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

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

MR ROBERT BEADLES, an individual,

Plaintiff,

Case No.: CV23-01341

Dept. No.: 9

vs.

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

Defendants.

MOTION TO CHANGE VENUE

TO THE HONORABLE COURT:

COMES NOW, the Plaintiff, Robert Beadles, and pursuant to [Relevant Rule/Statute if applicable], hereby moves this Court for an order changing the venue of the above-captioned case for the reasons stated herein:

1 **Introduction:** The present action was filed in Washoe County to address alleged violations of
2 Nevada Constitution Articles 1, 2, 15, the Voter's Bill of Rights, and malfeasance and nonfeasance
3 by the Defendants. The Plaintiff contends that the prevailing local conditions and recent actions of
4 the Defendants severely compromise the prospect of a fair trial in this jurisdiction.
5

6 **Media Bias:** Assisted by local media outlets, the Defendants have advanced an imbalanced and
7 partial narrative concerning the case's merits. This media effort involves revealing non-public
8 records and aiming to portray the Plaintiff's claims as lacking validity, even though substantial
9 corroborative evidence exists. Nowhere has the Plaintiff encountered a scenario in which the
10 District Attorney's office has collaborated with the media as extensively as evident in the attached
11 text messages, issued defamatory, slanderous, or biased materials, or given rise to the perception
12 of a trial by ambush.
13

14
15 **Improper Release of Non-Public Records:** As evidenced by attached media releases and text
16 messages with Mark Robison, an RGJ reporter, the Defendants have inappropriately shared non-
17 public records with the media. This action not only skews the narrative against the Plaintiff but
18 also puts into question the Defendants' commitment to justice and transparency.
19

20 **Conflicts of Interest with Court Officials:** The Plaintiff has valid reasons to assert that certain
21 court officials, inclusive of judges and clerks in Washoe County, share professional and personal
22 affiliations with the Defendants. Such affiliations breed an appearance of impropriety,
23 undermining the Plaintiff's trust in obtaining an impartial trial.
24
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1 **Request for Change of Venue:** In light of the outlined circumstances, the Plaintiff contends that
2 securing an impartial trial in Washoe County is implausible. Consequently, the Plaintiff seeks to
3 transfer this case to Lyon County. This jurisdiction, being neutral and geographically convenient,
4 is devoid of the aforementioned biases and conflicts. Transferring the case would serve the best
5 interests of the public, benefit all parties involved, and present no prejudice or evidence challenges
6 in relation to Case No. CV23-01341.

7
8 WHEREFORE, the Plaintiff respectfully requests:

9
10 a. The Court to grant this Motion to Change Venue and order the transfer of this case to Lyon
11 County.

12
13 b. Any other relief the Court deems just and proper.
14

15 Dated: 8/13/23

16
17
18 Respectfully submitted,

19
20 By: _____

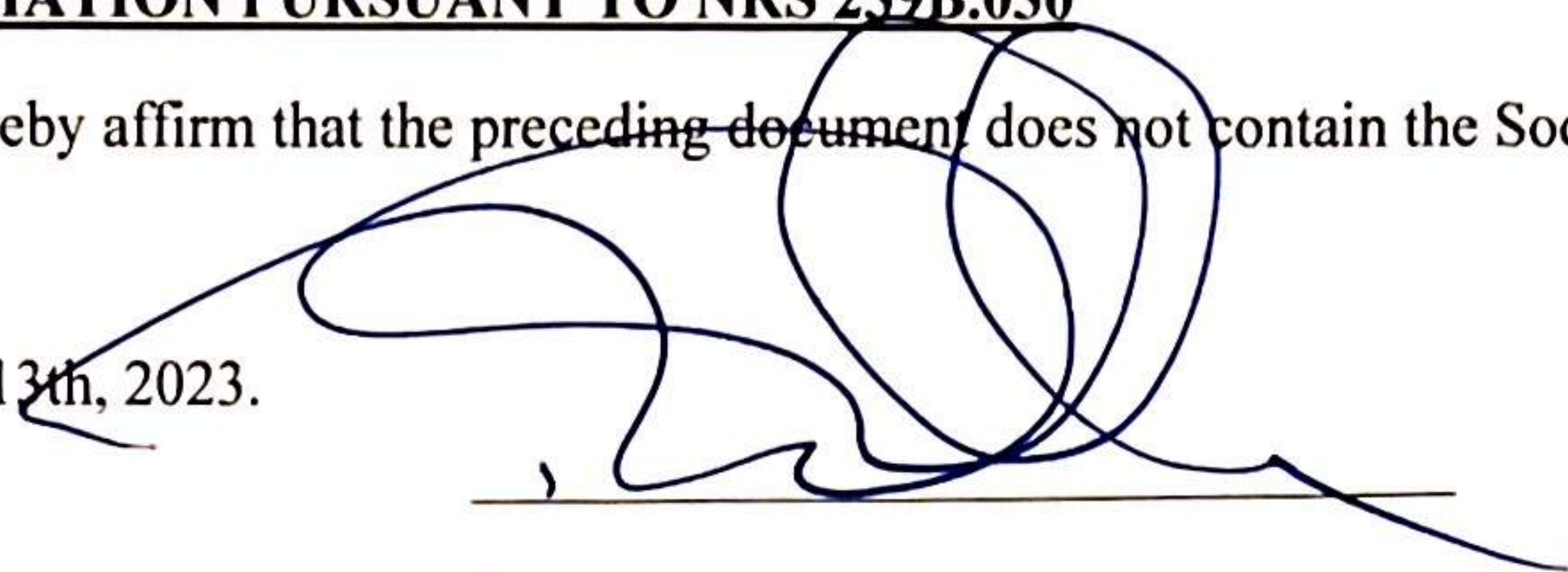
21 ROBERT BEADLES, Plaintiff Pro Se
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AFFIRMATION PURSUANT TO NRS 239B.030

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

DATED: August 13th, 2023.

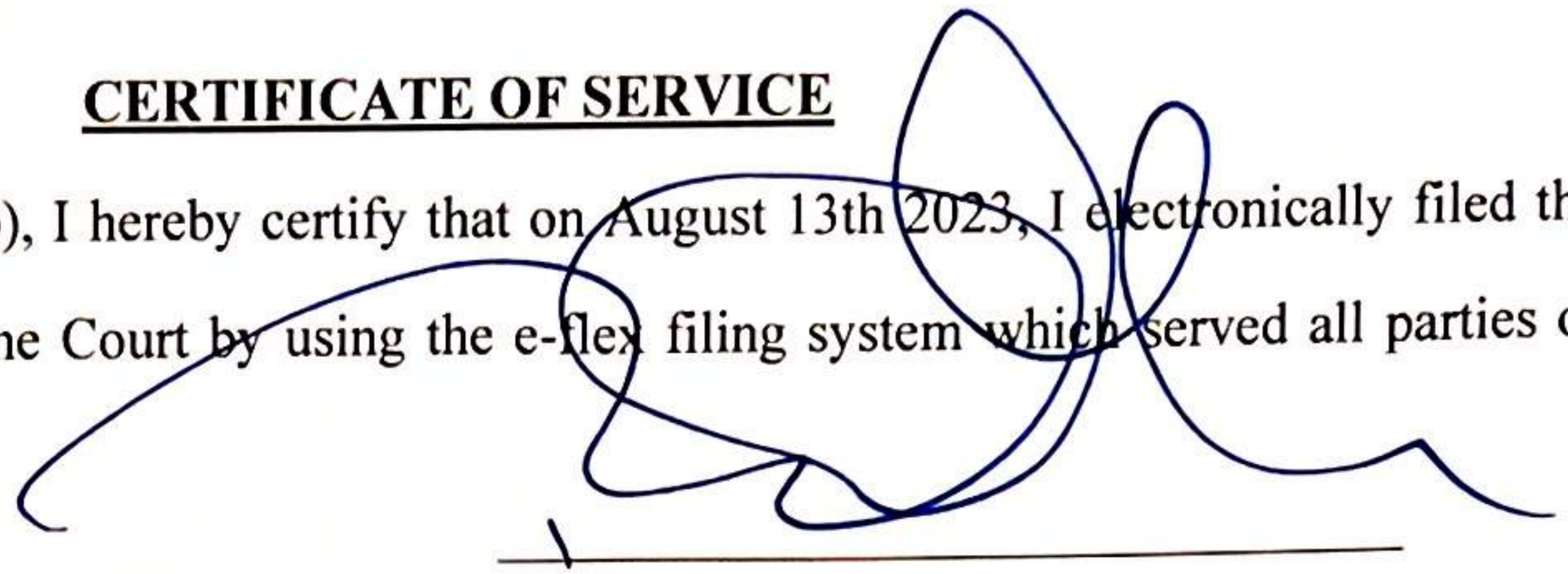
A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

Robert Beadles, Plaintiff

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on August 13th 2023, I electronically filed the foregoing with the Clerk of the Court by using the e-flex filing system which served all parties of record electronically.



Robert Beadles, Plaintiff

9:45



Mark Robinson RGJ

Tuesday 2:52 PM

Hey, I'm doing a follow-up story on the district attorney's reply today. I wanted to give you the opportunity to respond regarding what you think of it. And I wanted to check whether you have decided yet on their offer for you to withdraw your complaint. A text reply is fine or feel free to email me or call me on my landline at 775-475-0530.

I find it highly suspicious that a document that has yet to be filed in court I'm hearing about from you. Is the DA's office now using the press to attack me personally as well?

End quote

Got it

Why ask for a quote if You refuse to use it?

I always use your quotes. Thanks for sending it.

It's not in the article you just posted

That story is not about the district



9:45



Mark Robinson RGJ

That story is not about the district attorneys response. It was written before they sent you the rule 11 letter and the proposed motion. I'm writing a new story about their response. They had no response for the story published this morning beyond saying that they would defend the defendants.

You additionally say I lost the lawsuit for observation yet I received court orders from the court ensuring every Nevadan voter has legal observation. That's a victory.

The court granted nothing new that wasn't already being done.

Curious how you received the rule 11 letter before me. Who sent it to you?

Thats again not truthful, as we were kept from observation in 2020 as it wasn't defined, and again in 2022 when they broke the court orders

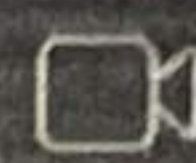
The Plaintiffs will be permitted to observe during the processing and in accordance with Nevada law and regulations and Washoe county to the same extent as other eligible observers. Washoe County is processing and/or counting ballots, observati



iMessage



9:45



Mark Robinson RGJ

Thats again not truthful, as we were kept from observation in 2020 as it wasn't defined, and again in 2022 when they broke the court orders

the Plaintiffs will be permitted to observe during the processing a
l in accordance with Nevada law and regulations and Washoe cou
o the same extent as other eligible observers.

Washoe County is processing and/or counting ballots, observati

this matter shall be dismissed without prejudice.

ORDER FOR DISMISSAL W

Try being truthful

"2. If Washoe County is processing and/or counting ballots, observations shall be allowed."

You had 16 claims for relief, and they were not granted.

You say I lost, all we really had to have was, 2. If Washoe County is processing and/or counting ballots, observations shall be allowed" which they again broke



9:45



Mark Robinson RGJ

"2. If Washoe County is processing and/or counting ballots, observations shall be allowed."

You had 16 claims for relief, and they were not granted.

You say I lost, all we really had to have was, 2. If Washoe County is processing and/or counting ballots, observations shall be allowed" which they again broke

Spin it how you want, you always do, no where in this order does it say I lost.

Your MSU

I'm happy to go over the judge's conclusions in that case whenever you would like. I've got a transcript of it. Right now, I've got to finish writing this story and we can catch up later.

It's in black in white. Nowhere does it say I lost, it's a victory for all Nevadans, even as simple as the order is they again broke the law and court orders.

Delivered

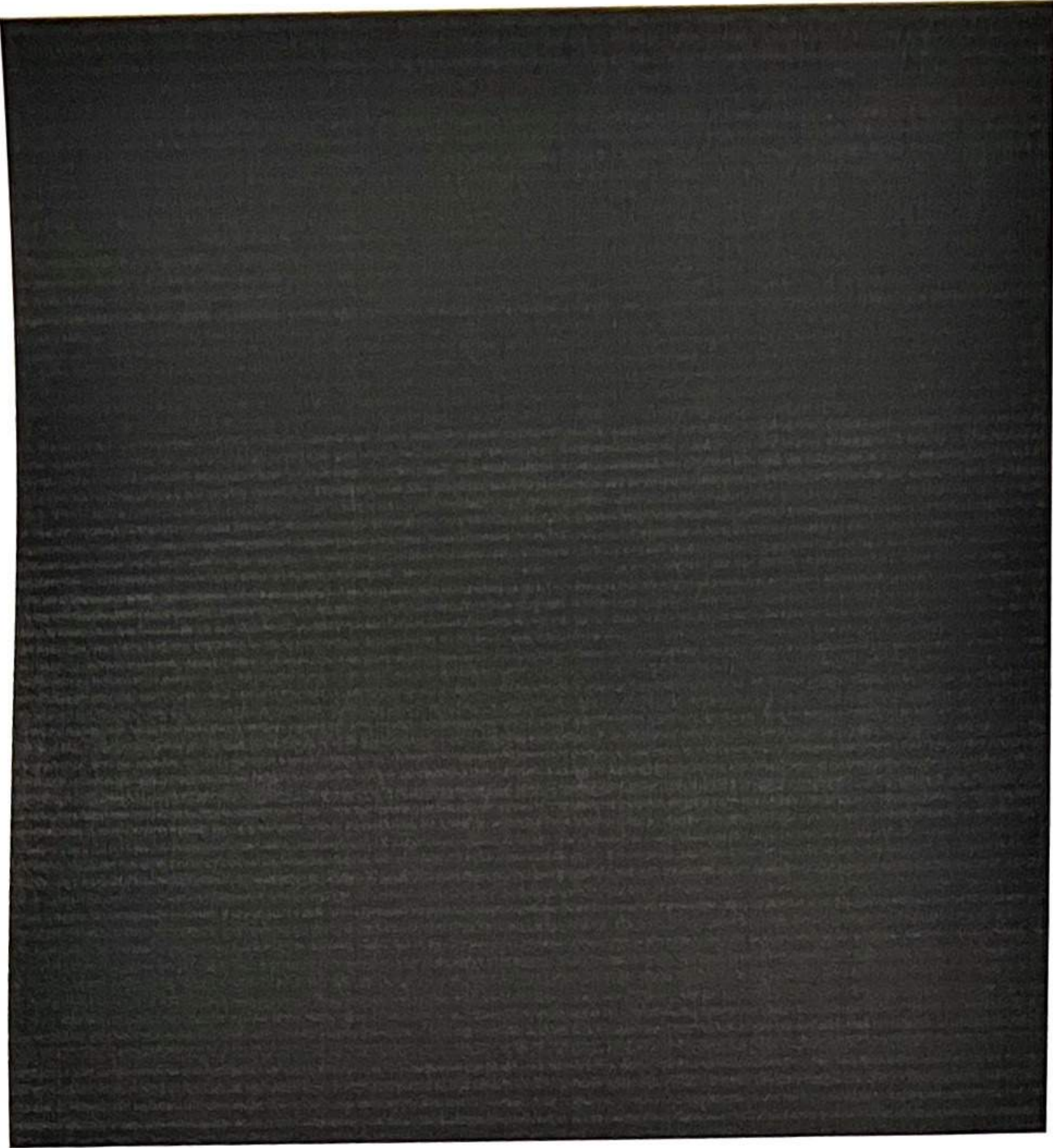


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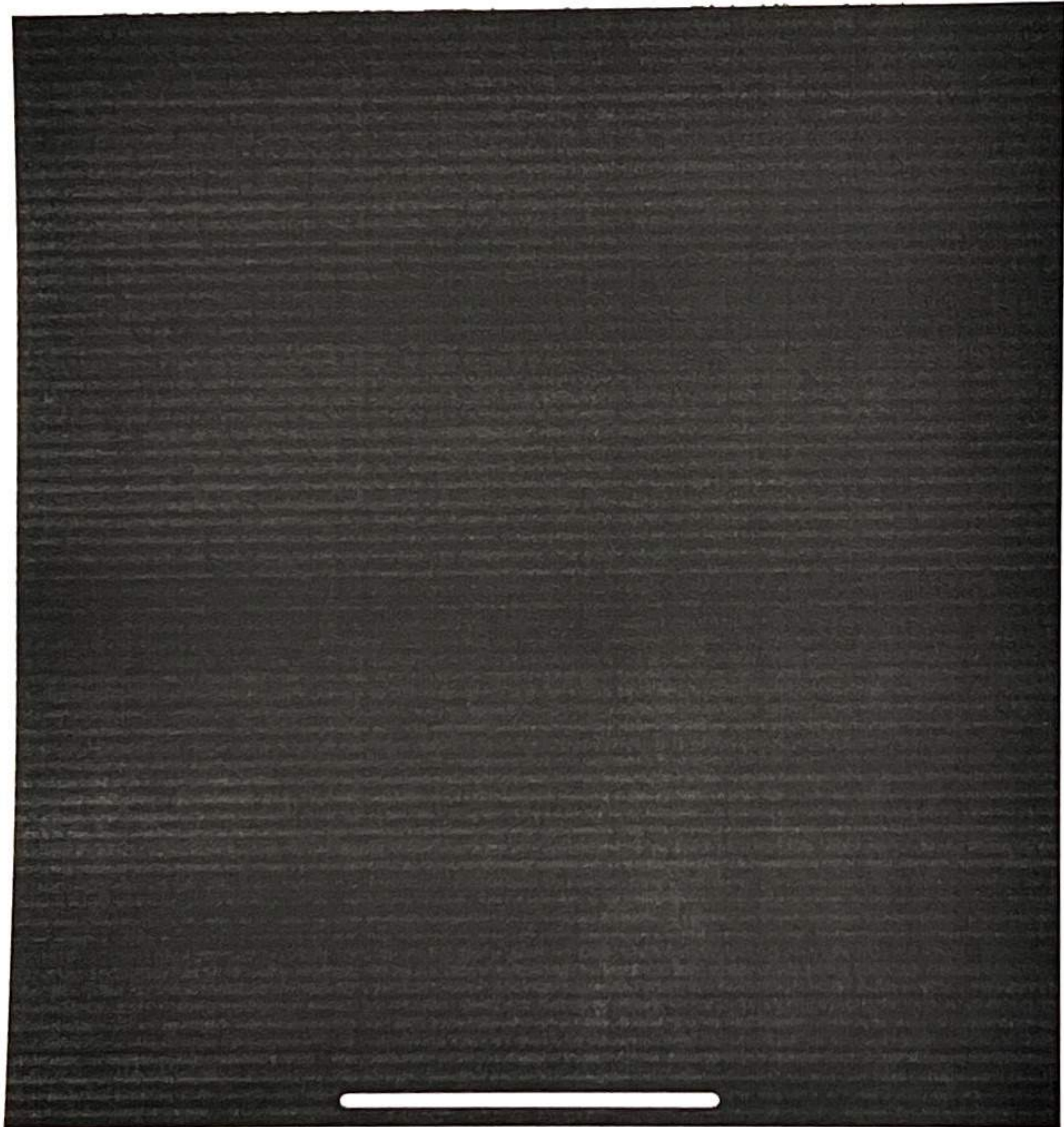


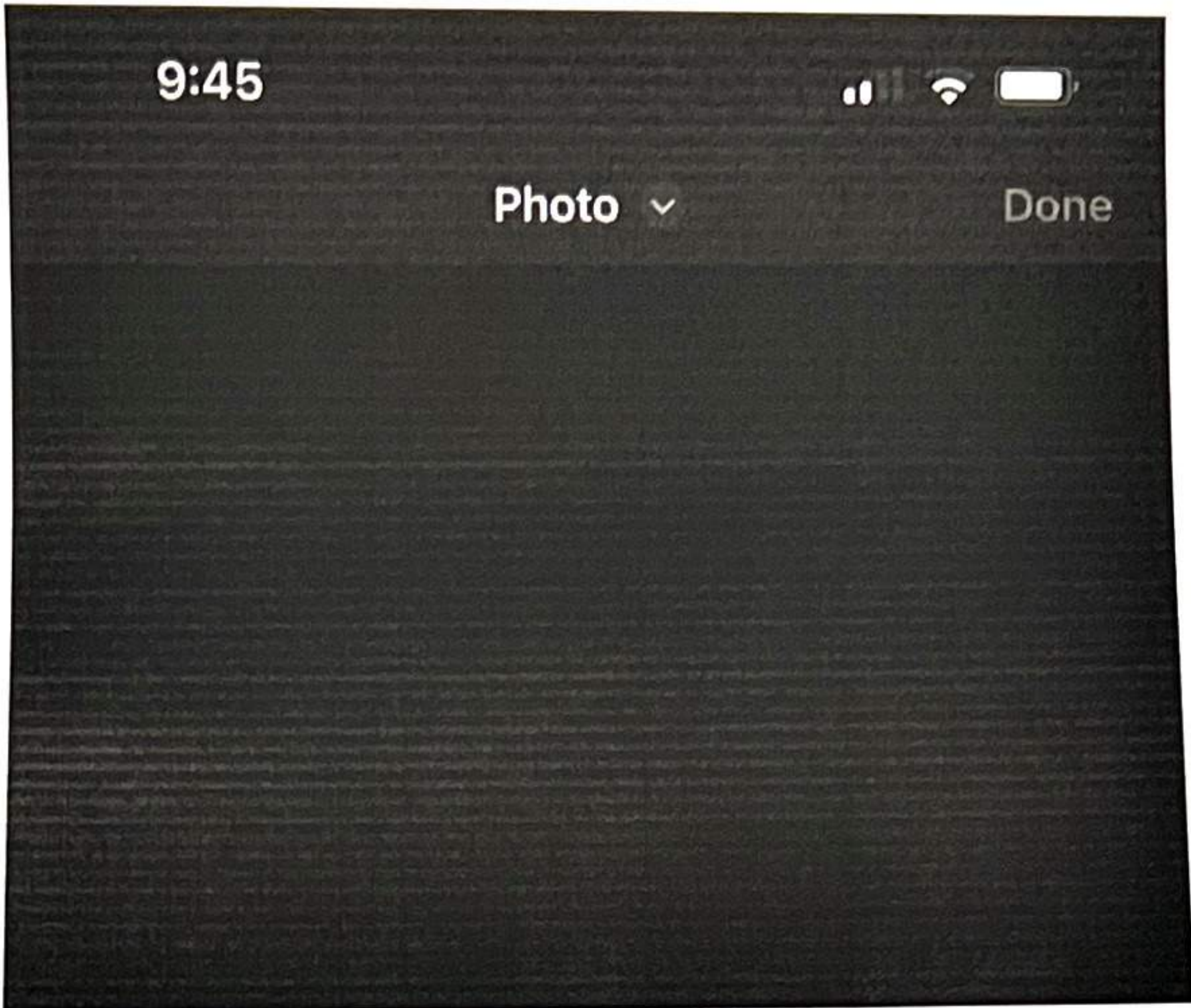
Cash



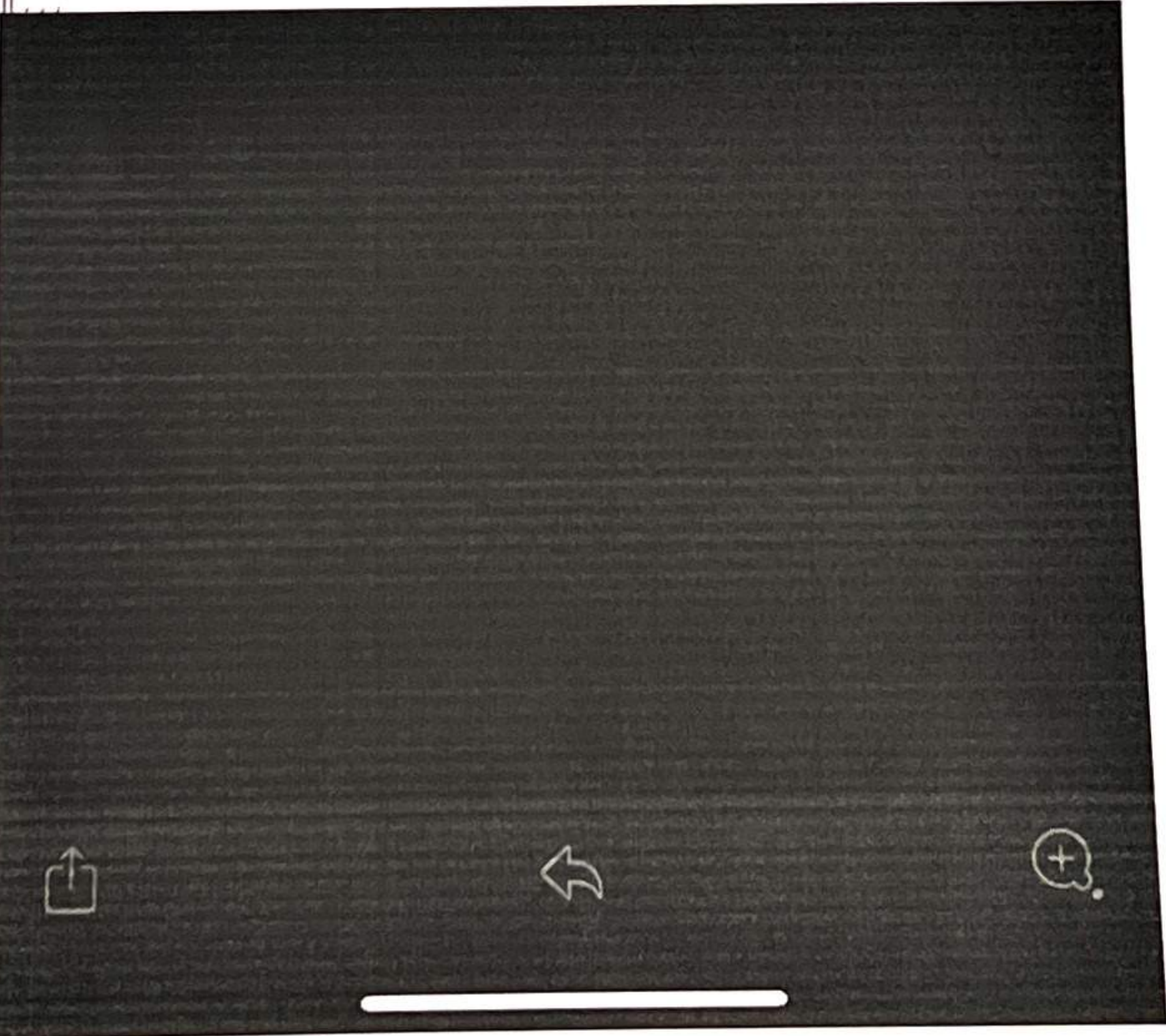


STIPULATION AND ORDER FOR DISMISSAL WITHOUT PREJUDICE





1. The Plaintiffs will be permitted to observe during the processing and counting of ballots and in accordance with Nevada law and regulations and Washoe county's existing procedures, to the same extent as other eligible observers.
2. If Washoe County is processing and/or counting ballots, observations shall be allowed.
3. This matter shall be dismissed without prejudice.



Washoe DA's office calls Beadles lawsuit 'rantings of a conspiracy theorist,' warns of sanctions

Summary by Ground News



Robert Beadles filed a lawsuit against three Washoe County officials last week. He wants to have his election fraud claims heard by a court. The DA's office sent him a letter saying that a motion will be filed after 21 days seeking sanctions for filing a frivolous lawsuit if he doesn't withdraw it.

Published 5 days ago · [Reno, United States](#)



Bias

Time Location

Factuality

Ownership

Bias Distribution



100% of the sources lean Left

rgj

L 100%

All

Left

Center

Right

rgj Reno Gazette-Journal Lean Left High Factuality



Media Conglomerate: Gannett

Washoe DA's office calls Beadles lawsuit 'rantings of a conspiracy theorist,' warns of sanctions

Political influencer Robert Beadles gets warning that he faces sanctions if he doesn't withdraw his "frivolous" election-fraud lawsuit.

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Insights



This report's coverage is more Left. Share it to spread the word.

rgj Reno Gazette-Journal, Lean Left bias, broke the news in Reno, United States 5 days ago on Tuesday, August 8,

Election-fraud claims resurfaced in Nevada as Robert Beadles revises Washoe County lawsuit



Summary by Ground News

Robert Beadles wants Washoe County officials to remove him from office. He's filed a second, stripped-down version of his complaint in state court. The first case had been moved to federal court. Judge Egan Walker, who previously ruled against Beades in a 2022 election lawsuit, has been assigned the case.

Published 2 days ago · [Reno, United States](#)



Bias

Time Location

Factuality

Ownership

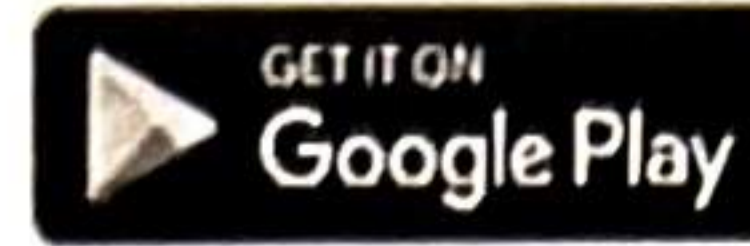
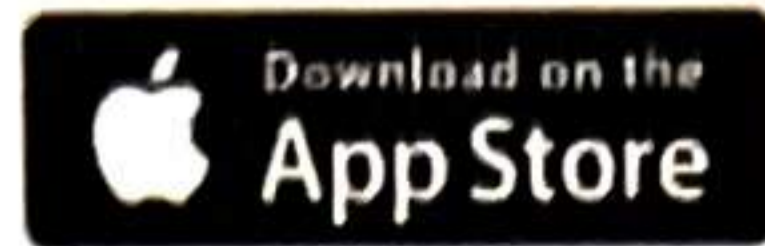
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100% of the sources lean Left

rgj

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**AM870**
THE ANSWER

Keyword

◀ GO

LISTEN LIVE

Nevada election-fraud crusader drops US lawsuit under threat of sanctions; presses on in state court

Politics & Government News

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Fri, Aug 11, 2023 7:55 PM*By SCOTT SONNER, Associated Press*

RENO, Nev. (AP) — An election-fraud crusader in Nevada has withdrawn his latest federal lawsuit in an ongoing feud with county officials in Reno after their lawyers threatened sanctions for filing a frivolous complaint. The Washoe County district attorney says Robert Beadles' baseless lawsuit is filled with the "rantings of a conspiracy theorist." Beadles is a wealthy businessman and right-wing activist who once ran for Congress in California. He dropped his latest federal suit but is continuing his legal battle in state court. He has filed a new suit with similar allegations of election fraud and other wrongdoing. The county says he's using the suit to harass public officials and waste taxpayers' money.

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Nevada election-fraud crusader drops US lawsuit under threat of sanctions; presses on in state court



People wait to vote in-person at Reed High School in Sparks, Nev., prior to polls closing on Nov. 3, 2020. An election-fraud crusader in Nevada has withdrawn his latest federal lawsuit in an ongoing feud with county officials in Reno after their lawyers threatened to seek sanctions for filing a baseless complaint laced with "rantings of a conspiracy theorist." (AP Photo/Scott Sonner, File) (Scott Sonner | AP)

By SCOTT SONNER Associated Press

Published: Aug. 11, 2023 at 8:55 PM PDT



RENO, Nev. (AP) — An election-fraud crusader in Nevada withdrew his latest federal lawsuit in an ongoing feud with county officials in Reno after their lawyers threatened to seek sanctions for filing a baseless complaint laced with "rantings of a conspiracy theorist."

But Robert Beadles, a wealthy ex-California businessman and [right-wing activist](#) who has embraced many Republicans' disproven claims of election fraud, is vowing to continue his legal battle in state court. He has filed a new lawsuit in Washoe County District Court with similar allegations of fraud and other wrongdoing.

Beadles, who once briefly ran for Congress in California in 2010, made his money in construction, software, real estate and cryptocurrency investments. Now affiliated with the conservative blog Operation Sunlight, he's helped lead attempts to recall or otherwise oust numerous county officials since he moved to Reno from Lodi, Nevada, in 2019.

He insists, without evidence, that the election system is rife with "flaws and irregularities" that robbed him of his vote in 2020. He lost another lawsuit last year that sought heightened observation of Washoe County's vote-counting process.

The Reno Gazette Journal first reported this week that county lawyers sent Beadles letters warning of potential punitive action unless he dropped his lawsuit, which was moved to U.S. court last week because of related federal jurisdiction.

Washoe County District Attorney Chris Hicks said in the letter to Beadles Tuesday provided to The Associated Press late Thursday that his lawsuit subjects him to sanctions because the sole purpose is to "harass and engage government entities and officials in costly frivolous litigation."

Hicks attached a draft copy of a motion he said they'd file unless he withdrew it. It said that since moving to Reno, Beadles has "engaged in a scheme to disrupt local and state government operations."

Beadles' lawsuit "contains various baseless and delusory allegations disjointed from any viable legal claim," Deputy District Attorney Lindsay Liddell wrote in the draft motion.

She described it as "inaccurate rantings of a conspiracy theorist disconnected from any legitimate claim."

Beadles said in an email to AP Thursday night he never requested his case be moved to federal court so he filed notice of a voluntary dismissal Wednesday. He said he filed the new case in Washoe District Court last Friday before he was threatened with sanctions.

"They put me in Federal Court. I didn't cower; I took us back to State court, where the evidence and truth will speak for itself on an expedited timeline," he wrote.

Like his earlier lawsuit, Beadles' new one in Washoe District Court stated that he was "robbed of his right to suffrage" in the last election. He accuses the county of maintaining inaccurate voter rolls, an unsecure voting system and "counting votes in secret," but hasn't provided any evidence.

He wants the county to ban the use of voting machines and count paper ballots by hand. He's also seeking the removal of a few county officials.

Last year, he accused county commissioners of "treason" when he confronted them with county statistics that he claimed proved there were 40,000 more votes cast than voters registered in 2020. He said the county appears to "have two sets of books."

Election officials have explained that his data is inaccurate.

Beadles has been aligned in the past with another election-fraud crusader, Reno lawyer Joey Gilbert, who lost the 2022 Republican gubernatorial primary to now Gov. Joe Lombardo.

[A judge in Carson City ordered Gilbert](#) last year to pay \$88,000 in sanctions for filing a frivolous lawsuit with no admissible evidence pressing his claims he really won the nomination. Gilbert finished second by 26,000 votes in the June primary but argued that he actually won by more than 50,000 votes.

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conspiracy theorist." (AP Photo/Scott Sonner, File)  SCOTT SONNER

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Political Cartoons



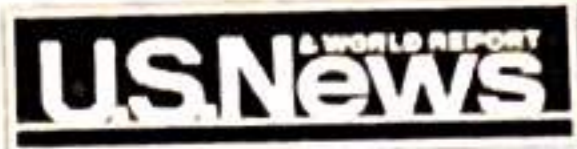

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Lawsuit Targets Wisconsin Legislative Districts Resembling Swiss Cheese

**Greater Reno**

48m · 🌐

Washoe County Deputy DA Lindsay Liddell fired back today at Robert Beadles and his lawsuit alleging election fraud. A letter was sent to him warning that he ought to withdraw his "frivolous" lawsuit or else face sanctions. In a proposed Motion for Sanctions, she writes his complaint is "disconnected from the law and from reality." Read her proposed motion at the story link.
<https://www.rgj.com/story/news/politics/elections/2023/08/08/robert-beadles-fraud-lawsuit-washoe-county-nevada/70555159007/>



8:44



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Robert Beadles, a wealthy ex-California businessman and right-wing activist who has embraced many Republicans' disproven claims of election fraud, is vowing to continue his legal battle in state court.



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Nevada election-fraud crusader withdraws federal lawsuit, vows to c...

Election-fraud claims resurfaced in Nevada as Robert Beadles revises Washoe County lawsuit



Mark Robison

Reno Gazette Journal

Robert Beadles withdrew a lawsuit that'd been moved to federal court and alleged election fraud against three Washoe County officials.

The revised lawsuit takes out U.S. constitutional matters and focuses on county officials not addressing his election grievances and seeking their removal from office.

Judge Egan Walker, who previously ruled against Beadles in a 2022 election lawsuit, has been assigned the case after Beadles challenged it having been given to Judge David Hardy.

Robert Beadles' attempt to test his election-fraud claims in court got a reset.

On Wednesday, he withdrew a lawsuit against Washoe County officials for not addressing his belief in widespread election integrity issues — and he's filed a second, stripped-down version of his complaint.

The Washoe County DA's office had moved the first case to federal court. Beadles wants the second one to stay in state court. Toward that end, he removed two causes of action alleging violations of the U.S. Constitution's 14th Amendment.

His goal with the second suit remains the same: to have a court address the validity of his election grievances and remove Washoe County Registrar of Voters Jamie Rodriguez, County Manager Eric Brown and Alexis Hill, Washoe County Commission chair.

"It's quite simple; I need to be in state court as the 2 main causes of action I seek are the removal of the ROV (registrar of voters), County manager, and County Commission Chair and to expose our election issues, then correct them," he wrote Wednesday on his Operation Sunlight blog.

Beadles is a member of the Washoe County Republican Party's Central Committee and was a big donor to right-wing causes in the 2022 election cycle.

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

"The Beadles' Complaint is disconnected from the law and from reality," the letter said. "The Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be sanctioned, and Defendants should likewise be awarded attorneys' fees."

In an email Thursday to the RGJ, the DA's office said it "has no additional comments at this time."

Disagreement over how to submit election-fraud claims

The revised lawsuit states that Beadles believes the three Washoe County officials violated their duties as well as his rights under Nevada's Constitution by not resolving his election grievances, and therefore they should be removed from their positions.

He claims they should've addressed his concerns because Nevada law states: "Each voter has the right ... to have complaints about elections and election contests resolved fairly, accurately and efficiently."

The DA's office disagrees. In its proposed "motion for sanctions" emailed Tuesday to Beadles, the DA's office wrote that Rodriguez, Brown and Hill had no duty to respond to him.

It cites Nevada Administrative Code, which says: "A person who wishes to file a complaint concerning an alleged violation of any provision of (Nevada election laws) must submit the complaint in writing to the Secretary of State and sign the complaint."

Claims of election fraud

Beadles' list of grievances cover alleged problems with voter registration lists, vote counting, signature verification, "illegal function within the election system" and violations of state election law.

The DA's office disputes his claims.

"Some of the aforementioned statements are so vague that a pointed response is difficult, but the statements are nonetheless inaccurate rantings of a conspiracy theorist disconnected from any legitimate claim," it wrote in the proposed motion for sanctions.

Fact check: Affidavits do not show Washoe votes were cast without voters' consent, as Beadles claims

To back up his claims, Beadles — who is representing himself — submitted to the court four legal boxes filled with documents and two flash drives of electronic files. The exhibit list shows at least two articles from the Reno Gazette Journal, a “Video Compilation of Prominent Democrats,” a graphic explainer on how to “solve the unsolvable” and numerous county documents on the voting process.

“Beadles knows or should know, based on the information Washoe County has thus far directly or indirectly provided to him, that his delusions are not accurate, yet he presents them in a court of law,” the DA’s office said in its proposed motion.

Beadles asks the court to stop Rodriguez, Brown and Hill from “using any voting and tabulation machines for elections in Washoe County” and instead to use “paper ballots at all polling locations and in every election.”

To bolster this demand, he seeks support from Vice President Kamala Harris, citing her comments on the campaign trail in 2019 saying, “The best way to conduct secure elections (is) paper ballots” because “Russia can’t hack a piece of paper.”

Washoe County and state positions on election fraud

Washoe County spokesperson Bethany Drysdale told the RGJ that the county conducts fair, transparent and accurate elections.

“There is extensive, randomized and thorough testing of machines, processes and tabulation before, during and after every election,” she said by email. “There are numerous redundancies to ensure that a single mistake cannot skew the results.”

Secretary of State Cisco Aguilar said his office had received more than 700 reports of possible 2022 election violations. His office is still investigating some individual concerns, but nothing has been found to put primary or general election results into question.

“We have seen no evidence of widespread voter fraud or voting machine errors in Nevada during the 2022 election cycle,” Aguilar testified at a February joint legislative meeting.

Beadles has a different viewpoint. In his lawsuit, he writes that because Rodriguez, Brown and Hill didn’t respond to his election complaints, they must be true, quoting the Latin legal phrase *Qui non negat, fatetur*, “he who does not deny, admits.”

Which judge will hear election case?

The first Beadles' filing in this matter — July 25 — was originally assigned to District Court Judge David Hardy.

Hardy is overseeing the Hillary Schieve-Vaughn Hartung case against private investigator David McNeely for spying on them with a GPS tracker placed on their vehicles. That case is awaiting a spot on the Nevada Supreme Court's calendar to decide whether the anonymous person who hired McNeely must be revealed.

Beadles submitted a motion asking that Judge Lynne Simons hear the case instead. It was reassigned to Judge Kathleen Sigurdson.

The revised lawsuit was again assigned to Judge Hardy.

Beadles filed a motion saying this seemed to violate a rule that cases be randomly assigned, and he asked again for Judge Simons.

"Judge Simons' experience and expertise make her the ideal judge to preside over this case," his motion reads.

Beadles' case was reassigned Thursday to Judge Egan Walker.

Walker oversaw a previous Beadles' election lawsuit last year, over observation of the vote-counting process. That suit claimed numerous people were prevented from meaningfully observing the vote count of the 2020 election.

Judge Walker rejected this, saying, "I have in front of me, in fact, no competent evidence which supports the claims."

Mark Robison covers local government for the Reno Gazette-Journal. His wages are 100% funded by donations and grants, and his journalism is always free for all to read. If you'd like to see more stories like this one, please consider donating at [RGJ.com/donate](https://www.rgj.com/donate). Email comments to mrobison@rgj.com or comment on Mark's Greater Reno Facebook page.

Washoe DA's office calls Beadles lawsuit 'rantings of a conspiracy theorist,' warns of sanctions



Mark Robison

Reno Gazette Journal

Political influencer Robert Beadles filed a lawsuit against three Washoe County officials in an effort to have his election fraud claims heard by a court.

The Washoe County District Attorney's Office sent him a letter saying that a motion will be filed after 21 days seeking sanctions for filing a frivolous, unfounded lawsuit if he doesn't withdraw it.

His lawsuit's statements are portrayed as "inaccurate rantings of a conspiracy theorist disconnected from any legitimate claim."

The Washoe County District Attorney's office fired back Tuesday against Robert Beadles' election-fraud lawsuit, calling his statements the "inaccurate rantings of a conspiracy theorist."

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

"This case is an abuse of the judicial process," Liddell wrote in a proposed motion for sanctions also emailed to Beadles.

"The Beadles' Complaint is disconnected from the law and from reality. The Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be sanctioned, and Defendants should likewise be awarded attorneys' fees."

Beadles — a member of the Washoe County Republican Party's Central Committee and a big political donor — filed a lawsuit July 25 seeking to have the court oversee an examination of election fraud claims he's been raising in public forums and online for the past two years.

Asked for comment on the DA's motion, Beadles responded by text.

"I find it highly suspicious that a document that has yet to be filed in court I'm hearing about from you," he wrote. "Is the DA's office now using the press to attack me personally as well? End quote."

The documents sent to Beadles are public records. They were also sent to the RGJ after requests to the DA's office for any responses to his lawsuit against county officials.

The motion was not immediately filed with the court because the federal rules of civil procedure require it to be served at least 21 days before filing. This delay in filing provides Beadles with a chance to withdraw the complaint before the court is asked to consider sanctions.

Beadles' legal filing — moved last week to federal district court — claims his rights were violated because his election concerns were not appropriately responded to by Registrar of Voters Jamie Rodriguez, County Manager Eric Brown and Commissioner Alexis Hill.

It seeks monetary damages, an end to the use of voting machines, and the removal of Rodriguez, Brown and Hill, among other requests.

Rule 11 letter

The first of two documents emailed Tuesday by the DA's office to Beadles was a Rule 11 letter.

Rule 11 is a federal rule of civil procedure that allows a district court to sanction attorneys and other parties — such as Beadles in this case — for submitting pleadings to the court that are improper or contain frivolous arguments or ones without evidentiary support.

The letter says Beadles' complaint “was filed for improper purposes, filed with claims not warranted by law, and containing statements not well grounded in fact.”

It adds that because of this, Beadles may be subject to sanctions if he doesn't withdraw his lawsuit within 21 days.

Proposed motion for sanctions

The second document sent to Beadles is a proposed motion for sanctions stating what the DA would file with the court if Beadles doesn't withdraw his suit. It lays out for a judge why the DA thinks Beadles should have to pay attorneys' fees and costs to Rodriguez, Brown and Hill.

The 46-page motion includes 17 pages of legal arguments and the rest is exhibits, mostly Beadles' writings from his Operation Sunlight blog.

Beadles “frivolously filed the Complaint with claims not warranted by existing law, not supported by facts, and to harass” Hill, Brown and Rodriguez, the proposed motion says.

Its language is harsh, calling his complaint baseless, deluded, disjointed and abusive.

There’s even a footnote saying that if attorneys were involved in ghost writing Beadles’ lawsuit, they may be open to sanctions, too, for not disclosing their identities.

Claims of faulty legal logic

Beadles is representing himself in the case, and the proposed motion calls many of his legal claims into question.

It says that his suing the Registrar of Voters makes no sense — “A department of a county is not a suable entity because it is not a political subdivision of the State of Nevada.”

His lawsuit's main claim involves the lack of responses by Rodriguez, Brown and Hill to his election concerns.

The proposed motion says the law imposes no such duty to respond and that the state has a mechanism for reporting violations — through the Secretary of State’s website and report form — that he should use instead to address his grievances.

It also claims he has a specific vendetta against Hill that shows his lawsuit isn't about remedying electoral legal matters but harassment.

"Beadles’ choice to name Commissioner Hill as a defendant rather than all commissioners suggests Beadles seeks to harass Commissioner Hill with this action," Liddell writes.

"Beadles is well aware that Commissioner Hill cannot bind Washoe County in action on her own — a majority vote of the Board of County Commissioners is required. Moreover, to the extent Commissioner Hill owed any duty to Beadles as he alleges, all County Commissioners would owe him that duty and would have fallen short according to his unviable legal theory. Yet, Beadles names only Commissioner Hill."

Claims of election fraud

The proposed motion says that Beadles’ lawsuit is filled with false statements.

It goes through multiple examples of quotes from the lawsuit that, it says, don’t match up with state law, the job duties of the defendants or even where he sent his petitions of

election grievances.

It also tackles head-on what Beadles is hoping to have vetted in court: claims of election fraud around voter rolls, security, signature verification and more.

“Some of the aforementioned statements are so vague that a pointed response is difficult, but the statements are nonetheless inaccurate rantings of a conspiracy theorist disconnected from any legitimate claim,” Liddell wrote.

The proposed motion includes an as-yet-unsigned declaration by Rodriguez that Beadles’ specific fraud claims are “false.”

“Beadles knows or should know, based on the information Washoe County has thus far directly or indirectly provided to him, that his delusions are not accurate, yet he presents them in a court of law,” it says.

“Beadles is free to use his website to express himself,” Liddell adds. “The Court, however, is not an appropriate venue for such behavior.”

Read the proposed Motion for Sanctions

Mark Robison covers local government for the Reno Gazette-Journal. His wages are 100% funded by donations and grants; his journalism is done in the public good and always free for all to read. If you'd like to see more stories like this one, please consider donating at [RGJ.com/donate](https://www.rgj.com/donate).

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Robert Beadles tests Washoe County election fraud claims in court



Mark Robison

Reno Gazette Journal

Lawsuit claims Washoe County didn't respond in a timely way to his election grievances and generally stonewalled him.

Beadles is representing himself, he says, "to save his lawyers from attacks on their livelihoods."

The Nevada Secretary of State's office says it's looked into more than 700 reported violations in the 2022 elections and has found "no evidence of widespread voter fraud."

For a year and a half, Robert Beadles has criticized Washoe County officials in public meetings, blog posts and email over election concerns. He's now filed a lawsuit backing up his claims.

The civil lawsuit – moved to federal district court Thursday – says his election concerns have been ignored in violation of state law.

It seeks the removal of Registrar of Voters Jamie Rodriguez, County Manager Eric Brown and Commission Chair Alexis Hill. All three are named as defendants.

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

Beadles, a member of the Washoe County Republican Party's Central Committee, wants his election fraud concerns "put on the table and addressed" by Rodriguez, Brown and Hill – under court supervision.

Unless this is done, the lawsuit says, Rodriguez will be "unprepared to run the 2024 presidential primary safely, securely, and accurately as required by law."

Kendall Holcomb, spokesperson for the Washoe County District Attorney's Office, said it was not appropriate to comment at this time.

"However," she said, "our office is aware of Mr. Beadles' lawsuit, dispute the claims, and will vigorously defend our clients."

Self-representation

Representing himself in the lawsuit, Beadles says that bringing forward legal claims of widespread election fraud opens up attorneys to be targeted.

“Plaintiff hereby represents himself *pro se* to save his lawyers from attacks on their livelihoods,” he writes in the lawsuit.

The Washoe County DA’s office filed a petition Thursday that moves Beadles’ lawsuit from state district court to federal court, citing the fact that Beadles claims his constitutional rights were violated.

According to the Administrative Office of the U.S. Courts, about 1 in 4 federal cases involves a party representing themselves in civil litigation.

Lawsuit details

On Thursday, Beadles had delivered three flash drives and 10 binders of documents to Washoe County District Court that he says back up his complaint.

His chief concern is that county officials have generally not responded to his election grievances and stonewalled his concerns. Claiming this is illegal, he cites a section of Nevada statutes that says each voter has the right “to have complaints about elections and election contests resolved fairly, accurately and efficiently.”

The state has an official mechanism for election concerns called the Election Integrity Violation Report. Anyone can report violations of Nevada’s election laws through the Secretary of State’s website.

Beadles also calls for punitive damages “in excess of \$15,000,” the standard phrasing used in Nevada civil suits.

The damages are intended to deter future election abuses and to compensate him because he’s “suffered and will continue to suffer emotional distress, reputation damage and irreparable harm” from not having his grievances answered and resolved in a timely manner, his court filing says.

The lawsuit also demands that Rodriguez, Brown and Hill be stopped from:

“Using any voting and tabulation machines for elections in Washoe County.”

Upgrading election equipment and software.

And using anything other than “paper ballots at all polling locations and in every election.”

Washoe County spokesperson Bethany Drysdale told the RGJ that the county conducts fair, transparent and accurate elections.

“There is extensive, randomized and thorough testing of machines, processes and tabulation before, during and after every election,” she said by email. “There are numerous redundancies to ensure that a single mistake cannot skew the results.”

“The recent operations audit of our Elections Office and the investment we’re making into infrastructure, technology and staffing should show the public that we are dedicated to not only fair elections, but also well-run elections,” Drysdale said.

A county audit board meeting last week where Manager Brown was scheduled to go over election-process changes was shut down before he could speak. Public commenters and Washoe County Commissioner Jeanne Herman raised alarms about the agenda and the fact the board has no chair or vice-chair.

Complaints about 2022 election

Beadles' lawsuit may lead to an examination of election concerns beyond what the state has already conducted.

During testimony before the Nevada Assembly in March, Secretary of State Cisco Aguilar said his office had received more than 700 reports of possible election violations in 2022.

“Based on our staff’s reviews so far, many of them are baseless and were filed in bad faith,” he testified.

“But it is our commitment to the law and to the people of this state that every report is carefully reviewed so that if there is even a single case of potential fraud identified, we conduct an investigation and, if necessary, refer it for criminal prosecution.”

The Secretary of State’s office is still investigating some individual concerns, but nothing has been found to put primary or general election results into question.

“We have seen no evidence of widespread voter fraud or voting machine errors in Nevada during the 2022 election cycle,” Aguilar testified at a February joint legislative meeting.

Previous lawsuits

In 2022, Beadles lost a lawsuit seeking heightened observation of Washoe County's vote-counting process.

It claimed that during vote counting for the 2020 election in Washoe County, "numerous individuals attempting to observe the process were prevented from doing so in any meaningful way."

Washoe County District Judge Egan Walker ruled there was "no competent evidence" to support these claims.

Beadles was also involved in a lawsuit by Reno attorney Joey Gilbert.

It claimed voter fraud in the Republican primary where official results showed Gilbert losing to Joe Lombardo by about 26,000 votes. Gilbert believed he won by 50,000 votes but that he'd been thwarted by a mysterious algorithm that switched votes away from him.

Beadles' new lawsuit makes a similar claim that the 2022 elections in Washoe County were "tainted by allowing and failing to address illegal functions within the election system that alter intended votes."

When Carson City District Judge James Wilson addressed this same issue in the Gilbert lawsuit, he found a "clear absence" of "competent evidence" to support the claim.

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The **NEVADA INDEPENDENT**

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Washoe meeting adjourned amid election audit outcry; recommendations moving forward



Noel Sims

August 1st, 2023 at 5:01 PM

Elections

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Washoe County Registrar of Voters Jamie Rodriguez oversees vote counting on Election Day, Nov. 8, 2022 (David Calvert/The Nevada Independent)

When the Washoe County Audit Committee convened on Tuesday morning, it was set to discuss one agenda item — **an external audit of Washoe County elections**.

But the committee never made it to that agenda item.

Instead, after a heated round of public comments alleging that the meeting was taking place illegally on account of vacancies and a lack of appointed chair, Commissioner Jeanne Herman made a motion to adjourn, which was approved unanimously by the three members of the committee — to the delight of many in the audience.

Had the meeting continued as planned, the three-member committee and the public would have heard a presentation from County Manager Eric

Brown on updates to county election procedures underway as a result of **an external audit** which found that the county elections office is understaffed and lacks adequate training, communication and security.

Herman told *The Nevada Independent* that she already thought the meeting should not take place before she heard public comments, but denied she was motivated by concerns about potential legal violations.

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She called the alleged violations “loose ends” to be straightened out before the next committee meeting and attributed them to the committee’s “quiet” and small role.

According to Washoe County Commission Chair Alexis Hill, the presentation, which can be **found online**, has not been rescheduled.

County staff affirmed to *The Nevada Independent* that the meeting was legally held.

“They wouldn’t have us meet if it wasn’t legal,” Hill said of the county district attorney’s office, which provides legal counsel at committee and board meetings.

Legal violations, 'loose ends' or a misunderstanding?

The audit committee, which is created by **a county ordinance**, is required to have at least three members — currently County Commissioner Jeanne Herman and two appointed volunteers — Charlene Hart and Barbara Kinnison. Two other members were still on the committee the last time the election audit was discussed, but their terms have since expired. The committee's purpose is to oversee county financial statements, internal and external audits.

One of the allegations made during the meeting's public comment portion was that it could not legally meet until those vacancies were filled. But the board currently meets its three-member minimum and can take action at meetings with a quorum of members — a simple majority as defined by Nevada's **Open Meeting Law**, which applies to advisory committees.

Another allegation raised was that the meeting was conducted without a chairperson. The committee is required by the county ordinance to designate a chair and vice chair, but it does not specify that the chair must be the person to call meetings to order; county staff assumed that role on Tuesday. The Open Meeting Law does not specify that the committee must appoint a chair.

Finally, many commenters alleged that Hill, who is an alternate member on the committee, had voted inappropriately at prior meetings. Open Meeting Law allows public bodies to designate an alternate member who assumes full responsibilities and powers when sitting in for another member.

Hill was present at Tuesday's meeting, but did not vote or participate in discussion. Hill did participate in the discussion at a June 9 committee meeting, but no votes or actions were taken.

The office of Nevada's attorney general declined to comment on any of the alleged legal violations around Tuesday's meeting, but encouraged anyone with a concern to **file a complaint**.

Activists take aim at election security, county officials

When the committee discussed the elections audit on June 9, several commenters expressed their distrust of the county's election system and opposed spending public funds on a contract with The Elections Group — an Illinois-based consultancy that opponents have attacked for "leftist" ties — to evaluate and address issues.

Many comments at Tuesday's meeting echoed those from June 9, but from the very first comment by Washoe County GOP Chair Bruce Parks, there was also a new refrain: The committee meeting Tuesday was illegal and should be adjourned.

Several commenters, including Washoe County GOP members, activists, and allies of **Robert Beadles**, repeated Parks's allegations. The two-hour meeting was taken up almost entirely by public comment and only one commenter, Cindy Martinez, disagreed with Parks.

Beadles, after assuring Herman that none of his remarks were aimed at her, criticized the county's election staff and contract with The Elections Group in his public comment.

He also called the committee's attention to a **lawsuit he filed** last week against county officials which alleges they have enabled election fraud. Beadles, representing himself, is calling for all three plaintiffs to be fined or removed from their positions.

Beadles **donated \$8,000** to Herman's 2022 campaign through Coral Bay, his business, and the Franklin Project, his PAC.

Meeting chaos doesn't affect audit status

Despite the meeting being cut short, Hill said implementation of suggestions from The Elections Group is already underway.

According to **a report from the county**, the registrar of voters has already put some of the proposed changes into place and others are in progress. For example, a project manager for technological security has already been assigned, and a new deputy registrar will likely be hired by Nov. 1.

The purpose of the meeting was to inform the public about this progress, rather than to take any action on the election audit. Hill said she was "disappointed" that the public missed that opportunity.

She also noted that Herman has proposed a citizen advisory board that will come before the board of county commissioners sometime in August, but said the exact nature of the proposed board and its authority were not yet clear.

Herman acknowledged that changes from The Elections Group audit were already underway, but argued that county citizens should have a say in how county elections are conducted.

“People don’t believe we need an outside group,” she said. “This is our job.”

1
2 SECOND JUDICIAL DISTRICT COURT
3 COUNTY OF WASHOE, STATE OF NEVADA

4 AFFIRMATION
5 Pursuant to NRS 239B.030 and 603A.040

6 The undersigned does hereby affirm that the preceding document, (*title of document*)

7 Motion To Change Venues

8 file in case number: CV23-01341

9
10 (*mark one*)

11 Document does not contain the personal information of any person.

12
13 Document contains the personal information of a person as required by: (*mark one*)

14 A specific state or federal law, to wit: (*write the specific state or federal law*)

15 _____
16 For the administration of a public program

17 For the administration for a federal or state grant

18 Confidential Family Court Information Sheet (NRS 125.130, NRS 125.230, and
19 NRS 125B.055)

20
21
22 DATED this (*day*) 13th day of (*month*) August, 2023.

23
24 Submitted By: (*Your signature*) _____

25 (*Print your name*) Robert Beadles

26 (*Attorney for*) N/A