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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.: CV23-01341

Dept. No.: 1

OPPOSITION OF MOTION FOR SANCTIONS

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

I. BACKGROUND

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 NRC 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.

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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

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.
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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.

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The plaintiff will now address these 4 points proving he “to the best of the person’s knowledge, information, and belief, formed after an inquiry reasonable under the circumstances”

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

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

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

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

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

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
27

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

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"

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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
16 Bostock v. Clayton County, 140 S. Ct. 1731 (2020), "The people are entitled to rely on the law as
17 written, without fearing that courts might disregard its plain terms based on some extratextual
18 consideration. See, e.g. , Carcieri v. Salazar , 555 U.S. 379, 387, 129 S.Ct. 1058, 172 L.Ed.2d 791
19 (2009) ; Connecticut Nat."

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.

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

The state has limited the immunity it affords local government.

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

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 of 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

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 Proconier 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.

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

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

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

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

24 Paradoxically, within the same context, Ms. Liddell inadvertently acknowledges the existence of
25 compelling evidence that demonstrates the defendants' violations. This duplicitous approach
26 serves only to perpetuate confusion and hinder the pursuit of justice.
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Defendants Own Words:

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

Unacceptable Collusion:

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

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

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 **È 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.

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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
5 other mechanical voting system or mechanical recording device.

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

17 Additionally, it's proven it's a mistruth in the 85-page scathing report from the "Election Group"
18 as per [Exhibit 97].
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

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

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

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

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.

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:
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.

25
26

27

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

14 ROBERT BEADLES, Plaintiff Pro Se
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.

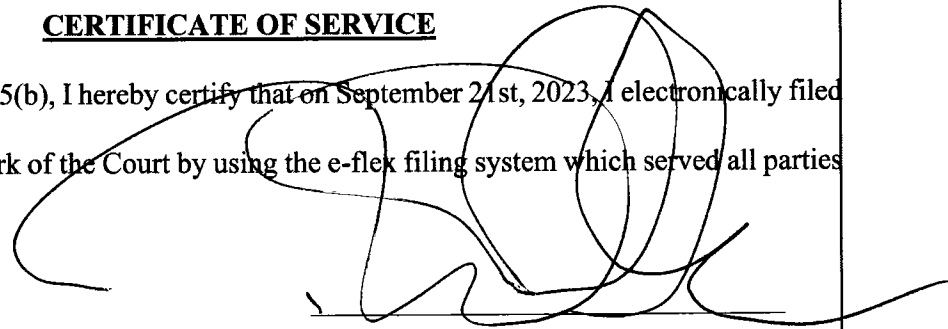
20 DATED: September 21st, 2023.
21

22 _____
23 Robert Beadles, Plaintiff
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CERTIFICATE OF SERVICE

Pursuant to NRCF 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.



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