

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

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

7 MR ROBERT BEADLES, an individual,  
8 Plaintiff,

Case No.: CV23-01341

Dept. No.:

9 vs.

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

Defendants.

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

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

22  
23 **ISSUE:**

24  
25 The Plaintiff has brought action against the Defendants for multiple alleged violations, including but  
26 not limited to election law violations, breach of court orders, malfeasance, nonfeasance, professional  
27 malpractice, and the removal of officers from office. The three Defendants, the Defense, and the  
28

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

6  
7 **BACKGROUND**  
8

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

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

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

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

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

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

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

20  
21 **I. Background**

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

- 24 1. The Complaint is brought against Defendants based on their violations of Plaintiff’s state  
25 Constitutional rights to due process, equal protection, voter’s rights, and the laws and codes  
26 of Nevada related to the conduct of elections regarding Defendants’ non-response to  
27 Plaintiff’s grievances and “general stonewalling” when presented with reports and analysis  
28 ¶ 33.
2. Plaintiff alleges violations of his rights and the laws of Nevada based on the Defendants  
having never acknowledged or responded to three formal Petitions filed with the county by  
Plaintiff. *Id.* ¶ 31.

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

27  
28  
**Plaintiffs Condensed Partial List Of Allegations:**

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

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.

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

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

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

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

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

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

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

27  
28 **II. ARGUMENT**

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

4  
5 "It is not only of some importance but is of fundamental importance that justice should not only be  
6 done, but should manifestly and undoubtedly be seen to be done." - Sir William Blackstone

7  
8  
9 An impartial judge is like a balance beam. It must be level in order to weigh the evidence fairly." -  
10 Earl Warren, Chief Justice of the Supreme Court of the United States

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

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

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

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

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

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

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

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

2  
3 **Beadles meets all 5 prongs as stated above and required by Nat'l Collegiate Athletic Ass'n v.**

4 **Tarkanian**, 113 Nev. 610 (Nev. 1997) *"A motion for change of venue must be granted where there*  
5 *is a reasonable likelihood that in the absence of such relief, an impartial trial cannot be held.*

6 *Martinez v. Superior Court*, 629 P.2d 502, 503 (Cal. 1981) (citing *Maine v. Superior Court*, 66  
7 *Cal.Rptr. 724* (Cal. 1968)). Courts look to five factors to determine if venue should be transferred:  
8 (1) the nature and extent of pretrial publicity; (2) the size of the community; (3) the nature and  
9 gravity of the lawsuit; (4) the status of the plaintiff and defendant in the community; and (5) the  
10 existence of political overtones in the case. *People v. Hamilton*, 774 P.2d 730, 737 (Cal. 1989)."  
11

12  
13 *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), *"even a probability of bias can violate the*  
14 *due process clause, undermining public confidence in the judiciary's ability to adjudicate*  
15 *impartially."*  
16

17  
18 While Defendants might view the motion as a mere formality or strategic play, the venue can play a  
19 crucial role in ensuring that justice is not only done but also seen to be done. The law is settled, and  
20 the facts are clear: Beadles cannot receive an unbiased trial in Carson City.  
21

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



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

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

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

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

16  
17 **Snippets from the article include:**

18 In a letter from Deputy District Attorney Lindsay Liddell, Beadles is urged to withdraw his  
19 “frivolous” court filing or else face sanctions.

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

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

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

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

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

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

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

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

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

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

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

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

1 **The Nevada Appeal**

2 **[Exhibit 154]**

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

8 **RGJ Change Of Venue**

9 **[Exhibit 155]**

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

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

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

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

22  
23 “The DA’s office responded that his request to move the trial location was done not in “pursuit of  
24 justice but rather as another strategic attempt to have his meritless allegations heard in the forum he  
25 believes will be most favorable to himself.”  
26

27  
28 “Reno attorney Joey Gilbert claimed that voting machines had altered votes away from himself and

1 for his opponent in the Republican gubernatorial primary, Joe Lombardo. Carson City District Judge  
2 James Wilson ruled that Gilbert's lawsuit was "a frivolous action that warrants sanctions." Gilbert  
3 says he no longer believes he really won against Lombardo, who went on to be elected governor.  
4 "We were not able to gather what I thought we had evidence-wise," Gilbert said this summer.  
5 Beadles cites the same source as Gilbert did for claims of vote switching – Edward Solomon.  
6 Solomon was found not qualified as an expert witness in Nevada, and Wilson ruled there was a  
7 "fundamental lack of evidence" to support claims of a rigged election in Gilbert's case.  
8 As of Thursday afternoon, the court in Carson City had not yet received the case or assigned it a  
9 judge.”  
10  
11

12 **The plaintiff can continue to show example after example**, but just [Exhibit 132, 134, and 135]  
13 alone will show the court that Beadles has no chance of a fair trial in Carson City. The defense uses  
14 mistruths in their opposition to change of venue to state, *“In the present case, the nature and extent*  
15 *of pretrial publicity has, to date, been minimal. Only a handful of articles have been published,*  
16 *detailing both the Complaint Beadles filed and the Rule 11 letter Defendants served in Beadles’s*  
17 *first case.1 The media coverage is no more inflammatory than Beadles’s own Complaint. Beadles*  
18 *included demonstrate the media’s efforts to take a neutral position by requesting his comment before*  
19 *publishing. Highlighting the absurdity of Beadles’s claim that media coverage somehow deprives*  
20 *him of the ability to have a fair trial, Beadles himself is the primary source of much pretrial*  
21 *publicity, as demonstrated by multiple articles quoting Beadles’ public blog, “Operation Sunlight.”*  
22 *Although there are several news articles relevant to this case, the medial quantity and nature of*  
23 *media coverage falls far short of the one-sided pervasive and prejudicial coverage that would*  
24 *necessitate a change of venue. The first factor favors denying the Motion to Change Venue. The*  
25 *second factor is the size of the community. Washoe County has nearly a half million people. There is*  
26 *no evidence that with a population this size, it would be difficult to seat a jury that had not been*  
27  
28

1 *exposed to any prejudicial publicity.”*

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

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

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

1 paper.

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

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

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

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

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

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

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

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

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

28

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

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

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

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

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

16  
17 Facebook:

18 KOLO 8: 10,000 followers

19 KRNV 3: 12,000 followers

20 KTVN: 15,000 followers

21 Fox 2 News 4: 18,000 followers

22 Twitter:

23 KOLO 8: 3,000 followers

24 KRNV 3: 4,000 followers

25 KTVN: 5,000 followers

26 Fox 2 News 4: 6,000 followers

27 Instagram:

28 KOLO 8: 2,000 followers



1 KRNV 3: 3,000 followers

2 KTVN: 4,000 followers

3 Fox 2 News 4: 5,000 followers

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

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

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

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

19  
20 Even the Attorney General attacked the Plaintiff personally, as seen in [Exhibit 156], where he  
21 states, "Robert Beadles is an extreme conspiracy theorist—so it's no surprise that he backed Sigal  
22 Chattah for AG. Folks like him and Chattah will do EVERYTHING in their power to impose their  
23 extremism on Nevadans. But we're stronger than this, NV, and I know justice will prevail in Nov."

24 The Attorney General for Nevada is supporting a publication that patently lied about Beadles, calling  
25 him an anti-Semite. What Ford fails to mention in his libelous comments about Beadles is that Sigal  
26 is Jewish and a close friend of Beadles. Beadles is the furthest thing from an anti-Semite or racist, as  
27 this slanderous and libelous article paints him as. As the highest-ranking law enforcement official in  
28 Nevada, with his base in Carson City, it is clear the Attorney General is additionally providing even

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 public figure. The defendants have sent out several emails to the entire Washoe County email list, as  
2 demonstrated in [Exhibits 134, 135, 139, 140], which greatly impacts Carson City. The media has  
3 written dozens of articles, and the extensive TV and social media coverage has again depicted  
4 Beadles as some sort of extremist villain, which couldn't be further from the truth. As stated above,  
5 and incorporated herein, the media overlay between Washoe County and Carson City is extreme.

6 The plaintiff solely wants all legal voters' votes to be counted legitimately and for election laws to be  
7 upheld. That shouldn't be controversial, yet the defendants have purposely twisted the truth of the  
8 matter, thereby ruining any chance of an unbiased trial and proceedings in Carson City.  
9

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

12 The media, defense, and defendants have worked in concert to make this entire case overtly political,  
13 pitting Beadles against the County of Washoe and Carson City, as some sort of bad guy vs. them  
14 being the good guys. This couldn't be further from the truth. Beadles has time and time again  
15 demonstrated the issues with the election system [as shown in numerous exhibits 1-154] in Washoe  
16 County, and Carson City only to be libeled and slandered by them. Plaintiff has tried to resolve the  
17 issues with the defendants to no avail. Thus, we are now here, in court. It is paramount this case be  
18 tried in an unbiased manner, where the evidence is simply weighed and ruled upon by its merits.  
19

20 This is now impossible due to the defense, defendants, and media working in concert. This case  
21 should not be political, all political parties should embrace free and fair elections. This case will  
22 absolutely affect them all positively if Plaintiff is allowed to present his evidence and prevail. What  
23 the defendants have done to poison that truth is reprehensible. Beadles must be allowed his day in an  
24 unbiased court as his rights entitle him to. It is the duty of this honorable court to ensure his rights  
25 are not impeded further.  
26  
27  
28

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

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

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

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

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

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

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

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

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

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

13 *"Respondents' demand for a change of venue was timely filed, see NRS 13.050(1)(a) (requiring a*  
14 *defendant seeking a change in venue to file a demand before the time to answer has expired), and*  
15 *preceded respondents' motion for a change of venue, see Nevada Transit Co. v. Harris Brothers*  
16 *Lumber Co., 80 Nev. 465, 468-69, 396 P.2d 133, 134 (1964) (explaining that a motion for a change*  
17 *of venue does not meet the requirement that a written demand for a change of venue be filed). While*  
18 *the demand contained two typographical errors, those errors were quickly corrected. See Tunnicliff*  
19 *v. Holmes, 232 P. 148, 149 (Cal. Dist. Ct. App. 1924) (concluding that a typographical error in a*  
20 *demand for a change of venue did not defeat the demand). Thus, we conclude the district court did*  
21 *not err in granting the motion to change venue."*  
22  
23  
24  
25  
26  
27  
28



1 **III. CONCLUSION**

2  
3 Your Honor,

4  
5 “A fair trial is not a trial by ambush. It is a trial in which both sides have an opportunity to present  
6 their case and to challenge the evidence of the other side.” - John Adams, Second President of the  
7 United States.

8  
9  
10 It is clear to anyone outside looking in, there is an absolute appearance of impropriety and bias in  
11 Carson City against Beadles. For the reasons mentioned above and those presented in the original  
12 motion, I respectfully demand that the Court grant his Motion to Change Venue to Lyon County to  
13 ensure the fair and impartial administration of justice his rights entitle me.

14  
15 Lastly, it is greatly in the public's best interest to have this case moved to Lyon County, where they  
16 feel their voices will be heard. While I recognize that this is my pro se case, there are hundreds of  
17 thousands of people behind me who all want the facts to be weighed on their merits and ruled upon  
18 impartially by an honorable court and jury.

19  
20 You have the chance to give them that. Thank you in advance for doing what’s right, not what is  
21 easy.

22  
23 “Not only is it important that justice be done; it is equally important that it be seen to be done.” -  
24 Justice Sonia Sotomayor

25  
26 Link to media metrics:

27 <https://g.co/bard/share/5f1633ac5e67>  
28 <https://g.co/bard/share/c8b8c35b9ec2>  
<https://g.co/bard/share/731f6d61553a>  
<https://g.co/bard/share/dbc6489cc8ef>

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

2 Dated: 9/21/23

3  
4 Respectfully submitted,

5  
6 By: 

7  
8 ROBERT BEADLES, Plaintiff Pro Se

9  
10  
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15  
16 **AFFIRMATION PURSUANT TO NRS 239B.030**

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

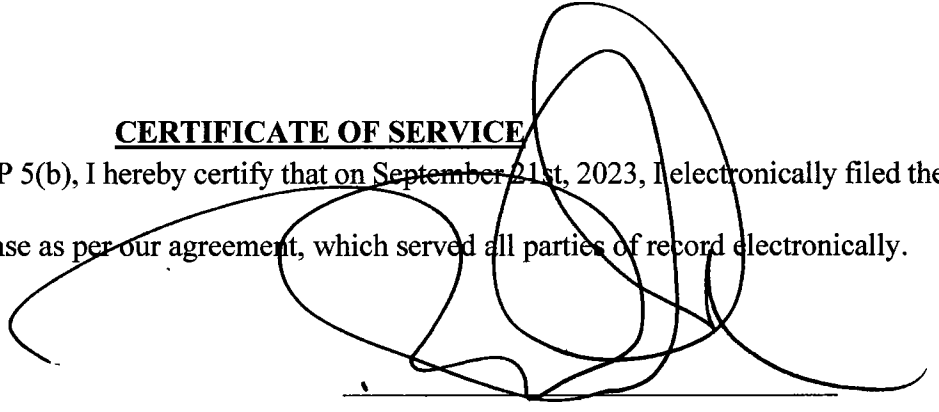
19 DATED: September 21st, 2023.

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22 Robert Beadles, Plaintiff

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**CERTIFICATE OF SERVICE**

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

A large, handwritten signature in black ink, appearing to read "Robert Beadles", is written over the text of the certificate. The signature is highly stylized and loops around the text.

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