

FILED

MAY 28 2024

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY *Mickna Stiles*  
DEPUTY CLERK

1  
2 ROBERT BEADLES  
3 10580 N. McCarran Blvd. #115, Apt. 386  
4 Reno, NV 89503  
Appellant, In Pro Per

5  
6 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

7 MR ROBERT BEADLES, an individual,  
8 Appellant,

9 vs.

10 JAMIE RODRIGUEZ, in her official  
11 capacity as Registrar of Voters and in her  
12 personal capacity; the WASHOE COUNTY  
13 REGISTRAR OF VOTERS, a government  
14 agency; ERIC BROWN in his official  
15 capacity as WASHOE COUNTY  
16 MANAGER and in his personal capacity,  
17 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.

18 Respondents.

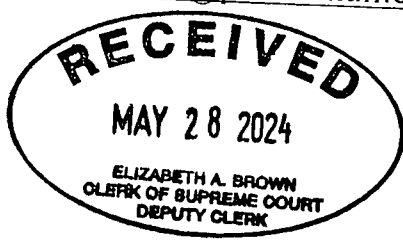
NVSC Case No.: 87683

District 1 Case No: 23-OC-00105 1B

District 2 Case No: CV23-01341

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20  
21 **NRAP RULE 40 Petition For Rehearing**

22 Robert Beadles, in Proper Person  
23 10580 N. McCarran Blvd. #115, Apt. 386  
24 Reno, NV 89503  
25 916-573-7133  
26 RobertBeadles@protonmail.com

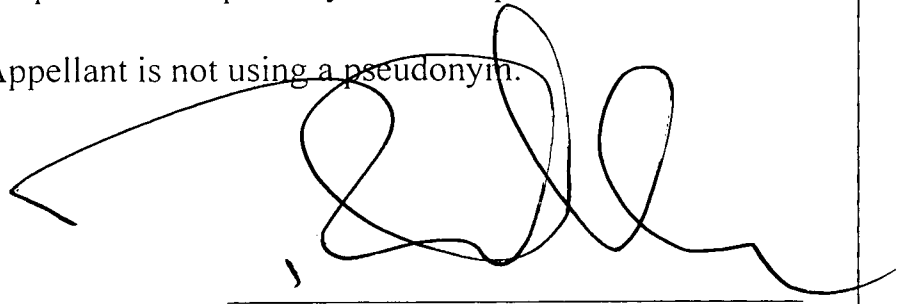


24-18547

NRAP 26.1 DISCLOSURE

The undersigned in proper person appellant certifies that the following are persons and entities as described in NRAP 26.1(a), and must be disclosed. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal. There are no parent corporations or publicly-held companies that own 10% or more of the Appellant. The Appellant is not using a pseudonym.

DATED: 5/28/24

A handwritten signature in black ink, appearing to read 'R. Beadles', written over a horizontal line.

Robert Beadles, Appellant In Pro Per

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## Exhibit Glossary

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- 3 Exhibit 1 ROV 11-17-22- Petition. 40 pg.
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- 5 Exhibit 2 11-23-22 Contest 12 pg.
- 6 Exhibit 3 Unanswered Petition served upon defendants 12/1/22. 19 pg.
- 7 Exhibit 4 Email exchange between the plaintiff and defendants. 5 pg.
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- 12 Exhibit 9 Email exchange between the plaintiff and defendants. 16 pg.
- 13 Exhibit 10 Addresses from tax records appearing in conflict to vote. 6 pg.
- 14 Exhibit 11 Addresses from tax records appearing in conflict to vote. 56 pg.
- 15 Exhibit 12 Addresses from tax records appearing in conflict to vote. 51 pg.
- 16 Exhibit 13 Addresses from tax records appearing in conflict to vote. 22 pg.
- 17 Exhibit 14 Addresses from tax records appearing in conflict to vote. 99 pg.
- 18 Exhibit 15 Detailed report showing tax record vs voter record concerns. 15 pg.
- 19 Exhibit 33 Petition proof 1 pg.
- 20 Exhibit 34 Petition proof 20 pg.
- 21 Exhibit 72 Washoe Observation Court Orders 6 pg.
- 22 Exhibit 109 Highlights of Supplemental Statements 4 pg.
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1 Exhibit 120 NV SOS 700 Complaints RGJ Article.pdf 4 pg.

2 Exhibit 127 Small Sample Of Violation Complaints sent to the SOS 33 pg.

3 Exhibit 163 11\_20\_23 Hearing Transcript-Court Reporter 37 pg.

4  
5 **NRAP RULE 2 and NRCR RULE 61:**

6 I ask this Honorable Court to adhere to NRAP Rule 2:

7 "On the court's own or a party's motion, the court may—to expedite its decision or for  
8 other good cause—suspend any provision of these Rules in a particular case and order  
9 proceedings as the court directs, except as otherwise provided in NRAP Rule 26(b),"  
10 if it applies. I additionally ask this Honorable Court to adhere to NRAP Rule 26(d),  
11 which grants the authority to: "Shorten Time. Except as otherwise provided in these  
12 Rules, or when not otherwise controlled by statute, the time prescribed by these Rules  
13 to perform any act may be shortened by stipulation of the parties, or by order of the  
14 court or a justice or judge."  
15  
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17

18 If I made any errors in the procedures or structure of this brief or prior filings with this  
19 Honorable Court, I ask, in the pursuit of justice, to allow this appeal and brief to  
20 proceed as per NRCR Rule 61, which states, "Unless justice requires otherwise, no  
21 error in admitting or excluding evidence—or any other error by the court or a party—  
22 is ground for granting a new trial, for setting aside a verdict, or for vacating,  
23 modifying, or otherwise disturbing a judgment or order. At every stage of the  
24 proceeding, the court must disregard all errors and defects that do not affect any  
25 party's substantial rights."  
26  
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1           **1. Introduction**

2  
3   On 5/15/95, this Court affirmed the lower D1 Court's ruling to dismiss my case,  
4   with prejudice. I am now appealing this Court's decision seeking a rehearing. Three  
5   Justices in this Court made several egregious errors in siding with the lower Court's  
6   ruling, which requires a rehearing so my Constitutionally enshrined rights are not  
7   further harmed. Of paramount importance too is that even if I somehow failed to  
8   state a claim in which I could be granted relief, I must be granted leave to amend  
9   as it is to be freely given, and I requested it numerous times.  
10  
11

12  
13           **2. Statement of the Case**

14  
15   On 8/4/23, I filed my complaint with the 2nd District Court in Washoe County.  
16   Judge Drakulich granted my motion to change venue; however, she granted it to  
17   D1 under Judge Russell, rather than the unbiased courts I had requested she send it  
18   to. According to statute, Judge Russell in D1 is required to accept all assertions in  
19   my complaint as true. However, Judge Russell overlooked the explicit language of  
20   my complaint and the supporting evidence provided, as well as what *NRCP Rule*  
21   *12(b)(5)* and *Rule 8(a)(2)* require to successfully defeat a motion to dismiss. Judge  
22   Russell dismissed my complaint with prejudice, despite my request for leave to  
23   amend, which should be freely given. I filed an appeal with this Court. Three  
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1 Justices within this Court either ignored or mistakenly missed the very things I  
2 included within my appeal that would have overcome their reasons for affirming  
3 the lower court's ruling. It is now paramount that this court shows the world it has  
4 not been politicized and will actually follow the law, and apply it equally for all.  
5 Key points this court used to affirm Russell's ruling are below. You will see I  
6 overcame the reasons this court affirmed Russell's ruling. It's paramount that this  
7 court realize that even if I somehow failed to state a claim as per *NRCP Rule*  
8 *8(a)(2)*, it is this court's duty to allow me leave to amend my complaint.

### 11 **3. Reasons for Granting Rehearing**

12 As per NRAP Rule 40, this court has overlooked or misapprehended a material  
13 fact, that if it stands, deprives me of my due process, and creates case law in  
14 Nevada that now completely undermines what NRCP Rule 12(b)(5), and Rule  
15 8(a)(2) mean, and how valid court orders are no longer enforceable in Nevada.  
16 This court additionally has a duty to reverse its decision as implied in *Cahill v.*  
17 *New York, N.H. & H.R. Co., 351 U.S. 183, 76 S.Ct. 758, 100 L.Ed. 1075 (1956).*

### 18 **4. NVSC Error: Early Engagement With The Secretary of State via NAC** 19 **293.025 Was Adhered To**

1 NAC 293.025 *Submission of complaint concerning violation of provision of title*  
2 *24 of NRS. (NRS 293.124) A person who wishes to file a complaint concerning*  
3 *an alleged violation of any provision of title 24 of NRS must:*

4  
5 1. *Submit the complaint in writing to the Secretary of State; and*

6  
7 2. *Sign the complaint.*

8  
9 *-The complaint may include proof of the alleged violation.*

10  
11 Pursuant to *NAC 293.025*, I diligently filed a written complaint to the Secretary of  
12 State about alleged violations under *NRS 293.124*, concerning Title 24 of the NRS.

13 Exhibit 1 and 3 show my grievances were first filed per *NAC 293.025* with the  
14 Secretary of State, Exhibit 33-34 shows proof the SOS received my grievances,  
15 Exhibit 120 shows the Secretary of State received over 700 complaints via *NAC*

16 *293.025*, Exhibit 127 shows several examples of me following *NAC 293.025* as  
17 well. All without any remedy from the Secretary of State, or Respondents. I  
18 exhausted all administrative processes with the Secretary of State with no remedy

19 nor redress of my grievances. Despite this thorough adherence to prescribed  
20 administrative procedures, no adequate remedy or acknowledgment was  
21 forthcoming. This neglect persisted through subsequent interactions, documented

22 in Exhibits 1-15, involving the respondents and Secretary of State, signaling a  
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1 systemic refusal to address election grievances as mandated by Nevada law, even  
2 after they said they would, but failed to.

3  
4 The silence from the Secretary of State and Respondents contravenes the due  
5 process and equal protection clauses stipulated in the *Nev Const.* and *Nev. Const.*  
6 *Art. 2 Sec. 1A § 11* and *NRS 293.2546*. Such inaction transforms *NAC 293.025* into  
7 an unconstitutional barrier that hinders public redress against official misconduct, a  
8 concern notably underscored by *James Madison in the Federalist Papers #10*  
9 regarding the impartiality required of those in positions of adjudication when he  
10 warned us, "*No man is allowed to be a judge in his own cause, because his interest*  
11 *would certainly bias his judgment, and, not improbably, corrupt his*  
12 *integrity.*" Allowing the Secretary of State to police itself, or the Respondents to  
13 police themselves is appalling; it is this court's duty to step in and enjoin them to  
14 do what is lawful

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19 Further, the Supreme Court's stance in *Darby v. Cisneros, 509 U.S. 137 (1993)*,  
20 reinforces the principle that judiciary intervention is necessary when all  
21 administrative avenues have been exhausted without resolution—precisely the  
22 scenario presented in my case. This precedent underpins the necessity for this  
23 Court to acknowledge the procedural diligence exercised in compliance with *NAC*  
24 *293.025* and to correct the lower court's oversight.

1 Moreover, referencing cases like *Law v. Whitmer* (136 Nev. 840, 2020) and  
2 *Anthony v. Miller* (137 Nev. 276, 2021), though dismissed on different grounds,  
3 emphasize the essential judicial consideration of election-related complaints  
4 irrespective of their initial outcomes. This illustrates that even if my adherence to  
5 *NAC 293.025* was in question—which it is not—precedent supports the argument  
6 that my case warrants judicial review.  
7

8  
9 This Court’s duty extends beyond mere procedural review to ensuring that  
10 substantial justice is served through the fair application of law, especially in cases  
11 impacting electoral integrity and public trust.  
12

### 13 14 **5. Error NVSC, My Exhibits Were Not Rogue**

15  
16 The Respondents Council was allowed to write the lower court's ruling that Judge  
17 Russell then just signed. They state that my exhibits were rogue, simply because  
18 they are so damning to their case. The Exhibits can not be rogue as I filed them at  
19 the same time as my **8/4/23 Original Complaint**. Additional exhibits were filed at  
20 the same time as the additional pleadings were filed. In my original complaint, this  
21 Court can clearly see from the docket that I filed 4 exhibits on 8/4/23 the date of  
22 my original complaint. Those exhibits, 1-3, 109 show all the proof in the world to  
23 overcome a *NRCP 12(b)(5)* ruling. They clearly show the numerous allegations,  
24 proof of the allegations, affidavits, petitions, etc. destroying the narrative that I  
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1 failed to meet the *NRCP Rule 12 (B)(5)* standard and that the exhibits were rogue. I  
2 then filed 112 more supplemental exhibits to the original 4 exhibits 5 days later, as  
3 exhibit 109 that was filed on 8/4/23 showed, and have filed 54 more exhibits with  
4 the various responses and motions since 8/9/23. As the docket will show, and as  
5 the exhibits show, they are not rogue, 116 were filed with the original complaint,  
6 and 54 more with the additional pleadings. Further, these exhibits show that I have  
7 gone above and beyond to obliterate the erroneous ruling stating I failed to state a  
8 claim in which I could be granted remedy. This is a ridiculous ruling as just the  
9 **first 4 exhibits and complaint filed on 8/4/23** do this. Additionally, the court  
10 orders I was granted Exhibit 72, clearly overcome a *Rule 12(B)(5)* as the  
11 Respondents are on video breaking the court orders (Exhibit 23-24), and NRS  
12 laws, the **Original Complaint filed on 8/4/23, on pages 15-16, viii**, show with  
13 zero doubt that court or this court could have, and can, simply enjoin the  
14 respondents to follow the law going forward. Again this one fact, easily overcomes  
15 the erroneous *Rule 12(b)(5)* dismissal. The Exhibits are not rogue, exhibits 1-3, and  
16 109 were filed with the original complaint on 8/4/23, on 8/9/23 the rest of the 116  
17 exhibits were filed, that were shown on exhibit 109, filed with the original  
18 complaint on 8/4/23. Many of these 1-116 exhibits easily overcome a *Rule*  
19 *12(B)(5)* dismissal and the dates of filings and what were filed show to anyone  
20 who looks they were not and are not rogue exhibits.  
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1       **6. Error NVSC, The Respondents Do Have A Duty To Respond**

2       As stated in section 1 above, I went through and followed *NAC 293.025* and *NRS*  
3       *293.407*. I exhausted all administrative avenues prior to filing my complaint in  
4       Washoe D2 Court. So, if the Secretary of State, the Washoe County ROV, the  
5       Respondents who run our elections have no duty to respond to my election  
6       grievances, who does? If this Court refuses to enjoin them to respond, who will? If  
7       this court fails to read the plain language of the US Constitution and of our Nevada  
8       Constitution and interpret the duty of these people to redress my grievances in  
9       favor of the people it is to protect, like myself, versus the people who are hiding  
10       from the crimes they may be committing, like the Respondents, there is no justice  
11       in this Court. *Cases Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009, Ex*  
12       *parte McCardle, 74 U.S. 506 (1868), Logan v. Zimmerman Brush Co., 455 U.S.*  
13       *422 (1982), Herrera v. Collins, 506 U.S. 390 (1993)* all demonstrate this to a large  
14       degree.  
15

16       *NRS 293.2546(11)* states, “To have complaints about elections and election  
17       contests resolved fairly, accurately, and efficiently.” That has never happened;  
18       there has been nothing fair, accurate, or efficient in this process, and I certainly  
19       was never granted resolution. I jumped through the administrative hoops via *NAC*  
20       *293.025* with again no remedy. I brought forth my complaints to the lower court  
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1 just to have it thrown out erroneously, to then have this court throw out my  
2 complaint, all of this is clearly a violation of my NV Constitutional Rights under  
3 *Article 1 Section 8* and my 14th Amendment rights via the US Constitution: “*nor*  
4 *shall any State deprive any person of life, liberty, or property, without due process*  
5 *of law; nor deny to any person within its jurisdiction the equal protection of the*  
6 *laws.*”  
7

8  
9 In the landmark case of *Myers v. Reno Cab Co., Inc.*, 137 Nev. Adv. Op. 36 (July  
10 29 2021), the Supreme Court of Nevada emphasized the critical importance of  
11 applying precise legal standards to assess employment status, firmly establishing  
12 that mere contractual labels are insufficient to bypass statutory and constitutional  
13 safeguards. This principle is directly applicable to my situation, where despite the  
14 respondents’ attempt to characterize our relationship through contractual terms, the  
15 actual dynamics of our interaction and my reliance on their statutory obligations  
16 call for a substantive judicial examination. Much like Myers, who pursued all  
17 required administrative remedies before approaching the courts, I too methodically  
18 fulfilled every procedural requirement, engaging thoroughly with both the  
19 Secretary of State and the respondents before seeking judicial recourse. This  
20 conscientious adherence underscores the necessity for judicial intervention to  
21 uphold accountability. The Nevada Supreme Court's role transcends simple  
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1 procedural reviews; it acts as a stalwart guardian of justice, charged with  
2 preserving the integrity of both administrative and legal processes, ensuring that  
3 public trust is not breached and that individuals like myself are afforded the justice  
4 they seek. The court's decisions in *Zgombic v. State* 798 P.2d 548 (1990) and *Clem*  
5 *v. State*, 104 Nev. 351, 760 P.2d 103, among others, illustrate its pivotal  
6 responsibility to interpret statutory language fairly and judiciously, protecting all  
7 citizens from disproportionate or unjust outcomes. In my case, the premature  
8 dismissal of my complaint, disregarding my exhaustive pursuit of all available  
9 administrative remedies, risks setting a dangerous precedent where public officials  
10 can evade accountability, thus undermining the rule of law and contradicting the  
11 judiciary's duty to prevent the misapplication of administrative powers. It is  
12 therefore crucial for the Supreme Court of Nevada to correct this oversight,  
13 reaffirming that no one, especially those in public service, is above the law. The  
14 court must assert where administrative mechanisms and self-regulation fail,  
15 reinforcing its dedication to equal justice and the strict enforcement of legal  
16 standards. This is not merely a procedural necessity but a fundamental imperative  
17 to maintain public confidence in the judicial system's capacity to dispense  
18 unbiased justice.  
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1 **7. Error NVSC, There are Numerous Claims Remedy Can Be Granted On**

2  
3 There are multiple claims in the **original complaint** as drafted that do not warrant  
4 dismissal, pursuant to NRCP Rule 12(b)(5). I will highlight a few examples of  
5 specific claims that survive.  
6

7 **The Original Complaint filed on 8/4/23**, as drafted, and the exhibits that  
8 accompanied and were referenced therein should not have been dismissed on their  
9 face pursuant to *NRCP Rule 12(b)(5)* for the reasons set forth below, and in this  
10 petition. The plain language of the **complaint** and accompanying exhibits starting  
11 with Exhibit 109 submitted with the **Original Complaint on 8/4/23**, are in  
12 accordance with *NRCP Rule 8(a)(2)*. Exhibit 109 lists dozens of allegations  
13 corroborated by the **8/4/23 submitted Exhibits 1-3** and further evidenced by the  
14 116 additional exhibits also referenced in Exhibit 109. Example, Exhibit 3 contains  
15 affidavits from Washoe County Election Workers and observers, stating that the  
16 Respondents failed to perform signature verification required by law. These  
17 witnesses, under penalty of perjury, declared they were either instructed by the  
18 ROV to disregard lawful signature verification procedures or observed others  
19 doing so. All witnesses have agreed to be cross-examined in court in addition to  
20 their affidavits. Another simple example is Exhibit 72 which are valid court orders  
21 that the defendants broke, on video, shown in exhibits 23-24, all of which was  
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1 originally plead in the **original filing on 8/4/23** in Exhibit 109. In my Original  
2 Complaint it very clearly lists 2 causes of action, on page 12 paragraph 80 it states:

3 *“In addition, Defendants have failed to address, correct, or rectify the issues*  
4 *raised in the underlying Petitions, including but not limited to, (1) updating and*  
5 *resolving the voter registration lists; (2) providing proper vote counting*  
6 *mechanisms; (3) counting votes in secret; (4) inadequate signature verification;*  
7 *(5) illegal function within the election system; (6) violations of election*  
8 *procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an*

9 *injunction regarding the foregoing.”* Further, the 8/4/23 Original Complaint states  
10 on page 11, paragraph 70, *“Defendants, and each of them, have a duty to uphold*  
11 *Plaintiff’s constitutional rights.”* The respondents, each of them swore an oath to  
12 defend and uphold our constitution, by breaking the law, not redressing my  
13 grievances, they have harmed me in which this court can grant me remedy as **per**  
14 **pages 15-16 of the Original Complaint vii**, where it states, *“Enjoin Defendants*

15 *from their continued violations of the following NRSs and strictly comply with NRS*  
16 *293.530, NRS 293.2546(11), NRS 293B.033, NRS 293.269927, NRS 293.740, NRS*  
17 *293B.063, NRS 293B.104, NRS 293B.1045(1), NAC 293B.110(1)(b), NRS*  
18 *293.269931(1), NRS 293.3606(1), NRS 293.363(1), NRS 293B.353, NRS 293B.354,*  
19 *NRS 293B.380(2)(a), NAC 293.311(4), NRS 293.423, NRS 293.269927(4)(b), NRS*  
20 *293.277(3), NRS 293.285(1)(b)(4), NRS 293.3075(4), NRS 293.3585(1)(d), NRS*

1 293.403(2), NRS 293.404(2), Nev. Const. Art. 2 Sec. 1A § 1(b)” 8/4/23 filed

2 **Exhibit 109** states they broke my court orders and counted our votes in secret. A  
3 complete disregard of my court orders Exhibit 72. In these clear examples, this  
4 court has the duty to reverse its ruling and the ruling of the lower court as  
5 numerous remedies are available to me. At a minimum, all this court or lower court  
6 had to do was simply Enjoin the Respondents to follow the law!  
7

8  
9 NRCP Rule 12(b)(5) states, “failure to state a claim upon which relief can be  
10 granted.”  
11

12 NRCP Rule 8(a)(2) states, “a short and plain statement of the claim showing that  
13 the pleader is entitled to relief.”  
14

15 In just these quick examples shown in my **Original Complaint**, and its attached  
16 exhibits, I overcome the *NRCP Rule 12(b)(5)* dismissal and adhered to *Rule*  
17 *8(a)(2)*.  
18

19  
20 There is no legitimate reason why my **Original Complaint** does not overcome a  
21 *NRCP Rule 12(b)(5)* motion based on the examples above. If this court says the  
22 respondents have no duty to answer me, I urge you to read section six above. If the  
23 respondents, who are conducting the elections, have no duty to follow the law or  
24 face consequences for breaking it, then what is the use of having courts in Nevada  
25  
26

1 if they won't distribute law and justice equally amongst all who live under it? An  
2 example of the necessity of this court's role to grant my petition is *Oregon v.*  
3 *Mitchell*, 400 U.S. 112 1970, the Supreme Court upheld key provisions of the 1970  
4 Voting Rights Act amendments, emphasizing the judiciary's vital role in enforcing  
5 laws that ensure fair electoral processes. This case underscores the necessity of  
6 judicial oversight in maintaining the integrity of elections and adherence to  
7 constitutional standards. Our case similarly requires such judicial intervention to  
8 uphold the legality and fairness of election administration.  
9  
10

11  
12 In the case of *Jason A. Crowe v. McCarthy & Holthus, LLP et al*, the United States  
13 District Court for the District of Nevada meticulously outlined the legal standards  
14 for amending complaints and the dismissal of cases that fail to state a claim under  
15 *Rule 12(b)(6)* or do not meet the pleading requirements of Rule 8. This framework  
16 is crucial when comparing it to my case, where numerous well-documented  
17 allegations conform to the requirements of *NRCP Rule 12(b)(5)* for stating a claim  
18 upon which relief can be granted, and *Rule 8(a)(2)*, which demands a clear and  
19 concise statement of claims showing entitlement to relief. My **Original**  
20 **Complaint**, backed by a wealth of evidence and detailed in multiple exhibits,  
21 points to systematic violations of legal procedures and rights, each potentially  
22 grounding separate claims for relief.  
23  
24  
25  
26  
27

1 In Crowe's scenario, failure to procedurally conform to court rules resulted in  
2 dismissal; however, his opportunity to amend was also curtailed by these failures.  
3 In contrast, my complaint presents a situation where, even if some claims might be  
4 dismissed as in Crowe's case, the multitude of other claims—each substantiated by  
5 specific allegations and evidence—provides an absolute need for the case to  
6 proceed. This not only underscores the necessity of the court's oversight in  
7 ensuring that each claim is individually assessed for its merit but also illustrates  
8 that even a single viable claim can suffice to sustain an action. Therefore, the  
9 principles laid out in Crowe's dismissal should justify a reevaluation of my case,  
10 emphasizing that the presence of multiple claims, if even one is actionable,  
11 mandates the continuation of legal proceedings to ensure justice and the proper  
12 application of the law. This is integral to uphold the judicial responsibility to  
13 distribute law and justice equitably, adhering to the established legal standards and  
14 principles, thereby safeguarding the procedural rights of individuals against  
15 arbitrary dismissals.

21 **8. Error NVSC, NRS 283.440 Does Apply**

23 In **Cause Two** of my **Original Complaint**, I state the Respondents need to be  
24 removed from office under *NRS 283.440*. *NRS 266.430* was listed as another  
25 option; however, *NRS 283.440* does apply, and the entire cause of action must not  
26

1 be thrown out simply because I listed two means by which removal can be granted,  
2 even if only one means is available to me as a citizen. The Respondents at the time  
3 of my **Original Complaint** all held public office. *NRS 283.440(1)* states, “*Any*  
4 *person who is now holding or who shall hereafter hold any office in this State and*  
5 *who refuses or neglects to perform any official act in the manner and form*  
6 *prescribed by law, or who is guilty of any malpractice or malfeasance in office,*  
7 *may be removed therefrom as hereinafter prescribed in this section.”* That means  
8  
9 ANY PERSON holding office can be removed from it; the Respondents all fit the  
10 positions from which they can be removed. This is demonstrated in *Mason v.*  
11 *Gammick, No. 71691 (Nev. App. June 26, 2017), Charles A. Muth v. Robert Loux,*  
12 *No. 2008 WL 6498697 (Nev. Dist. Ct., First Judicial Dist., Carson City County,*  
13 *Trial Order).* The defense acknowledges I have the authority to remove the  
14 respondents from office via *NRS 283.440*, citing *Madsen v. Brown, 701 P.2d 1086,*  
15 *1093 (Utah 1985)* in their *Motion to Dismiss, page 11, lines 5-15.*  
16  
17  
18  
19

20 Exhibit 109, originally filed on 8/4/23, with my Original Complaint shows  
21 numerous allegations in which the respondents committed malpractice or  
22 malfeasance, further backed by proof Exhibit 109 points to. Breaking election  
23 laws, court orders, etc. as shown in the exhibits filed at the same time as the  
24 original complaint, all justify removal from office. It's insane to allow public  
25  
26  
27

1 officials to break laws at will, with no potential for legal repercussions or removal  
2 from office. The *NRCP Rule 12(b)(5)* dismissal must be overturned for this second  
3 cause of action in my **Original Complaint**, and a trial must be held to weigh the  
4 evidence of the respondents' guilt and potential for removal from office. At a  
5 minimum, leave to amend must be granted.  
6

### 7 8 **9. Error NVSC, Change Of Venue VS Jury Trial**

9  
10 I won't rehash all the reasons in which I should be granted a change of venue; the  
11 evidence is and was clear and convincing. Simply reading my motions, and  
12 pleadings to change venue paints a clear picture as to how I wouldn't receive a fair  
13 hearing in Russell's courtroom, and as Judge Russell's ruling proved me right. The  
14 laughable metric Judge Russell used to deny my motion to change venue was he  
15 stated he didn't know who I was, so he would not change the venue. See *Official*  
16 *Transcript, Exhibit 163, page 13, lines 12-24, and page 14, lines 1-6*. I don't  
17 believe he was telling the truth, as several people have come forward and told me  
18 he absolutely knew who I was prior to his erroneous ruling. If he wouldn't, and  
19 you won't change the venue to an unbiased court, then you must uphold my  
20 constitutionally enshrined rights and grant me a jury trial in District 1, Carson City  
21 court for the citizens themselves to weigh the evidence. Per *NRCP Rules 38-*  
22 *39*, additionally the constitution grants me these rights under *The NV Constitution*  
23  
24  
25  
26  
27

1 Article 1 Section 3: “The right of trial by Jury shall be secured to all and remain  
2 inviolate forever; but a Jury trial may be waived by the parties in all civil cases in  
3 the manner to be prescribed by law; and in civil cases, if three-fourths of the  
4 Jurors agree upon a verdict it shall stand and have the same force and effect as a  
5 verdict by the whole Jury...” I did not waive my right to a Jury Trial, my  
6 complaint, evidence and exhibits overcome a *Rule 12(b)(5)* dismissal, if I am not  
7 granted a change of venue, then I demand my right to a Jury Trial be granted in  
8 Carson City D1 Court as per the Constitution entitles me. Additionally,  
9 *Roethlisberger v. McNulty, 127 Nev. Adv. Op. No. 48, 54774 (2011), 256 P.3d 955,*  
10 *127 Nev. Adv. Op. 48 (Nev. 2011)* shows that even if a motion to change venue is  
11 denied, the case still goes forward in the original court where the motion to change  
12 venue was filed.  
13  
14  
15  
16

#### 17 **10. Error NVSC, Leave to Amend or Errors Not Granted**

18  
19 “In the absence of any apparent or declared reason—such as undue delay, bad  
20 faith, or dilatory motive on the part of the movant—the leave sought should be  
21 freely given.” This is demonstrated in *Stephens v. S. Nev. Music Co. in the Nevada*  
22 *Supreme Court, in DeSoto v. Yellow Freight Sys., Inc., 957 F.2d 655, 658 (9th Cir.*  
23 *1992)*, as well as *Nutton v. Sunset Station, Inc., Court of Appeals of Nevada, June*  
24 *11, 2015, 131 Nev. 279, 357 P.3d 966,* and *NRCP Rule 15.*  
25  
26  
27

1 Further, if I made any errors, the law states, “*at every stage of the proceeding, the*  
2 *court must disregard all errors and defects that do not affect any party’s*  
3 *substantial rights.*” This is demonstrated in:

4  
5 NRCP Rule 61, *Paterson v. Condos*, 30 P.2d 283 (Nev. 1934), *Sweeney v. Schultes*,

6  
7 NRCP 8(e) and *S. Nev. Adult Mental Health Servs. v. Brown*.

8  
9 Lastly, the NRCP, like the FRCP, requires the district court to construe pleadings  
10 in favor of, not against, the person pleading them. See *Charles Alan Wright &*  
11 *Arthur R. Miller, Federal Practice and Procedure: Civil § 1286, at 747-48 (3d ed.*  
12 *2004).*

13  
14  
15 I drafted and filed all of these pleadings myself. If I made a mistake, or needed to  
16 amend a pleading for it to survive, it should have been granted, not dismissed with  
17 prejudice. Additionally, my case and pleadings should be construed in my favor,  
18 not the defense's. What's seriously saddening is the defense is paid for by my tax  
19 dollars, and my dollars are used to protect the very people I allege are harming  
20 myself and citizens. It is incumbent upon this Court to overturn Russell's ruling.  
21  
22  
23  
24  
25  
26  
27

1 **11. Conclusion**

2  
3 The request for a rehearing is driven by a critical need for justice and adherence to  
4 legal integrity, both egregiously overlooked in the prior rulings. This isn't merely  
5 procedural; it's about ensuring justice, equity, and the proper application of law as  
6 mandated by our constitutions.  
7

8 I've provided substantial evidence, including affidavits and statutory references,  
9 proving breaches of duty and malfeasance by the Respondents that directly violate  
10 *NRS 283.440*. Notably, I fully exhausted all administrative remedies under *NAC*  
11 *293.025*, firmly adhering to *NRCP Rule 8(a)(2)*, and easily overcoming an *NRCP*  
12 *Rule 12(b)(5)* dismissal. This court and the lower court's dismissal on procedural  
13 grounds unjustly ignored these merits, depriving me of my fundamental right to a  
14 fair trial and undermining judicial integrity. Even if for the sake of argument I still  
15 didn't plea my complaint properly it is the duty of this court to grant me leave to  
16 amend my complaint.  
17  
18  
19  
20

21 This procedural oversight sets a dangerous precedent that threatens the due process  
22 rights guaranteed by our constitutions. Judicial responsibility demands that claims,  
23 especially those involving public officials and electoral integrity, are thoroughly  
24 examined and impartially adjudicated. The requested rehearing must be granted;  
25 it's imperative this court corrects these overt errors by overturning the dismissal  
26  
27

1 for a comprehensive reevaluation of my claims and to remedy the procedural errors  
2 that led to the initial dismissal, thus granting me justice and preventing future  
3 judicial failures.

4  
5 Granting this rehearing is essential to uphold the judiciary's role in enforcing the  
6 law impartially, ensuring no individual, particularly those in public service, can  
7 sidestep legal accountability. This Court must affirm its commitment to justice and  
8 the meticulous application of the law, restoring public trust in the judicial process.

9  
10 My case must go forward as implied in *New York Times Co. v. United States*  
11 (*1971*) for the benefit of the public. This is a demand for justice and accountability  
12 at the highest echelons of our legal system.

13  
14  
15 You now have a chance to show Nevada, other lawyers, and the people, that the  
16 Nevada Supreme Court is not a political machine that has been corrupted but is a  
17 legitimate failsafe to prevent the perversion of our laws and courts and ensure  
18 equal due process and justice for all. **We will now wait and see which this court**  
19 **is or has become, the Supreme Court of Justice or the Supreme Court of**  
20 **Injustice.**

21  
22  
23  
24 Respectfully submitted,

25  
26 By: \_\_\_\_\_

1 ROBERT BEADLES, Appellant In Pro Per,  
2 10580 N. McCarran Blvd. #115, Apt. 386,  
3 Reno, NV 89503 916-573-7133  
4

5  
6 APPELLANT DID NOT DRAFT AN APPENDIX  
7

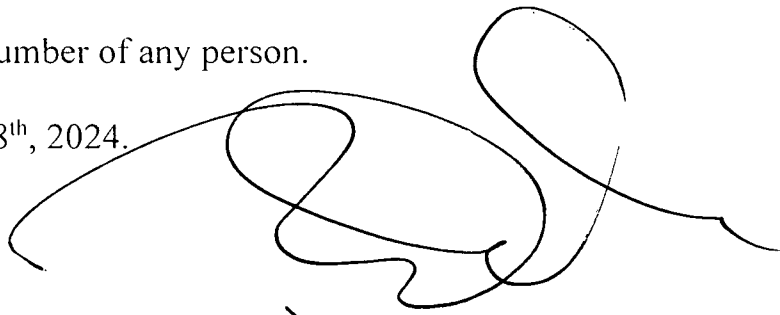
8  
9 NRAP Rule 30 (i)

10 **(i) Pro Se Party Exception.** This Rule does not apply to a party who is not  
11 represented by counsel. A pro se party shall not file an appendix except as  
12 otherwise provided in these Rules or ordered by the court. If the court's review of  
13 the complete record is necessary, the court will direct the district court to transmit  
14 the record as provided in Rule 11.  
15

16  
17 **AFFIRMATION PURSUANT TO NRS 239B.030**

18 The undersigned does hereby affirm that the preceding document does not  
19 contain the Social Security Number of any person.  
20

21 DATED: May 28<sup>th</sup>, 2024.

22  
23 

24  
25 Robert Beadles, Appellant In Pro Per  
26

1  
2 ROBERT BEADLES  
3 10580 N. McCarran Blvd. #115, Apt. 386  
4 Reno, NV 89503  
Appellant, In Pro Per

5  
6 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

7 MR ROBERT BEADLES, an individual,  
8 Appellant,  
9 vs.

NVSC Case No.: 87683  
District 1 Case No: 23-OC-00105 1B  
District 2 Case No: CV23-01341

10 JAMIE RODRIGUEZ, in her official  
11 capacity as Registrar of Voters and in her  
12 personal capacity; the WASHOE COUNTY  
13 REGISTRAR OF VOTERS, a government  
14 agency; ERIC BROWN in his official  
15 capacity as WASHOE COUNTY  
16 MANAGER and in his personal capacity,  
17 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.

18 Respondents.

19  
20 **Certificate of Compliance**

21  
22 I hereby certify that this petition complies with the formatting requirements of NRAP  
23 32(a)(4), the typeface requirements of NRAP 32(a)(5), and the type style requirements  
24 of NRAP 32(a)(6) because:

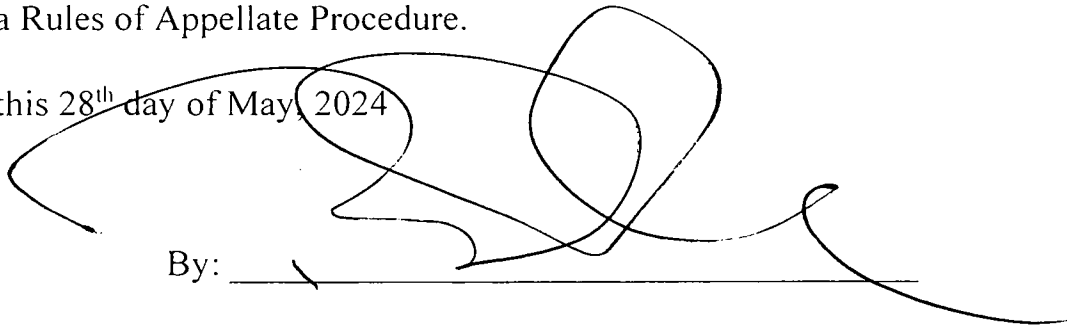
25  
26 This petition has been prepared in a proportionally spaced typeface using Microsoft  
27 Word Version 16.75 in 14 point Times New Roman Font.  
28

1 I further certify that this brief complies with the page- or type-volume limitations of  
2 NRAP 32(a)(7) because, excluding the parts of the petition exempted by NRAP  
3 32(a)(7)(C), it is:

4  
5 Proportionately spaced, has a typeface of 14 points or more, contains 4,505 words,  
6 which does not exceed 4,667 words.

7 Finally, I hereby certify that I have read this petition, and to the best of my knowledge,  
8 information, and belief, it is not frivolous or interposed for any improper purpose. I  
9 further certify that to the best of my knowledge, this petition complies with all  
10 applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which  
11 requires every assertion in the brief regarding matters in the record to be supported by  
12 a reference to the page and volume number, if any, of the transcript or appendix where  
13 the matter relied on is to be found. I understand that I may be subject to sanctions in the  
14 event that the accompanying brief is not in conformity with the requirements of the  
15 Nevada Rules of Appellate Procedure.  
16  
17  
18

19 Dated this 28<sup>th</sup> day of May, 2024

20  
21 

22 By: \_\_\_\_\_

23 ROBERT BEADLES, Appellant In Pro Per,

24 10580 N. McCarran Blvd. #115, Apt. 386,

25 Reno, NV 89503 916-573-7133  
26  
27  
28

1  
2 CERTIFICATE OF SERVICE  
3  
4  
5

6 Pursuant to NRCP 5(b), I hereby certify that on May 28th, 2024, I served all parties  
7 by electronically emailing the defense counsel and by sending via first-class mail  
8 with sufficient postage prepaid to Lindsay Liddell, the respondents' defense attorney.  
9

10  
11 Haldeman, Suzanne shaldeman@da.washoecounty.gov  
12

13 Hickman, Elizabeth ehickman@da.washoecounty.gov

14 Liddell, Lindsay L lliddell@da.washoecounty.gov  
15

16  
17 And mailed to:

18 One South Sierra Street Reno, Nevada 89501  
19  
20

21   
22 \_\_\_\_\_  
23 Robert Beadles, Appellant In Pro Per  
24  
25  
26  
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COMP  
ROBERT BEADLES  
10580 N. McCarran Blvd. #115, Apt. 386  
Reno, NV 89503  
*Plaintiff, Pro Se*

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

MR ROBERT BEADLES, an individual,

Plaintiff,

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.

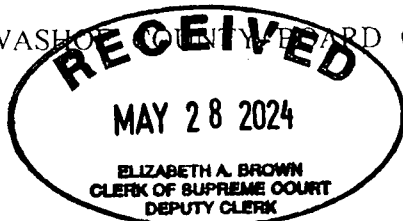
Defendants.

CASE NO.:  
DEPT. NO.:

**COMPLAINT FOR EQUITABLE,  
INJUNCTIVE RELIEF, PETITION FOR  
REMOVAL OF PUBLIC OFFICIAL  
FROM OFFICE,  
AND PUNITIVE DAMAGES**

**(Jury Trial Demanded)  
Automatically Exempt from Arbitration  
NAR 5(a)(1)(G)—Declaratory Relief**

Plaintiff ROBERT BEADLES (“Beadles”), in proper person, hereby files this Complaint against JAMIE RODRIGUEZ (“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 (“Brown”) in his official capacity as WASHOE COUNTY MANAGER and in his personal capacity, ALEXIS HILL (“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. collectively (“Defendants”), allege and petition this Court as follows:

**JURISDICTION & VENUE**

1. This Court has jurisdiction pursuant to NRS 13.030.
2. Under the doctrine of concurrent jurisdiction, this Court has jurisdiction to resolve claims under Nevada State Constitution and under Nevada State election laws.
3. This Court has jurisdiction to hear this matter, as all events giving rise to this incident took place in Washoe County, Nevada. The harm to be enjoined is threatened in Washoe County.
4. This Court has jurisdiction over this matter pursuant to Nev. Const. Art. 6 § 6, regarding all cases not assigned to the justices’ courts.
5. The venue is proper in Washoe County for election complaints pursuant to NRS 293.2546 (11).
6. The venue is proper in Washoe County pursuant to NRS 13.040, where the plaintiff and defendants reside.
7. In *Schumacher v. Furlong*, 78 Nev. 167, 370 P.2d 209 (1962), the Opinion of the Nevada Attorney General, “Under this statutory procedure any complainant can, for specifically enumerated grounds, e.g., malfeasance or nonfeasance, initiate district court proceedings to remove any person holding any nonjudicial office in this state. This statutory procedure has previously been used against a county officer.”
8. The Defendant(s), acting individually or in concert in contravention of Plaintiff’s right to equal protection are subject to penalties pursuant to NRS 283.440 and/or NRS 266.430.

9. Defendant Washoe County Nevada, is a political subdivision of the State of Nevada under the doctrine of respondent superior. Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
10. This Court has jurisdiction over this matter pursuant to NRS 4.370 (1) as the matter in controversy exceeds \$15,000, exclusive of attorney fees, interest, and costs.

### PARTIES

11. Plaintiff Robert Beadles resides in Washoe County, Nevada, and is a qualified elector who voted in the 2020 and 2022 elections and who intends to vote again in 2024.
12. Plaintiff comes before the court *pro se* because many BAR-certified attorneys are being targeted, dis-barred, sanctioned, etc. for simply bringing an elections-related lawsuit forward. Plaintiff hereby represents himself *pro se* to save his lawyers from attacks on their livelihoods.
13. Plaintiff's rights to have their legitimate grievances of matters of elections and the officials who conduct them responded to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants and DOES and ROES to be determined.
14. The office of the Registrar of Voters was created pursuant to NRS 244.164 and W.C.C. 5.541 (except duties imposed by virtue of NRS 293.393 to make out and deliver certificates of election). In general terms, the defendants handle voter registrations and conduct elections on behalf of the people of Washoe County.
15. Defendant Rodriguez is a resident of Washoe County. Rodriguez is and was at all times relevant hereto, the Washoe County Registrar of Voters and a person acting under the color and authority of law. Rodriguez is named in her official and personal capacities.
16. Rodriguez has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]

17. Rodriguez has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
18. Rodriguez has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
19. Defendant Brown is a resident of Washoe County. Brown is and was at all times relevant hereto, the Washoe County Manager and a person acting under the color and authority of law. Brown is named in his official and personal capacities.
20. Brown has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]
21. Brown has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
22. Brown has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
23. Defendant Hill is a resident of Washoe County. Hill is and was at all times relevant hereto, the Chairwoman of the Washoe County Board of Commissioners and a person acting under the color and authority of law. Hill is named in her official and personal capacities.
24. Hill has not responded to Plaintiff's November 18, 2022 Petition. [EXHIBIT 1]
25. Hill has not responded to Plaintiff's November 23, 2022 Petition. [EXHIBIT 2]
26. Hill has not responded to Plaintiff's December 1, 2022 Petition. [EXHIBIT 3]
27. Defendant Washoe County, Nevada, is a political subdivision of the State of Nevada under the doctrine of respondent superior. Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
28. Defendants Does I through X and Roe Corporations I through X are persons or entities that, at all times material hereto, committed acts, activities, misconduct or omissions which make them jointly and severally liable under the claims for relief set forth herein. The true names and capacities of the Doe Defendants and Roe Corporate Defendants are presently unknown, but when ascertained, Plaintiff requests leave of Court to amend this complaint to substitute their true names and identities.

### III. NATURE OF THE CASE

29. Plaintiff is and was at all times relevant hereto a legally registered voter in Washoe County who was affected by the 2020 and 2022 elections overseen by Defendants.
30. Plaintiff brings this complaint against Defendants based on their violations of Plaintiff's state Constitutional rights to due process, equal protection, voter's rights, and the laws and codes of Nevada in the conduct of elections, regarding Defendants' non-response to Plaintiff's grievances and general stonewalling when presented with reports and analysis on voting systems in use in Washoe County and various requests for information.
31. Plaintiff alleges violations of his rights and the laws of Nevada based on the Defendants having never acknowledged or responded to three formal Petitions filed with the county by Plaintiff.
32. Plaintiff will show that Defendants willfully committed acts of malpractice, maladministration, and/or nonfeasance, and perjury in the conduct of their official duties, thus having the appearance of impropriety and damaging the public's trust.
33. Plaintiff hereby introduces Exhibit 109 that is a highlight of several supplemental statements in support of the merits of the underlying Petitions. Individually and as a whole, highlights presented in Exhibit 109 are of such a serious matter that they cannot be ignored—just as the original Petitions should never have been ignored—to cure the problems that are self-evident, including but not limited to: unclean and grossly inaccurate voter rolls, un-approved and unsecure voting systems that Defendant(s) chose of their own volition, the rush toward pioneering new technology that could impact county, state, and national security, failure to train staff and election officials, failure to provide trained election officials, telling staff to not verify signatures, unequal treatment of signatures at

the polls, counting of votes in secret, illegal function within the election system, gross violations of the Nevada Revised Statutes and Administrative Codes regarding election procedures, and the list goes on.

34. Plaintiff wishes to direct the Court's attention to Exhibit 109, point 6 a) "The Washoe ROV's staff has seen: "100% turnover in permanent staff and a loss of institutional knowledge." The Elections Group 6-9-23" The Election Group is the consulting agency initially hired by County Manager Brown.
35. Plaintiff hereby alleges the Registrar of Voters is in violation of Nevada law and, if left uncorrected, is unprepared to run the 2024 presidential primary safely, securely, and accurately as required by law unless all the issues are put on the table and addressed by one or more Defendant(s) under the Court's supervision.
36. Plaintiff hereby alleges Defendant(s) ignored Plaintiff's Petitions as an annoyance and will continue to do so if this Court does not intervene.
37. The Plaintiff demands this complaint and the underlying Petitions be heard by this honorable court.

#### **FACTUAL ALLEGATIONS**

38. Plaintiff voted in Washoe County in the 2020 and 2022 elections overseen by Defendants.
39. Plaintiff intends to vote in Washoe County in the upcoming presidential primary to occur in January 2024 and in subsequent elections overseen by Defendants.
40. Plaintiff and others provided each of the Defendants with a Petition addressing certain violations of elections, errors, and anomalies, prior to the Board of Commissioner's canvass of the vote in public meeting held November 18, 2022. This first of three Petitions

was filed at the Washoe County Manager's office (the "November 18, 2022 Petition").

[Exhibit 1]

41. Plaintiff provided Defendants with a second Petition addressing a different set of issues and related violations of elections and other laws enumerated therein on November 23, 2022 Petition (the "November 23<sup>rd</sup>, 2022 Petition"). [Exhibit 2]
42. Plaintiff provided Defendants with a third Petition addressing a different set of issues and related violations of elections and other laws enumerated therein on December 1, 2022 (the "December 1st, 2022 Petition"). [Exhibit 3]
43. Defendants have a duty and obligation to respond to Petitions of elections pursuant to the Voter's Bill of Rights Nev. Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11).
44. Defendants, and each of them, have failed and refused to respond to or address the allegations made in the Petitions and continue to fail and refuse to respond to or address the same since the filing of the Petitions.
45. Plaintiff's rights to have legitimate grievances regarding matters of elections and the officials who conduct them responded to "fairly, accurately, and efficiently as provided by law" have been ignored by the Defendants, and each of them.
46. By failing to address the Petitions, Defendants have each violated their oath to office, Nevada Revised Statutes and Administrative Codes, and violated the Plaintiff's constitutional rights.
47. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address gross inaccuracies and improper maintenance of voter rolls.
48. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address illegal functions within the election system that alter intended votes.

49. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address the counting of votes in secret and without adequate verification.
50. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address instructions to Washoe County election workers to disregard signature verification, in violation of the law.
51. Defendants have allowed elections in Washoe County to be tainted by allowing and failing to address violations of the election processes required by Nevada statutes, Nevada administrative codes, and the Nevada Constitution.
52. Because of the violations alleged herein, Defendants have not and are not able to conduct elections fairly, accurately, and securely as required by law.
53. Defendants' actions or inaction going forward may impact state and national security because of the critical flaws and vulnerabilities in many of the systems and procedures related to voter registration, handling of signatures and voter data, voting, signature curing, and recording and reporting votes as mentioned in the underlying Petitions and Exhibit 109.
54. Plaintiff respectfully requests the court's indulgence to accept Exhibit 109 in support of a) timeliness of this complaint, b) the severity of problems that underpin the underlying Petitions.
55. Plaintiff has suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to pose grievances of elections and against election officials and have them answered and resolved.

56. Defendants' failure to address the various violations stated within the underlying Petitions has resulted in a loss of confidence in the election system in Washoe County and Nevada. The Defendants' continued failure will result in an irreparable erosion of public confidence in the election system and its results in future elections unless the Court intervenes.
57. The disregard of legal obligations by the Defendants will contribute to a more generalized erosion of the rule of law, encouraging further acts of disobedience by other public servants without the accountability this Court can and must impose.
58. If public officials are not held accountable for their actions, citizens will fear that their freedoms and rights are not adequately protected, leading to a sense of insecurity and potential suppression of those rights.
59. If left unchecked, if there is no accountability, public officials can act with impunity. By this Court not acting affirmatively to correct the ills before it will set a dangerous precedent, paving the way for more widespread infringement of civil liberties.
60. The mission statement of the ROV states in part: "that Washoe County's Elections are operated with the utmost integrity, transparency, and accountability; and that the department is known for excellence in customer service and the administration of elections."<sup>1</sup>
61. Plaintiff hereby alleges the Registrar of Voters has failed their mission statement.
62. Plaintiff hereby alleges that the Defendants, individually, have failed their oath of office and in their duties to Plaintiff and all electors who reside in Washoe County.
63. The Court should hold Defendants to a standard of propriety and as stated in Plaintiff's November 18, 2022 Petition, which reads:

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<sup>1</sup> <https://www.washoecounty.gov/voters/index.php>

- i. Federal judges are held to a standard known as a semblance of impropriety, to which Nevada's Chief Justice in 1980, Harry E. Claiborne, was accused. Judge Claiborne was the first federal judge to go to jail and the second to be impeached in U.S. history. (<https://www.senate.gov/about/powers-procedures/impeachment/impeachment-claiborne.htm>) Here, the defendants are held to a similar standard because of the nature of elections being a right and the pinnacle of a Constitutional Republic.
  - ii. By failing to address the petitions the Defendants have violated their oath to office, Nevada Revised Statutes and Administrative Codes, and violated the Plaintiff's constitutional rights.
  - iii. The actions of Defendants and/or those acting on behalf of Defendants and referred to herein, depriving Plaintiffs and other Washoe County residents of their rights secured by the Constitution and laws of the United States, were done while acting under color of law.
64. The plaintiff has diligently raised concerns regarding the flaws and irregularities within the Washoe County Nevada election system for the past two years. Despite the plaintiff's genuine efforts to bring these issues to the attention of the defendants, they have remained unresponsive.
65. Defendant Washoe County Nevada, a political subdivision of the State of Nevada under the doctrine of respondent superior, Washoe County is vicariously liable for the actions of its officers and officials when they are acting within the scope of their employment.
66. Plaintiff has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless this honorable court intervenes to enjoin the Defendants.

**FIRST CAUSE OF ACTION**

**VIOLATION OF NEVADA CONSTITUTION ARTICLES 1, 2, 15 and THE**

**VOTER'S BILL OF RIGHTS**

**(EQUITABLE AND INJUNCTIVE RELIEF SOUGHT OR WRIT OF MANDAMUS)**

67. Plaintiff repeats and realleges his allegations herein above inclusively, as though set forth herein, and incorporates the same by this reference.
68. "A public office is a public trust and shall be held for the sole benefit of the people." NRS 281A.020.
69. **Duty:** Defendants, and each of them, pledged an oath pursuant to Nev. Const. Art. 15 Sec. 2 that provides in part: "... I will well and faithfully perform all the duties of the office of ....., on which I am about to enter; (if an oath) so help me God; (if an affirmation) under the pains and penalties of perjury."
70. Defendants, and each of them, have a duty to uphold Plaintiff's constitutional rights.
71. Plaintiff's right to have their grievances heard is enshrined in Nev. Const. Art. 1 § 10: "to petition the Legislature for redress of Grievances."
72. Plaintiff's right to have their Petitions of elections resolved "fairly, accurately and efficiently" is enshrined in Nev. Const. Art. 2 Sec. 1A § 11 and NRS 293.2546 (11).
73. Plaintiff submitted valid Petitions to Defendant(s) as shown in Exhibits 1, 2, and 3 as referenced herein.
74. On information and belief, Defendants received and are aware of the underlying Petitions filed by Plaintiff.
75. **Breach Of Duty:** As of the filing of this complaint, there has been no acknowledgment or response from the Defendants regarding the underlying Petitions filed by Plaintiff.

76. Plaintiff exercised his constitutional right to pose grievances and have them resolved “fairly, accurately and efficiently” but was ignored by the Defendant(s).
77. Defendants have thus deprived Plaintiff to have his grievances heard as enshrined in Nev. Const. Art. 1 § 10.
78. Defendants have thus violated Plaintiff’s right to have his Petitions, individually or as a whole, resolved “fairly, accurately, and efficiently.” Nev. Const. Art. 2 Sec 1A § 11 and NRS 293.2546 (11) when they ignored said Petitions.
79. Defendants have thus perjured their oath of office.
80. In addition, Defendants have failed to address, correct, or rectify the issues raised in the underlying Petitions, including but not limited to, (1) updating and resolving the voter registration lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal function within the election system; (6) violations of election procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an injunction regarding the foregoing.
81. Plaintiff has further been damaged as his vote did not count as he cast it and thus has been robbed of his right to suffrage.
82. *Qui non negat, fatetur* is a Latin maxim of law, meaning “he who does not deny, admits.” As such, Plaintiff’s assertions in the underlying Petitions stand unopposed.
83. Plaintiff has a reasonable likelihood of prevailing on the merits.
84. As a result, Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one’s right to pose grievances of elections and against election officials and have them

answered and resolved. Without Injunctive Relief, Plaintiff will suffer irreparable harm for which monetary damages are inadequate.

85. The Defendant(s)' actions have resulted in harm to Plaintiff and unless admonished for their breach of oath and duty will continue to inflict harm upon Plaintiff.
86. Granting the requested relief will serve public interest in seeing the harm stopped. There is little to no hardship for the Defendants to respond to the Petitions and resolve discrepancies that are identified herein. In the alternative, Plaintiff seeks a writ of Mandamus from the Court as allowed by NRS 34.160; NRS 34.190, ordering the Defendants to respond to the Petitions and rectify those issues raised in Paragraph 80 herein.
87. Plaintiff has no adequate remedy at law and therefore seeks the injunctive and equitable relief as stated in Demand for Relief below.

## **SECOND CAUSE OF ACTION**

### **PETITION FOR REMOVAL OF OFFICERS FROM OFFICE**

88. Plaintiff repeats and realleges its allegations herein above inclusively, as through set forth herein, and incorporates the same by this reference.
89. Plaintiff respectfully demands this honorable court to remove Defendants Jaime Rodriguez, Washoe County Registrar of voters, Eric Brown, Washoe County Manager, Alexis Hill, Washoe County Commissioner from office pursuant to the Court's authority under NRS 283.440 and NRS 266.430.
90. Defendants, and each of them, have failed to fulfill the duties of their respective offices as alleged herein.

91. Defendants have additionally failed to address, correct, or rectify the issues raised in the underlying Petitions, including but not limited to, (1) updating and resolving the voter registration lists; (2) providing proper vote counting mechanisms; (3) counting votes in secret; (4) inadequate signature verification; (5) illegal function within the election system; (6) violations of election procedures as required under Nevada law. [Exhibit 109]. Plaintiff seeks an injunction regarding the foregoing.
92. Defendants through their acts of malpractice, malfeasance, and or nonfeasance have failed to perform their duties and have harmed and will continue to harm plaintiff.
93. Granting the requested relief will serve public interest.

**JURY TRIAL DEMANDED**

94. Plaintiff demands a jury trial on all claims triable by jury as provided by Nevada State laws.

**PUNITIVE DAMAGES**

95. The Defendant(s) have acted in their personal and professional capacities.
96. The actions of Defendant(s) constitute a willful disregard for Plaintiff's rights, accuracy in elections, the mission statement of the ROV, and a free and fair Constitutional republic.
97. Plaintiff suffered and will continue to suffer emotional distress, reputation damage, and irreparable harm—namely, disenfranchisement through gross violations of one's right to pose grievances of elections and against election officials and have them answered and resolved timely.
98. The Defendant(s) have no cover of sovereign immunity. *Scheuer v. Rhodes*, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974).
99. Punitive damages are warranted when gross and willful violations of rights and law occur as is the case here. *Smith v. Wade*, 461 U.S. 30 (1983).

100. Punitive damages, in this case, are meant to punish and deter future abuses of the same sort and must be significant in their application to these Defendant(s) per the Court's discretion.

**DEMAND FOR RELIEF**

101. WHEREFORE, Plaintiff respectfully demands for a judgment against Defendant(s) for:

i. An adequate and proper response by Defendant(s) to Plaintiff's petition of November 18, 2022, through the discovery processes, under court supervision and seeks an injunction regarding the same;

ii. An adequate and proper response by Defendant(s) to Plaintiff's petition of December 1, 2022, through the discovery processes, under court supervision and seeks an injunction regarding the same;

iii. Defendants must take into account and redress all elections issues that Plaintiff puts on the table, no shying away;

iv. Award Plaintiff their cost of suit;

v. Award monetary damages in excess of \$15,000;

vi. Award punitive damages;

vii. Defendants that are found in violation of laws shall be fined, fired, and/or removed from office; [NRS 283.440, NRS 266.430]

viii. Enjoin Defendants from their continued violations of the following NRSs and strictly comply with NRS 293.530, NRS 293.2546(11), NRS 293B.033, NRS 293.269927, NRS 293.740, NRS 293B.063, NRS 293B.104, NRS 293B.1045(1), NAC 293B.110(1)(b), NRS 293.269931(1), NRS 293.3606(1), NRS 293.363(1), NRS 293B.353, NRS 293B.354, NRS 293B.380(2)(a), NAC 293.311(4), NRS 293.423, NRS 293.269927(4)(b), NRS

293.277(3), NRS 293.285(1)(b)(4), NRS 293.3075(4), NRS 293.3585(1)(d), NRS 293.403(2), NRS 293.404(2), Nev. Const. Art. 2 Sec.1A § 1(b);

ix. Enjoin Defendants from using any voting and tabulation machines for elections in Washoe County; and

x. Enjoin Defendants to use paper ballots at all polling locations and in every election;

xi. Enjoin Defendants to disclose ACB applicant's names and credentials publicly prior to appointment;

xii. Enjoin the defendants and halt the expenditure of \$12.6M of taxpayer dollars for unapproved and unsafe equipment and software;

xiii. Enjoin the Defendants and make the digitized vote tally database (Microsoft SQL) open for public inspection;

xiv. Honorable court to strike down NRS 293.269935(2) and 293.3606(4) to allow public inspection of ballots;

xv. Enjoin the Defendants to prohibit QR codes from use in recounts;

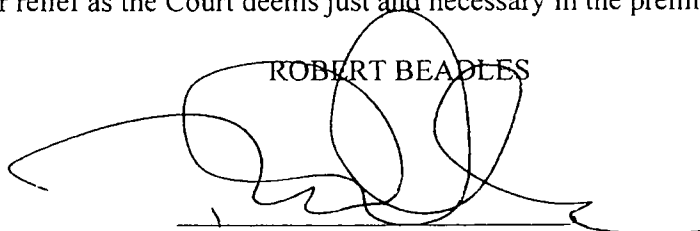
xvi. Grant or impose any remedy, and further relief at law or equity, that this Court deems just and proper in these circumstances;

xvii. Removal of Defendants from office; and

xviii. For such further relief as the Court deems just and necessary in the premises.

Dated: August 4, 2023

ROBERT BEADLES

A handwritten signature in black ink, consisting of several large, overlapping loops and a long horizontal stroke extending to the right.

Robert Beadles, *pro se*

VERIFICATION

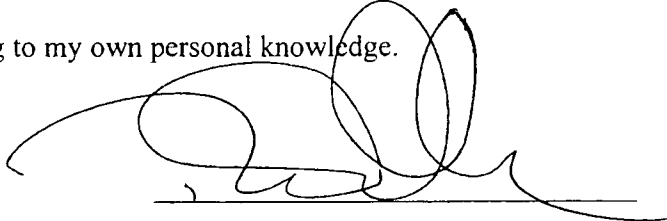
I, Robert Beadles have read Plaintiff's Verified Complaint for Removal Of Officers per 283.440 and believe the facts contained therein are true or based upon a good faith belief that the facts stated therein are true, under the penalty of perjury.

DATED: August 4<sup>th</sup>, 2023

  
\_\_\_\_\_  
Robert Beadles

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

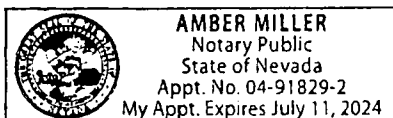
The undersigned does hereby affirm that this document does not contain the social security number of any person. UNDER PENALTIES OF PERJURY, I affirm that the facts alleged in the foregoing are true and correct according to my own personal knowledge.

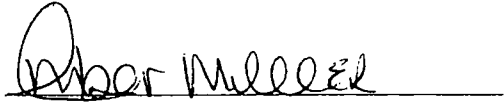
  
\_\_\_\_\_  
Robert Beadles, Plaintiff

STATE OF NEVADA

COUNTY OF WASHOE

On the 4<sup>th</sup> day of August, 2023, personally appeared before me Robert Beadles who, being by me first duly sworn, executed the foregoing in my presence and stated to me under penalties of perjury that the facts alleged therein are true and correct according to his own personal knowledge.



  
\_\_\_\_\_  
Notary Public

My commission expires: July 2024

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 COMPLAINT FOR RELIEF AND REMOVAL OF OFFICE

8 file in case number: \_\_\_\_\_

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)* 4th \_\_\_\_\_ day of *(month)* August \_\_\_\_\_, 2025.

23  
24 Submitted By: *(Your signature)* \_\_\_\_\_

25 *(Print your name)* Robert Beadles \_\_\_\_\_

26 *(Attorney for)* N/A \_\_\_\_\_  
27  
28

**“Exhibit 1”**

Washoe County Board of Commissioners and  
Registrar of Voters Jamie Rodriguez  
1001 E. Ninth Street  
Reno, Nevada 89512

RE: Complaint of Maladministration and Impropriety

To the Board of Commissioners and Ms. Rodriguez,

We, citizens of Washoe County, hereby submit this complaint of Maladministration and Impropriety against the Registrar of Voters based on the following facts and events leading up to and including the 2022 General Election.

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To have complaints about elections and election contests resolved fairly, accurately and efficiently as provided by law.

Nev. Const. Art. 2 Sec.1A § 11

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A public office is a public trust and shall be held for the sole benefit of the people.

NRS 281A.020

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1. The purpose of this chapter is to foster democratic principles by providing members of the public with prompt access to inspect, copy or receive a copy of public books and records to the extent permitted by law;

2. The provisions of this chapter must be construed liberally to carry out this important purpose;

NRS 239.001

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1. Any person who is now holding or who shall hereafter hold any office in this State and **who refuses or neglects to perform any official act in the manner and form prescribed by law, or who is guilty of any malpractice or malfeasance in office**, may be removed therefrom...

5. As used in this section, "**malfeasance in office**" includes, without limitation:

(a) **Engaging in an unlawful employment practice of discrimination** pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., or NRS 613.330 that is severe or pervasive such that removal from office is an appropriate remedy.

NRS 283.440

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### Points of Complaint

1. Extremely slow response time on information requests—February to September in some cases, blanket denials because of phrasing or did not request a specific document, clear ignorance or blatant omissions of information such as “What is an ‘ICX File?’” that is listed in the Pre- and Post-Certification of Voting System, or what is the File Election Computer Program’ which Ms. Rodriguez denies exists when it is stated in NRS 293B.135 and NAC 293B.050; [Exh. A: Williams affidavit, Exh. B: email from ROV of 9/21/22]
2. Unwillingness to provide for meaningful observation of equipment testing. The proprietary codes and logins used by administrators and testers could be shielded from the public, allowing observers to view the face of the equipment, but that was not done; [Exh. A, Exh. C: email from ROV of 10/4/22]
3. Unwillingness to provide evidence of partisan balance of election worker hires (NRS 293.269927 to 293.269937) (Goldman, Sheehan, Seymour et al v. Cegavske, Gloria et al, #A-22-851189-C, Nevada District Court, Dept 11);
4. Some critical equipment is not tested: Pollbooks and software, Sip ‘n Puff voting peripheral, Fluence mail sorter;
5. Use of Konnech spyware in pollbooks  
(<https://www.rgj.com/story/news/politics/elections/2022/10/13/washoe-county-nevada-uses-election-worker-pollchief-software-tied-identity-theft-case-konnech/10491086002/>);
6. Tallying and reporting votes too soon in violation of NRS 293.365: Accounting for all paper ballots before counting of votes begins. [Effective January 1, 2022.] Except as otherwise provided in NRS 293.269931, no counting board in any precinct, district or polling place in which paper ballots are used may commence to count the votes until all ballots used or unused are accounted for.
7. Intentionally boxing-in observers in a claustrophobic small enclosure with distant or no visibility of signature verification, ballot box resolution, adjudication, or administrative duties (Exh. D: Image of booth);
8. Providing a limited number of polling locations (19) for early voting, driving voters to vote by mail or to vote on election day (<https://mynews4.com/news/local/where-can-you-early-vote-in-washoe-county-ahead-of-general-election#>);
9. Additionally, available hours of early polls being open was restricted to 10:00 a.m. to 6:00 p.m., which represents a hardship for the average 9-5 worker (<https://mynews4.com/news/local/where-can-you-early-vote-in-washoe-county-ahead-of-general-election#>);

10. Equipment failures at Depoali Middle School and other locations also added to the inconvenience of voters (mechanized report to be provided);
11. The sixty-six election day polling locations out of 497 precincts (<https://www.washoecounty.gov/voters/files/precinct-districtreports/precinct-count-detail-10-07-2022-.xls>) is a form of deterrence of access to the polls which has been ruled unconstitutional by the U.S. Supreme Court in 2021: *Brnovich v. DNC*, No.19-1257 and *Arizona Republican Party v. DNC*, No. 19-1258;
12. Allowing insecure or unapproved WiFi connectivity of critical voting and pollbook systems at DePoali Middle School (eyewitness statement to be provided);
13. Sample ballot printing errors that resulted in excess waste and delay in mailing of ballots; (<https://www.rgj.com/story/news/politics/elections/2022/10/07/errors-washoe-county-sample-ballots-nevada-voting/8209759001/>)
14. Little to no signature verification training given to election workers (NRS 293.325, 293.877) (eyewitness statement to be provided);
15. An incongruous application of signature verification procedures between lax voting requirements and those stringently applied to ballot initiatives and contests of elections (Exh. E: Election Day manual, pg 57): “Election workers look for reasons to approve voter signatures, not to reject voter signatures.”;
16. Presumably, the ROV is still not validating citizenship of voters (NRS 293.485, 293.4855, 293.5235). From the minutes of BOC meeting of 4/13/2021, page 13, para. 4 (Exh. F: BCC2021-04-13RMinutes.pdf): “[Ms. Spikula] stated there was no centralized database to confirm citizenship. The ROV relied on the voter to provide factual information and not commit a crime by voting if they were ineligible.”
17. No plan or procedure in place to discover counterfeit ballots and report them to law enforcement;
18. Possibly due to an intentional and nefarious act, live video feeds of counting, adjudicating, etc. went dark at or around 11:24 p.m. of November 9 for about eight hours;
19. Allegedly, a forced error delayed reporting of results on election night, according to county spokesperson Bethany Drysdale: “The live file that was sent to T.S. (Washoe County’s technical services team) on Election Night listed the names in a different manner, so the dashboard could not read or populate them correctly,” Drysdale said in a follow-up email. “We believe there was an update in the machine’s configuration in early May that may have contributed to this error.” (<https://www.rgj.com/story/news/2022/06/16/washoe-county-changes-testing-protocols-after-primary-election-result-delays/7654451001/>)

20. No plan to protect vulnerable voters from bribery, coercion, or ballot or identity theft; (NRS 293.313, 293.775, 293.800, exceptions: NRS 293.329, 293.352)
21. Inability to enforce electioneering laws inside residences, including but not limited to senior independent living, assisted living, and restricted living for Alzheimer's/Dementia, nursing homes, and sanitariums; (NRS 293.361, 293.740)
22. Counties are required to secure chain-of-custody; however, Washoe County cannot prove chain-of-custody through the postal service and between when a voter receives their mail ballot and when that ballot is returned to county; (Chapter 293 of Nevada Administrative Code has been amended pursuant to regulatory amendment R090-21A Sec. 3 (eff. 2/28/22) to read as follows: 3. Each county clerk shall keep records of the chain of custody for all mail ballots, including, without limitation, the mailing of mail ballots, reissued mail ballots, rejected mail ballots, verified mail ballots, duplicated mail ballots and tabulated mail ballots.)
23. Hiring and employment discrimination: 12-hour shifts deter elderly persons and/or pregnant women from election work, no statistics on pregnant women hires, no known statistics on minority or ethnic hires; (NRS 613.330 and 613.4354 to 613.4383, 14<sup>th</sup> Amendment)
24. Sample ballots, ballots, and instructions printed only in English and Spanish, county voter population of Asian heritage in 2020 was ~10,000 adults (<https://suburbanstats.org/race/nevada/washoe-county/how-many-asian-people-live-in-washoe-county-nevada>) (NRS 293.2699, 52 USC 10503, 14<sup>th</sup> Amendment);
25. Systemic glitches and errors from 2020 persist in the 2022 primary and general elections, failure to correct known issues:
  - a. Voters who opted-out of mail ballots did not receive a sample ballot (Exh. G: Election violation affidavit of Williams);
  - b. DMV AVR changes party affiliation to nonpartisan without voter's consent or knowledge (Exh. H: NVSOS-memo reAVR\_2-15-22.pdf);
  - c. Bloated voter rolls—dead voters, ~30K adult deaths in NV each year (Click 'I Agree' at bottom of page for results: <https://wonder.cdc.gov/ucd-icd10.html>);
  - d. Excess provisional ballots in 2020 (Exh. I: Nic St. John's Cold Springs Provisional Report);
  - e. BallotTrax does not work, or provides useless information ([washoe.ballottrax.net/voter](http://washoe.ballottrax.net/voter)) (Exh. J: Williams's screenshot of 11/14/22).

We thus conclude that the Registrar has failed its mission statement:

*The Mission of the Washoe County Registrar of Voters Department is to ensure that... Washoe County's Elections are operated with the utmost integrity, transparency, and accountability; and that the*

*department is known for excellence in customer service and the administration of elections.*

In *Schumacher v. Furlong*, 78 Nev. 167, 370 P.2d 209 (1962), Opinion of the Nevada Attorney General, “Under this statutory procedure any complainant can, for specifically enumerated grounds, e.g. malfeasance or nonfeasance, initiate district court proceedings to remove any person holding any nonjudicial office in this state. This statutory procedure has previously been used against a county officer.”

Federal judges are held to a standard known as a semblance of impropriety, to which Nevada’s Chief Justice in 1980, Harry E. Claiborne, was accused. (<https://www.senate.gov/about/powers-procedures/impeachment/impeachment-claiborne.htm>) Here, the Registrar of Voters is held to a similar standard because of the nature of elections being a right and the pinnacle of a Constitutional Republic.

Wherefore, we, the undersigned, have no confidence in the Washoe County Office of the Registrar of Voters nor the results of the 2022 Primary and General elections under their watch. We believe we are not alone in our concerns among the general voting population. The situation portends to have a chilling effect on participation and representation going forward for if people don’t trust the system, they’re less likely to engage in it and will thus become disenfranchised.

Jamie Rodriguez, by virtue of her office, is required to uphold the integrity of elections and to perform the duties of her office impartially.

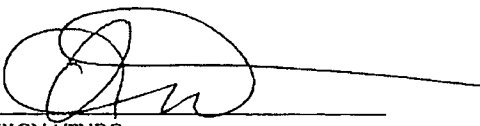
Jamie Rodriguez, by willfully and knowingly engaging in the numerous acts outlined in the Points of Complaint, has betrayed the trust of the people of Nevada and reduced confidence in the integrity and impartiality of the Office of the Registrar of Voters, thereby bringing disrepute on Washoe County and the administration of elections by the county commission.

As such, when individuals who are in the public’s trust engage in acts of maladministration, fail to fulfill their mission, and damage the public’s trust, they must be held accountable.

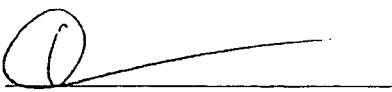
The Board of Commissioners appoints and has authority over the office of the ROV. It is thus incumbent upon the Commissioners to exercise their authority to protect voter rights and the true vote cast through removal of Jamie Rodriguez, Heather Carmen, and other staff members to be named. And to then investigate these individuals for their actions that are in contravention of the laws and the mission of the ROV.

We, the undersigned, hereby submit this complaint on this day, November 17, 2022:

Oscar D. Williams  
PRINT NAME

  
SIGNATURE

DAVID CHAMBERLIN  
PRINT NAME

  
SIGNATURE

JANICE HERMSEN  
PRINT NAME

Janice Hermesen  
SIGNATURE

Cc: District Attorney Chris Hicks

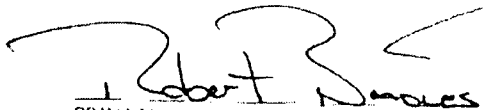
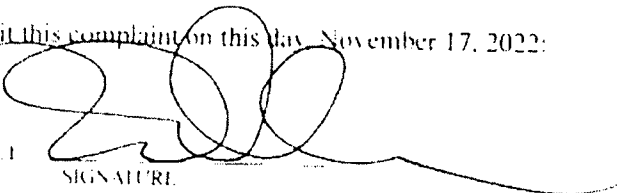
*...right to free and fair elections is inalienable, but that right is intruded by  
lack of transparency, and by whatever lies behind that opaque curtain  
- Mesa County, CO Forensic Report 3, excerpt of Introduction*


Jamie Rodriguez, by willfully and knowingly engaging in the numerous acts outlined in the Points of Complaint, has betrayed the trust of the people of Nevada and reduced confidence in the integrity and impartiality of the Office of the Registrar of Voters, thereby bringing disrepute on Washoe County and the administration of elections by the county commission.

As such, when individuals who are in the public's trust engage in acts of maladministration, fail to fulfill their mission, and damage the public's trust, they must be held accountable.

The Board of Commissioners appoints and has authority over the office of the ROV. It is thus incumbent upon the Commissioners to exercise their authority to protect voter rights and the true vote cast through removal of Jamie Rodriguez, Heather Carmen, and other staff members to be named. And to then investigate these individuals for their actions that are in contravention of the laws and the mission of the ROV.

We, the undersigned, hereby submit this complaint on this day, November 17, 2022:

 _____ PRINT NAME	 _____ SIGNATURE
--	--

OLena Alexander _____ PRINT NAME	 _____ SIGNATURE
--	--

_____ PRINT NAME	_____ SIGNATURE
---------------------	--------------------

Cc: District Attorney Chris Hicks

*Americans have a pre-emptive right to a fair election, but that right is abridged by lack of transparency, and all, whatever, measures that produce certain*

# Exhibit

A

**AFFIDAVIT**  
**(SWORN STATEMENT)**

Date: November 17, 2022

My legal name is **Oscar Dey Williams III** ("Affiant") and acknowledge I am:

- a.) Age: 58 years old
- b.) Address: 1540 Whisper Rock Way, Reno, Nevada, 89523
- c.) Residency: 29-years in Nevada
- d.) Citizenship: American

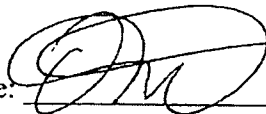
Being duly sworn, hereby swear under oath that:

- a) I submitted an information request to Washoe County in February 2022 and received a reply in September. County was unable to answer 'What is an ICX File?' that was certified by them. County also expressed ignorance of what is the 'File Election Computer Program.' And county failed to attach the historical EAV surveys that they agreed to attach to their email reply.
- b) When I asked at ICX and VVPAT equipment testing on Oct. 1 to be able to see the face of the units being tested, I was denied. The explanation given by Ms. Rodriguez said secret codes could not be viewed by the public.
- c) I opted-out of mail ballots for the 2022 primary and did not receive a sample ballot for the primary or the general until I opted back into mail ballot and then my sample ballot was received.
- d) Screenshot of my BallotTrax created 11/14/22.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

Affiant's Signature: \_\_\_\_\_

Date: \_\_\_\_\_



11-17-22

**NOTARY ACKNOWLEDGEMENT**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which the certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of Nevada

County of Washoe

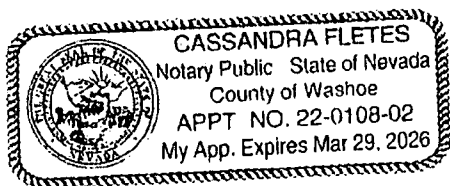
On November 17, 20 22, before me, Cassandra Fletes, personally appeared Oscar Dey Williams III who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

of Notary

Affiant's Signature: Cassandra Fletes



**Exhibit**

**B**



**Re: FW: Activity has been posted on Service Request #107024 (Registrar of Voters - Public Records Requests) - Washoe County, NV**

**From:** "Oscar Williams" <osc.williams@mail.com>  
**To:** "Washoe 311 Public Records Requests" <washoe311-PRR@washoecounty.gov>  
**Date:** Sep 22, 2022 1:20:03 PM

Hello. Your reply to me is missing the EAV surveys. You asked some questions as well. And I wish to reply to the Issue of foreign language ballots for the sake of discussion.

My reponses below in BLUE.

Best regards, Oscar Williams

**Sent:** Wednesday, September 21, 2022 at 3:57 PM  
**From:** "Washoe 311 Public Records Requests" <washoe311-PRR@washoecounty.gov>  
**To:** "osc.williams@mail.com" <osc.williams@mail.com>  
**Subject:** FW: Activity has been posted on Service Request #107024 (Registrar of Voters - Public Records Requests) - Washoe County, NV

Greetings,

Thank you for your patience while staff completed this public records request. Below and attached, please find the requested information.

**-How many indefinitely confined voters are there in Washoe County?**

*Washoe County Registrar of Voters does not track this information so therefore we do not have any information to provide.*

**-How many temporary confined voters?**

*Washoe County Registrar of Voters does not track this information so therefore we do not have any information to provide.*

**-Provide your ADA-compliance report on the 2020 general election**

*Attached*

**-Provide EAV Surveys for years 2012, 2014, 2016, and 2018**

*2014, 2016, 2018 are attached. We do not have a copy of our 2012 report so therefore will not be able to provide.*

*DOCUMENTS NOT ATTACHED. PLEASE ENJOY!*

**-Provide a list of all reports generated in regards to elections and the funding and expenditures thereof**

*The request for a list of all reports generated is vague and would like clarification. Staff may run their own reports to accomplish their specific tasks. The funding and expenditures there of, does this mean in correlation to the reports? Attached is our budget for the 2020 Election.*

*APOLGOY FOR MY VAGUENESS, I WILL TRY TO BE MORE SPECIFIC IN THE FUTURE.*

**-Provide the File Election Computer Program**

*Please clarify this request. The terminology is not something we are familiar with.*

*APOLGOY FOR MY VAGUENESS, I WILL TRY TO BE MORE SPECIFIC IN THE FUTURE!*

**-Provide the Mechanized Report Post Election**

*Attached*

**-Provide the Malfunction Report**

Same as Mechanized Report

**-Provide the Election Process Report**

2020 General Election attached

**-Provide the 2020 elections budget with line item revenues and expenses**

Attached

**-Provide post 2020 general election financial audit or summary and/or cost-benefit analysis**

*Per NRS 354.624 each local government shall provide for an annual audit of all of its financial statements. This audit requirement is a financial audit. It consists of a review and audit of each of the funds for the County as well as an audit of the grant funds that are received by the County. The Registrar of Voters does not conduct its own separate audit.*

**-How much does the standard ballot, envelope, and return envelope cost to produce?"**

*Printing of the ballot is \$.280 per card*

*Assembly & Mailing Services is \$.260 per packet*

*Secrecy sleeve is \$.069 per sleeve*

*Return Envelope is \$.101 per envelope*

*Outbound Envelope is \$.105 per envelope*

*Instructional Insert is \$.044 per sheet*

**-What are the mailing costs per unit of ballots/envelope/return envelope?**

*Outgoing mail = \$.101*

*Return mail = \$.136*

**-What languages are ballots printed in?**

*English and Spanish*

**-Are any ballots printed in Chinese?**

*No, Section 203 of the Voting Rights Act does not require us to provide election materials in Chinese.*

*NRS 293.2699 Voting systems used by counties and cities: Voting materials to be provided in English and other languages as required by federal law or as authorized by county or city clerk.  
RAILROADS PROVIDED FOR STATUTE*

**NRS 293.2699** Voting systems used by counties and cities: Voting materials to be provided in English and other languages as required by federal law or as authorized by county or city clerk.

1. Each voting system used by a county or city shall provide voting materials in:

(a) English; and

(b) Every language in which voting materials are required to be prepared in the county or city pursuant to 52 U.S.C. § 10503.

2. In addition to the requirements set forth in subsection 1, if a county clerk or city clerk determines that there is a significant and substantial need for voting materials of the county or city, as applicable, to be provided in the language or languages of a minority group, the county clerk or city clerk may prepare voting materials in such language or languages. For the purposes of this subsection, there is a significant and substantial need for voting materials to be provided in the language or languages of a minority group if, without limitation, the minority group has been subject to historical discrimination and unequal educational opportunities, and, as a result, members of the minority group are of limited-English proficiency.

3. As used in this section:

(a) "Limited-English proficiency" means being unable to speak or understand English adequately to participate in the electoral process.

(c) "Voting materials" has the meaning ascribed to it in 52 U.S.C. § 10503.

**-Has any voting equipment been replaced or decommissioned since Nov.**

3, 2020?

We had 56 ICX Primes go out for RMA to the vendor and have since been returned.

-Has any voting equipment been updated or serviced by the vendor since start of early voting in the 2020 general? If so, when and why?

No

Explain a voter with "status unknown".

On the EAV survey the "status unknown" is for voters we had mailed an address confirmation card. If the voter does not respond or the card did not come back undeliverable, then it falls into a category of "status unknown".

-How long does the status hold, or how and when are these unknowns resolved? Did any of these "unknown" vote in the 2020 elections?

When a voter does not respond to a to an address confirmation card, or we do not receive an undeliverable notice, the voters status changes from "Active" to "Inactive". The voter remains inactive for 2 federal election cycles, or four years. If they do not update their voter registration, or appear to vote, after four years the voters record is removed from the voting rolls.

-Provide the names and contact info for adjudication board members in the 2020 primary and general elections.

We do not have this documentation so we won't be able to provide you with the information.

-Provide a list of election complaints received in 2020, both formal and informal

We only keep a record when a citizen completes a form and submits it to our office. Received complaints of individuals receiving ballots multiple ballots or ballots to individuals that are deceased or no longer living there. When researched there was no proof in our system that these claims were accurate except for the very few times a ballot was suspended and re-issued to a voter. Received complaints about third party mailers sent to households for individuals that are deceased or no longer living there. Explained to the concerned citizen they are not getting their voter list from us and we cannot control what they send and to whom. Received complaints about organizations texting/calling individuals about the status of their ballot confirming they had voted. Explained to concerned citizens that other organizations do not have the final and accurate information. Advised citizens to contact us directly with any concerns.

-Need clarification as to where these numbers are coming from. Which report or document shows 130,770 ballots counted and 31,951 treated as mail?

Confirm that out of 130,770 ballots counted, 31,951 were treated as mail? (The others were surrendered in-person)

Thank you,

WASHOE COUNTY GOVERNMENT

Communications Division | Office of the County Manager

Washoe County Government | 1001 S. Virginia Street, Suite 200 | Reno, NV 89502

Phone: 775.784.5000 | Fax: 775.784.5001

www.washoe.gov

NOTICE: This communication, including any attachments, may contain confidential information and is intended only for the individual or entity whom it is addressed. Any review, dissemination, or copying of this communication by anyone other than the recipient is strictly prohibited by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521. If you are not the intended recipient, please contact the sender by reply email, delete and destroy all copies of the original message.

From: Washoe311 <washoe311@washoecounty.gov>  
Sent: Thursday, August 18, 2022 10:27 AM  
To: Washoe311 <Washoe311@washoecounty.gov>  
Subject: Activity has been posted on Service Request #107024 (Registrar of Voters - Public Records Requests) - Washoe County, NV

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Washoe County, NV

Activity was posted on service request ID 107024.

Service Request Details

ID 107024

Date/Time 2/25/2022 11:48 AM

Type Registrar of Voters - Public Records Requests

Address 1540 WHISPER ROCK WAY, Reno

**Comments** Under the Open Records law, I hereby request an expedited response to the following inquiries:

- How many indefinitely confined voters are there in Washoe County?
- How many temporary confined voters?
- Provide your ADA-compliance report on the 2020 general election
- Provide EAV Surveys for years 2012, 2014, 2018, and 2019
- Provide a list of all reports generated in regards to elections and the funding and expenditures thereof
- Provide the File Election Computer Program
- Provide the Mechanized Report Post Election
- Provide the Malfunction Report
- Provide the Election Process Report
- Provide the 2020 elections budget with line item revenues and expenses -Provide post 2020 general election financial audit or summary and/or cost-benefit analysis
- How much does the standard ballot, envelope, and return envelope cost to produce?"
- What are the mailing costs per unit of ballots/envelope/return envelope?
- What languages are ballots printed in?
- Are any ballots printed in Chinese?
- Has any voting equipment been replaced or decommissioned since Nov. 3, 2020?
- Has any voting equipment been updated or serviced by the vendor since start of early voting in the 2020 general? If so, when and why? Explain a voter with "status unknown".
- How long does the status hold, or how and when are these unknowns resolved? Did any of these "unknown" vote in the 2020 elections?
- Provide the names and contact info for adjudication board members in the 2020 primary and general elections.
- Provide a list of election complaints received in 2020, both formal and informal Confirm that out of 130,770 ballots counted, 31,951 were treated as mail? (The others were surrendered in-person)

Thank you for your interest and cooperation.

Oscar Williams

1540 Whisper Rock Way

Reno NV 89523

775-240-3456

Osc.williams@mail.com



Washoe County, NV

Attachments

- Image-png-attachment

- image-png-attachment
- image-png-attachment
- image-png-attachment
- image-png-attachment

**Exhibit**

**C**



## RE: My recent attendance of election equipment testing

**From:** "Rodriguez, Jamie L" <JARodriguez@washoecounty.gov>  
**To:** "Oscar Williams" <osc.williams@mail.com>  
**Date:** Oct 4, 2022 8:36:14 AM

Good Morning Mr. Williams,

Staff did advise me on Saturday of your objections to the layout of the process. The ATI are tested with each set of ICX Primes at this time. I am not sure what you mean by testing the pollbook. The pollbooks are loaded a couple of days before early voting and then for election day. There is no testing of the pollbooks as part of the Pre-LAT process. As for the schedule it is more of a process, we will test the tabulators when we are completed with the ICX Prime and accompanying equipment portion, it will not be before the week of October 17 as I mentioned in my email to you last week, but the specific day will depend on when we are done with that first step in the process. The equipment that we test for Pre-LAT includes the ICX Primes, ATI, VVPAT, ICC Tabulators and the software that reads the results.

As for the codes, they are entered multiple times throughout the process so there is not an ability to enter the code and then show the rest of the process. I hope you understand that the security of the election is of the utmost priority for this department and we do not create rules or processes for any one individual, so I am not making any statement or judgment of you. We cannot make 1 set of rules for 1 group and a second set of rules for another.

Thank you,

Jamie

**From:** Oscar Williams <osc.williams@mail.com>  
**Sent:** Monday, October 3, 2022 4:54 PM  
**To:** Rodriguez, Jamie L <JARodriguez@washoecounty.gov>  
**Subject:** My recent attendance of election equipment testing

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Dear Jamie,

On Saturday, October 1, I briefly attended the preparations for the ICX machine testing and was disappointed to learn that I would not be allowed meaningful observation of the face of the voting machines nor the VVPAT. Jason explained that because they have to enter secret codes, the machines have to be turned away from my prying eyes and that of any member of the public.

So, basically you have labeled me a future criminal who would tamper with the machines.

The practice of denying me, the public, of any understanding of how the machines, peripherals, and software are being tested is discriminatory and a violation of my taxpayer rights and my civil rights.

For the record, I merely wish to observe and to learn how our equipment is being tested.

And also for the record, I am nearsighted, which classifies as a disability. I can't read small type five-feet away.

And it seems to me that with the use of blinds and/or privacy screens, the security issues posed by possible observance of

the input of a code could be missed.

Will you be testing the Auditory Tactile Interface or the Sip 'n Puff?

I'd like to see what is on the thumb drives for which you are welcome to provide a screen shot image of folders and files.

Are pollbooks being tested at this time? If so, is there a specific date and time scheduled for observation of that testing?

Can you provide a list of all the equipment to be tested because I am confused about what is tested and when?

May I suggest or request that you provide a demonstration for the public on at least one machine so that I and others can better understand the process? Put in your codes first and then allow people to view.

I want to believe our election system works, that my vote counts, and that you are fulfilling the mission of the ROV for "...the utmost integrity, transparency, and accountability; and that the department is known for excellence in customer service and the administration of elections."

Please let me know if a demonstration or change to visibility of the equipment during observation are possible. You are welcome to call me if you want to talk at 775-240-3456.

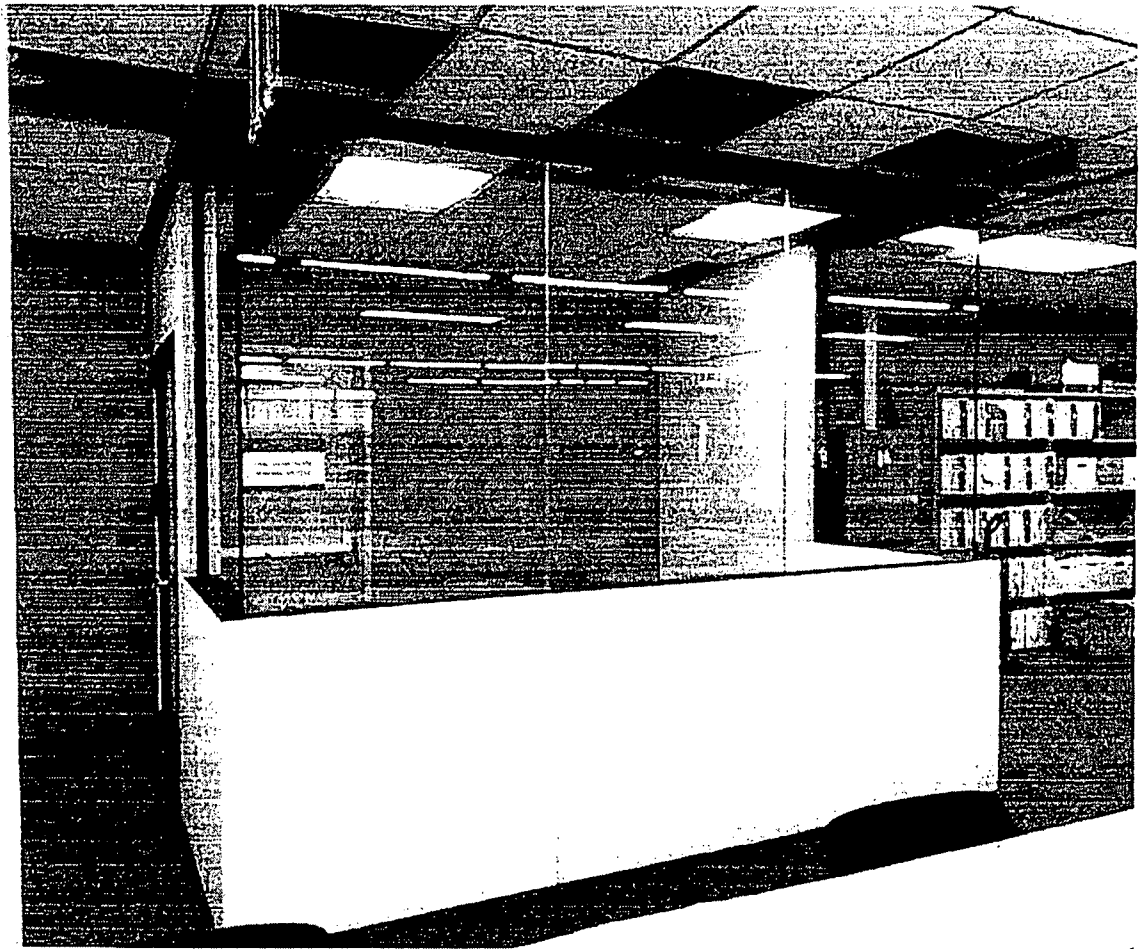
Thank you for your interest and cooperation.

Sincerely,

Oscar Williams  
1540 Whisper Rock Way  
Reno, NV 89523

# Exhibit

# D



# Exhibit

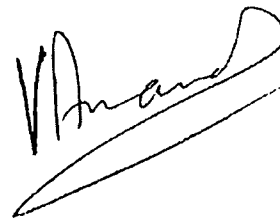
E

## Signature Verification

Election workers look for reasons to **approve** voter signatures, **not** to reject voter signatures. Signatures evolve as the signatory ages; they also change as the conditions under which the signature was made differ (e.g. electronic signature.)

Focus on the most basic elements of the two signatures being compared:

- Type of writing (e.g. cursive, print)
- Letter size, spacing, and proportion
- Letter slant
- Position of signature on the line



# Exhibit

**F**

Ms. Spikula, Chair Lucey, Vice Chair Hartung, County Manager Eric Brown, and the County's legal team for providing the information for this agenda item. She encouraged people to speak to their legislators who could change NRS and Governor Steve Sisolak. She said Mr. Brown, Chair Lucey, Vice Chair Hartung, and the other Commissioners had fielded thousands of phone calls on this issue. She respected everyone's efforts in supporting democracy, stating she believed the playing field had to be kept fair.

Commissioner Hill thanked the ROV and SOS staff for the presentation which showed how well they managed things so people were not taken off of voter rolls unnecessarily. She thought the ROV did a great job, noting this presentation was part of Mr. Brown's efforts to inform the citizenry about what each County department did. She said she had discussions with Mr. Brown about providing classes for citizens to explain what County departments did and provide information about volunteer opportunities.

Vice Chair Hartung expressed a dislike of same-day voter registration. He asked how the ROV verified identity, eligibility to vote in Washoe County, and voters' registration statuses in other states. Ms. Spikula replied same-day voter registration required a Nevada driver's license or identification card. If the identification did not have the voter's current residential address, a secondary proof of residency was required. She said poll workers had access to electronic poll books and they would input the voter's information, which would send a query to the voter database. The query would confirm whether the individual was an active voter and would confirm the residential address. She noted voters who wanted to update their information as part of their same-day registration would also need to provide a Nevada driver's license or identification card. The poll worker would enter the new information and the verification process would occur. She said the voter would sign an affirmation after verification to complete the registration process and sign the roster. She mentioned the County used paper rosters instead of electronic ones, providing greater image quality and a better paper trail.

Vice Chair Hartung asked for a response to a public commenter's allegation that non-citizens could get a Nevada driver's license and not be eligible to vote. Ms. Spikula responded people could get a driver's authorization card and work and live in the country indefinitely without becoming a citizen. She said it was each individual's responsibility to ensure they did not sign the affirmation if they were ineligible to vote. She stated there was no centralized database to confirm citizenship. The ROV relied on the voter to provide factual information and not commit a crime by voting if they were ineligible. Falsifying a voter registration application was a crime. A voter registration application could be sent to the District Attorney or the Attorney General for review. She stated falsifying a voter registration could affect a citizenship application. She mentioned that a non-citizen voter registration should not get through the DMV automatically, but it could happen. The voter could then contact the ROV to indicate they had not intended to register and the ROV would act accordingly.

Mr. Wlaschin confirmed there was no current statute to authorize the SOS to request or pursue any sort of citizenship test to screen out automatic voter registrations. He encouraged anyone with knowledge of an elections process abuse to report it to the

# Exhibit

# G



**STATE OF NEVADA**  
 SECRETARY OF STATE  
**BARBARA K. CEGAVSKE**

101 N. Carson St. Phone: 775-684-5705  
 Carson City, NV 89701 Fax: 775-684-5718

nvelect@sos.nv.gov  
 www.nvsos.gov

*For official use only:*  
 Received by: \_\_\_\_\_  
 Date Received: \_\_\_\_\_  
 Complaint Type: \_\_\_\_\_  
 [Stamp here]

## ELECTION INTEGRITY VIOLATION REPORT

The information you report on this form may be used to help us investigate violations of Nevada election laws. When completed, mail, email, or fax your form and supporting documents to the office listed above. Upon receipt, your complaint will be reviewed by a member of our staff. The length of this process can vary depending on the circumstances and information you provide with your complaint. The Office of the Secretary of State may contact you if additional information is needed.

**INSTRUCTIONS:** Please TYPE/PRINT your complaint in dark ink. You must write LEGIBLY. All fields MUST be completed.

### SECTION 1.

#### COMPLAINANT INFORMATION

Salutation:  Mr.  Mrs.  Ms.  Miss

Your Name: Williams Oscar D  
 Last First MI

Your Organization, if any: \_\_\_\_\_

Your Address: 1540 Whisper Rock Way Reno NV 89523  
 Address City State Zip

Your Phone Number: \_\_\_\_\_ (775) 240-3456 \_\_\_\_\_  
 Home Cell Work Fax

Email: osc.williams@att.net Call me between 8am-5pm at:  Home  Cell  Work

### SECTION 2.

#### TYPE OF COMPLAINT

- |   |   |
|---|---|
| <input type="checkbox"/> Campaign Practices       | <input type="checkbox"/> Voter Fraud                      |
| <input type="checkbox"/> Contributions / Expenses | <input type="checkbox"/> Initiative / Referendum Petition |
| <input type="checkbox"/> Voter Registration       | <input type="checkbox"/> Financial Disclosure Statement   |
| <input checked="" type="checkbox"/> Other         |   |

Election law violation

**SECTION 3.**

**COMPLAINT IS AGAINST**

**Please detail the nature of your complaint. Include the name and contact information (if known) of the individual, candidate, campaign, or group that is the subject of your complaint. Your complaint must also include a clear and concise statement of facts sufficient to establish that the alleged violation occurred. Any relevant documents or other evidence that support your complaint should be listed and attached. You may attach additional sheets if necessary.**

The Washoe County Registrar of Voters failed to mail me a sample ballot.

I voted on June 14th at McQueen H.S. in Reno and asked for a sample ballot because I had not received one. My request was denied.

I was told to go online and get it at the ROV's website but I did not have my cell phone with me. However, that is secondary to the laws that state sample ballots must be mailed and hard copies made available at vote centers.

I believe my rights have been violated per:

Counties are required to print a sample ballot upon request inside a vote center (R097-21A (4, 13));

and to have a copy of the sample booklet available (NRS293.3025, 293.325, 293B.205);

and a paper sample ballot must be mailed to each registered voter (NRS293.565, 293C.530, and NAC293.120).

Most people, including me, want fair and accurate elections, and transparency. Thank you for your time and interest.

**SECTION 4.**

**Sign and date this form. The Secretary of State's Office cannot process any unsigned, incomplete, or illegible complaints. In order to resolve your complaint, we may send a copy of this form to the person or group about whom you are complaining.**

I am filing this complaint to notify the Office of the Secretary of State of the activities of a particular candidate, campaign, individual or group. I understand that the information contained in this complaint may be used to establish violations of Nevada law in both private and public enforcement actions. I authorize the Office of the Secretary of State to send my complaint and supporting documents to the individual or group identified in this complaint.

By signing my name below, I certify under penalty of perjury that the information provided in this complaint is true and correct to the best of my knowledge.



Signature

Oscar D Williams

Print Name

6/15/22

Date (mm/dd/yyyy)

# Exhibit

H

**BARBARA K. CEGAVSKE**  
*Secretary of State*

STATE OF NEVADA

**SCOTT W. ANDERSON**  
*Chief Deputy Secretary of State*

**GAIL J. ANDERSON**  
*Deputy Secretary for Northern Nevada*



**ERIN HOUSTON**  
*Deputy Secretary for Securities*

**DEBBIE L. BOWMAN**  
*Deputy Secretary for Operations*

**KIMBERLEY PERONDI**  
*Deputy Secretary for Commercial Recordings*

OFFICE OF THE  
SECRETARY OF STATE

**MARK A. WLASCHIN**  
*Deputy Secretary for Elections*

## MEMORANDUM

---

To: Nevada County Clerks & Registrars

From: Mark Wlaschin

Date: February 15, 2022

Subject: Memo 2022-004 - Guidance Regarding Candidates whose Party Affiliations were changed because of AVR

---

The following guidance is provided to address candidates whose major political party affiliations were changed due to the Automatic Voter Registration (AVR) process.

NRS 293.176 describes the requirements for candidacy of a major political party for partisan office in any election:

- If a candidate of a major political party for partisan office had previously been affiliated with a major party, but then submitted to their Clerk a document or digital request changing their party affiliation from a major party to any other party prior to December 31, 2021, but then attempts changes it back, pursuant to NRS 293.176 they are not eligible to run for office as a representative of that major political party.
- If a candidate of a major political party for partisan office had their party affiliation changed from a major political party to any other party through the AVR process, including by the establishment of a new voter registration in a different county than they had been previously registered, the candidate is eligible to run for office as a representative of that major political party.

It is the intent of the Office of the Secretary of State that this guidance be submitted as a regulation following the conclusion of the 2022 election cycle. To that end, if any Clerk identifies a means to improve this guidance, please notify the Deputy for Elections prior to December 15, 2022.

Respectfully,

Barbara K. Cegavske  
Secretary of State

By: Mark Wlaschin  
Mark Wlaschin, Deputy Secretary for Elections

# Exhibit

I

## Provisional Ballots Anomalies 2020 General Election

### Statistics:

- 336,518 total number of registered and eligible voters for the 2020 General Election held 11/03/2020
- 308,363 Active
- 28,155 Inactive
- Total voters that voted: 252,566
- Washoe County EAVS
  - Same-day Registrations: 4,139
    - Election day: 1,931
      - 2,950 on Election Day at Cold Springs alone
      - 2,041 counted from Cold Springs on Election Day of the 1,931
    - Early voting: 2,208
- Secretary of State statistics:
  - 5,173 Provisional ballots cast from Washoe County
  - 4,179 PV ballots counted
    - 40 difference between EAVS and SoS records, nearly a 1% error
- PRR 109342 request for all provisional ballots cast sent to the SoS and the returned records of those verified by the SoS
  - Received a CD in MS Excel format containing 5,565 records
  - Accepted: 4,230 vs the 4,179 reported on EAVS
  - Rejected: 995
  - PV Status blank: 80 records
  - Duplicate voters in PV database: 320, 215 with exact same pv number
  - Duplicate voters in PV database with 2 different pv numbers: 106
  - Breakdown by polling place
    - Nixon: 30
    - Incline Village: 91
    - Sun Valley Center: 97
    - Downtown Library: 116
    - Reno Town Mall: 143
    - South Valleys Lib: 158
    - Dbl Diamond Ath: 166
    - North Valleys Lib: 183
    - Northwest Lib: 186
    - Reno/Spark Conv: 193
    - RoV Office: 259
    - Spanish Springs: 279
    - Lawlor Ctr UNR: 306
    - **Cold Springs: 2,950** over entire Early Voting period **all on Election Day 11/03/2020**
  - Polling books for Cold Springs processed 688 voters, NO provisionals processed on the polling books. That's 1 person every 1 minute and 3 seconds.
  - IF Cold Springs processed 2,950 provisional ballots from Same Day Registrations, that would be an additional 1 person every 14.6 seconds for the entire 12 hour Election Day.
  - If you got there to vote and the wait time was 10 minutes, you'd be 50<sup>th</sup> in line.
  - 25 electronic voting machines, 10 election workers, this would not even be physically possible

- After receiving training to be a Ballot Intake Clerk, each new Same Day Registration would be manually entered into the polling books in real time.
  - Was told by Heather Carmen that when they (not sure who "they" was) entered the SDR provisional ballots that "they" did not select the correct polling place and that they defaulted to Cold Springs.
  - So if that is true, which I don't believe that is the way it works as outlined in my training and confirmed at Save Mart #155 polling place on Plumb, then by admission of the RoV office, they made approximately 2,900 errors or 52% of the Provisionals were in error.
  - It would also mean that when someone came into any polling place besides Cold Springs to do an SDR, that the Ballot Intake Clerk would have to log out and inadvertently log back in as the Cold Springs Polling Place, then log back out and re-log back in at the proper Polling Place.
  - All of the associated paperwork would also be collected from the wrong Polling Place.
- We have collected about a dozen Affidavits from people in Washoe City, Incline Village and up in Cold Springs.
  - 6 Affidavits from Washoe City testifying that they did NOT vote in Cold Springs, however, we can also not find them on the Poll Books as having voted in Washoe City provisionally.
  - 1 Affidavit from Incline Village testifying that they did NOT vote in Cold Springs, however, we can also not find them on the Poll Books as having voted in Incline Village provisionally.
  - Several from Cold Springs testifying that their wait time in line was not more than a few minutes if any wait time at all.
- Response to PRR by Heather Carmen
  - "I have the list that was provided to the Secretary of State of provisional voters. This list has over 5,000 names and contained on that list is the voters residential address. If you allow me to remove the individuals residential address from the list I can provide the list tomorrow. With some of our voters being "Confidential" I would have to ask a staff member to go through it before I can release it and the timeframe that I would be able to provide it would be 3 months from now.  
We do not have a report from the State because there were no provisional to report as a potential double vote." (highlight added)
    - It is NOT the job of the RoV in Washoe County to decide if there was the "potential" for double votes, that is the job of the SoS to certify they had NOT voted in any other county statewide.
    - If they "do not have a report from the State..." then how is it that I have a report from the SoS and that it came from the RoV?
  - I had them remove all the addresses and received the email and CD of the file in MS Excel format
  - About 5 minutes to convert the .xlsx file to a .csv format.
  - Another 3 minutes to import into a database program.
  - Another 3 minutes to pull the addresses from the Voter Registration database, the method by which they voted, last time they voted, and the state voter id, btw, there were no Confidentials for any "Accepted"
  - Why would it have taken an estimated 3 months to do what I was able to do in less than 30 minutes?

- Removed from State Voter Rolls
  - By April 2021 the state's voter registration database shows that 399 of the 2,950 had already been removed from the Voter Rolls.
    - Did any statewide or countywide candidate win by less than 399 votes?
  - By September 2021, 673 of the 2,950 (22.8%) had been removed from the state's voter rolls
- 90 of the Provisional SDRs were processed AFTER 7 pm closing time of the Polling Place in Cold Springs. Does this mean there were 90 people still in line when the Polling Place closed?
- Why aren't any of the provisional voters listed in the polling books?
- According to the Voter History, 2041 of the 2,950 are marked as Polling Place (PP) voting NOT PV, Provisionally Voted

**Conclusion:** After investigating and doing an analysis of the Provisional Voting Ballots cast and counted in Washoe County, it appears that there are now more questions than answers. Possible 2,900 errors in PV ballots in Cold Springs alone. Why do NONE of the Provisional Ballots show up in any of the Polling Books? Why are ALL of the Provisional Ballots listed in the Voter Rolls database listed as PP rather than PV? Why did Cold Springs have 53% of all Provisional Ballots cast in the county yet no record in the Cold Spring Polling Books or ANY polling books for that matter? Where is all the paperwork associated with Provisional Ballots from the 2020 General Election? Why are so many (over 22%) of PV already removed from the Voter Rolls by Sept 2021?

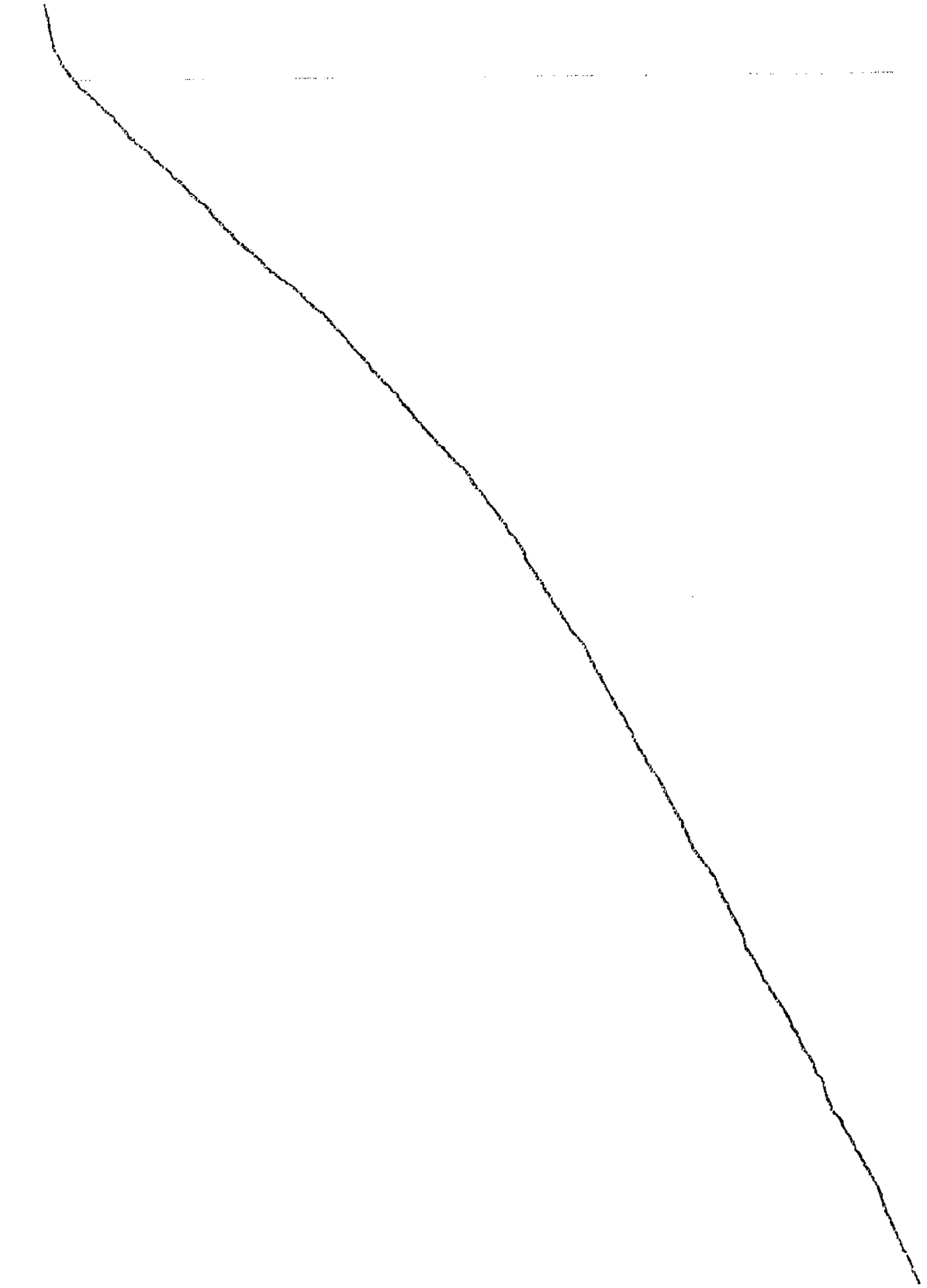
**Demand:** An Item be put on the June 21, 2022 Agenda to have a discussion on these findings and to have an investigation be opened looking into all these questions, anomalies, errors and concluded before the 22 months deadline to destroy all election data.

Place a "stay" on the destruction of all vote information in Washoe County to preserve all 2020 General Election data/information/paperwork.

# Provisional Ballots Cold Springs, NV November 3, 2020

Polls closed

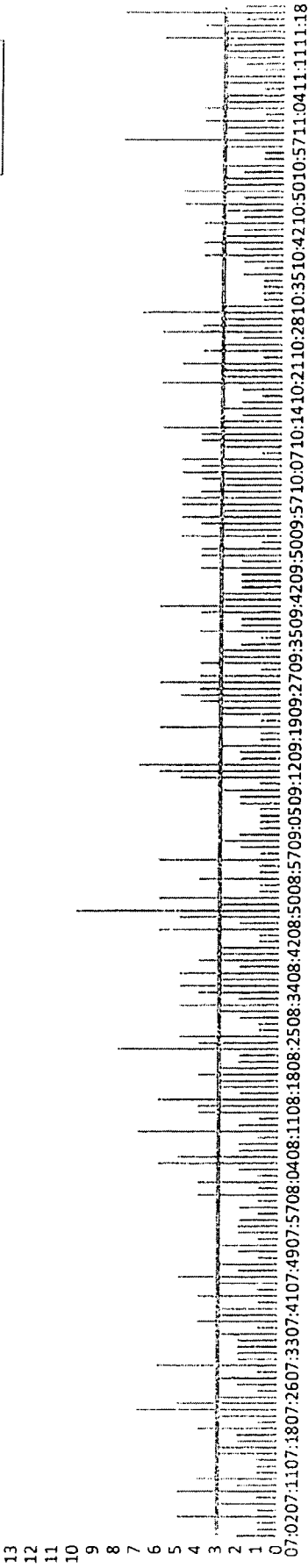
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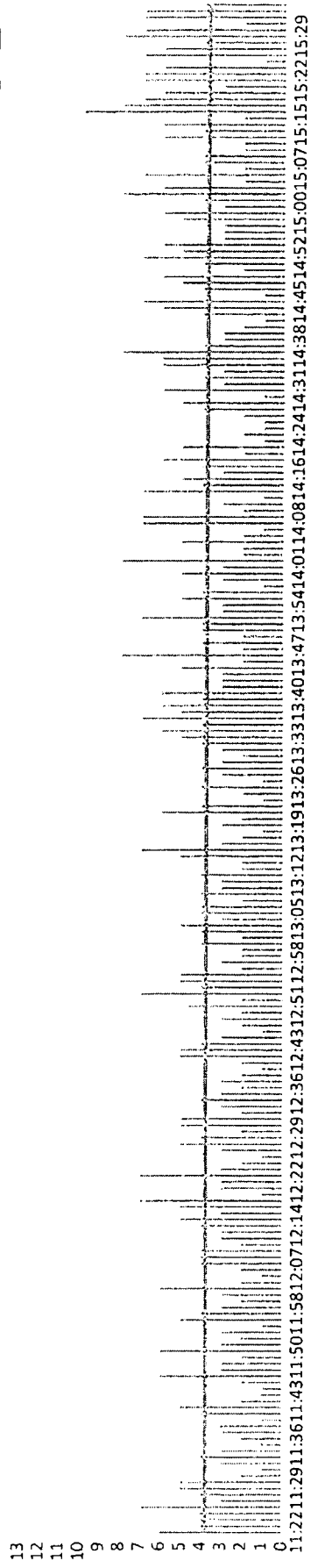
Provisional Ballots Cold Springs, NV 11-03-20 7:02 AM to 11:20 AM

Average 3



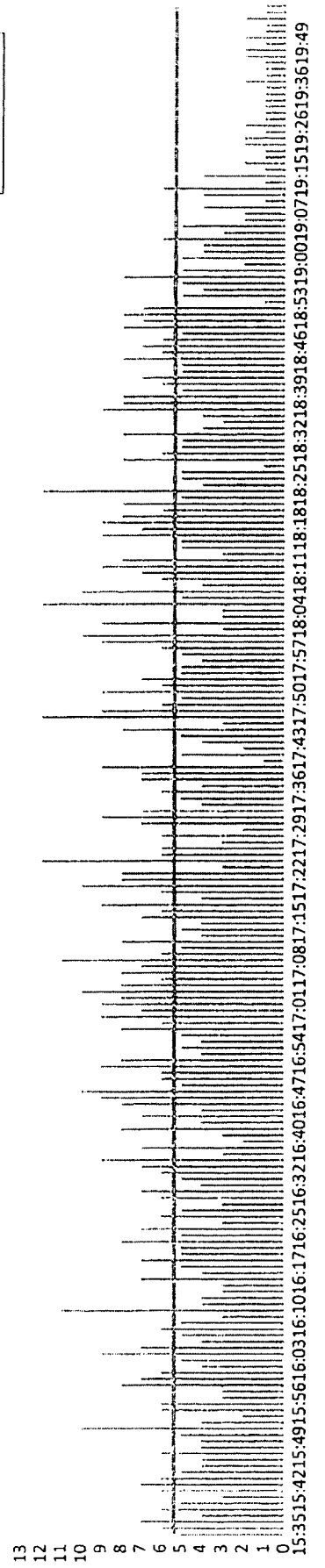
Provisional Ballots Cold Springs, NV 11-03-20 11:22 AM to 3:31 PM

Average 3.8



Provisional Ballots Cold Springs, NV 11-03-20 3:35 PM to 7:53 PM

Average 5.4





## 311 Request for Information - Request Response

### ID

109342

### Location

Reno

### Status

Closed

### Comment

All written procedures of how the Dominion voting machine data gets entered into the DIMS county database.

All reports of Provisional Votes cast using the Dominion voting machines that went to the Secretary of State's office and the report returned to you on or after the Saturday following the General Election of 2020.

Were there any Provisional votes cast using paper ballots? If so, how many and on what days.

## History

### + Created 2 months ago

All written procedures of how the Dominion voting machine data gets entered into the DIMS county database.

All reports of Provisional Votes cast using the Dominion voting machines that went to the Secretary of State's office and the report returned to you on or after the Saturday following the General Election of 2020.

Were there any Provisional votes cast using paper ballots? If so, how many and on what days.

## Public Records Request

Carmen, Heather <HCarmen@washoecounty.gov>  
To: Nicholas St Jon <nicholas.stjon@gmail.com>

Thu, Apr 14, 2022 at 4:09 PM

Mr. St Jon,

The following is an update to your public records request.

There is not a written procedure on how Dominion voting machine data gets entered into the DIMS county database.

I have the list that was provided to the Secretary of State of provisional voters. This list has over 5,000 names and contained on that list is the voters residential address. If you allow me to remove the individuals residential address from the list I can provide the list tomorrow. With some of our voters being "Confidential" I would have to ask a staff member to go through it before I can release it and the timeframe that I would be able to provide it would be 3 months from now.

We do not have a report from the State because there were no provisional to report as a potential double vote.

Please advise.



**Heather Carmen**

Assistant Registrar | Registrar of Voters

hcarmen@washoecounty.gov | Office: 775.328.3672 Cell: 775.300.3197

1001 E. 9th St., Reno, NV 89512



# Exhibit

J



## Current Mail Ballot Status

2022 GENERAL

Ballot Status  
11/10/2022

1 / 3

Ballots must be returned by 7:00 PM on Election Day, November 8, 2022.

Details

For assistance using this site or questions about information available on this site, contact your local election official.

## Contact Preferences

My Ballot

My ID

My Ballot

My Ballot

My Ballot

My Ballot

My Ballot

My Ballot

My Ballot



**“Exhibit 2”**



Robert Beadles <beadlesmail@gmail.com>

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## Election Contest-We The People

1 message

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Robert Beadles <beadlesmail@gmail.com>

Wed, Nov 23, 2022 at 2:38 PM

To: SOS Elections Division <nvelect@sos.nv.gov>, JARodriguez@washoecounty.gov, ssouthworth@ag.nv.gov, CNewby@ag.nv.gov, ClerkEM@clarkcountynv.gov, nvscclerk@nvcourts.nv.gov  
Bcc: Adam Fulton <afulton@jfnvlaw.com>, Joey Gilbert <Joey@joeygilbertlaw.com>


Please see attached.

Thank you, and Happy Thanksgiving.

*Kind Regards,*

**Robert Beadles**

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 **Contest\_All.pdf**  
2262K

To: Nevada Secretary of State  
101 North Carson Street, Suite 3, Carson City, NV 89701

To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701

To: Supreme Court Of Nevada  
201 S Carson St #201, Carson City, NV 89701

**[NRS 293.410] Statement of Contest**

**Please take notice that** it is my wish as one of the People that the Election of November 8, 2022 be denied certification because of the following:

- (A) There is more than one election worker who has been ordered by officials over the elections to do things outside the form of law which stands as malfeasance.
- (B) I further demand that under the fundamental principles of law, universally accepted, in all civilized nations, that you nullify this election as the will of one of the People, and by necessity, custom, and historical usages of the law:

**Maxim:** Legal form is essential form.

**Maxim:** Where form is not observed, nullity of the act is inferred or follows.

**Maxim:** Where the law prescribes a form, the non-observance of it is fatal to the proceeding, and the whole becomes a nullity.

**Please take notice that** the act of election workers, acting as trustees of the People, ordering government servants to ignore the form of elections presented in good faith is fatal to the whole proceeding and furthermore, government is without authority to certify anything that was void, null or invalid on its face as shown in the evidence below:

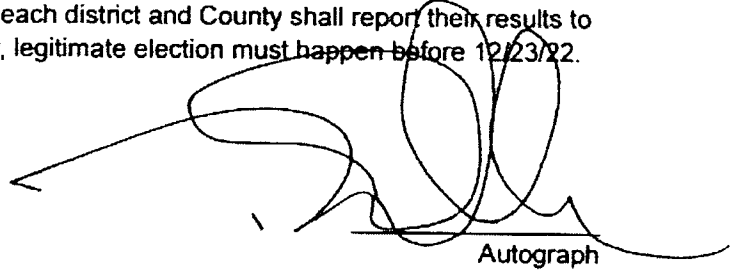
**Maxim:** Things invalid from the beginning cannot be made valid by subsequent act.

**Maxim:** Things grounded upon an ill and void beginning cannot have a valid or good perfection.

**Please take notice that** the People have come together, assembled for the common good, and they realize that our servants swore to be instructed by us in the Nevada State Constitution. I therefore come to you in love to tell you that certifying the 2022 general election after being shown fundamental law, and the fact that workers were instructed to ignore the law and verifications which rendered the proceeding a nullity, will be considered a trespass against the People in the highest degree.



Therefore, our remedy and cure is for a new election and to conduct the new election in such a way that our rights are not being violated. The public will have full transparency into the election process. The new election shall be conducted in one day, with picture voter ID required, using only paper ballots, and counted by hand. The election locations shall be numerous in order to comply with U.S. Supreme Court rulings. Mail ballots shall be opt-in. Indefinitely confined and military officers shall be mailed a paper ballot that must be filled out by the voter and mailed back to the Registrar of Voters or County Clerk in their county to be received by close of polls on election day. Election will be held from 7 am to 7 pm on the day of election. No late ballot arrivals after polls close. Election workers in each district and County shall report their results to the public by 9 PM on election day. This new, legitimate election must happen before 12/23/22.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the left.

Autograph

11/23/22  
Date

To: Nevada Secretary of State  
101 N. Carson Street, Suite 3  
Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. 9<sup>th</sup> Street  
Reno, NV 89512

## AFFIDAVIT

I, Tracey Thomas, one of the People, in this court of record, Sui Juris, do swear to the following claims:

1. The Constitution for the United States of America is the Supreme Law of the land and supersedes all other lesser law, statutes, codes, regulations and the State Constitution. What is written in the referenced national Constitution is valid, authorized and enforceable. What is not written in the national Constitution is prohibited by that Constitution. All provisions of the national and state Constitution are mandatory, and are not to be overlooked or ignored as if they did not exist. Any act committed by you either supports and upholds the Constitution, national and state, or opposes and violates them.
2. You have taken an oath to support and uphold the national and state Constitution and are constitutionally responsible and liable in the performance of your official duties as is further defined, but not limited to, in the state statutes. (Article 15, Section 2)
3. You have no Constitutional authority, or any other form of valid, lawful authority, to oppose and violate the very documents you swore or affirmed your oath and under which you were delegated by the people the limited authority to conduct the duties of your office.
4. No voting results of mail ballots may be released until all polling places are closed and all votes have been cast on the day of the election. Any person who disseminates to the public in any way information pertaining to the count of mail ballots before all polling places are closed and all votes have been cast on the day of the election is guilty of a misdemeanor. (NRS 293.269935)
5. A county clerk shall not post copies of the tabulated voting results for a statewide or multi-county race or ballot question until the county clerk has received notification from the Secretary of State that all polling places are closed and all votes have been cast. (NRS 293.383)



6. No counting board in any precinct, district or polling place in which paper ballots are used may commence to count the votes until all ballots used or unused are accounted for. (NRS 293.365)
7. You released 2022 General Election voting results before all votes had been cast on November 8, 2022. The United States Postal Service was still accepting and postmarking mail ballots on this date up until midnight Pacific Standard Time and Hawaiian Standard Time. This gave a vast amount of voters an unfair advantage that other voters did not have, as is evidenced by the number of ballots received November 8 through November 12. This gross breach of information thereby suppressed and diminished the value of lawfully cast ballots, as well as disenfranchised legal voters.
8. The processing procedures stipulated in NRS 293.269921, section 1(b) and section 2 are in direct violation of the above referenced state statutes and constitutions.
9. The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude. (15<sup>th</sup> Amendment)
10. The first qualification to vote listed under NRS 293.485 is citizenship and then item 1 proceeds with "Every citizen of the United States."
11. The Secretary of State shall verify the accuracy of the information in an application to register to vote. (NRS 293.675)
12. The first question on the State of Nevada Voter Registration Application is "Are you a citizen of the United States of America?"
13. Staff testified April 13, 2021 at the Washoe County Board of County Commissioners meeting that citizenship is not being verified on persons applying to register to vote.
14. You have not only infringed on the freedoms guaranteed to me as one of the People; but, you are flagrantly and willfully violating your trust indenture. You are practicing discrimination, segregation and intimidation by insisting on depriving me of my rights under color of law. You should be aware that Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws within the United States.



15. Licentiousness is to to be understood as acting without regard to law, ethics, or the rights of others. Licentiousness, or practices inconsistent with the peace and safety of the state may be construed to have occurred with all trust indenture servants of the state and state agencies and associations mentioned herein who have acted in a licentious and disruptive manner related to the complaints listed herein.
16. Any failure on your part to protect the People's freedom is a breach of your trust indenture and your oath of office, to which you swore. You were given certain responsibilities by the People, and you have acted in malfeasance and maladministration, intentionally attacking the People you serve, as these responsibilities were not fully and faithfully completed.

This Affidavit is lawful notification to you, and is hereby made and delivered to you pursuant to the national Constitution, specifically, the Bill of Rights, and The Bill of Rights of the Nevada Constitution, and requires your written rebuttal to me, in kind, specific to each and every point of the subject matter stated herein, within ten (10) days, via your own sworn and notarized affidavit, using true fact, valid law and evidence to support your rebuttal of the specific subject matter stated in this Affidavit.

You are hereby noticed that your failure to respond, as stipulated, and rebut, with particularity and specificity, anything with which you disagree in this Affidavit, is your lawful, legal and binding tacit agreement with and admission to the fact that everything in this Affidavit is true, correct, legal, lawful, and fully binding upon you in any court in America, without your protest or objection and that of those who represent you.

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC 1746 that all of the above and forgoing representations are true and correct to the best of my knowledge, information, and belief.

Executed in Sparks, Nevada on this 23 day of November in the Year of Our Lord Two Thousand and Twenty-Two.



Tracey Thomas  
1344 Disc Drive #140  
Sparks, NV 89436

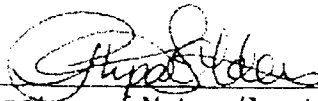
**Notary as JURAT CERTIFICATE**

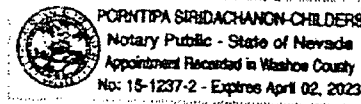
State of Nevada }  
                                  }  
Washoe County }

On this 23 day of November, 2022 before me, Porntipa Sirdachanon-Childers, a Notary Public, personally appeared Tracey Thomas, Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the woman executed, the instrument.

I certify under PENALTY of PERJURY under the lawful laws of the State of Nevada and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

  
\_\_\_\_\_  
Signature of Notary/Jurat



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

**Affidavit**

Affiant, Renee Lou Rezentos, one of the People, in this Court of Record, Sui Juris, do swear to the following claims:

1. most of the time they were not comparing signatures.
2. most envelopes were being passed without checking

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Reno, Nevada on this 22<sup>nd</sup> day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Renee Lou Rezentos  
Autograph of Affiant:

**Notary as JURAT CERTIFICATE**

Nevada State }  
Washoe County }

On this 22<sup>nd</sup> day of November, 2022 (date) before me,

Randy Miller, a Notary Public, personally appeared Renee Lou Rezentos Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat Randy Miller  
Commission Expires July 1, 2024



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

**Affidavit**

Affiant Aoife M. Tebbe, one of the People, in this Court of Record, Sui Jurs,  
do swear to the following claims:

1. In the Clark County Elections Department, in signature verification room I heard Victor, the room supervisor tell election workers the the signatures did not need to match as long as it was "close enough".
2. Victor also told them they did not need to use the second laptop to cross reference all other signatures on record, this is against Nevada Law.

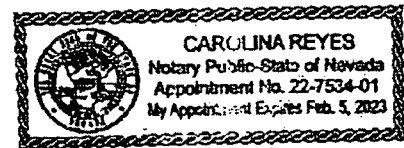
**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Las Vegas, Nevada on this 27 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

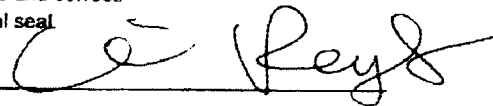
  
Autograph of Affiant:

Nevada State )  
Clark County )  
Notary as JURAT CERTIFICATE



On this 27 day of November, 2022 (date) before me,  
Carolina Reyes, a Notary Public, personally appeared  
Aoife M. Tebbe, Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat



To: The Nevada Secretary of State  
501 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

Affidavit

Affiant Micah Jordan, one of the People, in this Court of Record, Sui Juris,  
do swear to the following claims:

On October 28, 2022 at approximately 11:05 AM while  
in the signature verification room, I was seated single-file  
1. with other observers. There were on both sides, teams of two  
per monitor comparing voter signatures. One team noticed a discrepancy  
and had stopped and called for their supervisor. A younger man,  
who the team greeked as "Victor" told the team "no the signatures  
2. do not need to match, they may vary." I raised my hand, as  
instructed, to call for "Dan" who was our contact person and an  
Ambassador got him. When I asked about this, he said "he  
would look into it." It never got back to me. He never clarified

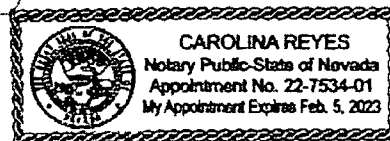
Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of  
the United States of America, and by the provisions of 28 USC § 1746 that all of the  
above and foregoing representations are true and correct to the best of my knowledge,  
information and belief.

Executed in (city) Las Vegas, Nevada on this 22 day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

Micah Jordan  
Autograph of Affiant

Notary as JURAT CERTIFICATE  
Nevada State )  
Clark County )



On this 22 day of November, 2022 (date) before me,  
Carolina Reyes, a Notary Public, personally appeared  
Micah Jordan Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the woman whose name is subscribed to the within instrument and  
acknowledged to me that she executed the same in her authorized capacity, and that by  
her autograph(s) on the instrument the woman executed, the instrument  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat Carolina Reyes

To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

Affidavit

Affiant, Cynthia L. Sassemann, one of the People, in this Court of Record, Sui Juris, do swear to the following claims:

- While working as a voter intake specialist at the library on Robt Dr in Reno, Heather Carver, the assistant registrar of voters, came in and was showing a new employee the election process. She happened to be behind me looking over my shoulder when a gentleman's signature looked like a bunch of loops. I said "I am sorry sir, that signature does not match, may I see your ID?" He showed me his ID without any problem. Heather was watching the exchange and she said "that loop kind of looks like that loop" comparing the two signatures out of 5 people per page. I would say I had at least one or two signatures that did not match.
2. We were given no signature verification training. We were told we would get a link or video in our email. It came after early voting started but I could not get it open. If election workers verified signatures on mail in ballots the way Heather Carver suggested during early voting, there is no meaningful signature verification.

Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Woodland Hills, <sup>CA</sup> ~~NV~~ Nevada on this 23 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Cynthia L. Sassemann  
Autograph of Affiant

Notary as JURAT CERTIFICATE

California State )  
Los Angeles County )

On this 23 day of November, 2022 (date) before me, Alina Bilych, a Notary Public, personally appeared Cynthia L. Sassemann Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument. I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct. WITNESS my hand and official seal.

Signature of Notary / Jurat Alina Bilych

Please, see attached a correct CA Notary Certificate.

JURAT

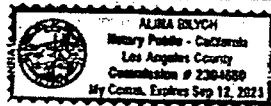
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of LOS Angeles

Subscribed and sworn to (or affirmed) before me on  
this 23 day of November, 20 22  
by Cynthia L. Sassenrath

proved to me on the basis of satisfactory evidence to be the person(s) who  
appeared before me.

Signature 



(Seal)

**“Exhibit 3”**

To: Nevada Secretary of State  
101 North Carson Street, Suite 3, Carson City, NV 89701

To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701

To: Supreme Court of Nevada  
201 S Carson St #201, Carson City, NV 89701

**We the People's Constitutional Demand to nullify and change the election system based on fundamental principles of law**

**Please take notice that** it is my wish as one of the People that the Election of November 8, 2022 be denied certification because of the following:

- A. There is more than one election worker who has been ordered by officials over the elections to do things outside the form of law which stands as malfeasance.
- B. I further demand that under the fundamental principles of law, universally accepted, in all civilized nations, that you nullify this election as the will of one of the People, and by necessity, custom, and historical usages of the law:

**Maxim:** Legal form is essential form.

**Maxim:** Where form is not observed, nullity of the act is inferred or follows.

**Maxim:** Where the law prescribes a form, the non-observance of it is fatal to the proceeding, and the whole becomes a nullity.

**Please take notice that** the acts of election workers, acting as trustees of the People, ordering government servants to ignore the form of elections, presented in good faith, is fatal to the whole proceeding. Furthermore, government is without authority to certify anything that was void, null, or invalid on its face as shown in the evidence below:

**Maxim:** Things invalid from the beginning cannot be made valid by subsequent act.

**Maxim:** Things grounded upon an ill and void beginning cannot have a valid or good perfection.

**Please take notice that** the People have come together, assembled for the common good, and they realize that our servants swore to be instructed by us in the Nevada State Constitution. I, therefore, come to you in love to tell you that certifying the 2022 general election after being shown fundamental law, and the fact that workers were instructed to ignore the law and verifications which rendered the proceeding a nullity, will be considered a trespass against the People in the highest degree.

Therefore, our remedy and cure is for a new election and to conduct the new election in such a way that our rights are not being violated. The public will have full transparency in the election process. The new election shall be conducted in one day, with a picture voter ID required, using only paper ballots, and counted by hand. The election locations shall be numerous in order to comply with U.S. Supreme Court rulings. Mail ballots shall be opt-in. Indefinitely confined and military officers shall be mailed a paper ballot that must be filled out by the voter and mailed back to the Registrar of Voters or County Clerk in their county to be received by close of polls on election day. The election will be held from 7 am to 7 pm on the day of the election. No late ballot arrivals after polls close. Election workers in each district and County shall report their results to the public by 9 PM on election day. This new, legitimate election must happen before 12/23/22.

Additionally, the Registrar of Voters furnished a list of voters they have reported as voted. We have found this list to be in error. We have additionally found a function within the election system that changes the voters vote from what they cast. We have found the voter rolls to be in error.

As per the Nevada Constitution Article 1, Section 2 **Purpose of government; paramount allegiance to United States.**

“All political power is inherent in the people[.] Government is instituted for the protection, security, and benefit of the people; and they have the right to alter or reform the same whenever the public good may require it....”

Therefore we the people demand the following be abolished immediately:

- AB321
- Use of electronic voting machines and counting machines
- The current voter rolls.

Therefore we the people demand the following be enacted upon immediately:

- Legal voters shall be shown how to re-register to a new set of voter rolls by 6/1/23
- Voter rolls shall be independently kept and maintained by each of the 15 county clerks and 2 registrar of voters
- Valid Voter ID will be required to vote or register to vote

We the people demand a full investigation into the following people:

Jamie Rodriguez, Washoe County Registrar of Voters  
Eric Brown, Washoe County Manager  
Bethany Drysdale, Washoe County communications director

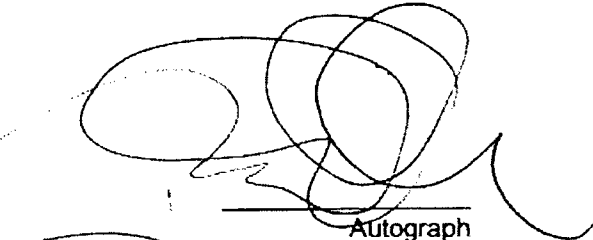
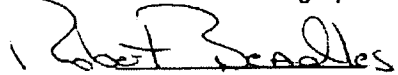
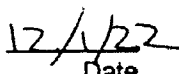
I have given proof of election errors to Eric Brown and Jamie Rodriguez of the Washoe County Registrar of Voters, including but not limited to:

- An algorithm flipping our votes,
- Voter rolls grossly in error,
- Missing votes and voters,
- Election equipment hooked up to the internet,
- Our votes being counted in secret,
- ROV reported voters who voted in 2022 General Election in error,

- Voters votes being cast without the voter's consent.

The errors still exist. After receiving notice of the errors, rather than correcting, the election officials used their communications team and Bethany Drysdale to deceive the public.

If, as Nevada government workers, you believe the People do not have rights as enumerated in the Nevada Constitution Article 1, Section 2: Purpose of Government and you refuse to immediately secure the People's elections and business by immediate investigations and nullifying this past election, that was filled with maladministration and malfeasance, you must present constitutional grants of authority showing you are allowed to do so, sworn under penalty of perjury, by affidavit within 7 days. If you should fail to respond, you agree that you are trespassing against the People, with full knowledge, intent, and malice, and that this notice can be used as evidence against you should you interfere with the People's rights.

  
Autograph  
  
Print Name  
  
Date

To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

To: Washoe County Registrar of Voters 1001 E. Ninth Street, Reno, NV 89512

To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701

To: Supreme Court Of Nevada  
201 S Carson St #201, Carson City, NV 89701

**Affidavit**

Affiant, Robert Beadles, one of the People, in this Court of Record, Sui Juris, do swear to the following claims:

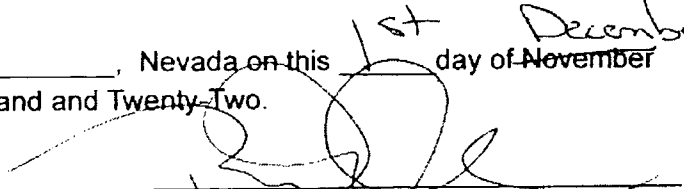
I have given the following proof of election errors to Eric Brown and Jamie Rodriguez of the Washoe County Registrar of Voters.

- An algorithm flipping our votes.
- Voter rolls grossly in error.
- Missing votes and voters
- Signature verification not adequately done
- Election equipment hooked up to the internet
- Our votes being counted in secret.
- ROV reported voters who did not vote in the 2022 General Election as voted.
- Voters votes being cast without the voters consent.
- The errors we have shown they then have their communications team discount to the public vs investigate and correct the errors.

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Reno, Nevada on this 1st day of December in the Year of Our Lord Two Thousand and ~~Twenty~~ Two.



Autograph of Affiant:

**Notary as JURAT CERTIFICATE**

Nevada State }

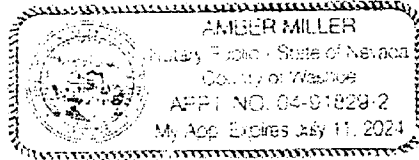
state of Nevada

Washoe County }

On this 1<sup>st</sup> day of Dec ~~November~~, 2022 (date) before me,  
Amber Miller, a Notary Public, personally appeared  
Robert D Beadles Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the man whose name is subscribed to the within instrument and  
acknowledged to me that he executed the same in his authorized capacity, and that by  
his autograph(s) on the instrument the man executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat

Amber Miller



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

To: Washoe County Registrar of Voters 1001 E. Ninth Street, Reno, NV 89512

To: Nevada Attorney General  
100 North Carson Street Carson City, NV 89701

To: Supreme Court Of Nevada  
201 S Carson St #201, Carson City, NV 89701

Affidavit

Affiant, Edward Solomon, one of the People, in this Court of Record, Sol Juris,  
do swear to the following claims:

1. For each precinct, from the tabulations published by the Clark County Registrar of Voters, let:  
A = Merchant's Early Vote B = Cisco's Mail-in Vote;  $x = \frac{A}{A+B}$   
2. C = Merchant's Mail-in Vote D = Cisco's Early Vote;  $y = \frac{C}{C+D}$   
 $T = \frac{A+C}{(A+C)+(B+D)}$ , then there exists an algorithm that calculates T as a function of x and y, a mathematical impossibility in the form

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.  
Executed in (city) New York, Nevada on this 26<sup>th</sup> day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Edward Solomon  
Autograph of Affiant

Notary as JURAT CERTIFICATE

New York State )  
Suffolk County )

On this 26<sup>th</sup> day of November, 2022 (date) before me,  
Babur Rahim a Notary Public, personally appeared  
Edward Solomon Name of Affiant, who proved to me on the basis of satisfactory evidence to be the man whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his autograph(s) on the instrument the man executed, the instrument.  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature of Notary / Jurat [Signature]

BABUR RAHIM  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01RA6358684  
Qualified in Suffolk County  
Commission Expires May 15, 2025

$0^2 = k_0 + k_1 x + k_2 y + k_3 x^2 + k_4 xy + k_5 y^2$ ,  $R^2 = 0.999$

Affiant Name: Kimberly Grover  
Affiant Address: 3408 Furlong Way, FORT WORTH, TX 76244

To: The Nevada Secretary of State  
Address: 101 N Carson Street Suite 3 Carson City, NV 89701

Nevada Affidavit to Derry Voting in Election

Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent

Affiant, Kimberly Grover, one of the People, in this Court of Record, Sul Juris, do make the following claims in regards to voting in the November 4, 2022 Election;

I did not vote in the NV elections because I moved to Fort Worth, TX at the end of June 2022. I am no longer a resident of NV. I registered to vote in Texas, but did not receive my voter registration card until Nov. 7<sup>th</sup> 2022; therefore, I was unable to vote in November.

Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

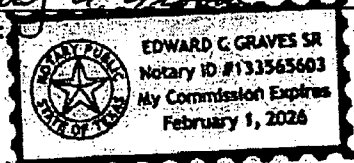
Executed in(city)

Fort Worth, TX on this 30<sup>th</sup> day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Autograph of Affiant: Kimberly Grover

Texas State )  
Ft Worth County )

Notary as JURAT CERTIFICATE



On this 30<sup>th</sup> day of November, 2022 (date) before me, Edward C. Grover

a Notary Public, personally appeared Kimberly Grover Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal

Signature of Notary / Jurat Edward C. Grover exp. 02/01/2026

Agent Name:  
Agent Address:

Amber Kinley  
5801 Spruce St. N. Las Vegas, NV 89148

To: The Nevada Secretary of State  
Address: 101 N Carson Street, Suite 3, Carson City, NV 89701

**Nevada Affidavit to Grant Voting by Election**

Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent

Agent: Amber Kinley of the County of Clark, State of Nevada, do hereby make the following statement regarding my principal's 2022 election:

I did not vote in Clark County  
in October 2022  
November

\_\_\_\_\_  
Principal's Name

\_\_\_\_\_  
Principal's Address

\_\_\_\_\_  
Principal's City

\_\_\_\_\_  
Principal's State

\_\_\_\_\_  
Principal's Zip

\_\_\_\_\_  
Principal's Date of Birth

\_\_\_\_\_  
Principal's Social Security Number

\_\_\_\_\_  
Principal's Driver's License Number

\_\_\_\_\_  
Principal's Voter Registration Number

\_\_\_\_\_  
Principal's Mailing Address

\_\_\_\_\_  
Principal's Mailing City

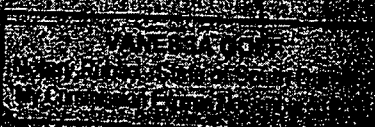
\_\_\_\_\_  
Principal's Mailing State

\_\_\_\_\_  
Principal's Mailing Zip

\_\_\_\_\_  
Principal's Signature

\_\_\_\_\_  
Principal's Date

\_\_\_\_\_  
Agent's Signature



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

Affidavit

Affiant Cynthia L. Sassonetto one of the People, in this Court of Record, Sui Juris, do swear to the following claims:

1. while working as a voter intake specialist at the library on Robt Dr in Reno, Heather Cerven, the assistant registrar of voters, came in and was showing a new employee the election process. She happened to be behind me looking over my shoulder when a gentleman's signature looked like a bunch of loops. I said "I am sorry sir, that signature does not match, may I see your ID?" He showed me his ID without any problem. Heather was watching the exchange and she said "that loop kind of looks like that loop" comparing the two signatures. out of 5 people per page I would say I had at least one or two signatures that did not match.
2. we were given no signature verification training. We were told we would get a hand-out video in our email. It came after early voting started but I could not get it to open. If election workers verified signatures as a) in ballots the way Heather Cerven suggested during early voting, there is no meaningful signature verification.

Verification

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1748 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Woodland Hills <sup>CA</sup> on this 23 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Cynthia L. Sassonetto  
Autograph of Affiant

Notary as JURAT CERTIFICATE

California State )  
Los Angeles County )

On this 23 day of November, 2022 (date) before me, Alina Bilych a Notary Public, personally appeared Cynthia L. Sassonetto Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument. I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct. WITNESS my hand and official seal.

Signature of Notary / Jurat [Signature] Alina Bilych

Please, see attached a correct CA Notary Certificate.

JURAT

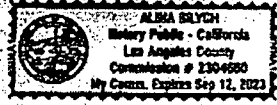
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on  
this 23 day of November, 20 22  
by Cynthia L. Sassenrath

proved to me on the basis of satisfactory evidence to be the person(s) who  
appeared before me.

Signature [Handwritten Signature]



(Seal)

To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

**Affidavit**

Affiant, Aoife M. Tebbe one of the People, in this Court of Record, Sui Juris,  
do swear to the following claims:

1. In the Clark County Elections Department, in signature verification room I heard Victor, the room supervisor tell election workers the the signatures did not need to match as long as it was "close enough".
2. Victor also told them they did not need to use the second laptop to cross reference all other signatures on record, this is against Nevada Law.

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Las Vegas, Nevada on this 22 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

[Signature]

Autograph of Affiant:

<u>Nevada</u>	Notary as JURAT CERTIFICATE
State	}
<u>Clark</u>	County
County	}



On this 22 day of November, 2022 (date) before me,  
Carolina Reyes, a Notary Public, personally appeared  
Aoife M. Tebbe Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal

Signature of Notary / Jurat [Signature]

Affiant Name:  
Affiant Address:

To: The Nevada Secretary of State  
Address: 101 N Carson Street Suite 3 Carson City, NV 89701

**Nevada Affidavit to Deny Voting in Election**

**Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent**

Affiant, BRIAN HOWERY, one of the People, in this Court of Record, Sul Juris, do make the following claims in regards to voting in the November 8, 2022 Election;

I BRIAN HOWERY RESIDE AT 7421 VILLAGE ROAD, UNIT 13 IN SYKESVILLE MARYLAND, 21784. I VOTED IN MARYLAND ELECTIONS AND DID NOT VOTE IN RENO, NEVADA. I MOVED TO MARYLAND IN JUNE 2022

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in(city)

SYKESVILLE, MD on this 25 day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Autograph of Affiant:

**Notary as JURAT CERTIFICATE**

Maryland State }  
Carroll County }

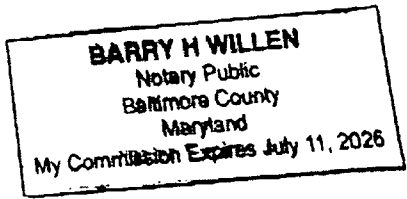
On this 25<sup>th</sup> day of November, 2022 (date) before me, Barry H Willen <sup>BM</sup>

a Notary Public, personally appeared Brian Howery Name of Affiant, who proved to me on the basis of satisfactory evidence to be the man whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his autograph(s) on the instrument the man executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat



To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Clark County Registrar of Voters  
500 S. Grand Central PKWY., Las Vegas, NV 89155

**Affidavit**

Affiant, Micah Jordan, one of the People, in this Court of Record, Sui Juris,  
do swear to the following claims:

On October 28, 2022 at approximately 11:05 AM while  
in the signature verification room, I was seated single-file  
1. with other observers. There were on both sides, teams of two  
per monitor comparing voter signatures. One team noticed a discrepancy  
and had stopped and called for their supervisor. A younger man,  
who the team greeked as "Victor" told the team "no the signatures  
2. do not need to match, they may vary." I raised my hand, as  
instructed, to call for "Dan" who was our contact person and an  
Ambassador got him. When I asked about this, he said "he  
would look into it." He never got back to me. He never clarified

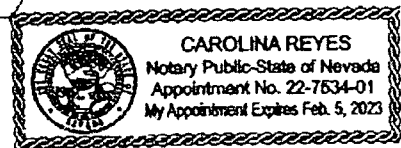
**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of  
the United States of America, and by the provisions of 28 USC § 1746 that all of the  
above and foregoing representations are true and correct to the best of my knowledge,  
information and belief.

Executed in (city) Las Vegas, Nevada on this 22 day of November  
in the Year of Our Lord Two Thousand and Twenty-Two.

Micah Jordan  
Autograph of Affiant

Nevada State }  
Clark County }  
Notary as JURAT CERTIFICATE



On this 28 day of November, 2022 (date) before me,  
Carolina Reyes, a Notary Public, personally appeared  
Micah Jordan Name of Affiant, who proved to me on the basis of satisfactory  
evidence to be the woman whose name is subscribed to the within instrument and  
acknowledged to me that she executed the same in her authorized capacity, and that by  
her autograph(s) on the instrument the woman executed, the instrument  
I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that  
the foregoing paragraph is true and correct.  
WITNESS my hand and official seal:

Signature of Notary / Jurat Carolina Reyes

Noting in Election

Notice to Principal & Notice to Agent

of the People. In this Court of Record, So Juris, do make  
2022 Election

*at a vote in Nevada  
28th 2022*

Verification

to the penalties of perjury under the laws of the United States of  
1746 that all of the above and foregoing representations are true and  
and belief

November in the Year of Our Lord Two Thousand and Twenty-Two

*[Handwritten Signature]*

Autograph of Agent

AFFIRMATION CERTIFICATE

Name: *Eugene R. [unclear]*

*[Handwritten Signature]*

man whose name

this authority

To: The Nevada Secretary of State  
101 N Carson Street Suite 3 Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. Ninth Street, Reno, NV 89512

**Affidavit**

Affiant, Renee Lou Rezendes, one of the People, in this Court of Record, Sui Juris, do swear to the following claims:

1. Most of the time they were not comparing signatures.
2. Most envelopes were being passed without checking

**Verification**

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC § 1746 that all of the above and foregoing representations are true and correct to the best of my knowledge, information and belief.

Executed in (city) Reno, Nevada on this 22<sup>nd</sup> day of November in the Year of Our Lord Two Thousand and Twenty-Two.

Renee Lou Rezendes  
Autograph of Affiant:

**Notary as JURAT CERTIFICATE**

Nevada State )  
Washoe County )

On this 22<sup>nd</sup> day of November, 2022 (date) before me,

Randy Miller, a Notary Public, personally appeared Renee Lou Rezendes Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her autograph(s) on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Nevada State and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary / Jurat Randy Miller  
Commission Expires July 1, 2024



To: Nevada Secretary of State  
101 N. Carson Street, Suite 3  
Carson City, NV 89701

To: Washoe County Registrar of Voters  
1001 E. 9<sup>th</sup> Street  
Reno, NV 89512

**AFFIDAVIT**

I, Tracey Thomas, one of the People, in this court of record, Sui Juris, do swear to the following claims:

1. The Constitution for the United States of America is the Supreme Law of the land and supersedes all other lesser law, statutes, codes, regulations and the State Constitution. What is written in the referenced national Constitution is valid, authorized and enforceable. What is not written in the national Constitution is prohibited by that Constitution. All provisions of the national and state Constitution are mandatory, and are not to be overlooked or ignored as if they did not exist. Any act committed by you either supports and upholds the Constitution, national and state, or opposes and violates them.
2. You have taken an oath to support and uphold the national and state Constitution and are constitutionally responsible and liable in the performance of your official duties as is further defined, but not limited to, in the state statutes. (Article 15, Section 2)
3. You have no Constitutional authority, or any other form of valid, lawful authority, to oppose and violate the very documents you swore or affirmed your oath and under which you were delegated by the people the limited authority to conduct the duties of your office.
4. No voting results of mail ballots may be released until all polling places are closed and all votes have been cast on the day of the election. Any person who disseminates to the public in any way information pertaining to the count of mail ballots before all polling places are closed and all votes have been cast on the day of the election is guilty of a misdemeanor. (NRS 293.269935)
5. A county clerk shall not post copies of the tabulated voting results for a statewide or multi-county race or ballot question until the county clerk has received notification from the Secretary of State that all polling places are closed and all votes have been cast. (NRS 293.383)



6. No counting board in any precinct, district or polling place in which paper ballots are used may commence to count the votes until all ballots used or unused are accounted for. (NRS 293.365)
7. You released 2022 General Election voting results before all votes had been cast on November 8, 2022. The United States Postal Service was still accepting and postmarking mail ballots on this date up until midnight Pacific Standard Time and Hawaiian Standard Time. This gave a vast amount of voters an unfair advantage that other voters did not have, as is evidenced by the number of ballots received November 8 through November 12. This gross breach of information thereby suppressed and diminished the value of lawfully cast ballots, as well as disenfranchised legal voters.
8. The processing procedures stipulated in NRS 293.269921, section 1(b) and section 2 are in direct violation of the above referenced state statutes and constitutions.
9. The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude. (15<sup>th</sup> Amendment)
10. The first qualification to vote listed under NRS 293.485 is citizenship and then item 1 proceeds with "Every citizen of the United States."
11. The Secretary of State shall verify the accuracy of the information in an application to register to vote. (NRS 293.675)
12. The first question on the State of Nevada Voter Registration Application is "Are you a citizen of the United States of America?"
13. Staff testified April 13, 2021 at the Washoe County Board of County Commissioners meeting that citizenship is not being verified on persons applying to register to vote.
14. You have not only infringed on the freedoms guaranteed to me as one of the People; but, you are flagrantly and willfully violating your trust indenture. You are practicing discrimination, segregation and intimidation by insisting on depriving me of my rights under color of law. You should be aware that Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws within the United States.



15. Licentiousness is to to be understood as acting without regard to law, ethics, or the rights of others. Licentiousness, or practices inconsistent with the peace and safety of the state may be construed to have occurred with all trust indenture servants of the state and state agencies and associations mentioned herein who have acted in a licentious and disruptive manner related to the complaints listed herein.

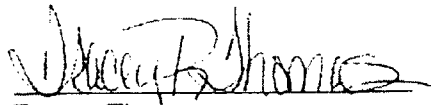
16. Any failure on your part to protect the People's freedom is a breach of your trust indenture and your oath of office, to which you swore. You were given certain responsibilities by the People, and you have acted in malfeasance and maladministration, intentionally attacking the People you serve, as these responsibilities were not fully and faithfully completed.

This Affidavit is lawful notification to you, and is hereby made and delivered to you pursuant to the national Constitution, specifically, the Bill of Rights, and The Bill of Rights of the Nevada Constitution, and requires your written rebuttal to me, in kind, specific to each and every point of the subject matter stated herein, within ten (10) days, via your own sworn and notarized affidavit, using true fact, valid law and evidence to support your rebuttal of the specific subject matter stated in this Affidavit.

You are hereby noticed that your failure to respond, as stipulated, and rebut, with particularity and specificity, anything with which you disagree in this Affidavit, is your lawful, legal and binding tacit agreement with and admission to the fact that everything in this Affidavit is true, correct, legal, lawful, and fully binding upon you in any court in America, without your protest or objection and that of those who represent you.

I hereby declare, certify and state, pursuant to the penalties of perjury under the laws of the United States of America, and by the provisions of 28 USC 1746 that all of the above and forgoing representations are true and correct to the best of my knowledge, information, and belief.

Executed in Sparks, Nevada on this 23 day of November in the Year of Our Lord Two Thousand and Twenty-Two.



Tracey Thomas  
 1344 Disc Drive #140  
 Sparks, NV 89436


**Notary as JURAT CERTIFICATE**

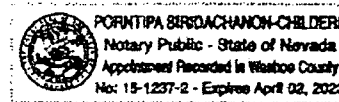
State of Nevada }  
                          }  
Washoe County   }

On this 23 day of November, 2022 before me, Pornitpa Sirdachanon-Childers, a Notary Public, personally appeared Tracey Thomas, Name of Affiant, who proved to me on the basis of satisfactory evidence to be the woman whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the woman executed, the instrument.

I certify under PENALTY of PERJURY under the lawful laws of the State of Nevada and that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

  
\_\_\_\_\_  
Signature of Notary/Jurat



**“Exhibit 4”**

## RE: Voter Role information

From robertbeadles@protonmail.com <robertbeadles@protonmail.com>  
To Brown, Eric P.<EPriceBrown@washoecounty.gov>  
CC Zamanian, Behzad<BZamanian@washoecounty.gov>,  
Rodriguez, Jamie L<JARodriguez@washoecounty.gov>, Willrich, Erick S<ewillrich@washoecounty.gov>,  
jherman@washoecounty.gov  
Date Thursday, March 17th, 2022 at 4:20 PM

Good afternoon,

We were hoping to hear back from you by now.

As discussed, allowing bloat on the voter rolls is horrible for we the people.

Attached, there is no reason NOT to remove all the attached illegal "voters".

Rodriguez Friday mentioned it would target and disenfranchise these "people". However, every illegal vote or voter disenfranchises we legal people.

The attached have no leg to stand on for targeting or disenfranchisement as these "people" are:

DEAD  
MOVED  
No address  
Voting from a POB, vacant lot, casino, business only address etc etc

These people must be removed, they are illegally on the rolls.

There are around 25-30,000 here for you to remove.

There is no legitimate reason to keep them on the rolls.

Please remove them asap, verify first obviously, but it shouldn't take your team more than a day to do as it takes us an hour to verify.

In addition, on Tuesdays agenda, it shows Hermans election integrity resolution is back, we see all the arguments against from your lawyer, my question is how did you come to the postage fee?

Please forward over to us how your team came to a \$12 cost for postage for each signature verified ballot.

We look forward to your response.

Regards,

Beadles

Sent with ProtonMail secure email.

----- Original Message -----

On Wednesday, March 9th, 2022 at 5:35 PM, Robert Beadles <robertbeadles@protonmail.com> wrote:

Understood, let me see if Edward is available for the algo side of things, he will have to be zoomed in, as to the other issues, I'll bring samples and see what you do with it before unloading it all on you.

See you soon.

Sent with ProtonMail secure email.

----- Original Message -----

On Wednesday, March 9th, 2022 at 4:56 PM, Brown, Eric P. <EPriceBrown@washoecounty.gov> wrote:

As a follow up to your meeting with me and Jaime Rodriguez, you indicated you have information that there are algorithms in the Dominion voting machines that discount Republican voters. We agreed to a follow up meeting to see your evidence. Jaime and I will be there Friday along with representatives from our Tech Services team that have expertise in this area.

I would also offer, that if you have additional evidence regarding some of the other claims that you have made regarding your concerns with election integrity in Washoe County you are welcome to make that available to us as well.

Thanks



Eric P. Brown

County Manager

epricebrown@washoecounty.gov

775.451.4104

1001 E. Ninth St., Bldg. A

Reno, NV 89512



**From:** Robert Beadles <robertbeadles@protonmail.com>

**Sent:** Tuesday, March 8, 2022 4:30 PM

**To:** Brown, Eric P. <EPriceBrown@washoecounty.gov>; Zamanian, Behzad <BZamanian@washoecounty.gov>; Rodriguez, Jamie L <JARodriguez@washoecounty.gov>

**Subject:** Re: Voter Role information

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Thank you Eric, for the purpose of this meeting

what exactly will we be discussing?

Just the voter rolls or?

Thank you

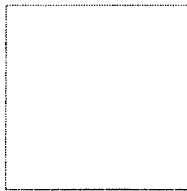
Sent from ProtonMail for iOS

On Tue, Mar 8, 2022 at 12:45 PM, Brown, Eric P. <EPriceBrown@washoecounty.gov> wrote:

Greetings,

This meeting will be in-person; 1001 E. Ninth St., Bldg. A, 2<sup>nd</sup> Fl. Office of the County Manager.

Sincerely,



**Erick Willrich**

**Assistant to the County Manager | Washoe County**

[ewillrich@washoecounty.gov](mailto:ewillrich@washoecounty.gov) | Office: 775.203.8755

1001 E. Ninth St., Bldg. A, Reno, NV 89512



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2.64 MB 8 files attached 5 embedded images

BusinessAddress1.xlsx 360.75 KB BusinessAddress2.xlsx 66.93 KB NO\_ADDRESSES.xlsx 389.58 KB

NO\_APPT\_NUMBER.xlsx 45.12 KB NO\_PRECINCT.xlsx 256.79 KB RELOCATED\_OUT\_WASHOE.xlsx 140.67 KB

RelocatedOUTSIDENEVADA.xlsx 1.37 MB ZERO\_ADDRESS.xlsx 15.61 KB

**“Exhibit 5”**

## RE: Voter Role information

From robertbeadles@protonmail.com <robertbeadles@protonmail.com>  
To Brown, Eric P.<EPriceBrown@washoecounty.gov>  
CC Zamanian, Behzad<BZamanian@washoecounty.gov>, Rodriguez, Jamie L<JARodriguez@washoecounty.gov>, Willrich, Erick S<ewillrich@washoecounty.gov>, jherman@washoecounty.gov  
Date Monday, March 21st, 2022 at 11:12 AM

Good morning,

I realized we left out the deceased from my previous email to you, attached is the spreadsheet info for them.

This now brings us to over 40,000 names we've given to you to be removed.

There is no reason they can not be removed after you verify them and definitely prior to the primaries.

We have 10s of thousands more, but will wait to see if you address these first.

Keep us posted,

Beadles

Sent with [ProtonMail](#) secure email.

----- Original Message -----

On Thursday, March 17th, 2022 at 4:20 PM, Robert Beadles <robertbeadles@protonmail.com> wrote:

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I would also offer, that if you have additional evidence regarding some of the other claims that you have made regarding your concerns with election integrity in Washoe County you are welcome to make that available to us as well.

Thanks



**Eric P. Brown**

**County Manager**

epricebrown@washoecounty.gov

775.451.4104

1001 E. Ninth St., Bldg. A

Reno, NV 89512



**From:** Robert Beadles <robertbeadles@protonmail.com>

**Sent:** Tuesday, March 8, 2022 4:30 PM

**To:** Brown, Eric P. <EPriceBrown@washoecounty.gov>; Zamanian, Behzad <BZamanian@washoecounty.gov>; Rodriguez, Jamie L <JARodriguez@washoecounty.gov>

**Subject:** Re: Voter Role information

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Just the voter rolls or?

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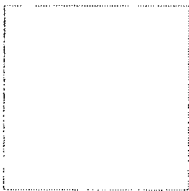
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Sincerely,



**Erick Willrich**

**Assistant to the County Manager | Washoe County**

[cwillrich@washoecounty.gov](mailto:cwillrich@washoecounty.gov) | Office: 775.203.8755

1001 E. Ninth St., Bldg. A, Reno, NV 89512

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**21.84 MB** 1 file attached 5 embedded images

RUN\_Deceased.xlsx 21.81 MB

**“Exhibit 6”**

## RE: Voter Role information

From robertbeadles@protonmail.com <robertbeadles@protonmail.com>  
To Brown, Eric P.<EPriceBrown@washoecounty.gov>  
CC Zamanian, Behzad<BZamanian@washoecounty.gov>,  
Rodriguez, Jamie L<JARodriguez@washoecounty.gov>, Willrich, Erick S<ewillrich@washoecounty.gov>,  
jherman@washoecounty.gov  
Date Wednesday, March 23rd, 2022 at 10:51 PM

Good evening,

I heard the comments read from Eric Brown's letter at the 3-22-22 meeting.

To follow up, I have never received a response from you or team as to our findings from your data, other than I'm wrong.

That "I am wrong response" has always come through the media or through a one sided meeting, never a debate nor proof we're wrong.

We would appreciate an explanation as to how we're wrong, vs just you stating it through the media.

To start here is the video you say you don't have. It 100% shows an issue, you state it's Clark County data, yes it is, as well as WASHOE.

You can't have every precinct in Washoe and Clark have the exact same voting percentage.

Please debunk his findings with other than "I'm wrong"

Show us how we're wrong.

<https://drive.google.com/file/d/1Sy2Qd3I91Px6EtDINyV-RkBYGB8fzEG9/view?usp=sharing>

I'm told theres nothing wrong with the voter rolls by Browns letter, so what about the over 40,000 names we've furnished you?

We have 10s of thousands more.

Please debunk us.

What about your own data, from your own disks showing these issues: