



One South Sierra Street
Reno, Nevada 89501

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Christopher J. Hicks
District Attorney

August 16, 2023

Via U.S. Mail:

Robert Beadles
10580 N. McCarran Blvd. #115, Apt. 386
Reno, NV 89503

Via Email:

robertbeadles@protonmail.com
beadlesmail@gmail.com

Re: *Robert Beadles v. Jamie Rodriguez, et al.; Second Judicial District Court case number CV23-01341*

Dear Mr. Beadles,

Enclosed is a proposed motion for sanctions that will be filed with the Court after 21 days, as provided by NRC 11(c), unless your new Complaint, the Motion to Request Judge Simons, 2nd Motion to Request Judge Simons, Motion to Change Venue, and Motion to Recuse Judge filed in case number CV23-01341, case are withdrawn in their entirety. The Nevada Rules of Civil Procedure, just like the Federal Rules of Civil Procedure has a Rule 11 prohibiting parties from filing for improper purposes, alleging facts without evidentiary support, and for pursuing claims without legal bases.

You filed an improper Complaint, duplicating claims in the first case you filed and then dismissed. This case was filed for improper purposes, including to needlessly increase the cost of litigation and to forum shop. As with the first case, this case was also filed for the improper purpose of harassing and vexing Commissioner Hill, Manager Brown, and Jamie Rodriguez. Each of these are improper purposes in violation of Rule 11.

As set forth in detail in the proposed Motion, your claims continue to lack basis in law and fact. Oddly, you continue to pursue claims against the Office of the Registrar of Voters, which is not a suable entity. Your removal claim fails to set forth any actual malfeasance or nonfeasance of an official duty to act. As you were previously informed, there is no obligation for any of the Defendants to respond to your "petitions." Elections-related complaints are handled by the Secretary of State, who has a duty to *resolve* – not necessarily respond – to those complaints. You were previously put on notice that your claims violated Rule 11. Your continued pursuit of these claims demonstrates their frivolity and your improper purpose in so filing.

Justice First, People Always



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Additionally, your two Motions to Request Judge Simons, the Motion to Change Venue, and the Motion to Recuse Judge are inappropriate and without legal basis. Judge and forum shopping is disfavored and sanctionable.

I again offer you an opportunity to withdraw your frivolous Complaint in its entirety before the attached Motion for Sanctions is filed in your duplicative extortionate case. I also offer you an opportunity to withdraw the Motions to Request Judge Simons, Motion to Change Venue, and the Motion to Recuse Judge. Pro se parties are not immune from Rule 11 sanctions in Nevada State Courts. NRCPC 11(c)(1) ("the court may impose an appropriate sanction on any...party that violated the rule or is responsible for the violation").

Sincerely,

CHRISTOPHER J. HICKS
Washoe County District Attorney

By: /s/ Lindsay Liddell
LINDSAY L. LIDDELL
Deputy District Attorney

LLL