

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

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

MR ROBERT BEADLES, an individual,

Plaintiff,

vs.

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

Defendants.

CASE NO.:
DEPT. NO.:

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

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

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

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

JURISDICTION & VENUE

1. This Court has jurisdiction pursuant to NRS 13.030.
2. Under the doctrine of concurrent jurisdiction, this Court has jurisdiction to resolve claims under Nevada State and federal Constitution and under federal and Nevada State election laws.
3. This Court has jurisdiction to hear this matter, as all events giving rise to this incident took place in Washoe County, Nevada. The harm to be enjoined is threatened in Washoe County.
4. This Court has jurisdiction over this matter pursuant to Nev. Const. Art. 6 § 6, regarding all cases not assigned to the justices’ courts.
5. The venue is proper in Washoe County for election complaints pursuant to NRS 293.2546 (11).
6. The venue is proper in Washoe County pursuant to NRS 13.040, where the plaintiff and defendants reside.
7. The Fourteenth Amendment permits the aggrieved party to initiate a contested proceeding both to secure his or her rights by declaring the wrongful actions constitutionally void and, in appropriate circumstances such as in this case, for monetary damages.
8. In *Schumacher v. Furlong*, 78 Nev. 167, 370 P.2d 209 (1962), the Opinion of the Nevada Attorney General, “Under this statutory procedure any complainant can, for specifically enumerated grounds, e.g., malfeasance or nonfeasance, initiate district court proceedings

to remove any person holding any nonjudicial office in this state. This statutory procedure has previously been used against a county officer.”

9. The Defendant(s), acting individually or in concert in contravention of Plaintiff’s right to equal protection are subject to penalties pursuant to NRS 283.440 and/or NRS 266.430.
10. Defendant Washoe County Nevada, is a political subdivision of the State of Nevada under the doctrine of respondent superior. Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
11. Under 42 U.S.C. 1983, every person acting under color of state law who deprives another person of his or her constitutional rights is also liable at law and in equity.
12. This Court has jurisdiction over this matter pursuant to NRS 4.370 (1) as the matter in controversy exceeds \$15,000, exclusive of attorney fees, interest, and costs.
13. Where, as here, Defendants’ conduct is shown to be inspired by a reckless or callous indifference to Plaintiff’s constitutional rights, punitive damages may be awarded. *Smith v. Wade*, 461 U.S. 30 (1983).

PARTIES

14. Plaintiff Robert Beadles resides in Washoe County, Nevada, and is a qualified elector who voted in the 2020 and 2022 elections and who intends to vote again in 2024.
15. Plaintiff comes before the court *pro se* because many BAR-certified attorneys are being targeted, dis-barred, sanctioned, etc. for simply bringing an elections-related lawsuit forward. Plaintiff hereby represents himself *pro se* to save his lawyers from attacks on their livelihoods.

16. Plaintiff's rights to have their legitimate grievances of matters of elections and the officials who conduct them responded to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants and DOES and ROES to be determined.
17. The office of the Registrar of Voters was created pursuant to NRS 244.164 and W.C.C. 5.541 (except duties imposed by virtue of NRS 293.393 to make out and deliver certificates of election). In general terms, the defendants handle voter registrations and conduct elections on behalf of the people of Washoe County.
18. Defendant Rodriguez is a resident of Washoe County. Rodriguez is and was at all times relevant hereto, the Washoe County Registrar of Voters and a person acting under the color and authority of law. Rodriguez is named in her official and personal capacities.
19. Rodriguez has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]
20. Rodriguez has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
21. Rodriguez has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
22. Defendant Brown is a resident of Washoe County. Brown is and was at all times relevant hereto, the Washoe County Manager and a person acting under the color and authority of law. Brown is named in his official and personal capacities.
23. Brown has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]
24. Brown has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
25. Brown has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
26. Defendant Hill is a resident of Washoe County. Hill is and was at all times relevant hereto, the Chairwoman of the Washoe County Board of Commissioners and a person acting under the color and authority of law. Hill is named in her official and personal capacities.
27. Hill has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]

28. Hill has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
29. Hill has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
30. Defendant Washoe County, Nevada, is a political subdivision of the State of Nevada under the doctrine of respondent superior. Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
31. Defendants Does I through X and Roe Corporations I through X are persons or entities that, at all times material hereto, committed acts, activities, misconduct or omissions which make them jointly and severally liable under the claims for relief set forth herein. The true names and capacities of the Doe Defendants and Roe Corporate Defendants are presently unknown, but when ascertained, Plaintiff requests leave of Court to amend this complaint to substitute their true names and identities.

III. NATURE OF THE CASE

32. Plaintiff is and was at all times relevant hereto a legally registered voter in Washoe County who was affected by the 2020 and 2022 elections overseen by Defendants.
33. Plaintiff brings this complaint against Defendants based on their violations of Plaintiff's federal and state Constitutional rights to due process, equal protection, voter's rights, and the laws of Nevada in the conduct of elections, regarding Defendants' non-response to Plaintiff's grievances and general stonewalling when presented with reports and analysis on voting systems in use in Washoe County and various requests for information.
34. Plaintiff alleges violations of his rights and the laws of Nevada based on the Defendants having never acknowledged or responded to two formal Petitions filed with the county by Plaintiff.

35. Plaintiff will show that Defendants willfully committed acts of malpractice, maladministration, and/or nonfeasance, and perjury in the conduct of their official duties, thus having the appearance of impropriety and damaging the public's trust.
36. Plaintiff hereby introduces Exhibit 4 that is a highlight of several supplemental statements in support of the merits of the underlying Petitions. Individually and as a whole, highlights presented in Exhibit 4 are of such a serious matter that they cannot be ignored—just as the original Petitions should never have been ignored—to cure the problems that are self-evident, including but not limited to: unclean and grossly inaccurate voter rolls, unapproved and unsecure voting systems that Defendant(s) chose of their own volition, the rush toward pioneering new technology that could impact county, state, and national security, failure to train staff and election officials, failure to provide trained election officials, telling staff to not verify signatures, unequal treatment of signatures at the polls, counting of votes in secret, illegal function within the election system, gross violations of the Nevada Revised Statutes and Administrative Codes regarding election procedures, and the list goes on.
37. Plaintiff wishes to direct the Court's attention to Exhibit 4, point 6 a) "The Washoe ROV's staff has seen: "100% turnover in permanent staff and a loss of institutional knowledge." The Elections Group 6-9-23" The Election Group is the consulting agency initially hired by County Manager Brown.
38. Plaintiff hereby alleges the Registrar of Voters is in violation of Nevada law and, if left uncorrected, is unprepared to run the 2024 presidential primary safely, securely, and accurately as required by law unless all the issues are put on the table and addressed by one or more Defendant(s) under the Court's supervision.

39. Plaintiff hereby alleges Defendant(s) ignored Plaintiff's Petitions as an annoyance and will continue to do so if this Court does not intervene.
40. The Plaintiff demands this complaint and the underlying Petitions be heard by this honorable court.

FACTUAL ALLEGATIONS

41. Plaintiff voted in Washoe County in the 2020 and 2022 elections overseen by Defendants.
42. Plaintiff intends to vote in Washoe County in the upcoming presidential primary to occur in January 2024 and in subsequent elections overseen by Defendants.
43. Plaintiff and others provided each of the Defendants with a Petition addressing certain violations of elections, errors, and anomalies, prior to the Board of Commissioner's canvass of the vote in public meeting held November 18, 2022. This first of three Petitions was filed at the Washoe County Manager's office (the "November 18, 2022 Petition").
[Exhibit 1]
44. Plaintiff provided Defendants with a second Petition addressing a different set of issues and related violations of elections and other laws enumerated therein on November 23, 2022 Petition (the "November 23rd, 2022 Petition"). [Exhibit 2]
45. Plaintiff provided Defendants with a third Petition addressing a different set of issues and related violations of elections and other laws enumerated therein on December 1, 2022 (the "December 1st, 2022 Petition"). [Exhibit 3]
46. Defendants have a duty and obligation to respond to Petitions of elections pursuant to the Voter's Bill of Rights Nev. Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11).

47. Defendants, and each of them, have failed and refused to respond to or address the allegations made in the Petitions and continue to fail and refuse to respond to or address the same since the filing of the Petitions.
48. Plaintiff's rights to have legitimate grievances regarding matters of elections and the officials who conduct them responded to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants, and each of them.
49. By failing to address the Petitions, Defendants have each violated their oath to office, Nevada Revised Statutes, Federal, and State laws, and violated the Plaintiff's constitutional rights.
50. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address gross inaccuracies and improper maintenance of voter rolls.
51. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address illegal functions within the election system that alter intended votes.
52. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address the counting of votes in secret and without adequate verification.
53. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address instructions to Washoe County election workers to disregard signature verification, in violation of the law.
54. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address violations of the election processes required by Nevada statutes, HAVA, NVRA, the Nevada Constitution, the U.S. Constitution, the United States Code, and numerous other laws and statutes.

55. Because of the violations alleged herein, Defendants have not and are not able to conduct elections fairly, accurately, and securely as required by law.
56. Defendants' actions or inaction going forward may impact state and national security because of the critical flaws and vulnerabilities in many of the systems and procedures related to voter registration, handling of signatures and voter data, voting, signature curing, and recording and reporting votes as mentioned in the underlying Petitions and Exhibit 4.
57. Plaintiff respectfully requests the court's indulgence to accept Exhibit 4 in support of a) timeliness of this complaint, b) the severity of problems that underpin the underlying Petitions.
58. Plaintiff has suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to pose grievances of elections and against election officials and have them answered and resolved.
59. Defendants' failure to address the various violations stated within the underlying Petitions has resulted in a loss of confidence in the election system in Washoe County and Nevada. The Defendants' continued failure will result in an irreparable erosion of public confidence in the election system and its results in future elections unless the Court intervenes.
60. The disregard of legal obligations by the Defendants will contribute to a more generalized erosion of the rule of law, encouraging further acts of disobedience by other public servants without the accountability this Court can and must impose.
61. If public officials are not held accountable for their actions, citizens will fear that their freedoms and rights are not adequately protected, leading to a sense of insecurity and potential suppression of those rights.

62. If left unchecked, if there is no accountability, public officials can act with impunity. By this Court not acting affirmatively to correct the ills before it will set a dangerous precedent, paving the way for more widespread infringement of civil liberties.
63. The mission statement of the ROV states in part: “that Washoe County's Elections are operated with the utmost integrity, transparency, and accountability; and that the department is known for excellence in customer service and the administration of elections.”¹
64. Plaintiff hereby alleges the Registrar of Voters has failed their mission statement.
65. Plaintiff hereby alleges that the Defendants, individually, have failed their oath of office and in their duties to Plaintiff and all electors who reside in Washoe County.
66. The Court should hold Defendants to a standard of propriety and as stated in Plaintiff's November 18, 2022 Petition, which reads:
- i. Federal judges are held to a standard known as a semblance of impropriety, to which Nevada's Chief Justice in 1980, Harry E. Claiborne, was accused. Judge Claiborne was the first federal judge to go to jail and the second to be impeached in U.S. history. (<https://www.senate.gov/about/powers-procedures/impeachment/impeachment-claiborne.htm>) Here, the defendants are held to a similar standard because of the nature of elections being a right and the pinnacle of a Constitutional Republic.
 - ii. By failing to address the petitions the Defendants have violated their oath to office, Nevada Revised Statutes, Federal, and State laws, and violated the Plaintiff's constitutional rights.

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

- iii. The actions of Defendants and/or those acting on behalf of Defendants and referred to herein, depriving Plaintiffs and other Washoe County residents of their rights secured by the Constitution and laws of the United States, were done while acting under color of law.
67. The plaintiff has diligently raised concerns regarding the flaws and irregularities within the Washoe County Nevada election system for the past two years. Despite the plaintiff's genuine efforts to bring these issues to the attention of the defendants, they have remained unresponsive.
68. Defendant Washoe County Nevada, a political subdivision of the State of Nevada under the doctrine of respondent superior, Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
69. Plaintiff has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless this honorable court intervenes to enjoin the Defendants.

FIRST CAUSE OF ACTION

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

VOTER'S BILL OF RIGHTS

(EQUITABLE AND INJUNCTIVE RELIEF SOUGHT OR WRIT OF MANDAMUS)

70. Plaintiff repeats and realleges his allegations herein above inclusively, as though set forth herein, and incorporates the same by this reference.
71. "A public office is a public trust and shall be held for the sole benefit of the people." NRS 281A.020.
72. **Duty:** Defendants, and each of them, pledged an oath pursuant to Nev. Const. Art. 15 Sec. 2 that provides in part: ". . . I will well and faithfully perform all the duties of the office of

....., on which I am about to enter; (if an oath) so help me God; (if an affirmation) under the pains and penalties of perjury.”

73. Defendants, and each of them, have a duty to uphold Plaintiff’s constitutional rights.
74. Plaintiff’s right to have their grievances heard is enshrined in Nev. Const. Art. 1 § 10: “to petition the Legislature for redress of Grievances.”
75. Plaintiff’s right to have their Petitions of elections resolved “fairly, accurately and efficiently” is enshrined in Nev. Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11).
76. Plaintiff submitted valid Petitions to Defendant(s) as shown in Exhibits 1, 2, and 3 as referenced herein.
77. On information and belief, Defendants received and are aware of the underlying Petitions filed by Plaintiff.
78. **Breach Of Duty:** As of the filing of this complaint, there has been no acknowledgment or response from the Defendants regarding the underlying Petitions filed by Plaintiff.
79. Plaintiff exercised his constitutional right to pose grievances and have them resolved “fairly, accurately and efficiently” but was ignored by the Defendant(s).
80. Defendants have thus deprived Plaintiff to have his grievances heard as enshrined in Nev. Const. Art. 1 § 10.
81. Defendants have thus violated Plaintiff’s right to have his Petitions, individually or as a whole, resolved “fairly, accurately, and efficiently.” Nev. Const. Art. 2 Sec 1A § 11 and NRS 293.2546 (11) when they ignored said Petitions.
82. Defendants have thus perjured their oath of office.
83. In addition, Defendants have failed to address, correct, or rectify the issues raised in the underlying Petitions, including but not limited to, (1) updating and resolving the voter

registration lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal function within the election system; (6) violations of election procedures as required under Nevada law. [Exhibit 4]. Plaintiff seeks an injunction regarding the foregoing.

84. Plaintiff has further been damaged as his vote did not count as he cast it and thus has been robbed of his right to suffrage.
85. *Qui non negat, fatetur* is a Latin maxim of law, meaning “he who does not deny, admits.” As such, Plaintiff’s assertions in the underlying Petitions stand unopposed.
86. Plaintiff has a reasonable likelihood of prevailing on the merits.
87. As a result, Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one’s right to pose grievances of elections and against election officials and have them answered and resolved. Without Injunctive Relief, Plaintiff will suffer irreparable harm for which monetary damages are inadequate.
88. The Defendant(s)’ actions have resulted in harm to Plaintiff and unless admonished for their breach of oath and duty will continue to inflict harm upon Plaintiff.
89. Granting the requested relief will serve public interest in seeing the harm stopped. There is little to no hardship for the Defendants to respond to the Petitions and resolve discrepancies that are identified herein. In the alternative, Plaintiff seeks a writ of Mandamus from the Court as allowed by NRS 34.160; NRS 34.190, ordering the Defendants to respond to the Petitions and rectify those issues raised in Paragraph 83 herein.

90. Plaintiff has no adequate remedy at law and therefore seeks the injunctive and equitable relief as stated in Demand for Relief below.

SECOND CAUSE OF ACTION

Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983 and Nevada

Constitution Article 1

**(PROCEDURAL DUE PROCESS VIOLATION, EQUITABLE AND INJUNCTIVE
RELIEF SOUGHT OR WRIT OF MANDAMUS)**

91. Plaintiff repeats and realleges its allegations herein above inclusively, as through set forth herein, and incorporates the same by this reference.
92. Plaintiff is a registered voter in Washoe County, Nevada who filed timely Petitions against the Defendants stating various violations of election laws by Defendants and Washoe County on the morning of November 18, 2022 [Exhibit 1], on November 23, 2022 [Exhibit 2], and on December 1, 2022. [Exhibit 3].
93. **Duty:** Section I of the Fourteenth Amendment to the United States Constitution prohibits states from depriving “any person of... liberty... without due process of law.” This includes the fundamental right to pose grievances as enshrined in Nev. Const. Art. 1, Sec. 10.
94. **Breach Of Duty:** There has been no acknowledgment or response from the defendants regarding the petitions filed by the Plaintiff.
95. Defendants have failed and refused to redress the violations enumerated in the underlying Petitions.
96. Plaintiff exercised his constitutional right to pose grievances and have them resolved “fairly, accurately and efficiently” but was ignored numerous times.

97. Under 42 U.S.C. § 1983, every person acting under color of law who deprives another person of his or her constitutional rights is also liable at law and in equity.
98. The plaintiff's efforts to bring attention to the flaws and gross violations in the Washoe County election system have been met with negligent disregard by the Defendants.
99. Defendants violated Plaintiffs' due process rights by failing to respond to Plaintiff's grievances/Petitions. Plaintiff seeks an order from the Court requiring the County to respond to the Petitions and address the other issues as set forth in paragraphs herein.
100. Plaintiff has further been damaged as his vote did not count as he cast it and thus has been robbed of his right to suffrage.
101. Plaintiff has a reasonable likelihood of prevailing on the merits.
102. Granting the requested relief will serve public interest.
103. As a result, Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to pose grievances of elections and against election officials and have them answered and resolved timely.
104. Plaintiff will suffer irreparable harm in the form of the continued failure to redress the violations contained in the underlying Petitions, as well as the harm of failing to provide secure and accurate elections, without the Court's intervention. There is little to no hardship for the Defendants to respond to the Petitions and resolve discrepancies that are identified herein. In the alternative, Plaintiff seeks a writ of Mandamus from the Court as allowed by NRS 34.160; NRS 34.190, ordering the Defendants to respond to the Petitions and rectify those issues raised herein.

105. Plaintiff has no adequate remedy at law and therefore seeks the injunctive relief as stated in the Demand for Relief below.

THIRD CAUSE OF ACTION

EQUAL PROTECTION VIOLATION

Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983 and Nevada

Constitution Article 1

(EQUITABLE AND INJUNCTIVE RELIEF SOUGHT)

106. Plaintiff repeats and realleges its allegations herein above inclusively, as through set forth herein, and incorporates the same by this reference.

107. **Duty:** “A public office is a public trust and shall be held for the sole benefit of the people.”
NRS 281A.020.

108. Section I of the Fourteenth Amendment to the United States Constitution prohibits states from depriving “any person within its jurisdiction the equal protection of the laws.”

109. **Breach of Duty:** Defendant(s), acting by and through themselves, their managers, agents, and their employees, have twice ignored Plaintiff’s valid grievances to which he is entitled to receive proper application and equal protection under the law.

110. The Defendants have thus broken the public’s trust by failing to rectify those issues identified in paragraph 83 herein and failed Plaintiff through their flagrant and negligent ignoring of Plaintiff’s Petitions.

111. Unless restrained from doing so, Defendant(s) will continue to violate Plaintiff’s rights or that of any other citizen with a proper Petition, thus continuing to inflict injuries for which Plaintiff has no adequate remedy at law.

112. Under 42 U.S.C. 1983, every person acting under color of state law who deprives another person of his or her constitutional rights is also liable at law and in equity.
113. Plaintiff has further been damaged as his vote did not count as he cast it and thus has been robbed of his right to suffrage.
114. Plaintiff has a reasonable likelihood of prevailing on the merits.
115. Granting the requested relief will not disservice the public interest.
116. As a result, Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one’s right to pose grievances of elections and against election officials and have them answered and resolved.
117. Plaintiff will suffer irreparable harm in the form of the continued failure to redress the violations contained in the underlying Petitions, as well as the harm of failing to provide secure and accurate elections, without the Court’s intervention.
118. As a direct and proximate result of Defendant’s actions, Plaintiff has been damaged and is entitled to the relief set forth below, in addition to such other relief as the circumstances and demands of justice may warrant to restore the public’s trust in elections and the officials who run them.

FOURTH CAUSE OF ACTION

PETITION FOR REMOVAL OF OFFICERS FROM OFFICE

119. Plaintiff repeats and realleges its allegations herein above inclusively, as through set forth herein, and incorporates the same by this reference.
120. Plaintiff respectfully demands this honorable court to remove Defendants Jaime Rodriguez, Washoe County Registrar of voters, Eric Brown, Washoe County Manager,

Alexis Hill, Washoe County Commissioner from office pursuant to the Court's authority under NRS 283.440 and NRS 266.430.

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

JURY TRIAL DEMANDED

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

PUNITIVE DAMAGES

126. The Defendant(s) have acted in their personal and professional capacities.
127. The actions of Defendant(s) constitute a willful disregard for Plaintiff's rights, accuracy in elections, the mission statement of the ROV, and a free and fair Constitutional republic.
128. Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to

pose grievances of elections and against election officials and have them answered and resolved timely.

129. The Defendant(s) have no cover of sovereign immunity. *Scheuer v. Rhodes*, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974).

130. Punitive damages are warranted when gross and willful violations of rights and law occur as is the case here. *Smith v. Wade*, 461 U.S. 30 (1983).

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

DEMAND FOR RELIEF

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

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

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

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

iv. Award Plaintiff their cost of suit;

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

vi. Award punitive damages;

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

viii. Enjoin Defendants from their continued violations of the following NRSs and strictly comply with NRS 293.530, NRS 293.2546(11), NRS 293B.033, NRS 293.269927, NRS 293.36, NRS 293.740, NRS 293B.063, NRS 293B.104, NRS 293B.1045(1), NAC 293B.110(1)(b), NRS 293.269931(1), NRS 293.3606(1), NRS 293.363(1), NRS 293B.353, NRS 293B.354, NRS 293B.380(2)(a), NAC 293.311(4), NRS 293.423, NRS 293.269927, NRS 293.269927(4)(b), NRS 293.277(3), NRS 293.269927, NRS 293.285(1)(b)(4), NRS 293.3075(4), NRS 293.3585(1)(d), NRS 293.403(2), NRS 293.404(2), Nev. Const. Art. 2 Sec.1A § 1(b);

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

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

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

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

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

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

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

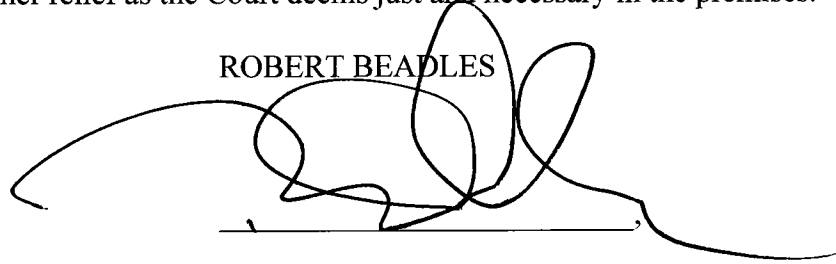
xvi. Grant or impose any remedy, and further relief at law or equity, that this Court deems just and proper in these circumstances;

xvii. Removal of Defendants from office; and

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

Dated: July 25, 2023

ROBERT BEADLES

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Robert Beadles, *pro se*

VERIFICATION

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

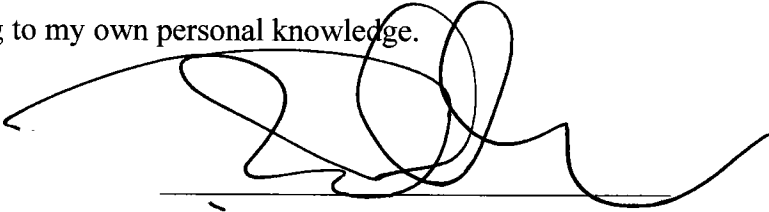
DATED July 25th, 2023



Robert Beadles

AFFIRMATION PURSUANT TO NRS 239B.030

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

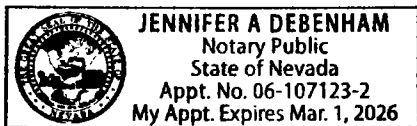


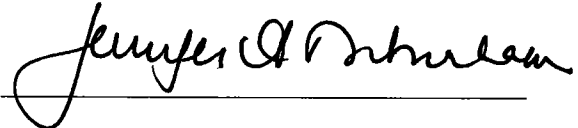
Robert Beadles, Plaintiff

STATE OF NEVADA

COUNTY OF WASHOE

On the 25 day of July, 2023, personally appeared before me Robert Beadles who, being by me first duly sworn, executed the foregoing in my presence and stated to me under penalties of perjury that the facts alleged therein are true and correct according to his own personal knowledge.





Notary Public

My commission expires: 03-01-2026-

CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I hereby certify that I am an _____, and that on the ___ day of _____, 2023, I caused a true and correct copy of the foregoing COMPLAINT FOR EQUITABLE AND INJUNCTIVE RELIEF, PUNITIVE DAMAGES to be served via personal service as follows:

RODRIGUEZ
REGISTRAR OF VOTERS
1001 E Ninth Street, Bldg. A, suite 135
Reno, Nevada 89512-2845
Defendant

BROWN
COUNTY MANAGER
1001 E Ninth Street, Bldg. A
Reno, Nevada 89512-2845
Defendant

HILL
COUNTY COMMISSION CHAIR
1001 E Ninth Street, Bldg. A
Reno, Nevada 89512-2845
Defendant

_____/s/ [NAME]_____
[TITLE]

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

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

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

7 Complaint For Relief

8 file in case number: _____

9
10 (*mark one*)

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

12
13 Document contains the social security number of a person as required by: (*mark one*)


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

15 _____
16 For the administration of a public program

17 For the administration for a federal or state grant

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

20
21
22 DATED this (*day*) 25 day of (*month*) July, 20 23

23
24 Submitted By: (*Your signature*) 

25 (*Print your name*) Robert Bendles

26 (*Attorney for*) _____
27
28

Exhibit Glossary

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

Exhibit 2 11-23-22 Contest 11 pg.

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

Exhibit 4 Highlights of Supplemental Statements 5 pg.