUSION

Your Honor,

I extend my heartfelt gratitude to this honorable Court for granting the Motion for Change of Venue. However, I must respectfully submit that relocating the trial to Carson City does not improve the likelihood of achieving a fair and impartial trial as compared to the Lyon County. While I note that the Defense did not specifically object to Lyon County as an alternative venue, the Court has not articulated any rationale beyond the convenience of travel for selecting Carson City over Lyon County.

Upon exhaustive research and contemplation, it is my considered belief that the unique

characteristics of Carson City, particularly its relatively small population of approximately 55,000 residents and its highly politically charged atmosphere as the capital of Nevada, negatively affect my prospects for a fair trial. Given my level of public recognition in that locale, I am concerned that an unbiased jury is not feasible.

Justice Felix Frankfurter once aptly remarked, "Justice must satisfy the appearance of justice." Guided by this principle, I request the case be transferred to Lyon County.

Lastly, it is greatly in the public's best interest to have this case moved to Lyon County, where they feel their voices will be heard. While I recognize that this is my pro se case, there are hundreds of thousands of people behind me who all want the facts to be weighed on their merits and ruled upon impartially by an honorable court and jury.

You have the chance to give them that.

"Not only is it important that justice be done; it is equally important that it be seen to be done." - Justice Sonia Sotomayor

Dated: 9/15/23

Respectfully submitted,

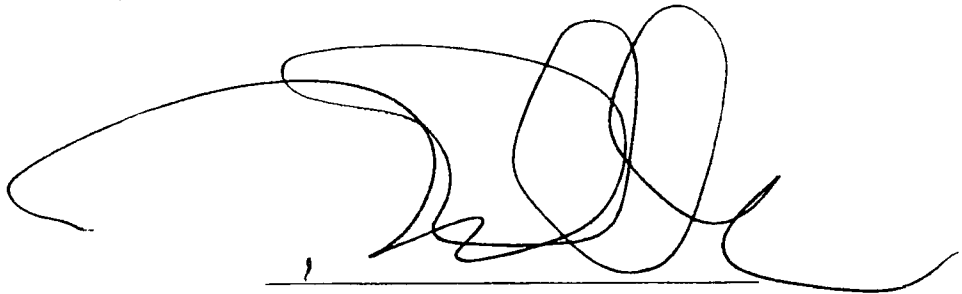
By: _____

ROBERT BEADLES, Plaintiff Pro Se

AFFIRMATION PURSUANT TO NRS 239B.030

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

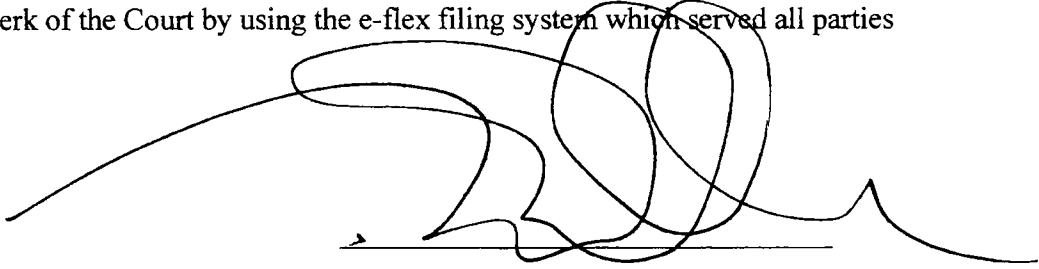
DATED: September 15th, 2023.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end, positioned above a horizontal line.

Robert Beadles, Plaintiff

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on September 15th, 2023, I electronically filed the foregoing with the Clerk of the Court by using the e-flex filing system which served all parties of record electronically.

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

Robert Beadles, Plaintiff

Exhibit Glossary

Exhibit 155 RGJ-Change Of Venue 3 pg.

Exhibit 156 AG Ford attacks Beadles on Twitter 1 pg.

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2023-09-18 01:39:28 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 9892233 : yvilorla

“Exhibit 155”

ELECTIONS

Beadles' election lawsuit against Washoe officials gets change of venue to Carson City

**Mark Robison**

Reno Gazette Journal

Robert Beadles successfully argued for a change of venue in his election lawsuit against Washoe County.

Judge Kathleen Drakulich on Thursday granted his motion and ordered the case be heard in Carson City's First Judicial District Court, rather than Lyon County as Beadles had requested.

She found a venue change was called for because of significant media coverage and the fact that jurors would likely know of the parties, who are all public figures: Beadles as well as those he's suing – Washoe County Registrar of Voters Jamie Rodriguez, Manager Eric Brown and Commission Chair Alexis Hill.

Brief case summary

Beadles – a big donor to conservative candidates and member of the Washoe County Republican Party's central committee – claims that his rights and Nevada law have been violated because the defendants did not respond sufficiently to his grievances about how Washoe County's elections have been run.

He wants Rodriguez, Brown and Hill removed from their jobs, paper ballots to be used in every election and punitive damages, among other claims for relief.

He has submitted about 150 exhibits for court review that he says support his belief in “gross inaccuracies and improper maintenance of voter rolls,” voting machines that altered intended votes, improper signature verification and more. He claims these kept the county from running fair elections.

The Nevada Secretary of State's office, which oversees claims of election violations, has said it found no evidence of widespread fraud in the 2020 or 2022 elections.

The Washoe County District Attorney's office moved to dismiss the case, writing to the judge that "The Complaint is no more than a conspiracy theorist's wishlist – Beadles seeks to remove those who do not agree with him, to control the County's election procedures, to 'strike down' election laws, and use this court to legitimize his unfounded claims. That is not how the judicial system nor elections systems operate in the State of Nevada."

In a filing last week, the DA's office also sought sanctions.

"Beadles should be sanctioned for his chicanery, which amounts to a misuse of the judicial system in this case," the DA's motion says. "A court of law is an inappropriate tool to pursue harassment and relitigate debunked elections-related claims. Beadles's Complaint is disconnected from the law and from reality."

Why the judge changed venues

Beadles moved for a change of venue because, he wrote in a motion where he represents himself, "Securing an impartial trial in Washoe County is implausible."

He claims the District Attorney's office collaborated with the media in a way that gave "rise to the perception of a trial by ambush" and that judges and court clerks had professional and personal affiliations with Rodriguez, Brown and Hill that "breed an appearance of impropriety."

The DA's office responded that his request to move the trial location was done not in "pursuit of justice but rather as another strategic attempt to have his meritless allegations heard in the forum he believes will be most favorable to himself."

Beadles requested that the case be moved to Lyon County. Last year, Lyon County renamed the campus housing its sheriff's office, jail and courts to the Donald J. Trump Justice Complex. The former president faces multiple indictments related to unproven claims of voter fraud and his attempts to hold onto power after his loss to Joe Biden in the 2022 election.

Drakulich used a five-factor test to decide whether to grant a change of venue.

The test stems, in part, from a 30-year-old lawsuit by former University of Nevada, Las Vegas basketball coach Jerry Tarkanian against the National Collegiate Athletic Association for trying to sanction him. The NCAA claimed potential jurors in Clark County would be biased in favor of "Tark," as he was called.

Using this test regarding venue changes, courts look at pretrial publicity, community size, the nature and gravity of the lawsuit, the status of the parties in the community, and political overtones to the case.

Drakulich found that two of the five factors applied here: pretrial publicity and how well-known Beadles and the defendants are in the community.

"The parties are entitled to entrust the important legal issues in this case to a venue where there would be few if any external influences and where the Tarkanian factors are neutralized," she wrote.

She added that the Carson City court was picked for the convenience of Beadles, the defendants and any witnesses.

Election-fraud case in Carson City

Carson City District Court heard an election fraud case last year with some of the same claims that Beadles makes in his lawsuit against Washoe County.

Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and for his opponent in the Republican gubernatorial primary, Joe Lombardo.

Carson City District Judge James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions."

Gilbert says he no longer believes he really won against Lombardo, who went on to be elected governor. "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer.

Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.

Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.

As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a judge.

Mark Robison covers local government for the Reno Gazette-Journal. Email comments to mrobison@rgj.com or comment on Mark's Greater Reno Facebook page.

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“Exhibit 156”



Aaron D. Ford

Robert Beadles is an extreme conspiracy theorist — so it's no surprise that he backed Sigal Chattah for AG. Folks like him & Chattah will do EVERYTHING in their power to impose their extremism on Nevadans.

But we're stronger than this, NV, and I know justice will prevail in Nov.

■ KUNR Public Radio

Who is Robert Beadles?

He's aiming to be a power player in Washoe County and NV GOP politics. Beadles also regularly shared conspiracy theories and cited antisemitic propaganda in online spaces.

Our story with @TheNVIndy and @apnreports:

bit.ly/3CFq383