

IN THE SUPREME COURT OF THE STATE OF NEVADA

MR ROBERT BEADLES, an individual,

Appellant,

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.

Respondents.

Case No.: 87683

**MOTION FOR LEAVE TO FILE
AMICUS BRIEF PURSUANT TO
N.R.A.P. 29**

FILED

JAN 12 2024

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *Melissa J. Miller*
DEPUTY CLERK

Oscar Williams, Janice Hermsen, Olena Alexander, and David Chamberlain, acting in proper person, hereby moves this Honorable Court pursuant to N.R.A.P. 29 for leave to file their Amicus Curiae Brief.

I. INTRODUCTION

Oscar Williams, Janice Hermsen, Olena Alexander, and David Chamberlain are Washoe County electors and taxpayers in good standing who have an interest in the outcome of elections, how elections are conducted, and related costs. We individually have histories of advocacy for voter's rights and fiscal responsibility in elections, including attending county and state meetings and workshops, writing

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letters to public officials and elected representatives, numerous information requests to county and state, educating the public through radio and social media, news, and blog websites, supporting favored candidates, and all the while educating ourselves about the laws of Nevada and the United States and elections and voter's rights. We each volunteer our time.

We, as electors, are the ultimate stakeholders in elections and, as such, we require a high level of confidence and trust in election outcomes and the officials who conduct elections. As electors and taxpayers, we seek to secure our constitutional and statutory rights to have our votes counted accurately and effectively.

Our brief (Appendix, Exhibit 1) is predicated on a recent court ruling in Georgia and a 2022 ruling in Wisconsin and other evidence and news reports that have recently come to our attention which have bearing on the Beadles matter.

The authority of the *amici curiae* to file this Brief is pursuant to leave of the Court by a motion under Nevada Rules of Appellate Procedure 29(a) and (f).

II. ARGUMENT

This Court should permit Williams/Hermesen/Alexander/Chamberlain to file their Amicus Curiae Brief. Nevada Rule of Appellate Procedure 29 provides that an amicus curiae brief may be filed with leave of the Court and upon the showing of: “(1) the movant's interest; and (2) the reasons why an amicus brief is desirable.”

N.R.A.P. 29(c).

We are uniquely situated as co-signors of the Beadles petition to Washoe County of November 18, 2022. This gives us license to file this Motion to Leave for Amicus Curiae.

Why is an amicus brief desirable?

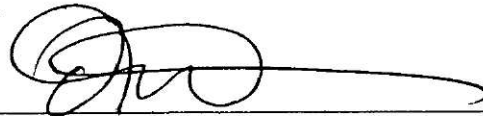
“The case of the political franchise of voting is one. Though not regarded strictly as a natural right, but as a privilege merely conceded by society according to its will under certain conditions, nevertheless it is regarded as a fundamental political right, because preservative of all rights.” *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886).

In short, we have been slighted by Washoe County officials just like Mr. Beadles has. Our Amicus Curiae Brief provides further context on the Beadles matter based on new information, mainly Judge Tottenberg’s ruling in *Curling v. Raffensberger* (Georgia District Court-Atlanta, # 1:17-cv-2989-AT) from November 10, 2023, regarding derelict voting systems used in Georgia and Tennessee; systems similar to those used in Nevada. Judge Tottenberg makes salient points on how and where modes of implementation of the election management system by election officials deprives voters of their First and Fourteenth Amendment rights. If this court is not aware of the Tottenberg ruling, or even if it is, that is reason enough to allow us to present such critical evidence to this Court.

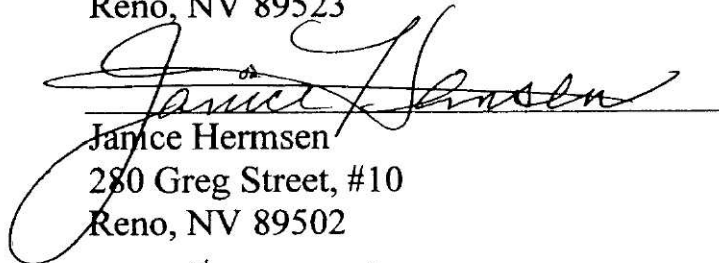
Considering the import of any severe burden on or deprivation of voter's rights presented to this Court, our standing as stakeholders of elections, and the diligence we have exercised to file this amicus brief, this Court's standard for granting this motion is satisfied.

Given the potential effects of this Court's decision and ongoing risks to our voter's rights, and our diligence, we respectfully submit that this Court should accept our Amicus Curiae Brief.

DATED this 11th day of January 2024.



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Olena Alexander
1520 Cherokee Trail
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Amicus Curiae in proper person

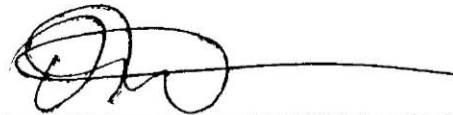
CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 11th day of January 2024, I sent by first-class mail with delivery confirmation a true and correct copy of the foregoing Motion for Leave to File Amicus Brief of Oscar Williams, Janice Hermesen, Olena Alexander, and David Chamberlain, with sufficient postage prepaid to Lindsay Liddell, the respondents' defense attorney, and to Robert Beadles.

Lindsay L. Liddell
Deputy District Attorney
One South Sierra Street
Reno, NV 89501
REPRESENTING THE RESPONDENTS

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

DATED this 11th day of January 2024.

A handwritten signature in black ink, appearing to be 'Oscar Williams', written over a horizontal line.

Oscar Williams
In proper person