

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

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

6 MR ROBERT BEADLES, an individual,

Case No.: CV23-01341

7 Plaintiff,

Dept. No.: 1

8 vs.

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

15 Defendants.
16

17 **MOTION IN REQUEST OF SUR-REPLY**

18 Plaintiff Robert Beadles respectfully requests that this Honorable Court grant permission to file a
19 Sur-Reply in response to the Defendant's Reply to Plaintiff's Opposition to the Motion to Dismiss.
20

21 **I. ABILITY TO SUBMIT SUR-REPLY RESPONSES**

22 The authorities suggest that it is generally within the court's discretion to allow or deny a sur-reply,
23 although there is no explicit rule or statute in Nevada that directly addresses the issue. In *Gong v.*
24 *Fed. Nat'l Mortg. Ass'n*, No. 63857 (Nev. Apr. 17, 2015), the Nevada Supreme Court granted a
25 motion to file a sur-reply, which implies that the court has discretion in this matter. Similarly, in
26 *Brown v. Washoe Cnty. Dist. Attorney (In re Estate of Klein)*, 373 P.3d 926 (Nev. 2011), the court
27 stated that a party should generally seek permission from the court to file a sur-reply, which also
28

1 implies that the court has discretion to allow or deny the filing. The plaintiff hereby requests that this
2 honorable court allow him to file a sur-reply.

3 **II. THE PURPOSE OF THE SUR-REPLY:**

4 The Plaintiff does not wish to revisit all the details, evidence, and arguments previously outlined in
5 the Opposition to the Motion to Dismiss. Instead, the Plaintiff respectfully requests that all prior
6 pleadings and exhibits be incorporated into the Sur-Reply. The purpose of this Sur-Reply is to
7 correct several inaccuracies asserted by the defense that appear to be new or expounded upon
8 arguments from their initial Motion to Dismiss. It should be noted that the Plaintiff never intended to
9 fully argue the case solely through the original complaint. Rather, the Plaintiff followed the
10 guidelines of notice pleading, with the expectation of presenting further evidence, utilizing discovery
11 tools, and making a case before a jury in due course.
12

13
14 The Sur-Reply would address the following:

15
16 **III. Illegal Election Function, Solomon Was Never Debunked as Defense Claims**

17 If the Sur-Reply is granted, the Plaintiff would expand to completely refute the Defense's claim that
18 Mr. Solomon's "math" has been "debunked."

19
20 The defense states now, "In his 119-page Opposition, Beadles implores this Court to allow this case
21 to move forward based on the purported output of an artificial intelligence chat robot and he spends
22 more than a dozen pages walking through a mathematical algorithm the Nevada Supreme Court has
23 already deemed so lacking in arguable merit that reliance on it is sanctionable."
24

25 First, it is not Mr. Solomon's "math" or opinion; it is what the state's own certified, under perjury,
26 election results state. No one has ever successfully "debunked" Mr. Solomon. In fact, dozens of
27 PhDs have tried; all have failed. The Defense falsely claims it's accepted and concluded Solomon is
28 wrong. That is false as well. The Defense states in Gilbert v. Lombardo, Solomon was debunked;

1 that is false, again. The truth is, Gilbert's Counsel, Craig Mueller, failed via incompetence or
2 betrayal to show both prongs of 293.410, which reads:

3 **NRS 293.410 Statement of contest must not be dismissed for deficiencies of form; grounds for contest.**

4 1. A statement of contest shall not be dismissed by any court for want of form if the grounds of contest are
5 alleged with sufficient certainty to inform the defendant of the charges the defendant is required to meet.

6 2. An election may be contested upon any of the following grounds:

7 (a) That the election board or any member thereof was guilty of malfeasance.

8 (b) That a person who has been declared elected to an office was not at the time of election eligible to that
9 office.

10 (c) That:

11 **(1) Illegal or improper votes were cast and counted;**

12 **(2) Legal and proper votes were not counted; or**

13 **(3) A combination of the circumstances described in subparagraphs (1) and (2) occurred, in an amount
14 that is equal to or greater than the margin between the contestant and the defendant, or otherwise in an
15 amount sufficient to raise reasonable doubt as to the outcome of the election.**

16 Mueller, on his own, left out most of Gilbert's evidence, then, without Gilbert being able to read,
17 decided to file the election contest. In the contest, he only showed that "illegal votes" were cast but
18 without showing that the amount was equal or greater than the margin between Gilbert and
19 Lombardo. Solomon showed the illegal votes were cast via the state's own certified election results
20 and showed that it was enough to prove Gilbert was the actual winner. Mueller failed to add the
21 "restoration" (the proof the votes were equal or greater than the margin) to the Election Contest, thus
22 the case was dismissed, and sanctions were granted. Quoting directly from page 5 of [Exhibit 147], it
23 clearly states, "even if his claim regarding mathematical or geometric 'impossibility' was true, Mr.
24 Gilbert still did not have any competent evidence to demonstrate that he won the 2022 Primary as
25 would be required to prevail under NRS 293.410(2)."

26 Additionally, quoting directly from page 6 in [Exhibit 148], "Mueller alternatively contends that the
27 district court misconstrued NRS 293.410 as requiring evidence of 'restoration.' Admittedly, NRS
28 293.410 does not use the term 'restoration.' But it is evident from the record that the district court
used that term synonymously with the statutory language 'change[d] the result of the election' and
that had the statement of contest not been premised on the concept of 'restoration' and used that term,

1 the district court would not have used that term in its orders. To this end, in granting Governor
2 Lombardo's motion for summary judgment, the district court made its stance as clear as possible that
3 it was not basing its decision on 'restoration' but that it was 'relying upon the fact that [the court did
4 not] have any information, if all of the math [in the Solomon Report] is correct, that there's a
5 difference in voting of 1 or 1,000 or 10,000 or any other number.'"

6
7 Solomon's "math" was never debunked, nor disproven, as shown in the Plaintiff's Opposition to
8 Motion to Dismiss. Instead, Gilbert's counsel failed to do his job and present all the evidence. That is
9 one of many reasons Gilbert has been in litigation against Mueller since the spoiled outcome of the
10 election contest. The defense continues to mislead this court; Solomon has never been disproven. He
11 is, in fact, a witness to what happened in the Washoe County elections; he simply found that there is
12 an impossible, illegal function within the election system. The defense wants to state that because
13 the Plaintiff fails to state who put it there, how it happened, it's not a problem, nothing to see here,
14 move along. It's like a witness finding a murder victim who has been stabbed, with a knife in the
15 victim's back; the witness doesn't know who stabbed the person, only that the person is dead, there's
16 a knife in the victim's back, and that it's the authorities' job, not the witness's nor the plaintiff's, to do
17 law enforcement's job and solve the "who done it." The facts are simple: the certified election results
18 show that in the two largest counties, separated on opposite sides of the state, all the precincts voted
19 identically, while the other 15 counties and Carson City did not. The defense tries to discount the
20 additional comparison showing that the multi-billion-dollar artificial intelligence platform known as
21 Google's Bard additionally concurred that, by looking at the county's own certified election data, the
22 Washoe County elections are rigged [Exhibit 129]. The outcome of this "illegal function" cost
23 numerous candidates their elections and all legal voters their right to suffrage. Those are the facts.
24 It's not the Plaintiff's job to tell this honorable court who did it, but rather that it happened, and here's
25 the proof [Exhibits 104, 105]. As stated in the Plaintiff's Opposition to Motion to Dismiss, the
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1 defendants have the power to stop using all electronic voting and tabulation machines. The defense
2 is trying to mislead this court and say they don't have the power when NRS clearly shows they do,
3 and that is one of many remedies the Plaintiff seeks. Our votes are our only voice in determining the
4 change we want to see in our county. Our voices are being stolen from us all. This honorable court
5 has the ability to right this wrong going forward. The remedy sought is straightforward: the
6 defendants will cease using all election voting and tabulation machines and will use paper ballots,
7 counted by hand, and reported, by person, in the voters' precincts.
8

9 NRS 244.194: Boards of county commissioners may rent, lease or otherwise acquire voting or counting devices
10 in whatever manner will best serve local interests.

11 NRS 293B.105 General authority. The board of county commissioners of any county or the city council or other
12 governing body of any city may purchase and adopt for use at elections any mechanical voting system and
13 mechanical recording device. The system or device may be used at any or all elections held in the county or
14 city, for voting, registering, and counting votes cast.

15 293B.110 Adoption of different systems or devices for different precincts or districts. A mechanical voting
16 system or mechanical recording device may be adopted for some of the precincts or districts in the same county
17 or city, while the remainder of the precincts or districts in that county or city may be furnished with paper
18 ballots or any other mechanical voting system or mechanical recording device.

19 N.R.S. 293.269925 Establishment of procedures for processing and counting mail ballots. 1. The county clerk
20 shall establish procedures for the processing and counting of mail ballots.
21

22
23 In the first three NRS cited, the language indicates that the defendants "may" use machines,
24 suggesting they have discretion in this matter. In contrast, NRS 293.269925 mandates that the
25 Registrar of Voters (ROV) "shall" create procedures for counting ballots, which—as evidenced by
26 the 2022 Nye County Elections—can be conducted manually.
27

28 If the motion is granted, the Plaintiff will present dozens of additional examples to unequivocally

1 demonstrate that Solomon has never been debunked. The Plaintiff will further argue that there is
2 most certainly an illegal function that is flipping the votes of legal voters in Washoe County.

3 **IV. DEFENDANTS HAVE A DUTY TO FOLLOW THE LAW**

4 If the motion is granted, the Plaintiff will greatly expand on the defendants' duties to follow the law,
5 as the defense is essentially claiming that the defendants have no such duty. "There are no laws
6 specifically prescribing a duty for a county commissioner or a county manager to perform any of the
7 acts set forth in the Complaint," is stated on page 17 of the defense's reply.
8

9
10 The Plaintiff has identified 24 Nevada Revised Statutes (NRS) that the defendants have allegedly
11 violated, as indicated in the original complaint. Dozens more are pointed out within the supplemental
12 exhibits filed alongside the original complaint, including [Exhibit 109, which additionally pointed to
13 Exhibits 16-22]. Many of these NRS violations could result in prison sentences and fines; surely, the
14 defendants have a duty to abide by the law? What about court orders? The defendants have violated
15 the Plaintiff's court orders. Is this honorable court and it's orders now irrelevant to the defendants?
16

17 If the defense is correct and the defendants have no duty to follow the law, this would fundamentally
18 undermine the rule of law, leading to chaotic and arbitrary governance. If the defendants are not
19 bound by the law, then neither would any citizen be, resulting in untenable anarchy.
20

21 The defendants are not just morally but also legally obligated to obey the law. Ignoring this
22 obligation would lead to societal breakdown, fundamentally opposing the principles of democratic
23 governance they are sworn to uphold.
24

25 The defense further argues that the defendants' oaths to uphold the Constitution, State and Federal
26 laws, and their offices do not make them duty-bound. They claim that the 1st and 2nd Articles in the
27 Nevada Constitution do not obligate them to address grievances or ensure that elections are
28 conducted lawfully.

1 In re Raggio, 487 P.2d 499 (Nev. 1971), states, "The obligation of this court to follow and apply
2 controlling decisions of the United States Supreme Court is written in our Nevada Constitution
3 Article 1, Section 2, and that obligation must be discharged fearlessly and without regard to
4 consequences."

5
6 In Caruso v. The Eighth Judicial District Court of the State, 509 P.3d 604 (Nev. 2022), it states, "It is
7 well-settled that where the Constitution's language is clear, this court will interpret the Constitution
8 according to its plain language and will not look beyond that language."

9
10 The language and duty are clear. "To have complaints about elections and election contests resolved
11 fairly, accurately and efficiently as provided by law," is enshrined in Nev. Const. Art. 2 Sec. 1A § 11
12 and NRS 293.2546 (11).

13
14 The Plaintiff will further clarify that NRS Chapter 197 deals with "Crimes by Public Officers,"
15 outlining what constitutes misconduct, malfeasance, or failure to perform duties. NRS 282.020
16 outlines the oath of office for public employees and makes it clear that they are bound to uphold
17 state and federal law. The U.S. Supreme Court case United States v. Nixon, 418 U.S. 683 (1974),
18 also affirmed that no person, not even the President of the United States, is above the law.

19
20 If this motion is granted, the Plaintiff will elaborate extensively on the defendants' duties to abide by
21 the law, and on the defendants' lack of attention to the grievous election issues, which have thus
22 created a National Security Issue. The Plaintiff will detail the NRS violations alleged against each
23 defendant and clarify the severity of potential prison sentences or fines per violation. This aims to
24 further demonstrate that the defense is misleading this court by claiming that the defendants have no
25 duty to act or follow existing laws.

26
27 **V. THE EXHIBITS FILED ARE NOT ROGUE**

28 The defense now states that Beadles has thus far filed two rogue sets of "supplemental exhibits:" "(1)

1 the Supplemental Exhibits in Support of Plaintiff's Complaint filed on August 9, 2023, and (2) the
2 Supplemental Exhibits in Support of Plaintiff's Motions filed on August 24, 2023."

3 If the motion is approved, the plaintiff will provide further elaboration on why the submitted exhibits
4 should be accepted by the court. Exhibit 109, which includes 35 claims and the remedies sought, was
5 clearly filed alongside the original complaint. This exhibit explicitly points to "Supplemental
6 Statements 16-22" and the other exhibits. The submissions filed on 8/9 and 8/24 was designed to
7 supplement the case before any citations were issued, giving this honorable court more evidence to
8 consider, especially if the trial were to be conducted in chambers. These additional filings were
9 made in part due to the possibility that, under Nevada Revised Statute 283.440, the honorable court
10 would have more comprehensive proof supporting the allegations in the complaint. It's important to
11 note that a complaint need not lay out the entire case; it only needs to comply with notice pleading
12 requirements. The defense has attempted to discredit the compelling evidence of legal violations
13 presented in these exhibits. The plaintiff, therefore, seeks the opportunity to further elucidate these
14 points so they may be fully assessed on their merits.
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18 **VI. Plaintiff Stated Claims and Remedies in Complaint and Causes of Actions**

19 If this motion for Sur-Reply is granted, the Plaintiff will additionally show how the defense
20 continues to omit the fact that there are over 119 claims and remedies sought in the original
21 complaint and supplemental statements. [Exhibit 109] clearly points to [Exhibits 16-22],
22 where 100 claims and remedies are sought. In the actual pages of the original complaint, it
23 clearly requests 19 remedies on pages 15 and 16 alone. Within the causes of action 1 and 2, it
24 clearly states claims on lines 80, 81, 90, 91, 92, and 93. Within those lines, claims such as
25 "Defendants through their acts of malpractice, malfeasance, and or nonfeasance have failed
26 to perform their duties and have harmed and will continue to harm plaintiff" and
27
28

1 "Defendants, and each of them, have failed to fulfill the duties of their respective offices as
2 alleged herein," are shown. It was the Plaintiff's intent to bring in evidence of allegations
3 such as theft of county property by Defendant Hill, Defendant Brown using his position to
4 keep his wife out of a DUI and jail, and Defendant Rodriguez breaking court orders and
5 robbing every Washoe voter of their right to suffrage, etc. On lines 80 and 91, claims state
6 many of the issues addressed in [Exhibits 16-22, and 109]. It was never the Plaintiff's intent
7 to litigate this case through his original complaint, but the defense seems hell-bent on it.
8 Therefore, if the motion for Sur-Reply is granted, the Plaintiff would like the opportunity to
9 properly address these inaccuracies. Furthermore, the Plaintiff will demonstrate how this
10 honorable court and the defendants have the ability to grant most, if not all, of the remedies
11 sought.
12

13
14 **VII. DEFENSE RELEASED SANCTIONS LETTER 21 DAYS BEFORE IT WAS**
15 **PUBLIC RECORD**
16

17 The defense continues to mislead this honorable court, at best. In Exhibit 124 in case CV23-01283,
18 the defense sent the motion for sanctions to the media without an NRS 239 request by reporter Mark
19 Robison. By law, the Plaintiff has 21 days to decide whether or not to dismiss a case prior to the
20 letter being released and sanction proceedings beginning. Instead, it appears that the motion was not
21 only sent to the media but also sent to the media prior to being sent to the Plaintiff. It was sent to the
22 media 21 days before becoming a public record. This was a blatant attempt to make the Plaintiff's
23 case appear in the public eye as the "rantings of a conspiracy theorist" [Exhibit 132]. These actions
24 are breaches of Rule 3.6(a) and also impair the Plaintiff's ability to receive a fair trial. This
25 calculated strategy to manipulate public perception constitutes an act unbecoming of an officer of the
26 court.
27
28

1 **VIII. NRS 283.440 IS NOT VAGUE**

2 If this motion is granted, the Plaintiff will address the defense's claim that NRS 283.440 is too vague
3 to be enforced and does not apply to the defendants. The defense also attempts to mislead this
4 honorable court by suggesting that AB397 somehow defines what NRS 283.440 is. The Plaintiff will
5 demonstrate that his argument is not incomprehensible, as the defense suggests, but rather quite
6 clear. NRS 283.440 specifies that it is applicable to any person in any office and explicitly lists the
7 exceptions to whom it does not apply. The defendants are not among those exceptions, making the
8 statute clear to the Plaintiff and, presumably, most readers, contrary to the defense's claim of
9 vagueness.
10

11 In *State v. Lincoln Co. P.D.*, 60 Nev. 401 (Nev. 1941), it is stated, "Every presumption is in favor of
12 the validity of a statute, *Ex parte Goddard*, 44 Nev. 128, 190 P. 916, and a statute will always be
13 sustained if there is any reasonable doubt of its unconstitutionality. *State v. Westerfield*, 24 Nev. 29,
14 49 P. 554, 2."
15

16 The defense omits the serious allegations the Plaintiff brings against the defendants. Citing *Jones v.*
17 *Eighth Jud. Dist. Ct. of State*, 67 Nev. 404, 418, 219 P.2d 1055, 1062 (1950), the defense states,
18 "Removal 'is an extreme and extraordinary measure, intended only for extreme and extraordinary
19 occasions.'" The Plaintiff will show that intentional law-breaking, abuse of office for personal gain,
20 robbing every Washoe County voter of their right to suffrage, and violating court orders are all
21 "extreme and extraordinary measures" that unequivocally merit removal from office, if proven true.
22
23

24 The defense additionally tries to use a weak argument and states that the statute has only been used
25 on elected officials; well, there is a first time for everything, isn't there? The statute is clear and
26 specifies to whom it doesn't apply. The defendants' positions, nor the terms "non-elected" or
27 "appointed," were ever mentioned. The Plaintiff will further demonstrate that NRS 283.440 is
28

1 applicable to the defendants if the motion is allowed to proceed. Additionally, the Plaintiff will
2 provide further evidence that the defense is attempting to mislead this honorable court by asserting
3 that AB397 and NRS 283.440 are the same or that one has replaced the other. The defense's own
4 exhibits, if properly examined, clearly show that they are two distinct legal matters, which the
5 plaintiff will greatly expand upon if the motion is granted.
6

7 **IX. IF NO REMEDY IS AVAILABLE, COURT CAN STILL ISSUE REMEDY**

8 If the motion is allowed, the Plaintiff would like to further elaborate on the defense's claims that no
9 remedies are allowed. While the Plaintiff strongly disagrees and believes this to be untrue, a simple
10 glance at NRS 283.440 shows that if the Plaintiff is successful, the defendants will be removed from
11 office. That is the remedy the Plaintiff seeks. Additionally, simply looking at remedy VIII on page
12 15 of the Plaintiff's original complaint asks this honorable court to enjoin the defendants to follow all
13 those NRSs. Just these two simple facts obliterate the defense's argument. The Plaintiff strongly
14 believes that this honorable court and the defendants can grant most, if not all, remedies the Plaintiff
15 seeks.
16

17
18 However, for the sake of argument, let's pretend that in Nevada this honorable court has no power to
19 grant any remedy the Plaintiff seeks. In this absurd scenario, one simply needs to look to case law
20 that demonstrates this honorable court does have the power to create and issue remedies when none
21 may seem available. This is known as the court's equitable power. Equitable power is the court's
22 authority to fashion remedies that are fair and just, even if they are not available under the law. The
23 Nevada Supreme Court has held that "courts of equity have the power to fashion remedies to fit the
24 circumstances of each case." This means that the court is not limited to the remedies that are
25 specifically provided for by statute or common law.
26

27 In *Bedore v. Familian*, the Nevada Supreme Court states that "district courts have full discretion to
28

1 fashion and grant equitable remedies." See *Bedore v. Familian*, 122 Nev. 5 (Nev. 2006). Additional
2 citations include *Alaska Plastics*, 621 P.2d at 274-75; *Hammes v. Frank*, 579 N.E.2d 1348, 1355
3 (Ind. Ct. App. 1991) (stating that "[t]he trial court has full discretion to fashion equitable remedies
4 that are complete and fair to all parties involved"); *Maddox*, 669 P.2d at 237; *Vorachek v. Citizens*
5 *State Bank of Lankin*, 421 N.W.2d 45, 54-55 (N.D. 1988); and *Delaney*, 564 P.2d at 288-89.

6
7 If the motion is granted, the Plaintiff will elaborate further with numerous case law and authorities
8 that show this honorable court has the ability to grant the Plaintiff's remedies sought or has the
9 power to create remedies.

10
11 **X. THE BUCK DOES NOT STOP WITH THE NAC OR SOS**

12 If the Plaintiff is granted this motion, he will address the new falsehood that the defense has
13 presented to this honorable court, where they claim, "Beadles is not the Nevada legislature, nor the
14 Nevada Secretary of State. He does not have the power to enact the laws governing elections or
15 implement regulations on how elections are conducted or how election complaints should be
16 handled. Beadles's preferences for how elections should be conducted, how his complaints should be
17 addressed, and his various theories of past election fraud, which have been soundly rejected by every
18 competent court to address them, do not state viable claims upon which relief can be granted."

19
20 The Plaintiff will demonstrate that the remedies sought are not an attempt to assume the role of the
21 Secretary of State (SOS) or the Legislature. Rather, they are procedures and options already allowed
22 by existing law that the defendants can enact. The fact that they have not done so provides a lens into
23 why Washoe County experiences so many election issues and has to "take it down to the studs, and
24 start over," as Defendant Brown stated in [Exhibit 101].

25
26
27 Furthermore, the Plaintiff will prove that no court, in any jurisdiction, has ever disproved Beadles'
28 claims, thereby showing that the defense is once again providing false information to this court. The

1 Plaintiff will also elaborate on how the Nevada Administrative Code (NAC) is subordinate to the
2 Nevada Revised Statutes (NRS), which in turn is subordinate to the Constitution.

3 The Plaintiff will provide evidence, including [Exhibits 23, 24, 126, and 127], to demonstrate that he
4 did, in fact, petition the SOS numerous times, using the SOS's own forms, as suggested by the NAC
5 and NRS. These petitions have gone unanswered or have been misrepresented by the defendants,
6 thereby providing no relief or remedy to the Plaintiff.
7

8 The Plaintiff will demonstrate with detailed precision how every properly filed violation, complaint,
9 petition, and even emails, have gone without remedy from the SOS or the defendants. The Plaintiff
10 is in this honorable court to seek justice when the normal channels, as prescribed by law, have failed.
11 When the defendants and the SOS fail to adhere to the law, the last line of defense is this honorable
12 court. The Plaintiff will expand on this in great detail, presenting evidence ranging from emails and
13 postal records to SOS forms, violation reports, and petitions, if the motion is granted.
14

15 **XI. ADDRESSING ADDITIONAL ARGUMENTS**

16 If this motion to sur-reply is granted, the Plaintiff will further go through the defense's reply and
17 address all the additional new arguments brought forth in their reply. Plaintiff will also address how
18 the defense filed their reply in the wrong court, D9, instead of this honorable court, D1.
19

20 Additionally, clarifying numerous errors in their reply, misstating facts like the officials removed
21 from office, and their actual positions instead of what they stated. Plaintiff will also address in detail
22 that the defense is clearly trying to mislead or outright lie to the court when they state numerous
23 times NRS that do not apply to the Plaintiff's case. One of many examples is, "Secretary of State or
24 District Court. NRS 293.407; NAC 293.025." The defense tries to mislead this court and say the
25 Plaintiff must follow those laws to address past election fraud. That's ridiculous as Plaintiff is not
26 "contesting" a past election; he is showing how the Washoe Election system as a whole is
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28

1 completely untrustworthy and filled with fraudulent occurrences, that he will prove in court. Plaintiff
2 will additionally address non-existent NRS the defense is now quoting, in their attempt to state
3 Plaintiff has no cause of action or remedy due to these NRS. That would be correct as the NRS does
4 not exist. Plaintiff will rip apart their reply and demonstrate example by example how the defense is
5 misleading this court and how every Washoe voter is being damaged by the defenses unethical and
6 disgraceful treatment of this most serious atrocity of our right to suffrage.
7

8 XII. CONCLUSION

9
10 Your Honor, before delving into any other matter, it is of utmost importance to address the issue of
11 change of venue. I respectfully submit that for the interests of justice, a different forum is more
12 appropriate for the adjudication of this case. Should the Court disagree, I implore it to make that
13 ruling before entertaining any prior pleadings, so the substantive matters may be addressed
14 accordingly.
15

16 Should we proceed in this venue, I wish to clarify that I never intended for my original complaint to
17 serve as my sole argument in this litigation. Being in a notice pleading state, the objective of the
18 initial filing is to provide a "short and plain statement" of my case, leaving room for discovery and
19 trial to flesh out the specifics. To that end, I respectfully ask this Court to grant my motion to issue a
20 sur-reply. This additional pleading will serve to further clarify my position and directly address new
21 arguments that have been raised by the Defense.
22

23 Your Honor, you have the power to do what is right, for me and for all of Washoe County. The
24 citizens here are burdened with the belief that their elections are rigged, that their voice no longer
25 matters. This case presents an opportunity to change that perception, to hold officials accountable for
26 alleged crimes, malpractice, malfeasance, nonfeasance, and the National Security Issue they have
27 created and allowed to occur. This is about protecting the rule of law, and by extension, the very
28

1 principles that our society holds dear.

2 I look forward to the opportunity to engage in oral arguments, to utilize discovery tools, and to
3 proceed to trial to prove the allegations set forth in my complaint. Right is right, and wrong is
4 wrong. I implore the Court to uphold the integrity of its oath, even if the Defendants do not.
5

6 Thank you for considering these matters.

7
8 Dated: 9/7/23

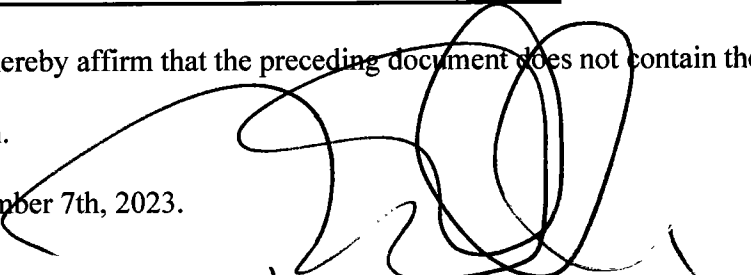
9 
10 Respectfully submitted,

11 By: _____
12 ROBERT BEADLES, Plaintiff Pro Se

13 **AFFIRMATION PURSUANT TO NRS 239B.030**

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

16
17 DATED: September 7th, 2023.

18 
19 Robert Beadles, Plaintiff

20 **CERTIFICATE OF SERVICE**

21 Pursuant to NRC 5(b), I hereby certify that on September 7th, 2023, I electronically filed the
22 foregoing with the Clerk of the Court by using the e-flex filing system which served all parties of
23 record electronically.

24 
25 Robert Beadles, Plaintiff
26
27
28

Exhibit Glossary

Exhibit 147 Gilbert V Lombardo Sanctions 5 pg.

Exhibit 148 Order denying petition 7 pg.