

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

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

7 MR ROBERT BEADLES, an individual,
8 Plaintiff,

Case No.: CV23-01341

Dept. No.: 1

9 vs.

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

22 Defendants.

23 **Reply In Support of Motion To Change Venue**

24
25 Plaintiff Robert Beadles ("Beadles"), submits the following Reply In Support Of Motion To Change
26 Venue to the Defendants Opposition To Motion to Change Venue ("Opposition") filed by
27 Defendants.
28

I. INTRODUCTION

At the heart of our democracy is the unwavering belief that every individual deserves a fair and
impartial trial. It's the cornerstone of our judicial system and is deeply rooted in our nation's

1 Constitution. As we venture into this Motion for Change of Venue, it's imperative to recognize that
2 the plaintiff, Beadles, is not merely seeking a change in geographic location but is imploring the
3 court for a venue where justice can be genuinely blind and unbiased. The media's persistent portrayal
4 of Beadles, influenced by the defendants, has fundamentally challenged the essence of a fair trial in
5 Washoe County. Beyond the plaintiff's rightful claims and assertions, there is the sacrosanct duty of
6 the court to ensure that the tenets of justice are upheld. In the realm of justice, every party should be
7 given the unprejudiced space to present their case, a principle that the revered Ben Franklin, the
8 great uncle to Mr. Beadles, championed. The question before the court is not just whether Beadles
9 has been unfairly characterized in Washoe County but whether the inherent rights bestowed upon
10 every individual by our Constitution are being upheld. With the backdrop of this historic legacy and
11 the invaluable principles of fairness, impartiality, and justice, Plaintiff respectfully presents the
12 reasons why this case should be moved to Lyon County, Nevada.
13

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15 **II. ARGUMENT**

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18 **A. THE BASIS FOR THE CHANGE OF VENUE IS FOUNDED ON LEGITIMATE**
19 **CONCERNS**

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21 "It is not only of some importance but is of fundamental importance that justice should not only be
22 done, but should manifestly and undoubtedly be seen to be done." - Sir William Blackstone
23

24
25 "An impartial judge is like a balance beam. It must be level in order to weigh the evidence fairly." -
26 Earl Warren, Chief Justice of the Supreme Court of the United States
27

28 Impartiality Concerns Are Well-Founded. In fact, it is now impossible for Beadles to receive a fair

1 trial in Washoe County. The defense, judges, clerks, and defendants, appear to all have professional
2 and/or personal relationships. The defense, defendants, and media all appear to be working in
3 concert against Beadles for a trial by ambush. In [Exhibit 132], it's evident that receiving a fair trial
4 for Beadles in Washoe County is now an impossibility due to their shenanigans at best. One can
5 observe Defendant Hill using the media, the DA, resorting to libel and slander against Beadles, by
6 sending out a request for financial gain for her own campaign! What's worse? We're told she used
7 the entire Washoe County email database, as she is a sitting County Commissioner with access to it!
8 She clearly did this to further taint the case and for financial gain [Exhibit 134, 135, 139 and 140].
9 The Washoe County justice system clearly has been weaponized against Beadles here in Washoe
10 County. Additionally, the defense again tries to obfuscate the truth when they state that NRS 239
11 allows them to share "public records with the media." While that is true, what the defense fails to
12 admit is the press did not ask for the *Motion For Sanctions*; the defense sent it to the media, it
13 appears, even before it was sent to the Plaintiff.¹³² Additionally, the *Motion For Sanctions*, which
14 was filed with libelous defaming mistruths, should have been NON-PUBLIC for the 21 days as
15 required by law for the Plaintiff to decide whether or not he wants to move forward with the case or
16 to dismiss it. It is clear that the Defense, the Defendants, and the media are all working against
17 Beadles unethically.

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19
20 While the defendants try to downplay the significance of the clear biases and affiliations in Washoe
21 County, Beadles' concerns are neither unfounded nor without basis. It's not merely the appearance of
22 lack of impartiality that's at stake here; there is a direct blatant display of bias and partiality.
23
24

25 **Public Interests Are Varied and Not Solely Financial.**

26 Although the Opposition cites financial and administrative concerns, the essence of public interest is
27 the fair administration of justice. The potential savings of taxpayer dollars cannot and should not
28 outweigh a party's right to an impartial trial. Furthermore, it is in the public's best interest that

1 Beadles receives a change of venue to Lyon County where bias is less likely. If Beadles is successful
2 in his case, many relief items could save taxpayers millions of dollars and ensure their Constitutional
3 rights are upheld by the Defendants.

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6 **B. CONCERNS REGARDING A JURY TRIAL ARE MISPLACED**

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8 **Right to an Impartial Adjudicator is Paramount.**

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10 Regardless of whether a jury trial is anticipated for Cause 2 under NRS 283.440 or Cause 1
11 pertaining to violations of Nevada Constitution Articles 1, 2, 15, and the Voter's Bill of Rights, the
12 underlying principle remains: every litigant is entitled to an impartial judge and jury. The importance
13 of venue cannot be diminished just because a jury trial may not be immediately forthcoming for
14 either or both causes of action. Beadles retains the unequivocal constitutional right to a just and
15 unbiased trial.
16

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18 **Judges, Though Presumed Unbiased, Are Human.**

19 The Opposition leans heavily on the presumption of judge impartiality. While this presumption
20 exists, it does not negate the possibility, nor the appearance, of potential biases.
21

22 **Right to Jury Trial in Constitutional Violations:** The Plaintiff's primary cause of action alleges
23 violations of several articles of the Nevada Constitution. In constitutional cases, particularly where
24 individual rights are at stake, the right to a jury trial should not be narrowly construed.
25

26
27 **Monetary Damages Claim:** The Defendant's contention that neither cause of action seeks monetary
28 damages is without merit. The Plaintiff's remedies specifically demand "Award monetary damages

1 in excess of \$15,000” as well as punitive damages. Traditionally, claims for damages, especially
2 punitive damages, are legal in nature and come with the right to a jury trial.

3
4 **Equitable Claims and Right to Jury:** While it is a general principle that equitable claims do not
5 entitle one to a jury trial, the presence of legal claims alongside equitable ones does warrant a jury
6 trial. This principle is enshrined in the Seventh Amendment of the U.S. Constitution and is
7 applicable to states via the Fourteenth Amendment. The Plaintiff, in this case, is seeking both legal
8 and equitable relief, which entitles them to a jury trial on their legal claims.
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11 **Discretion of the Court:** As stated by the Defense, NRS 34.220 provides that the Court may, in its
12 discretion, order a jury trial in a mandamus action. Given the significance of the matters at hand and
13 the direct impact on individual rights, it is appropriate for the Court to exercise its discretion in favor
14 of a jury trial.
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16
17 **Precedence on Removal Proceedings:** While the Defendant cites Jones v. Eighth Jud. Dist. Ct. of
18 State for the proposition that removal proceedings do not come with the right to a jury, it is essential
19 to recognize that the Plaintiff's claim extends beyond just a simple removal. Given the demand for
20 monetary and punitive damages and the significance of the constitutional violations alleged, the
21 scope and depth of this case necessitate the use of a jury to determine the facts.
22

23
24 **Purpose of a Jury:** A jury's purpose is to ensure that a community's standards and values are
25 represented in the legal process. Given the allegations of constitutional violations, and the fact that
26 they revolve around the very essence of a democratic process—voting—it is quintessential that the
27 community has a say in this matter.
28

1 The Plaintiff's claims, while including equitable remedies, predominantly revolve around legal rights
2 and damages. As such, the Plaintiff is entitled to a jury trial, and any suggestion to the contrary
3 disregards the fundamental principles enshrined in both the U.S. and Nevada Constitutions. The
4 Plaintiff respectfully demands the Court to recognize Beadles' right to a jury trial and dismiss the
5 Defendant's arguments against the same.

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8 **C. THE CLAIM OF FORUM SHOPPING IS MISLEADING AND UNFOUNDED**

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10 **Seeking Impartiality is Not Forum Shopping.**

11 The Opposition's claim of "forum shopping" misconstrues Beadles' motives. Seeking a venue where
12 justice can be impartially administered is a right, not a strategic game.

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14 **Prior Actions Do Not Demonstrate Ill Intent.**

15 Beadles' prior actions, including motions related to the judicial assignment, were born out of
16 legitimate concerns, not attempts to manipulate the system.

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19 **D. VENUE IS A FUNDAMENTAL ASPECT OF FAIR TRIAL**

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

24
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26 Due to the publicity, Beadles has received from the press, defense and the defendants, working in
27 concert, he has become, or is close to becoming, a household name in much of Washoe County.

28 Within this context, Beadles's reputation has been severely tarnished by the Defendants. The

1 remedies that Beadles seeks will benefit all Washoe County voters, and it is in their best interest to
2 have the facts heard in Lyon County. The defendants attempt to portray Beadles as some type of
3 right-wing conspiracy theorist, which is far from the truth. Beadles is a direct descendant of Ben
4 Franklin, his great nephew, and wishes only to ensure that all legal votes from Washoe County
5 residents are counted as per the Nevada and US Constitution demand. The defendants are overtly
6 using the media, defense, their platforms, county resources, and more to discredit Beadles rather than
7 disprove his assertions.
8

9
10 **20 examples of this** are in [Exhibit 132]. This is just in the past few weeks; if you go back over the
11 past year or more, you will find dozens more. **All of these articles paint Beadles in a bad light;**
12 **none are favorable to Beadles.** All of which are tied directly or indirectly to the defendants and
13 defense against Beadles.
14

15 **A few examples of which are:**
16

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

20 **Snippets from the article include:**

21 In a letter from Deputy District Attorney Lindsay Liddell, Beadles is urged to withdraw his
22 “frivolous” court filing or else face sanctions.
23

24 “This case is an abuse of the judicial process,” Liddell wrote in a proposed motion for sanctions also
25 emailed to Beadles. “The Beadles’ Complaint is disconnected from the law and from reality. The
26 Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be
27 sanctioned, and Defendants should likewise be awarded attorneys’ fees.” Beadles “frivolously filed
28 the Complaint with claims not warranted by existing law, not supported by facts, and to harass” Hill,

1 Brown, and Rodriguez, the proposed motion says. Its language is harsh, calling his complaint
2 baseless, deluded, disjointed, and abusive. There's even a footnote saying that if attorneys were
3 involved in ghostwriting Beadles' lawsuit, they may be open to sanctions, too, for not disclosing
4 their identities. It also claims he has a specific vendetta against Hill that shows his lawsuit isn't about
5 remedying electoral legal matters but harassment. "Beadles' choice to name Commissioner Hill as a
6 defendant rather than all commissioners suggests Beadles seeks to harass Commissioner Hill with
7 this action," Liddell writes. "Some of the aforementioned statements are so vague that a pointed
8 response is difficult, but the statements are nonetheless inaccurate rantings of a conspiracy theorist
9 disconnected from any legitimate claim," Liddell wrote. The proposed motion includes an as-yet-
10 unsigned declaration by Rodriguez that Beadles' specific fraud claims are "false." "Beadles knows
11 or should know, based on the information Washoe County has thus far directly or indirectly provided
12 to him, that his delusions are not accurate, yet he presents them in a court of law," it says. "Beadles
13 is free to use his website to express himself," Liddell adds. "The Court, however, is not an
14 appropriate venue for such behavior."
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18 **RGJ, dated 8/8/23.**

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

20 "DA's Office response: Beadles lawsuit 'frivolous,' 'disconnected from reality'; warns of sanctions if
21 it's not withdrawn."
22

23
24 **RGJ again on 8/11/23.**

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

26
27 "In response to the first lawsuit, the Washoe County District Attorney's office sent Beadles a letter
28 on Tuesday calling his claims the "inaccurate rantings of a conspiracy theorist" and warning that if

1 he didn't withdraw it, sanctions would be sought against him.

2 "The Beadles' Complaint is disconnected from the law and from reality," the letter said. "The
3 Complaint and its frivolous and unfounded claims should be dismissed, Beadles should be
4 sanctioned, and Defendants should likewise be awarded attorneys' fees." "Some of the
5 aforementioned statements are so vague that a pointed response is difficult, but the statements are
6 nonetheless inaccurate rantings of a conspiracy theorist disconnected from any legitimate claim," it
7 wrote in the proposed motion for sanctions. "Beadles knows or should know, based on the
8 information Washoe County has thus far directly or indirectly provided to him, that his delusions are
9 not accurate, yet he presents them in a court of law."
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12 **The global Associated Press, which directly quotes the RGJ and Defense states:**

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14 "But Robert Beadles, a wealthy ex-California businessman and right-wing activist who has
15 embraced many Republicans' disproven claims of election fraud, is vowing to continue his legal
16 battle in state court. He has filed a new lawsuit in Washoe County District Court with similar
17 allegations of fraud and other wrongdoing." "Washoe County District Attorney Chris Hicks said in
18 the letter to Beadles Tuesday provided to The Associated Press late Thursday that his lawsuit
19 subjects him to sanctions because the sole purpose is to "harass and engage government entities and
20 officials in costly frivolous litigation." Hicks attached a draft copy of a motion he said they'd file
21 unless he withdrew it. It said that since moving to Reno, Beadles has "engaged in a scheme to
22 disrupt local and state government operations." "Beadles' lawsuit "contains various baseless and
23 delusory allegations disjointed from any viable legal claim," Deputy District Attorney Lindsay
24 Liddell wrote in the draft motion. She described it as "inaccurate rantings of a conspiracy theorist
25 disconnected from any legitimate claim." "Election officials have explained that his data is
26 inaccurate."
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3 **The plaintiff can continue to show example after example**, but just [Exhibit 132] alone will show
4 the court that Beadles has no chance of a fair trial in Washoe County. The defense uses mistruths in
5 their opposition to change of venue to state, *“In the present case, the nature and extent of pretrial*
6 *publicity has, to date, been minimal. Only a handful of articles have been published, detailing both*
7 *the Complaint Beadles filed and the Rule 11 letter Defendants served in Beadles’s first case.1 The*
8 *media coverage is no more inflammatory than Beadles’s own Complaint. Beadles included*
9 *demonstrate the media’s efforts to take a neutral position by requesting his comment before*
10 *publishing. Highlighting the absurdity of Beadles’s claim that media coverage somehow deprives*
11 *him of the ability to have a fair trial, Beadles himself is the primary source of much pretrial*
12 *publicity, as demonstrated by multiple articles quoting Beadles’ public blog, “Operation Sunlight.”*
13 *Although there are several news articles relevant to this case, the medial quantity and nature of*
14 *media coverage falls far short of the one-sided pervasive and prejudicial coverage that would*
15 *necessitate a change of venue. The first factor favors denying the Motion to Change Venue. The*
16 *second factor is the size of the community. Washoe County has nearly a half million people. There is*
17 *no evidence that with a population this size, it would be difficult to seat a jury that had not been*
18 *exposed to any prejudicial publicity.”*
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23 To start, the defense says only a handful of articles have been published about Beadles. A quick
24 glance at [Exhibit 132] will show that unless the Defense is an octopus with 8 arms and 10 hands, it's
25 more than a handful—and that's just in a few days. This does not take into account the TV and
26 online coverage as well. The defense's statement that there is “no evidence that with a population
27 this size, it would be difficult to seat a jury that had not been exposed to any prejudicial publicity” is
28 untruthful. A simple web search will show that the TV coverage of the major stations, which all

1 appear to have run libelous and slanderous stories on Beadles, reaches into almost all homes in
2 Washoe County. DAILY viewership from web searches appears to be 100,000 people per day
3 viewing each of these TV stations: KOLO 8, KRNV 3, KTVN, FOX, and on News 4. Their online
4 social media reach is comparable as well. The RGJ appears to reach 140,000 homes in Washoe, with
5 a similar online presence. Moreover, the Associated Press, according to a 2022 Pew Research Center
6 report, is the most trusted news source in the United States and has a significant presence in Washoe
7 County. It's ridiculous to state that the lead person, who is fighting for free and fair elections in
8 Washoe County and who has been chastised by the defendants using the media for nearly 2 years
9 straight, can find a jury of his peers who are not already tainted due to this enormous media reach
10 that has clearly reached most, if not all, homes in Washoe County. Additionally, the defense states
11 that "*Beadles himself is the primary source of much pretrial publicity, as demonstrated by multiple*
12 *articles quoting Beadles' public blog, 'Operation Sunlight.'*" This statement is absurd, as it is the only
13 place—a personal opinion blog—where Beadles can share his thoughts and findings. It is a far cry
14 from the so-called trusted media of Washoe County, which is supposed to report "Truth," not
15 opinions. Washoe citizens look to the RGJ, AP, and others for "Truth." With Operation Sunlight,
16 they go to hear Beadles' opinions and what he exposes to the county. The two are not the same. It is
17 evident that the county's citizens have been exposed to the press's libelous and slanderous one-sided
18 commentary of Beadles for the past year or two. There is now no chance for a fair trial for Beadles
19 in Washoe.
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24 When the facts emerge, Beadles will be vindicated. It is essential and in the best interest of all
25 Washoe voters to have the case transferred to Lyon County. The defense's arguments to the contrary
26 stem from their desire to control the entire process and deprive Beadles of his right to a fair trial.
27 NRS 13.050(2)(b) allows for a change of venue in a civil case when there is reason to believe that an
28 impartial trial cannot be had in the county where the case originated. This clearly applies to this case.

1 For additional context, NRS 174.455 similarly allows for a change of venue in a criminal case when
2 a fair and impartial trial cannot be had in the county where the case is pending. Section 66.020 of the
3 Nevada Revised Statutes, outlines the circumstances in which a court may change the place of trial.
4 According to this statute, the court may change the place of trial on motion if the justice is a material
5 witness, the party believes they cannot receive a fair trial due to the justice's bias, the party cannot
6 receive a fair trial due to the bias of the citizens in the county, the justice is disqualified, or the
7 justice is sick or unable to act.
8

9
10 **Beadles meets all 5 prongs as stated above and required by Nat'l Collegiate Athletic Ass'n v.**
11 **Tarkanian**, 113 Nev. 610 (Nev. 1997) *"A motion for change of venue must be granted where there*
12 *is a reasonable likelihood that in the absence of such relief, an impartial trial cannot be held.*
13 *Martinez v. Superior Court*, 629 P.2d 502, 503 (Cal. 1981) (citing *Maine v. Superior Court*, 66
14 *Cal.Rptr. 724 (Cal. 1968)*). Courts look to five factors to determine if venue should be transferred:
15 (1) the nature and extent of pretrial publicity; (2) the size of the community; (3) the nature and
16 gravity of the lawsuit; (4) the status of the plaintiff and defendant in the community; and (5) the
17 existence of political overtones in the case. *People v. Hamilton*, 774 P.2d 730, 737 (Cal. 1989)."
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20 *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), *"even a probability of bias can violate the*
21 *due process clause, undermining public confidence in the judiciary's ability to adjudicate*
22 *impartially."*
23

24
25 Additionally, *Patricio-Bellizzi v. Hill*, 475 P.3d 771 (Nev. 2020) shows this Honorable Court has the
26 ability to grant Beadles' motion to change venue to Lyon County:

27 *"Respondents' demand for a change of venue was timely filed, see NRS 13.050(1)(a) (requiring a*
28 *defendant seeking a change in venue to file a demand before the time to answer has expired), and*

1 *preceded respondents' motion for a change of venue, see Nevada Transit Co. v. Harris Brothers*
2 *Lumber Co., 80 Nev. 465, 468-69, 396 P.2d 133, 134 (1964) (explaining that a motion for a change*
3 *of venue does not meet the requirement that a written demand for a change of venue be filed). While*
4 *the demand contained two typographical errors, those errors were quickly corrected. See Tunnicliff*
5 *v. Holmes, 232 P. 148, 149 (Cal. Dist. Ct. App. 1924) (concluding that a typographical error in a*
6 *demand for a change of venue did not defeat the demand). Thus, we conclude the district court did*
7 *not err in granting the motion to change venue.”*

8
9 A THE NATURE AND EXTENT OF THE PRETRIAL PUBLICITY WARRANTS A
10 CHANGE OF VENUE.

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

16
17 B THE SIZE OF THE COMMUNITY WARRANTS A CHANCE OF VENUE

18 As stated above, the amount and type of publicity, coupled with the reach of the media,
19 permeate this community, making it impossible for Beadles to have a fair trial. Simply considering
20 the reach of the media outlets and the continued attacks on Beadles in this county of 500,000 people,
21 it becomes nearly impossible to find someone who hasn't heard about this “crazy right-wing election
22 denier, extremist” that the defendants, media, and defense have portrayed in this false light. It is
23 likely that a Washoe County jury pool will have heard of Beadles and have a negative opinion about
24 him based on the extensively broad media coverage Beadles has received.

25
26 C THE NATURE AND GRAVITY OF THE LAWSUIT JUSTIFIES CHANGING
27 VENUE

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

14 D THE STATUS OF THE PLAINTIFF AND DEFENDANT IN THE COMMUNITY
15 CLEARLY FAVORS A CHANGE OF VENUE
16

17 The media has painted Beadles in a false light, portraying him as some kind of extremist who
18 is trying to destroy the rights of voters, harass officials, and pose a threat to the community. Most
19 people in this community have heard this libelous story; even if they don't recognize his face or
20 name, they have heard about him. The media, defense, and defendants have turned Beadles into a
21 public figure. The defendants have sent out several emails to the entire County email list, as
22 demonstrated in [Exhibits 134, 135, 139, 140]. The media has written dozens of articles, and the
23 extensive TV and social media coverage has again depicted Beadles as some sort of extremist
24 villain, which couldn't be further from the truth. The plaintiff solely wants all legal voters' votes to
25 be counted legitimately and for election laws to be upheld. That shouldn't be controversial, yet the
26 defendants have purposely twisted the truth of the matter, thereby ruining any chance of an unbiased
27 trial and proceedings in Washoe County.
28

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

3 The media, defense, and defendants have worked in concert to make this entire case overtly
4 political, pitting Beadles against the County, as some sort of bad guy vs. them being the good guys.
5 This couldn't be further from the truth. Beadles has time and time again demonstrated the issues
6 with the election system [as shown in numerous exhibits] in Washoe County, only to be libeled and
7 slandered by them. Plaintiff has tried to resolve the issues with the defendants to no avail. Thus, we
8 are now here, in court. It is paramount this case be tried in an unbiased manner, where the evidence
9 is simply weighed and ruled upon by its merits. This is now impossible due to the defense,
10 defendants, and media working in concert. This case should not be political, all political parties
11 should embrace free and fair elections. This case will absolutely affect them all positively if Plaintiff
12 is allowed to present his evidence and prevail. What the defendants have done to poison that truth is
13 reprehensible. Beadles must be allowed his day in an unbiased court as his rights entitle him to. It is
14 the duty of this honorable court to ensure his rights are not impeded further.
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18 **E. REHASHING OF SAME ELECTION FRAUD THEORIES**

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20 Here again, the defense is obfuscating the truth. The plaintiff cares little for whatever cases have
21 been filed before him, or by him previously, or where they were filed. The facts of the case Beadles
22 presents are unique to Washoe County and will prove when the facts are heard the prior litigation
23 was absolutely warranted and had the remedies been granted then, we would not be in this place
24 now. Beadles in this complaint will show the jury clear and convincing facts that the defendants
25 broke the law and/or the oath of offices, committed malpractice, malfeasance or nonfeasance.
26 Additionally, it will show unique findings into unexplainable irregularities found within the Washoe
27 County election systems. The defense is clearly trying to disguise what the merits of this case will
28

1 expose, and how it will potentially show a role the defense plays in covering up the defendant's
2 crimes and/or malpractice, malfeasance, or nonfeasance. This is all the more reason to immediately
3 without delay move this entire case to Lyon County.

4
5 **F. REQUEST FOR SANCTIONS AND JUDGE REFER DEFENSE TO BAR FOR**
6 **VIOLATIONS**

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9 In reading the text messages between Mark Robison and Beadles [Exhibit 132], you can see the
10 defense sent the Motion For Sanctions directly to Robison, without Robison doing an NRS
11 information request. The defense says it's a public document; that is again untrue, as Beadles had 21
12 days to weigh whether he wanted to move forward with the Federal Lawsuit. Instead, he was
13 informed about it by the press 21 days early, before it became public record. The honorable court
14 can read the motion for sanctions and all the press coverage where the defense is quoted and quickly
15 see there are numerous ethical violations. The defense has violated the rules for professional conduct
16 under Rule 3.6 (a). *A lawyer who is participating or has participated in the investigation or*
17 *litigation of a matter shall not make an extrajudicial statement that the lawyer knows or reasonably*
18 *should know will be disseminated by means of public communication and will have a substantial*
19 *likelihood of materially prejudicing an adjudicative proceeding in the matter.* Defense, in concert
20 with the defendants and media, has tainted this lawsuit in Washoe County. The conspiracy between
21 the defense, defendants, and media is deplorable, and extrajudicial statements made by the defense
22 are inexcusable. Beadles hereby demands this honorable court to sanction the defense, namely Ms.
23 Liddel, and refer these gross violations to the BAR.
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28 **III. CONCLUSION**

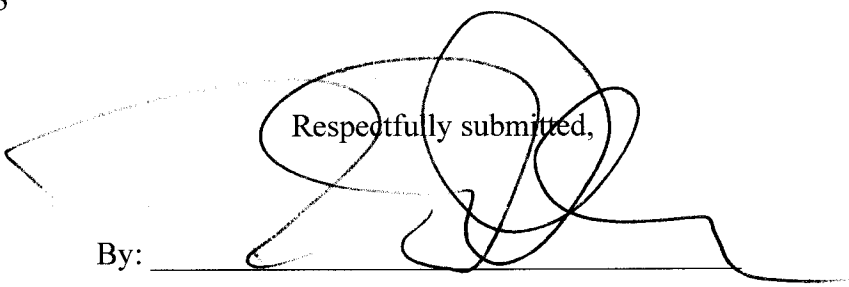
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A fair trial is not a trial by ambush. It is a trial in which both sides have an opportunity to present their case and to challenge the evidence of the other side." - John Adams, Second President of the United States.

It is clear to anyone outside looking in, there is an absolute appearance of impropriety and bias in Washoe County against Beadles. For the reasons mentioned above and those presented in the original motion, Beadles respectfully demands that the Court grant his Motion to Change Venue to Lyon County to ensure the fair and impartial administration of justice his rights entitle him to.

<https://g.co/bard/share/5f1633ac5e67> Link to media metrics

Dated: 8/24/23

Respectfully submitted,


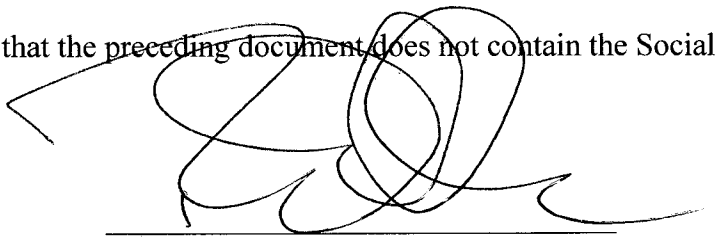
By: _____
ROBERT BEADLES, Plaintiff Pro Se

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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.

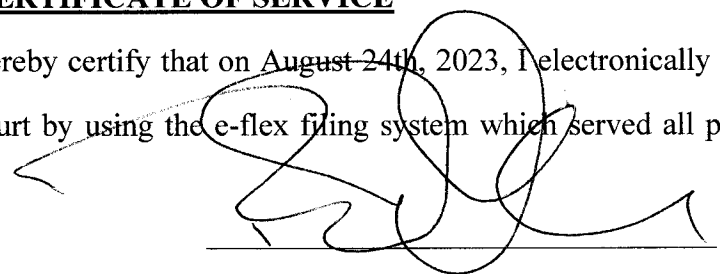
DATED: August 24th, 2023.



Robert Beadles, Plaintiff

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on August 24th, 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