

# **EXHIBIT 1**

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**IN THE FIRST JUDICIAL DISTRICT COURT OF NEVADA**  
**CARSON CITY**

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ROBERT BEADLES, an individual,

Plaintiff,

Case No. 23-OC-00105-1B

vs.

Dept No. D1

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, a political subdivision of the State of Nevada, and DOES I-X; and ROE CORPORATIONS I-X.

Defendants.

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**ORDER GRANTING MOTION FOR SANCTIONS**

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1 **PROCEDURAL HISTORY**

2 On July 25, 2023, Plaintiff Robert Beadles (“Beadles”) filed a Complaint against the  
3 Washoe County Registrar of Voters Jamie Rodriguez (“Ms. Rodriguez”), the Washoe  
4 County Registrar of Voters (“ROV”), Washoe County Manager Eric Brown (“Manager  
5 Brown”), Chairperson of the Washoe County Board of County Commissioners Alexis Hill  
6 (“Commissioner Hill”), and Washoe County in Second Judicial District Court case  
7 number CV23-01283. That Complaint contained two causes of action arising under federal  
8 law, and two causes of action arising under Nevada law. On August 3, 2023, Defendants  
9 removed that case to the United States District Court District of Nevada, case number  
10 3:23-cv-00382-ART-CSD.

11 On August 4, 2023, Beadles opened the instant case against Defendants in the  
12 Second Judicial District Court, case number CV23-01341. Beadles’s Complaint in this case  
13 is identical to his first complaint, but with the federal causes of action deleted. That same  
14 day, Beadles filed a Motion to Request Judge Simons. On August 9, 2023, Beadles filed<sup>1</sup> a  
15 Notice of Voluntary Dismissal in the first case, United States District Court District of  
16 Nevada, case number 3:23-cv-00382-ART-CSD. Also on August 9, 2023, in this case  
17 Beadles filed a “2<sup>nd</sup> Motion to Request Judge Simons,” and “Supplemental Exhibits in  
18 Support of Plaintiff’s Complaint” which was comprised of 116 “exhibits.” On August 10,  
19 2023, Beadles filed a “Motion to Assign Judge.” On August 13, 2023, Beadles filed a  
20 “Motion to Compel Court to Issue Citations Against Defendants.” On August 16, 2023,  
21 Beadles filed a Motion for Recusal of Judge Freeman.

22 On August 15, 2023, Defendants filed a Motion to Dismiss under NRCP 12(b)(5),  
23 and on September 11, 2023, Defendants filed a Motion for Sanctions. The Motion for  
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25 <sup>1</sup> The federal court’s docket identifies attorney Sigal Chattah as the filer, but the filing itself identifies Beadles  
26 acting pro se. *See Docket for United States District Court District of Nevada*, case no. 3:23-cv-00382-ART-CSD.

1 Sanctions argues that sanctions are appropriate under NRCP 11 because Beadles filed the  
2 Complaint for improper purposes to harass Commissioner Hill, Manager Brown, and Ms.  
3 Rodriguez, that he filed various motions for the improper purpose of forum and judge  
4 shopping, that he filed the Complaint with allegations not supported by evidence, and that  
5 he filed claims not warranted by existing law.

6 On September 14, 2023, this case was transferred to the First Judicial District Court  
7 of the State of Nevada in and for Carson City.

### 8 FINDINGS OF FACT

9 Having reviewed the filings in this case, and having considered, without limitation,  
10 all evidence submitted by the parties to the Court, as well as the parties' arguments, the  
11 Court makes the following findings of fact:

#### 12 **I. Robert Beadles, Commissioner Hill, Manager Brown, and Ms. Rodriguez, and ROV**

13 1. Beadles is a well-known political malcontent in Northern Nevada. He also has self-  
14 proclaimed extensive wealth. He has means to hire an attorney, but admits he chose not to  
15 in this case to protect his attorneys from sanctions and disciplinary action.

16 2. Beadles's disdain for Commissioner Hill, Manager Brown, and Ms. Rodriguez is  
17 clear. He regularly expresses his hostility regarding Defendants—describing Commissioner  
18 Hill as a communist and referring to her as “Comrad Hill-insky,” referring to Manager  
19 Brown as “Eric Brownstain,” and referring to Ms. Rodriguez as “the utterly incompetent,  
20 who's not competent enough to clean toilets let alone our voter rolls.” In his Opposition to  
21 Motion for Sanctions, Beadles further displayed hostility toward Commissioner Hill,  
22 Manager Brown, and Ms. Rodriguez. *Opp.* at pp. 40–44. He asserts his opinion that they  
23 are “utterly incompetent or corrupt.” *Opp.* at p. 41, ln. 1. He displays his fury with  
24 Commissioner Hill for removing the general public comment period at the beginning of  
25 commission meetings. *Opp.* at p. 41. He states he could “write a book” on Commissioner  
26 Hill “alone and her acts of dictatorship...” *Opp.* at p. 41 ln. 13–15. He explains he

1 nicknamed Manager Brown “Eric BrownStain,” because “everything he touches turns to  
2 crap for the Washoe residents. *Opp.* at p. 41 ln. 17–21. Without any evidentiary support,  
3 Beadles alleges Manager Brown is involved in “unexplainable budgets” and “the cover-up  
4 of elections issues.” *Id.* He asserts that Ms. Rodriguez is unqualified for the ROV position.  
5 *Opp.* at p. 41, ln. 23–26. He now erroneously claims Ms. Rodriguez committed perjury  
6 when she provided a declaration refuting Beadles’s election conspiracies. *Opp.* at 42–44.  
7 Beadles inappropriately singles out Commissioner Hill in an attempt to use this case to  
8 further his scheme of harassing her. Beadles does not reside in Commissioner Hill’s district,  
9 but filed an action to remove her from her elected office.

10 3. In a blog post describing his first, nearly identical Complaint, Beadles declared he  
11 was “putting it all on the line to sue the County Manager, ROV and Commissioner Chair –  
12 in both their personal and official capacities and the whole damn county itself.” The Court  
13 finds Beadles needlessly extended his claims to include various capacities and “the whole  
14 damn county.” He states, “I’m calling them out on every front.”

15 4. The Court finds Beadles filed the Complaint to vex and harass Commissioner Hill,  
16 Manager Brown, and Ms. Rodriguez.

17 5. The ROV is a department of Washoe County, and not a separate legal entity or  
18 political subdivision of the State of Nevada.

## 19 **II. The Present Case**

20 6. Beadles filed the Complaint in this case duplicating claims in a case that he filed two  
21 weeks prior, only deleting the Federal claims. *See Beadles v. Rodriguez, et al*, CV23-01283  
22 (Second Judicial District Court). In a subsequent blogpost, Beadles states “...I filed a new  
23 lawsuit and only incorporated 2 State causes of action, with no Federal causes of action.  
24 This way, I would stay in State Court as that’s where I want to be right now, and that’s  
25 where remedies need to take place.”

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1 7. In both the instant action and the first case, he goes so far as to specifically request  
2 the judge he prefers to hear this action, inappropriately asserting that he is entitled make  
3 such a request and opine on the qualifications of his desired judicial officer. *See Mot. to*  
4 *Request Judge Simons; 2nd Mot. to Request Judge Simons.* In each case, he also filed peremptory  
5 challenges in an attempt to obtain his desired judge. Dissatisfied, he then moved to recuse  
6 the presiding judge, making baseless and outrageous claims regarding the Court’s collusion  
7 with the defense and taking issue with the Court’s adherence to the rule against ex parte  
8 communication. *See Mot. for Recusal of Judge.*

9 8. Though unrelated to his claims, Beadles includes allegations that Defendants  
10 oversaw elections in 2020. *Compl.* at ¶¶29, 38. As an initial matter, Beadles knows that  
11 Commissioner Hill was not a County Commissioner until 2021. Beadles is also aware that  
12 Ms. Rodriguez did not take on the Registrar for Voters role until 2022. Beadles’s reckless  
13 disregard for facts is evident with these allegations. Beadles did not refute either points in  
14 his Opposition to Motion for Sanctions.

15 9. Beadles falsely alleges that Commissioner Hill and Manager Brown “handle voter  
16 registrations and conduct elections on behalf of the people of Washoe County.” *Compl.* at  
17 ¶14. Beadles acknowledges that Ms. Rodriguez is the appointed Registrar of Voters. *See*  
18 *Compl.* at ¶14, ¶15. He acknowledges that the Registrar of Voters has all the powers and  
19 duties that would otherwise be assigned to a county clerk regarding elections. *See Compl.* at  
20 ¶14(citing NRS 244.164); WCC 5.451(4). Based on that knowledge, Beadles should know  
21 that County Manager and the Chairperson for the Board of Commissioners are not directly  
22 involved in conducting elections. Manager Brown and Commissioner Hill have no such  
23 duties nor power, yet Beadles maintains each handles and oversees elections. *Compl.* at  
24 ¶¶14, 29, 38.

25 10. Beadles also makes various generalized statements without any admissible  
26 evidentiary support regarding Washoe County elections, including: “unclean and grossly

1 inaccurate voting rolls,” “unapproved and unsecure voting systems,” “rush toward  
2 pioneering new technology that could impact county, state, and national security,” “failure  
3 to train staff and election officials,” “unequal treatment of signatures at the polls,”  
4 “counting of votes in secret,” “illegal function within the election system,” and “gross  
5 violations of the Nevada Revised Statutes and Administrative Codes regarding election  
6 procedures and the list goes on.” *Compl.* at ¶33. In his Opposition to the Motion for  
7 Sanctions, Beadles presented no reliable, admissible, or credible evidence to support this  
8 allegation.

9 11. Beadles makes statements regarding election integrity that are not supported by  
10 admissible, reliable, or credible evidence. Beadles’s allegations and fugitively filed<sup>2</sup>  
11 “evidence” seek to relitigate “evidence” proffered in gubernatorial candidate Joey Gilbert’s  
12 2022 primary election contest. *See Ex. 9, Statement of Contest of the June 14, 2022, Primary*  
13 *Election Pursuant to NRS § 293.407, filed in the First Jud. Dist. Ct. of the State of Nevada in and*  
14 *for Carson City, case no. 22 OC 000851B* (“2022 Gilbert Election Contest”).<sup>3</sup> The source of the  
15 debunked mathematics is Edward King Soloman (“Solomon”), a self-proclaimed “expert”  
16 without formal qualifications who could not qualify as an expert in a court of law. The  
17 Court found that the 2022 Gilbert Elections Contest, which was based on a Solomon  
18 Report, was frivolous. Beadles funded the 2022 Gilbert Elections Contest. The Court found  
19 the claim regarding “math” was “highly dubious,” and his contentions did not “rise to the  
20 level of a well-grounded claim under Nevada law.” Relying again on similar Solomon  
21 reports, in this case Beadles alleges without any admissible, reliable, or credible evidence,

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24 <sup>2</sup> On August 9, 2023, Beadles filed a document titled “Supplemental Exhibits in Support of Plaintiff’s  
25 Complaint,” and, upon information and belief, delivered several boxes of records to the Court. Supplemental  
26 pleadings are not permitted without leave of Court. NRCP 15(d).

<sup>3</sup> Pursuant to NRS 47.130(2) and NRS 47.150(2) the Court takes judicial notice of all filings in the 2022  
Gilbert Elections Contest, including Beadles’s documented role in that case.

1 that defendants conduct unfair and inaccurate elections and that his vote did not count as  
2 he cast it.

3 12. In his “Demand for Relief,” Beadles asks the Court to “strike down NRS  
4 293.269935(2) and 293.3606(4) to allow public inspection of ballots.” *Compl.* at p. 16. He  
5 asks that the Court prohibit Defendants from “using any voting and tabulation machines  
6 for elections,” which the law allows them to do. *Id.* He asks that the Court require  
7 Defendants to use paper ballots, “[e]njoin the Defendants and make the digitized vote tally  
8 database (Microsoft SQL) open for public inspection,” require Defendants disclose  
9 applicant name and credentials, prohibit Defendants from using QR codes, “halt”  
10 Defendants’ expenditure of “unapproved and unsafe equipment and software.” *Id.* He also  
11 requests that the Court require Defendants “take into account and redress all elections  
12 issues that Plaintiff puts on the table, no shying away.” *Id.* at p. 15.

13 13. Beadles improperly attempts to use this Court as a vehicle to direct Washoe  
14 County’s elections policies.

15 14. Defendants served Beadles with their proposed Motion for Sanctions on August 16,  
16 2023, via U.S. Mail. With the proposed Motion, Defendants also included a Rule 11 letter  
17 requesting that Beadles resolve his Rule 11 violations. Beadles did not, and has not,  
18 resolved any of the issues alleged in the Motion for Sanctions. Defendants waited twenty-  
19 one days after service, plus three additional days for mailing, before they filed the instant  
20 Motion for Sanctions.

21 15. After he filed his Complaint in this case, Beadles added a link on the front page of  
22 his blog so readers can access “The Case in One Place,” and hosts a google drive where his  
23 follows can access this case’s filings. In a subsequent blog post, he proclaims the lack of  
24 election integrity in Washoe County, and states “...this is all the truth, not hyperbole, not a

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1 16. conspiracy theory; most if not all of the above is proven in CV23-01341.”<sup>4</sup> He  
2 claims to have “proved,” in this case, that there is no election transparency, the existing  
3 signature verification is flawed, “[t]here is an illegal function in the election system flipping  
4 votes, which is stealing elections from all of us,” the voting equipment is unreliable, etc.  
5 The Court finds that this further shows Beadles filed the Complaint for an improper  
6 purpose and is misusing the judicial system. Before the Court order on the merits in this  
7 case, Beadles already publicly claimed to have proven his election fraud theories in this  
8 case.

### 9 CONCLUSIONS OF LAW

10 17. When a party files a complaint, they certify that to the best of their knowledge,  
11 information and belief formed after an inquiry reasonable under the circumstances:

- 12 (1) it is **not being presented** for any improper purpose, such  
13 as **to harass**, cause unnecessary delay, or needlessly  
14 increase the cost of litigation;
- 15 (2) the claims, defenses, and other legal contentions are  
16 **warranted by existing law** or by a nonfrivolous argument  
17 for extending, modifying, or reversing existing law or for  
18 establishing new law;
- 19 (3) the **factual contentions have evidentiary support** or, if  
20 specifically so identified, will likely have evidentiary  
21 support after a reasonable opportunity for further  
22 investigation or discovery; and
- 23 (4) the denials of factual contentions are warranted on the  
24 evidence or, if specifically so identified, are reasonably  
25 based on a belief or lack of information.

26 NRCP 11(b)(emph. added).

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<sup>4</sup> CV23-01341 is the Second Judicial District Court’s case number for the instant case, which is now First Judicial District Court case number 23-OC-00105-1B.

1 18. “Rule 11 is intended to deter baseless filings in district court and imposes a duty of  
2 reasonable inquiry so that anything filed with the district court is well grounded in fact,  
3 legally tenable, and not interposed for any improper purpose.” *Walker v. City of N. Las Vegas*,  
4 394 F. Supp. 3d 1251, 1260 (D. Nev. 2019), *appeal dismissed*, 19-16305, 2020 WL 3620207  
5 (9th Cir. Jan. 21, 2020) (quotations omitted).<sup>5</sup> Rule 11 should be vigorously applied to  
6 “curb widely acknowledged abuse from the filing of frivolous pleadings.” *In Re Grantham*  
7 *Bros.*, 922 F.2d 1438, 1441 (9th Cir. 1991)(quotations omitted).

8 19. Rule 11 sanctions should be imposed for the filing of frivolous actions. *Bergmann v.*  
9 *Boyce*, 109 Nev. 670, 676, 856 P.2d 560, 564 (1993), *superseded by statute on other grounds as*  
10 *recognized in In re DISH Network Derivative Litig.*, 133 Nev. 438, 451 n.6, 401 P.3d 1081, 1093  
11 n.6 (2017). A frivolous action is one that is “both baseless and made without a reasonable  
12 and competent inquiry.” *Id.*, *citing Townsend v. Holman Consulting Corp.*, 929 F.2d 1358, 1362  
13 (9th Cir. 1990). The determination of frivolity is two-pronged: (1) the court must determine  
14 whether the pleading is “well grounded in fact and is warranted by existing law or a good  
15 faith argument for the extension, modification or reversal of existing law,” and (2) whether  
16 the party made a reasonable and competent inquiry. *Id.* “The trial court must examine the  
17 actual circumstances surrounding the case to determine whether the suspect claims were  
18 brought without reasonable ground.” *Bergmann*, 109 Nev. at 676, 856 P.2d at 564.

19 20. An improper purpose can be deduced where there is no legal or factual basis for a  
20 claim. *Paciulan v. George*, 38 F.Supp.2d 1128 (N.D. Cal. 1999).

21 21. “The legal standard applied to a Rule 12(b)(5) [m]otion to dismiss differs from the  
22 legal standard applied to a Rule 11 motion for sanctions.” *Bergmann v. Boyce*, 109 Nev. 670,  
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24 \_\_\_\_\_  
25 <sup>5</sup> “Federal cases interpreting the Federal Rules of Civil Procedure are strong persuasive authority, because the  
26 Nevada Rules of Civil Procedure are based in large part upon their federal counterparts.” *Executive Mgmt., Ltd.*  
*v. Ticor Title Ins. Co.*, 118 Nev. 46, 53, 38 P.3d 872, 876 (2002) (internal quotations omitted).

1 677, 856 P.2d 560, 564 (1993), *superseded by statute on other grounds as recognized in In re DISH*  
2 *Network Derivative Litig.*, 133 Nev. 438, n. 6, 401 P.3d 1081, 1093, n.6 (2017).

3 **I. Beadles’s Improper Purpose to Vex, Harass, and Consume Defendants’ Resources**

4 22. While Beadles has a right to express himself on his blog, his disdain for Defendants  
5 displayed therein is relevant to the circumstances giving rise to this litigation, specifically  
6 his intention to further harass Commissioner Hill, Manager Brown, and Ms. Rodriguez  
7 through the misuse of this Court. Beadles inappropriately singles out Commissioner Hill in  
8 an attempt to use this case to further his scheme of harassing her.

9 23. Beadles knows Commissioner Hill cannot bind the County without a majority vote  
10 of all commissioners, and yet he names her as a Defendant. He now claims she was  
11 necessary to grant the remedies requested. *Opp.* at p. 30. This is not true. Even if remedies  
12 were obtainable, the Court could issue relief against Washoe County in its entirety, who is  
13 also a Defendant. Beadles was not required to name Commissioner Hill. The  
14 circumstances show that he singled out Commissioner Hill as a Defendant to vex her with  
15 this case.

16 24. Beadles made this lawsuit personal by individually naming Defendants  
17 Commissioner Hill, Manager Brown, and Ms. Rodriguez, directly retaliating against them  
18 for disagreeing with him. He stated he was “calling them out on every front,” which now  
19 includes requiring them to respond to baseless claims in this case. *Ex. 3 to Mot.* As set forth  
20 above, Beadles named Commissioner Hill, Manager Brown, and Ms. Rodriguez  
21 Defendants in this case for the improper purpose of harassment, to vex, and to consume  
22 their resources. This is the exact behavior that Rule 11 was intended to prohibit. Sanctions  
23 are warranted for filing the Complaint for an improper purpose.

24 25. Beadles violated Rule 11 by filing his claims in pursuit of his personal animus  
25 against Commissioner Hill, Manager Brown, and Ms. Rodriguez rather than to resolve  
26 legitimate legal disputes.

1 26. Beadles violated Rule 11 by filing the Complaint for an improper purpose, and  
2 sanctions are warranted on that basis alone. *See e.g., Knipe v. Skinner*, 10 F.3d 72, 77 (2d Cir.  
3 1994)(affirming Rule 11 sanctions, where, as the district court found, filing of the action  
4 was “[a]nother creative avenue to beat a dead horse” and the “pursuit[t of] a personal  
5 agenda against [a government entity]” without a good faith basis). Based on Beadles’s well  
6 documented personal animus and the profound lack of merit to his causes of action, an  
7 improper purpose can be inferred.

## 8 **II. Beadles’s Forum Shopping is an Improper Purpose Sanctionable Under Rule 11.**

9 27. “Forum shopping is ‘[t]he practice of choosing the most favorable jurisdiction or  
10 court in which a claim might be heard.’” *Uber Tech., Inc. v. Second Jud. Dist. Court of State ex*  
11 *rel. County of Washoe*, 130 Nev. 1256, 2014 WL 6680785 at \*2 (Nov. 24, 2014(unpublished  
12 disposition), quoting BLACK’S LAW DICTIONARY 681 (8th ed. 2004). “Forum shopping” is  
13 disfavored in Nevada State Courts. *See, e.g., Adams v. Adams*, 107 Nev. 790, 795, 820 P.2d  
14 752 (1991); *Lyon County v. Washoe Med. Cntr., Inc.*, 104 Nev. 765, 768, 766 P.2d 902, 904  
15 (1988). The practice of “forum shopping” is “inimical to sound judicial administration.”  
16 *Pub. Serv. Comm’n of Nev. v. SW. Gas Corp.*, 103 Nev. 307, 308, 738 P.2d 891, 891 (1987).

17 28. Forum shopping is sanctionable under Rule 11. *C. v. Rady Children’s Hosp.*, 17-cv-  
18 0846-AJB-JLB, 2017 WL 6327138, at \*5 (S.D. Cal. Dec. 8, 2017); *Fransen v. Terps, LLC*, 153  
19 F.R.D. 655, 660 (D. Colo. 1994)(imposing Rule 11 sanctions for a “blatant example of  
20 forum shopping”). In *C. v. Rady Children’s Hosp.*, plaintiff engaged in similar conduct as  
21 Beadles in the reverse order—plaintiff filed a state court action, then dismissed that action  
22 and refiled a complaint in federal court omitting state law claims. 2017 WL 6327138, at \*5.  
23 The plaintiff expressly stated they did this to pursue claims in their preferred venue. *Id.* The  
24 court found that “plaintiffs’ filing in federal court due to a general dissatisfaction with state  
25 court was improper forum shopping, and also grounds for Rule 11 sanctions.” *Id.* The court  
26 awarded the opposing party their attorneys’ fees as sanction. *Id.* at \*6.

1 29. Beadles filed the instant case for the purpose of forum shopping, which is an  
2 improper purpose in violation of Rule 11. He filed the instant Complaint duplicating  
3 claims in a case that he filed two weeks prior, only deleting the Federal claims. *See Beadles v.*  
4 *Rodriguez, et al*, CV23-01283 (Second Judicial District Court).

5 30. The Court finds Beadles’s numerous motions requesting judges, displays filing for an  
6 improper purpose of forum shopping. Moreover, Beadles provided rebuttal nor excuse for  
7 his forum shopping in filing two separate motions “to Request Judge Simons.” *See Opp.*

8 31. Beadles’s forum shopping is blatant and sanctionable under Rule 11. Sanctions are  
9 appropriate to demonstrate the forum shopping is disfavored by punishing Beadles, to  
10 compensate Defendants for their attorneys’ fees, and to deter future attempts to forum shop  
11 which have and will continue. Defendants were forced to expend resources to address and  
12 respond to each of Beadles’s forum shopping tactics.

13 **III. Beadles Alleged Facts Not Supported by Evidence.**

14 32. Beadles filed a verified Complaint, stating “the facts alleged therein are true and  
15 correct according to his own personal knowledge.” *Compl.* at p. 17. In his Opposition to  
16 Motion for Sanctions, he claims “Every allegation that the Plaintiff has made, he believes  
17 to be true.” *Opp.* p. 3 at ln. 5. Beadles cannot avoid Rule 11 sanctions “by operating under  
18 the guise of a pure heart and empty head.” *Zuniga v. United Can Co.*, 812 F.2d 443, 452 (9th  
19 Cir. 1987).

20 33. Beadles recklessly included readily disprovable allegations, and provides no rebuttal  
21 to explain why sanctions are not warranted for those allegations. For example, Beadles  
22 includes allegations that Defendants oversaw elections in 2020, but neither Commissioner  
23 Hill nor Ms. Rodriguez were in their current positions in 2020. *See Compl.* at ¶¶29, 38. He  
24 also alleges that Manager Brown and Commissioner Hill personally conduct elections.  
25 *Compl.* at ¶14. In the Opposition he continues to join all “Defendants,” as one, stating  
26 things like they “prep the machines and ballot printing.” *Opp.* at p. 4. He provides no

1 evidence to support his allegation that Commissioner Hill or Manager Brown personally  
2 voter registration and conduct elections. *See Opp.* Moreover, his Complaint acknowledges  
3 that it is Ms. Rodriguez, as the ROV, who is charged with handling the elections. *Compl.* at  
4 ¶14, ¶15. Beadles provides no excuse for his false allegations, and declined an opportunity  
5 to resolve them.

6 34. Additionally, Beadles provides no admissible evidence supporting allegations  
7 regarding elections. *See Opp.*; *Compl.* at ¶33. His allegations relying on Edward Solomon’s  
8 “math” will be addressed in section to follow. Regarding his allegation that “Defendants”  
9 allowed “the counting of votes in secret,” he provides no admissible evidence. *Cite; Compl.*  
10 at ¶49. He provides no evidence whatsoever specific to Manager Brown or Commissioner  
11 Hill on this allegation. *See Opp.* He presumably cites to his “supplemental exhibits” filed on  
12 August 9, 2023, specifically to Exhibits 23 and 24, which appears to be an altered video file  
13 and a transcript of the video. *Opp.* at p. 21. He provides with no credible support,  
14 authentication, or context. The video includes an unidentified person speaking with  
15 County employee Heather Carmen and Ms. Rodriguez can be heard speaking behind  
16 closed doors during the 2022 Joey Gilbert recount. Ballots are not processed in the room  
17 identified in Beadles’s Exhibit 23. Ex. 1 at ¶2. In that room, staff obtains reports from  
18 tabulators. *Id.* Staff allows public viewing of ballot processing so long as it does not  
19 interfere with staff’s handling of the ballots. *Id.* at ¶3. Beadles’s generalized allegation  
20 regarding Defendants counting votes in secret is not supported by evidence.

21 35. Beadles alleges, without supporting admissible, credible, or reliable evidence, that  
22 there are “illegal functions within the election system,” *Compl.* at ¶¶48, 80, 91; *see also*  
23 *Opp.*(failing to provide or cite to admissible, credible, or reliable evidence). Beadles relies on

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1 his self-proclaimed expert Edward Solomon (“Solomon”),<sup>6</sup> and insists Solomon’s math has  
2 never been “debunked.” Solomon has no formal training or qualifications in statistics,  
3 mathematics, or elections sciences. Beadles falsely claims Solomon is “a witness to what  
4 happened in the Washoe County elections.” *Opp.* at p. 38, ln. 25. Beadles nonetheless does  
5 not refute the contention that Solomon lacks formal qualifications and cannot qualify as an  
6 expert in a court of law. *See Mot.* at p. 12; *Opp.* at pp. 37–40.

7 36. Moreover, the Nevada Supreme Court noted that in the 2020 Gilbert Contest, “none  
8 of the three experts could replicate the Solomon Report’s restoration calculations.” *Mueller*  
9 *v. First Jud. Dist. Ct. in and for Cnty. of Carson City*, no. 86064, 2023 WL 5317951 at \*3 (Aug.  
10 17, 2023)(unpublished disposition). In other words, Solomon’s findings on an illegal  
11 function in the election system were not credible and therefore debunked.<sup>7</sup>

12 37. Beadles is quick to offer various reports he presumably paid Solomon to create, but  
13 offers **no admissible evidence to support his allegations of illegal functions within the**  
14 **election system.** *See Opp.* Noticeably absent is any sworn statement from Solomon. *Id.* He  
15 proffers inadmissible screenshots of artificial intelligence Google Bard output.<sup>8</sup> *Opp.* at 39.

16 38. Beadles violated Rule 11 by proffering allegations regarding election integrity based  
17 Solomon’s dubious “math.” These claims are not supported by admissible or credible  
18 evidence. On the contrary, they are not supported by evidence. An artificial intelligence  
19 chatbot confirming math that relies on a false premise is neither admissible nor credible.

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21 <sup>6</sup> Solomon’s full name appears to be Edward King Solomon as Beadles’s Exhibit 130 filed on August 24,  
22 2023, identifies an email address of edwardkingsolomon@gmail.com.

23 <sup>7</sup> Solomon’s analysis is flawed from the outset. It is based on a flawed “premise that a ‘fair’ election is one in which  
24 the Election Day, early vote, and mail vote shares of candidates running for office are roughly similar.” *Defendant*  
25 *Joseph Lombardo’s Motion for Sanctions*, filed in Case No. 22 OC 000851B in the First Judicial District Court, at  
26 p.14. Governor Lombardo’s expert testified that “this fundamental premise is not grounded in academic  
literature or any other data adduced in this case.” *Id.* at 14, Ex. K.

<sup>8</sup> This is both inadmissible and unreliable. *See* NRS 50.285; NRS 52.015; NRS 51.065.

1 There is no legal authority that would allow a Plaintiff to avoid sanctions for Rule 11  
2 violations simply by providing flawed “google bard” or “chatGBT” output. Moreover, a  
3 Court found that one Solomon report, relying on the same “math” as Beadles presents  
4 here, “does not constitute the type of evidence ‘reasonably relied on by experts’ under NRS  
5 50.285(2).” *Order Granting Joseph Lombardo’s Motion for Summary Judgment*, Case No. 22 OC  
6 000851B, at p. 4 (FJDC of Nev., Aug. 11, 2022).

7 39. Additionally, the Court finds that Beadles’s improper purposes in filing the  
8 Complaint are further demonstrated by the inclusion of these allegations. Even if his  
9 allegations were true, they do not establish whether any Defendant has a duty to respond to  
10 Beadles’s petitions or whether Commissioner Hill, Manager Brown, and Ms. Rodriguez  
11 personally did anything to warrant their removal. Instead of pursuing legitimate claims,  
12 Beadles vexes and forces Defendants to respond to his allegations lacking evidentiary  
13 support.

14 40. Beadles’s allegations regarding election integrity are not supported by evidence. A  
15 reasonable inquiry would reveal that Solomon is unreliable and uncredible to opine on  
16 elections “math.” “A good faith belief in the merits of a case is insufficient to avoid  
17 sanctions.” *Tahfs v. Proctor*, 316 F.3d 584, 594 (6th Cir. 2003). The Court finds that relying  
18 on Solomon to allege there are illegal functions within Washoe County’s election system,  
19 national security issues, etc., was reckless and violated Rule 11.

20 **IV. Beadles’s Claims against the ROV are not Warranted by Law.**

21 41. A department of a county is not a suable entity because it is not political subdivision  
22 of the State of Nevada. *Wayment v. Holmes*, 112 Nev. 232, 237–38, 912 P.2d 816, 819; *see*  
23 *also Schneider v. Elko Cnty. Sheriff’s Dep’t*, 17 F. Supp. 2d 1162, 1165 (D. Nev.  
24 1998)(dismissing suit against a county sheriff’s department for lack of capacity to be sued).  
25 A county department is “immune from suit” because it is not a suable entity. *Wayment*, 112  
26 Nev. at 239, 912 P.2d at 820.



1 42. Beadles’s claims against the Registrar of Voters are not warranted by law. The  
2 Registrar of Voters is a department of Washoe County, and not a suable entity. This issue is  
3 straightforward, and Beadles was notified of the same as early as August 8, 2023. Providing  
4 no legal authority nor evidentiary support, Beadles claims “The [ROV] position and in her  
5 person are all suable entities.” *Opp.* at p. 22, ln. 15–16. In addition to this claim being  
6 groundless, Beadles’s initial filing and continued pursuit of this claim also shows this case  
7 was filed for improper purposes. This is precisely the activity Rule 11 seeks to punish—  
8 there is no basis or good faith argument for establishing a claim against the ROV here.

9 43. The Court finds that the claims against Defendant ROV are not warranted by  
10 existing law, or a nonfrivolous argument for extending, modifying, or reversing existing law  
11 or for establishing new law. Thus, Beadles violated Rule 11 when he filed those claims.

12 **V. The First Cause of Action Regarding Elections Petitions is not Warranted by Law.**

13 44. Beadles alleges that by not acknowledging and responding to the three documents  
14 he and others submitted to Defendants complaining about election processes and  
15 contesting the 2022 election, Defendants “deprived Plaintiff to have his grievances heard as  
16 enshrined in Nev. Const. Art. 1 § 10.” *Compl.* at p. 11–12. Article 1 Section 10 of the  
17 Nevada Constitution, titled “Right to assemble and to petition,” provides: “The people  
18 shall have the right freely to assemble together to consult for the common good, to instruct  
19 their representatives and to petition the Legislature for redress of Grievances.” Beadles’s  
20 allegations, specifically that the Washoe County Manager, Chair of the Washoe County  
21 Board of County Commissioners, and the Washoe County Registrar of Voters did not  
22 respond to his complaints, does not give rise to a claim under Article 1 Section 10 of the  
23 Nevada Constitution. Construing the Complaint broadly, there are no facts alleged that, if  
24 true, demonstrate that Defendants impeded Beadles’s right to assemble, to instruct his  
25 representatives, or to petition the Legislature. The Court finds that this claim under Article

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1 Section 10 of the Nevada Constitution is not warranted by existing law, or a nonfrivolous  
2 argument for extending, modifying, or reversing existing law or for establishing new law.

3 45. Next, Beadles alleges Defendants violated his rights under Article 2 Section  
4 1A(11) of the Nevada Constitution because he has a “constitutional right to pose  
5 grievances and have them resolved “fairly, accurately and efficiently,” but Defendants  
6 ignored his complaints. *Compl.* at p. 11–12. Article 2 Section 1A(11) provides that each  
7 registered voter in the State of Nevada has the right “to have complaints about elections  
8 and election contests resolved fairly, accurately and efficiently as provided by law.” This  
9 provision of the Nevada Constitution is codified in NRS 293.2546(11), the Nevada Voters’  
10 Bill of Rights.

11 46. The Nevada Secretary of State is the Chief Officer for Elections in the State. NRS  
12 293.124. As Chief Officer for Elections, the Secretary of State is responsible for the  
13 execution and enforcement of all provisions of NRS Title 24 and all other provisions of  
14 State and Federal law relating to elections in this State. *Id.* Consistent with this framework,  
15 NAC 293.025 provides, “A person who wishes to file a complaint concerning an alleged  
16 violation of any provision of title 24 of NRS must: 1. Submit the complaint in writing to  
17 the Secretary of State; and 2. Sign the complaint.” In addition to submitting complaints to  
18 the Secretary of State concerning any alleged violation of NRS Title 24 (NRS Chapters  
19 293–306), any registered voter may contest the election of a candidate by filing a Statement  
20 of Contest with the clerk of the district court. NRS 293.407.

21 47. Nothing in Nevada law required Defendants to respond to documents that, by law,  
22 were required to be submitted to the Nevada Secretary of State or the district court. As  
23 such, these claims are not warranted by law.

24 48. The law imposes no such duty to “respond,” and no such duty on Defendants  
25 specifically. *See* NRS 293.2546(11), NAC 293.025(requiring elections complaints be  
26 submitted to the Secretary of State).

1 49. The Court finds that the First Cause of Action against Defendants is not warranted  
2 by existing law, or a nonfrivolous argument for extending, modifying, or reversing existing  
3 law or for establishing new law. Thus, Beadles violated Rule 11 when he filed it.

4 **VI. The Second Cause of Action for Removal is not Warranted by Law.**

5 50. Beadles's Second Cause of Action, citing NRS 283.440 and NRS 266.430, demands  
6 Ms. Rodriguez's removal from her appointed position as Registrar of Voters, Manager  
7 Brown's removal from his appointed position as Washoe County Manager, and  
8 Commissioner Hill's removal from her elected position as Chair of the Washoe County  
9 Board of County Commissioners.

10 51. NRS 266.430 is a criminal statute that provides for the removal of the mayor or any  
11 municipal officer of an incorporated city or town who is adjudged guilty of nonfeasance,  
12 misfeasance or malfeasance by any court of competent jurisdiction. Setting aside that a  
13 member of the public cannot pursue criminal liability, Beadles relies on clearly inapplicable  
14 law. Defendants are employed by Washoe County, not an incorporated city or town, and  
15 this is a civil action. As such, NRS 266.430 is inapplicable as a matter of law.

16 52. Rather than address his claim not warranted by law, Beadles attempts to gaslight  
17 Defendants, stating Defendants "misinterpreted" and that "At no time does the Plaintiff  
18 claim relief or demand of the Court that NRS 266.430 be applied to the Defendants." *Opp.*  
19 at p. 22 ln. 22–26. His Complaint literally "demands" Commissioner Hill, Manager Brown,  
20 and Ms. Rodriguez's removal "under NRS 266.430." *Compl.* at ¶89. Stating otherwise in his  
21 Opposition, Beadles again violates Rule 11 in proffering a statement not supported by fact.

22 53. The parties seem to agree that NRS 266.430 provide a basis for Defendants'  
23 removal. *See Opp.* at p. 22. Beadles filed a claim not warranted by law, which violated Rule  
24 11. Beadles could have withdrawn this part of his second cause of action, but chose not to.

25 54. Relief sought under NRS 266.430 is not warranted by existing law, or a nonfrivolous  
26 argument for extending, modifying, or reversing existing law or for establishing new law.

1 The Court also finds that this further evidences Beadles’s improper purpose in bringing the  
2 present action.

3 55. Removal “is an extreme and extraordinary measure, intended only for extreme and  
4 extraordinary occasions.” *Jones v. Eighth Jud. Dist. Ct. of State*, 67 Nev. 404, 418, 219 P.2d  
5 1055, 1062 (1950). A public officer “who refuses or neglects to perform any official act in  
6 the manner and form prescribed by law, or who is guilty of any malpractice or malfeasance  
7 in office, may be removed therefrom...” NRS 283.440(1). The officer must have  
8 substantially failed to perform their legal duties or intentionally committed a wrongful act  
9 directly related to their duties. *Id.*; *Jones*, 67 Nev. at 408, 219 P.2d at 1057; *Schumacher v.*  
10 *State ex rel. Furlong*, 78 Nev. 167, 172, 370 P.2d 209, 211 (1962). Where there is no official  
11 duty to act prescribed by law, there can be no removal. *See* NRS 283.440(2); *Schumacher*, 78  
12 Nev. at 172, 370 P.2d at 211(citations omitted).

13 56. Beadles states generally, “Defendants... failed to fulfill the duties of their respective  
14 offices as alleged herein.” *Compl.* at ¶91. Beadles identifies no specific duty for which  
15 Defendants individually committed malpractice nor neglect. Beadles alleges that, “By  
16 failing to address the Petitions, Defendants have each violated their oath to office, Nevada  
17 Revised Statutes and Administrative Codes, and violated the Plaintiff’s constitutional  
18 rights.” *Compl.* at ¶46. As set forth above, there is no specific duty requiring Defendants to  
19 respond or address any of Beadles’s “petitions.” NRS 293.2546(11); NAC 293.025.

20 57. Beadles also states, “Defendants have additionally failed to address, correct, or  
21 rectify the issues raised in the underlying Petitions, including but not limited to, (1)  
22 updating and resolving the voter registration lists; (2) providing proper vote counting  
23 mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal  
24 function within the election system; (6) violations of election procedures as required under  
25 Nevada law. [Exhibit 109].” *Compl.* at ¶91; *see also Compl.* at ¶¶46–51. He again fails to

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1 identify any legal duty regarding this allegation that could warrant removal for malfeasance  
2 or nonfeasance.

3 58. The removal claim is not warranted by existing law, or a nonfrivolous argument for  
4 extending, modifying, or reversing existing law or for establishing new law. Beadles does  
5 not identify a specific legal duty for each of Commissioner Hill, Manager Brown, and Ms.  
6 Rodriguez. Beadles erroneously takes the position that his disagreement with Washoe  
7 County's election procedures warrants removal of public employees.

8 59. The Court finds that the Second Cause of Action is not warranted by existing law,  
9 or a nonfrivolous argument for extending, modifying, or reversing existing law or for  
10 establishing new law. Thus, Beadles violated Rule 11 when he filed those claims.

11 **VII. Many Requests for Relief are Not Warranted by Law.**

12 60. There is a vast disparity between the factual assertions made, the harm claimed, and  
13 the ultimate relief requested. The Court "cannot recognize a remedy absent an underlying  
14 cause of action." *Badillo v. American Brands, Inc.*, 117 Nev. 34, 41, 16 P.3d 435, 440 (2001).

15 61. In the removal action, removal is the only available remedy. *Armstrong v. Reynolds*,  
16 2:17-cv-02528-APG-CWH, 2019 WL 1062364 at \*8 (D. Nev. Mar. 6, 2019), *aff'd in part*,  
17 *rev'd in part and remanded*, 22 F.4th 1058 (9th Cir. 2022). For a writ of mandamus action, the  
18 relief would be equitable in the form of an order compelling a person to perform their  
19 official duty, and in some circumstances monetary damages. NRS 34.160; NRS 34.270.

20 62. Nevada law prohibits awards of punitive damages against government entities and  
21 employees. NRS 41.035(1). "An award may not include any amount as exemplary or  
22 punitive damages." *Id.*

23 63. In the present case, Beadles alleges he is entitled to punitive damages in his state law  
24 tort claims. As a matter of law, he is not. Beadles's pursuit of punitive damages in state law  
25 claims is unwarranted by law. The Court finds that the request for punitive damages is not  
26 warranted by existing law, or a nonfrivolous argument for extending, modifying, or

1 reversing existing law or for establishing new law. Thus, Beadles violated Rule 11 when he  
2 filed the same.

3 64. The Complaint requests unavailable relief, including invalidating provisions of the  
4 NRS, requiring Defendants use paper ballots, “[e]njoin the Defendants and make the  
5 digitized vote tally database (Microsoft SQL) open for public inspection,” require  
6 Defendants disclose applicant name and credentials, prohibit Defendants from using QR  
7 codes, “halt” Defendants’ expenditure of “unapproved and unsafe equipment and  
8 software.” The relief request is detached from any causes of action.

9 65. Beadles’s relief request is frivolous, and suggests that the Complaint was filed for an  
10 improper purpose rather than to resolve legitimate legal claims.

11 **VIII. Sanctions are Appropriate and Necessary.**

12 66. The Court may impose sanctions for violations of Rule 11. NRCP 11(c).  
13 Appropriate sanctions may include “reasonable expenses, including attorneys fees, incurred  
14 for presenting” the motion for sanctions. NRCP 11(c)(2). Nevada law further provides for  
15 attorney’s fees with regard to claims “brought or maintained without reasonable ground or  
16 to harass the prevailing party,” stating:

17 It is the intent of the Legislature that the court award attorney’s  
18 fees pursuant to this paragraph and impose sanctions pursuant to  
19 Rule 11 of the Nevada Rules of Civil Procedure in all appropriate  
20 situations to punish and deter frivolous or vexatious claims and  
21 defenses because such claims and defenses overburden limited  
22 judicial resources, hinder the timely resolution of meritorious  
23 claims and increase the costs of engaging in business and  
24 providing professional services to the public.

25 NRS 18.010(2)(b).

26 67. Courts across the nation have expressed concerns regarding “misuse of the judicial  
system to baselessly cast doubt on the electoral process in a manner that is conspicuously  
consistent with the plaintiffs’ political ends.” *Lake v. Hobbs*, 643 F.Supp.3d 989, 1010 (D.  
Az. 2022). “[F]alse claims based upon nothing but conjecture, speculation, and guesswork”  
are the “precise conduct Rule 11 is intended to deter.” *Trump v. Clinton*, 640 F.Supp.3d

1 1321, 1329 (S.D. Fl. 2022). Ordering Rule 11 sanctions on political claims with false  
2 allegations, the Southern District of Florida held:

3 [T]he courts are not intended for performative litigation for  
4 purposes of fundraising and political statements. It is harmful  
5 to the rule of law, portrays judges as partisans, and diverts  
6 resources that should be directed to real harms and legitimate  
7 legal claims. The judiciary should not countenance this  
8 behavior and it should be deterred by significant sanctions.

9 *Trump v. Clinton*, 640 F.Supp.3d at 1332–33.

10 68. A sanction “must be limited to what suffices to deter repetition of this conduct or  
11 comparable conduct by others similarly situated.” NRCP 11(c)(4). “The sanction may  
12 include nonmonetary directives; an order to pay a penalty into court; or if imposed on  
13 motion and warranted for effective deterrence, an order directing payment to the movant of  
14 part or all of the reasonable attorney’s fees and other expenses directly resulting from the  
15 violation.” *Id.*

16 69. The severity of the sanctions should take into account whether a filing is only  
17 frivolous or both frivolous and made for an improper purpose. *Townsend v. Holman*  
18 *Consulting Corp.*, 929 F.2d 1358, 1362 (1990). Where, as here, a complaint has no legal basis,  
19 an improper purpose may be inferred. *Agbabiaka v. HSBC Bank USA Nat. Ass’n*, Case No.  
20 09-05583 JSW, 2010 WL 1609974, at \*8) (N.D. Cal. Apr. 20, 2010)(quoting *Paciulan v.*  
21 *George*, 38 F.Supp.2d 1128, 1144 (N.D. Cal. 1999). The Ninth Circuit noted that “evidence  
22 bearing on frivolousness or non-frivolousness will often be highly probative of purpose.”  
23 *Townsend*, 929 F.2d at 1362.

24 70. Nonmonetary sanctions may also be appropriate. NRCP 11(c)(4). When  
25 appropriate, a Court may dismiss an entire offending Complaint. *See Rhinehart v. Stouffer*,  
26 638 F.2d 1169, 1170–71(9th Cir. 1979).

71. Reviewing NRCP 11’s federal counterpart, the Ninth Circuit held that Rule 11(b)  
“explicitly applies to parties not represented by attorneys.” *Warren v. Guelker*, 29 F.3d 1386,

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1 1390 (9th Cir. 1994). Thus, a court cannot decline to impose sanctions “where a violation  
2 has arguably occurred, simply because plaintiff is proceeding pro se.” *Id.*

3 72. Beadles violated Rule 11 in signing a pleading containing claims not supported by  
4 evidence and not warranted by existing law or by a nonfrivolous argument for extending,  
5 modifying, or reversing existing law or for establishing new law, for forum shopping, and  
6 for filing a complaint for improper purposes. Sanctions are appropriate, including a  
7 monetary sanction paid to the court, an award of Defendants’ attorneys’ fees and costs,  
8 and dismissal of this action.

9 73. Beadles improperly seeks to use the judicial system to legitimize his conspiracy  
10 theories. Before any ruling on the merits of his case, he claimed in a blogpost that he  
11 “proved,” in this case, that there is no election transparency, the existing signature  
12 verification is flawed, “[t]here is an illegal function in the election system flipping votes,  
13 which is stealing elections from all of us,” the voting equipment is unreliable, etc.

14 74. Beadles’s refusal to take accountability and to resolve even the minor and irrelevant  
15 false allegations display a disregard and disrespect for the rules. Sanctions are appropriate  
16 to punish current Rule 11 violations and to deter future Rule 11 violations.

17 75. An award of attorneys’ fees and costs to Defendant is appropriate. Defendants have  
18 already expended substantial time responding and addressing Beadles’s frivolous filings.  
19 Moreover, taking into account Beadles’s wealth, which he does not deny exists, a  
20 substantial fine to both the Second Judicial District Court and First Judicial District Court  
21 sanction funds is appropriate. Additionally, because the claims lack any basis in law,  
22 dismissal with prejudice is appropriate.

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**JUDGMENT**

Therefore, based on the above Findings and Fact and Conclusions of Law made by this Court, and good cause appearing, the following Judgment is entered by the Court:

**IT IS HEREBY ORDERED** that Defendants' Motion for Sanctions is **GRANTED**.

**IT IS HEREBY FURTHER ORDERED** that this case is **DISMISSED WITH PREJUDICE**.

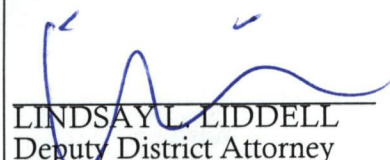
**IT IS HEREBY FURTHER ORDERED** that within thirty days of service of this Order, Defendants shall file and submit their memorandum of attorneys' fees and costs.

**IT IS HEREBY FURTHER ORDERED** that within thirty days of service of this Order, Robert Beadles shall submit payment to the Second Judicial District Court's sanction fund in the amount of \_\_\_\_\_, and payment to the First Judicial District Court's sanction fund in the amount of \_\_\_\_\_.

Dated \_\_\_\_\_.

\_\_\_\_\_  
JAMES T. RUSSELL  
DISTRICT JUDGE

Submitted on September 28, 2023 by:

  
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COUNTY REGISTRAR OF VOTERS,  
ERIC BROWN, ALEXIS HILL,  
and WASHOE COUNTY