

1 SUPREME COURT CASE NO. 59272  
2 District Court Case No. D-373016

3 IN THE SUPREME COURT OF THE STATE OF NEVADA

4 Electronically Filed  
5 Jun 06 2012 04:50 p.m.  
6 Tracie K. Lindeman  
7 Clerk of Supreme Court

8 KRISTI RAE FREDIANELLI, AND  
9 TONY FREDIANELLI,  
10 Appellants.

11 Vs.  
12 SEBASTIAN MARTINEZ,  
13 Respondent

14 **REPLY TO SHOW CAUSE**

15 COMES NOW, KRISTI RAE FREDIANELLI and TONY FREDIANELLI,  
16 by and through their attorney, MATTHEW Q. CALLISTER, ESQ., of the firm of  
17 Callister and Associates, LLC, and hereby submits this REPLY TO SHOW  
18 CAUSE addressing the jurisdictional issue raised by this Honorable Court, and  
19 would submit the following:

20 **FACTUAL BASIS FOR APPEAL**

21 It is respectfully submitted that in any matter involving custody, it is not  
22 uncommon for a court to issue reunification visitation schedules, thereby gradually  
23 reintroducing a parent into a child's life. This is precisely what occurred in this  
24 case. Under the scenario suggested by this court, then, if graduated reunification  
25 orders were in place, and the court set matters for status checks in order to monitor  
26 the progress of visitation, then a custody determination would never be appealable  
27 until and unless status checks ceased.  
28

1 In this case, the central issue was one of jurisdiction and the court's unilaterally  
2 finding the California Superior Court order void, declining to give the Order full  
3 faith and credit, leaving dueling orders involving the single child. The orders are  
4 in such conflict that Tony is the father per the laws and order of California,  
5 whereas Sebastian is the father in Nevada. This court made critical findings that  
6 are ripe for appeal, as these findings are not related to gradual reunification orders.  
7 First, the court determined that it had jurisdiction in spite of a California custody  
8 order that, under California law, declared Tony to be the father of this child.<sup>1</sup> See  
9 **Exhibit 1**. Contrast this with the Order the Nevada trial court entered, naming  
10 Sebastian the father of the child. See **Exhibit 2**, and there now exists a  
11 fundamental dilemma created by these two dueling orders, namely this child now  
12 has two legal fathers. This matter should be reconciled, and thus gravamen of this  
13 appeal are the findings in the Order that unilaterally without notice to the  
14 California court declared the California custody order void. It should be pointed  
15 out the Nevada Attorney General, in a response to Sebastian Martinez's attempts to  
16 enforce the Nevada order, indicated that there was no fraud committed by the  
17 Fredianellis that would render the California order void. See **Exhibit 3**.

18 The crux of this appeal is the finding by the trial court that the California decree  
19 was obtained by fraud. The court based it upon the fact that an oral dismissal was  
20 not a final order until there was a notice of entry filed, and that the Fredianellis and  
21 their counsel committed fraud when it was represented to the California court that  
22 the matter had been dismissed, due to the order not formally being entered. See  
23 Order (EXH2) P 7, LL8-16, P 12. Curiously, the court found, at P 12, that the  
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25 <sup>1</sup> West's Ann.Cal.Fam.Code § 7540 states that "Except as provided in Section  
26 7541, the child of a wife cohabiting with her husband, who is not impotent or  
27 sterile, is conclusively presumed to be a child of the marriage."  
28

1 representations could have been negligent. Although the AG's memorandum  
2 (Exhibit 3) may not have precedential effect, their findings amply summarize the  
3 position of the appellants, namely, that there was no fraud, and that the California  
4 order is valid.<sup>2</sup> The Fredianellis had counsel throughout this entire process, and  
5 without notice and opportunity for any of the California parties' attorneys to  
6 present their position, the trial court seems to have made a fraud finding against  
7 their counsel. The court thus made critical findings, namely, the denial of full faith  
8 of credit to the California order and the declaration of same invalid based upon  
9 fraud. The court then made findings that had the California Superior Court been  
10 "properly told that the Nevada case existed" that jurisdiction would have been  
11 addressed pursuant to the UCCJEA. We are talking about a case that did not exist  
12 in the true sense that it was pending, but simply a case that had been orally  
13 dismissed and not yet reduced to writing. Thus, there is no reason to believe that  
14

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15 <sup>2</sup> Further, Sebastian can contest paternity in California under West's  
16 Ann.Cal.Fam.Code § 7541:

17 (a) Notwithstanding Section 7540, if the court finds that the conclusions of all the  
18 experts, as disclosed by the evidence based on blood tests performed pursuant to  
19 Chapter 2 (commencing with Section 7550), are that the husband is not the father  
20 of the child, the question of paternity of the husband shall be resolved accordingly.

21 (b) The notice of motion for blood tests under this section may be filed not later  
22 than two years from the child's date of birth by the husband, or for the purposes of  
23 establishing paternity by the presumed father or the child through or by the child's  
24 guardian ad litem. As used in this subdivision, "presumed father" has the meaning  
25 given in Sections 7611 and 7612.

26 (c) The notice of motion for blood tests under this section may be filed by the  
27 mother of the child not later than two years from the child's date of birth if the  
28 child's biological father has filed an affidavit with the court acknowledging  
paternity of the child.

1 the California Superiour Court would have yielded jurisdiction to the orally  
2 dismissed Nevada case that had not yet been reduced to writing, and there is  
3 further no reason to believe that the California court would have found fraud to  
4 have been committed by the Fredianellis and their California counsel. Instead of  
5 the Nevada court initiating a call, there are now two dueling orders that give  
6 Mikaella two different legal fathers. The findings of the court should be  
7 considered final, notwithstanding a court's ability, assuming that it has jurisdiction,  
8 to modify visitation and/or custody.

### 9 ARGUMENT

10 This order was comprehensive, and must be considered final for the issue that is  
11 being raised, namely, the unilaterally voiding of the California Superior Court  
12 based upon fraud. This finding empowered the court to make custody orders,  
13 which granted Sebastian certain parental rights. The matriculation type orders  
14 wherein the court was setting status checks does not render the principal findings  
15 of the voiding of the California decree nonappealable as somehow premature. This  
16 court determines finality of order or judgment for appeal purposes by looking to  
17 *what order or judgment actually does, not what it is called.* Valley Bank of  
18 Nevada v. Ginsburg, 1994, 874 P.2d 729, 110 Nev. 440. In Valley, there was a  
19 pre-dismissal order. The order here voided a California decree, and it is  
20 respectfully submitted that there are insufficient grounds for finding fraud, since  
21 Judge Duckworth had rendered an oral decision dismissing the matter, and this fact  
22 was represented to the California Superior Court. The fact that California  
23 considered the matter dismissed cannot suggest that they were acting with the type  
24 of intent required to find a fraud upon the court. There is no relation to the  
25 evolving visitation orders to the appellate issue presented. The central issue in this  
26 case is whether the court incorrectly found that the representations to the California  
27 court that the matter was dismissed constituted such a fraud upon the court that the  
28 decree was invalid.

1 The moving target of visitation orders does not render the voiding of the  
2 California decree nonfinal. This Court has held that it is not essential, for a  
3 judgment to be final, that it should settle all the rights existing between the parties  
4 to the suit. All that is required is that it should determine the issues involved in the  
5 action. The judgment is none the less final because some future orders of the court  
6 may become necessary to carry it into effect. Perkins v. Sierra Nevada Silver Min.  
7 Co., 1876, 10 Nev. 405. The order in this case resolves the jurisdictional issues,  
8 resolves the issue of parentage, and resolves that validity of a sister state's decree.  
9 The voiding of a sister state's decree is final, and should be able to appealed while  
10 a reunification plan is being implemented.

11 This court has ruled previously in cases involving full faith and credit in  
12 domestic issues. In Mizner v. Mizner 84 Nev. 268, 269, 439 P.2d 679, 679 (Nev.  
13 1968), this court was asked to set aside a partial summary judgment of the district  
14 court in so far as it accords full faith and credit to an alimony award contained in a  
15 California interlocutory divorce decree entered upon extraterritorial personal  
16 service of process. It was this court's opinion that the district court ruled correctly.  
17 Here, likewise, the appellants ask this Honorable Court to give full faith and credit  
18 to the California decree, basing their argument on the issue that the court erred in  
19 finding that there was a fraud on the court when appellants' attorneys represented  
20 that the Nevada case had been dismissed for the reason that the written order had  
21 not been entered. The collateral visitation status checks in no way impact the  
22 crucial appellate issue.

23 The precedential value of this case is significant, particularly with respect of this  
24 child's life, who apparently now has two legal fathers, depending on what state the  
25 child happens to be. At a minimum, this case could be remanded back to the trial  
26 court to make additional findings as to what portions of its order is final,  
27 whereupon the clock can again begin to run.

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1. That this court reinstate the appeal, or,
2. In the alternative, that this court remand the matter to the district court to make NRCP 54(b) type findings so that these important issues can be addressed by this Honorable Court.

By:     /s/ Matthew Q. Callister, Esq.      
**MATTHEW Q. CALLISTER, ESQ.**  
Nevada Bar No. 001369  
823 Las Vegas Blvd. South, 5<sup>th</sup> Floor  
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Las Vegas, NV 89101  
*Attorney for Defendants /Appellants*

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Sebastian Martinez  
261 Lenape Heights Avenue  
Las Vegas, Nevada 89148

Hon. T. Arthur Ritchie, Jr.  
Family Division Department H  
Las Vegas Nevada 89144

/s/ Gaylynn West  
Employee of CALLISTER AND ASSOCIATES, LLC.

# **EXHIBIT “1”**



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): JANIS K. STOCKS, CA-CFLS, SB #62420 STOCKS & FENTIN, LLP 600 B STREET, STE 2050 SAN DIEGO, CA 92101  TELEPHONE NO.: (619) 231-2025 FAX NO.: (619) 231-2024 ATTORNEY FOR (Name): KRISTI R. FREDIANELLI	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS: 1555 SIXTH AVENUE MAILING ADDRESS: SAME CITY AND ZIP CODE: SAN DIEGO, CA 92101 BRANCH NAME: CENTRAL DIVISION/FAMILY COURT	
PETITIONER: KRISTI R. FREDIANELLI  RESPONDENT: ANTHONY J. FREDIANELLI	
JUDGMENT	
CASE NUMBER: D518220-LAF	

1. ☒ This judgment contains personal conduct restraining orders ☐ modifies existing restraining orders.  
 The restraining orders are contained in item(s): \_\_\_\_\_ of the attachment.  
 They expire on (date): \_\_\_\_\_ A CLETS form must be attached.
2. a. This matter proceeded as follows: ☒ Default or uncontested ☒ By declaration ☐ Contested  
 b. Date: OCT 01 2009 Dept.: \_\_\_\_\_ Room: \_\_\_\_\_  
 c. Judicial officer (name): LISA FOSTER ☐ Temporary judge  
 d. ☐ Petitioner present ☐ Attorney present (name): \_\_\_\_\_  
 e. ☐ Respondent present ☐ Attorney present (name): \_\_\_\_\_  
 f. **Petitioner** (1) ☐ The petitioner appeared without counsel and was advised of relevant rights.  
 (2) ☒ The petitioner signed *Advisement and Waiver of Rights Re: Establishment of Parental Relationship* (form FL-235).  
 (3) ☒ The petitioner is married to the Respondent, and no other action is pending.  
 (4) ☐ The petitioner signed a Voluntary Declaration of Paternity.  
 (5) ☐ There is a prior judgment of parentage in a family support, juvenile, or adoption court case.  
 g. **Respondent** (1) ☐ The respondent appeared without counsel and was advised of relevant rights.  
 (2) ☒ The respondent signed *Advisement and Waiver of Rights Re: Establishment of Parental Relationship* (form FL-235).  
 (3) ☒ The respondent is married to the Petitioner, and no other action is pending.  
 (4) ☐ The respondent signed a Voluntary Declaration of Paternity.  
 (5) ☐ There is a prior judgment of parentage in a family support, juvenile or adoption court case.  
 h. Other parties or attorneys present (specify): \_\_\_\_\_

## 3. THE COURT FINDS

Name: KRISTI R. FREDIANELLI

☒ Mother ☐ Father

Name: ANTHONY J. FREDIANELLI

☐ Mother ☒ Father

are the parents of the following children:

Child's name

MIKAELLA RAE FLANNERY

Date of birth

1/30/09

PETITIONER: KRISTI R. FREDIANELLI	CASE NUMBER:
RESPONDENT: ANTHONY J. FREDIANELLI	D518220-LAF

**5. THE COURT FURTHER ORDERS**

- a. ☐ Child support is as stated in one or more of the attached:
- (1) ☐ *Child Support Information and Order Attachment* (form FL-342)
- (2) ☐ *Stipulation to Establish or Modify Child Support and Order* (form FL-350)
- (3) ☐ Other (specify):
- b. Both parties must complete and file with the court a *Child Support Case Registry Form* (form FL-191) within 10 days of the date of this judgment. Thereafter, the parents must notify the court of any change in the information submitted, within 10 days of the change.
- c. The form *Notice of Rights and Responsibilities—Health Care Costs and Reimbursement Procedures and Information Sheet on Changing a Child Support Order* (form FL-192) is attached.
- d. ☒ The last names of the children are changed to (specify): FREDIANELLI
- e. ☒ The birth certificates must be amended to conform to this court order by
- (1) ☒ adding the father's name.
- (2) ☒ changing the last name of the children.
- f. ☐ Attorney fees and costs are as stated in the attachment.
- g. ☐ Reasonable expenses of pregnancy and birth are as stated in the attachment.
- h. ☐ Other (specify):

☐ Continued on Attachment 3h.

6. Number of pages attached: 0

Date:

OCT 01 2009

**LISA FOSTER**

JUDICIAL OFFICER

SIGNATURE FOLLOWS LAST ATTACHMENT

**NOTICE:** Any party required to pay child support must pay interest on overdue amounts at the "legal" rate, which is currently 10 percent.

## NOTICE OF RIGHTS AND RESPONSIBILITIES

### Health-Care Costs and Reimbursement Procedures

**IF YOU HAVE A CHILD SUPPORT ORDER THAT INCLUDES A PROVISION FOR THE REIMBURSEMENT OF A PORTION OF THE CHILD'S OR CHILDREN'S HEALTH-CARE COSTS AND THOSE COSTS ARE NOT PAID BY INSURANCE, THE LAW SAYS:**

**1. Notice.** You must give the other parent an itemized statement of the charges that have been billed for any health-care costs not paid by insurance. You must give this statement to the other parent within a reasonable time, but no more than 30 days after those costs were given to you.

**2. Proof of full payment.** If you have already paid all of the uninsured costs, you must (1) give the other parent proof that you paid them and (2) ask for reimbursement for the other parent's court-ordered share of those costs.

**3. Proof of partial payment.** If you have paid only your share of the uninsured costs, you must (1) give the other parent proof that you paid your share, (2) ask that the other parent pay his or her share of the costs directly to the health-care provider, and (3) give the other parent the information necessary for that parent to be able to pay the bill.

**4. Payment by notified parent.** If you receive notice from a parent that an uninsured health-care cost has been incurred, you must pay your share of that cost within the time the court orders; or if the court has not specified a period of time, you must make payment (1) within 30 days from the time you were given notice of the amount due, (2) according to any payment schedule set by the health-care provider, (3) according to a schedule

If you claim that the other party has failed to reimburse you for a payment, or the other party has failed to make a payment to the provider after proper notice has been given, you may file a motion in court to resolve the dispute. The court will presume that if uninsured costs have been paid, those costs were reasonable. The court may award attorney fees and costs against a party who has been unreasonable.

**6. Court-ordered insurance coverage.** If a parent provides health-care insurance as ordered by the court, that insurance must be used at all times to the extent that it is available for health-care costs.

a. **Burden to prove.** The party claiming that the coverage is inadequate to meet the child's needs has the burden of proving that to the court.

b. **Cost of additional coverage.** If a parent purchases health-care insurance in addition to that ordered by the court, that parent must pay all the costs of the additional coverage. In addition, if a parent uses alternative coverage that costs more than the coverage provided by court order, that parent must pay the difference.

**7. Preferred health providers.** If the court-ordered coverage designates a preferred health-care provider, that provider must be used at all times consistent with the terms of the health insurance policy. When any party

## INFORMATION SHEET ON CHANGING A CHILD SUPPORT ORDER

### General Information

The court has just made a child support order in your case. This order will remain the same unless a party to the action requests that the support be changed (modified). An order for child support can be modified only by filing a motion to change child support and serving each party involved in your case. If both parents and the local child support agency (if it is involved) agree on a new child support amount, you can complete, have all parties sign, and file with the court a *Stipulation to Establish or Modify Child Support and Order* (form FL-350) or *Stipulation and Order (Governmental)* (form FL-625).

### When a Child Support Order May Be Modified

The court takes several things into account when ordering the payment of child support. First, the number of children is considered. Next, the net incomes of both parents are determined, along with the percentage of time each parent has physical custody of the children. The court considers both parties' tax filing status and may consider hardships, such as a child of another relationship. An existing order for child support may be modified when the net income of one of the parents changes significantly, the parenting schedule changes significantly, or a new child is born.

### Examples

- You have been ordered to pay \$500 per month in child support. You lose your job. You will continue to owe \$500 per month, plus 10 percent interest on any unpaid support, unless you file a motion to modify your child support to a lower amount and the court orders a reduction.
- You are currently receiving \$300 per month in child support from the other parent, whose net income has just increased substantially. You will continue to receive \$300 per month unless you file a motion to modify your child support to a higher amount and the court orders an increase.
- You are paying child support based upon having physical custody of your children 30 percent of the time. After several months it turns out that you actually have physical custody of the children 50 percent of the time. You may file a motion to modify child support to a lower amount.

### How to Change a Child Support Order

To change a child support order, you must file papers with the court. *Remember: You must follow the order you have now.*

### What forms do I need?

If you are asking to change a child support order open with the local child support agency, you must fill out one of these forms:

- FL-680, *Notice of Motion (Governmental)* or FL-683 *Order to Show Cause (Governmental)* and
- FL-684, *Request for Order and Supporting Declaration (Governmental)*

If you are asking to change a child support order that is not open with the local child support agency, you must fill out one of these forms:

- FL-301, *Notice of Motion* or FL-300, *Order to Show Cause* and
- FL-310, *Application for Order and Supporting Declaration* or
- FL-390, *Notice of Motion and Motion for Simplified Modification of Order for Child, Spousal, or Family Support*

You must also fill out one of these forms:

- FL-150, *Income and Expense Declaration* or FL-155, *Financial Statement (Simplified)*

### What if I am not sure which forms to fill out?

Talk to the family law facilitator at your court.

**After you fill out the forms**, file them with the court clerk and ask for a hearing date. Write the hearing date on the form.

The clerk will ask you to pay a filing fee. If you cannot afford the fee, fill out these forms, too:

- Form FW-001, *Application for Waiver of Court Fees and Costs*
- Form FW-003, *Order on Application for Waiver of Court Fees and Costs*

**You must serve the other parent.** If the local child support agency is involved, serve it too.

This means someone 18 or over—not you—must serve the other parent copies of your filed court forms at least 16 court days before the hearing. Add 5 calendar days if you serve by mail within California (see Code of Civil Procedure section 1005 for other situations).

**Court days** are weekdays when the court is open for business (Monday through Friday except court holidays). **Calendar days** include all days of the month, including weekends and holidays. To determine court and calendar days, go to

[www.courtinfo.ca.gov/selfhelp/courtcalendars/](http://www.courtinfo.ca.gov/selfhelp/courtcalendars/).

The court must also serve blank copies of these forms:

PETITIONER: KRISTI R. FREDIANELLI

CASE NUMBER:

D518220 LAF

RESPONDENT: ANTHONY J. FREDIANELLI

**ADVISEMENT AND WAIVER OF RIGHTS RE: ESTABLISHMENT OF PARENTAL RELATIONSHIP**

1. **RIGHT TO BE REPRESENTED BY A LAWYER.** I understand that I have the right to be represented by a lawyer of my own choice at my own expense. If I cannot afford a lawyer, I can contact the Lawyer Referral Association of the local bar association or the Family Law Facilitator for assistance.
2. **RIGHT TO A TRIAL.** I understand that I have a right to have a judge determine whether I am the parent of the children named in this action.
3. **RIGHT TO CONFRONT AND CROSS-EXAMINE WITNESSES.** I understand that in a trial I have the right to confront and cross-examine the witnesses against me and to present evidence and witnesses in my own defense.
4. **RIGHT TO HAVE PARENTAGE TESTS.** I understand that, where the law permits, I have the right to have the court order parentage tests. The court will decide who pays for the tests. The court could order that I pay none, some, or all of the costs of the tests.
5. **OBLIGATIONS.** I understand that if I admit that I am the parent of the children in this action that those children will be my children for legal purposes.
6. **WAIVER.** I understand that I am admitting that I am the parent of the children named in the stipulation and am giving up the rights stated above (except the right to an attorney if I have an attorney).
7. **CHILD SUPPORT.** I understand that I will have the duty to contribute to the support of the children named in this action and that this duty of support will continue for each child until the obligation is terminated by law.
8. **CRIMINAL NON-SUPPORT.** I understand that if I willfully fail to support the children, criminal proceedings may be initiated against me.
9. **UNDERSTANDING.**
  - a. ☒ I have read and understand the *Judgment (Uniform Parentage - Custody and Support)* (form FL-250) and this *Advisement and Waiver of Rights*.
  - b. ☐ I understand the translation.

IF I AM REPRESENTED BY AN ATTORNEY, I ACKNOWLEDGE THAT MY ATTORNEY HAS READ AND EXPLAINED TO ME THE CONTENTS OF THE STIPULATION, RECITALS, AND WAIVERS, AND I ACKNOWLEDGE THAT I UNDERSTAND THEM.

Date: 9/14/09

KRISTI R. FREDIANELLI

(TYPE OR PRINT NAME)

  
(SIGNATURE OF DECLARANT)

**INTERPRETER'S DECLARATION**

1. The ☐ Petitioner ☐ Respondent is unable to read or understand the *Judgment (Uniform Parentage - Custody and Support)* (form FL-250) and this *Advisement and Waiver of Rights* because:

PETITIONER: KRISTI R. FREDIANELLI	CASE NUMBER:
RESPONDENT: ANTHONY J. FREDIANELLI	D518220 LAF

### ADVISEMENT AND WAIVER OF RIGHTS RE: ESTABLISHMENT OF PARENTAL RELATIONSHIP

- RIGHT TO BE REPRESENTED BY A LAWYER.** I understand that I have the right to be represented by a lawyer of my own choice at my own expense. If I cannot afford a lawyer, I can contact the Lawyer Referral Association of the local bar association or the Family Law Facilitator for assistance.
- RIGHT TO A TRIAL.** I understand that I have a right to have a judge determine whether I am the parent of the children named in this action.
- RIGHT TO CONFRONT AND CROSS-EXAMINE WITNESSES.** I understand that in a trial I have the right to confront and cross-examine the witnesses against me and to present evidence and witnesses in my own defense.
- RIGHT TO HAVE PARENTAGE TESTS.** I understand that, where the law permits, I have the right to have the court order parentage tests. The court will decide who pays for the tests. The court could order that I pay none, some, or all of the costs of the tests.
- OBLIGATIONS.** I understand that if I admit that I am the parent of the children in this action that those children will be my children for legal purposes.
- WAIVER.** I understand that I am admitting that I am the parent of the children named in the stipulation and am giving up the rights stated above (except the right to an attorney if I have an attorney).
- CHILD SUPPORT.** I understand that I will have the duty to contribute to the support of the children named in this action and that this duty of support will continue for each child until the obligation is terminated by law.
- CRIMINAL NON-SUPPORT.** I understand that if I willfully fail to support the children, criminal proceedings may be initiated against me.
- UNDERSTANDING.**

- ☒ I have read and understand the *Judgment (Uniform Parentage - Custody and Support)* (form FL-250) and this *Advisement and Waiver of Rights*.
- ☐ I understand the translation.

IF I AM REPRESENTED BY AN ATTORNEY, I ACKNOWLEDGE THAT MY ATTORNEY HAS READ AND EXPLAINED TO ME THE CONTENTS OF THE STIPULATION, RECITALS, AND WAIVERS, AND I ACKNOWLEDGE THAT I UNDERSTAND THEM.

Date:

9/16/09

ANTHONY J. FREDIANELLI

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

### INTERPRETER'S DECLARATION

- The ☐ Petitioner ☐ Respondent is unable to read or understand the *Judgment (Uniform Parentage - Custody and Support)* (form FL-250) and this *Advisement and Waiver of Rights* because:

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): JANIS K. STOCKS, CA-SB #62420 STOCKS & FENTIN, LLP 600 B STREET, STE 2050 SAN DIEGO, CA 92101  TELEPHONE NO.: (619) 231-2025 FAX NO.: (619) 231-2024 ATTORNEY FOR (Name): KRISTI R. FREDIANELLI	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS: 1555 SIXTH AVENUE MAILING ADDRESS: SAME CITY AND ZIP CODE: SAN DIEGO, CA 92101 BRANCH NAME: CENTRAL DIVISION/FAMILY COURT	
PLAINTIFF/PETITIONER: KRISTI R. FREDIANELLI  DEFENDANT/RESPONDENT: ANTHONY J. FREDIANELLI	
STIPULATION FOR ENTRY OF JUDGMENT RE: ESTABLISHMENT OF PARENTAL RELATIONSHIP	CASE NUMBER: D518220 LAF

## THE PARTIES STIPULATE THAT

1. ☒ Both parties have read and understand the *Advisement and Waiver of Rights Re: Establishment of Parental Relationship* (form FL-235), which is submitted with this *Stipulation for Entry of Judgment*. Both parties give up these rights and freely agree that a judgment may be entered in accordance with this stipulation.

2. (Name of mother): KRISTI R. FREDIANELLI  
 (Name of father): ANTHONY J. FREDIANELLI  
 are the parents of the following children:

Name

MIKAELLA RAE FLANNERY

Date of Birth

January 30, 2007

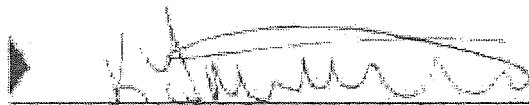
3. ☐ Child custody and visitation shall be ordered as set forth in the proposed *Judgment (Uniform Parentage)* (form FL-250).  
 4. ☐ Child support shall be ordered as set forth in the proposed *Judgment (Uniform Parentage)* (form FL-250).  
 5. ☐ Attorney fees shall be ordered as set forth in the proposed *Judgment (Uniform Parentage)* (form FL-250).  
 6. ☒ Names of the children shall be changed as set forth in the proposed *Judgment (Uniform Parentage)* (form FL-250).  
 7. ☐ Reasonable costs of pregnancy and birth shall be paid as ordered in the proposed *Judgment (Uniform Parentage)* (form FL-250).  
 8. ☐ Other orders shall be as set forth in the proposed *Judgment (Uniform Parentage)* (form FL-250).  
 9. ☐ The parties further agree that the court make the following orders:

☐ See attached.

Date: 9/14/09

KRISTI R. FREDIANELLI

(TYPE OR PRINT NAME)


  
 ANTHONY J. FREDIANELLI

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO**

X Family Court, 1555 6<sup>th</sup> Ave., San Diego, CA 92101-3294  
o Madge Bradley Bldg., 1409 4<sup>th</sup> Ave., San Diego, CA 92101-3105  
o North County Division, 325 S. Melrose Dr., Vista, CA 92083-6651  
o East County Division, 250 E. Main St., El Cajon, CA 92020-3941  
o South County Division, 500 3rd Ave., Chula Vista, CA 919 10-5649

KRISTI R. FREDIANELLI

Petitioner

v.

ANTHONY J. FREDIANELLI

Respondent

Case No.: D518220 LAF

**CUSTODY/VISITATION  
STIPULATION/WAIVER ATTACHMENT  
(FC 3048)**

**The parties declare and agree to the following:**

This Court has jurisdiction over the minor child/children as California is the child/children's home state. Both parties were personally present at the execution of the attached custody/visitation agreement, both have knowledge of their right to a hearing in this matter and both waive their right to the hearing based upon the attached custody and visitation agreement. The parties agree the habitual residence of the child/children is the U.S.A.

Both parties acknowledge being advised that any violation of this order may result in civil or criminal penalties, or both.

Each party declares under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

DATE: 9/14/09

  
KRISTI R. FREDIANELLI, MOTHER,

DATE: 9/16/09

  
ANTHONY J. FREDIANELLI, FATHER

**Based upon the knowledge and agreement of the parties, IT IS SO ORDERED:**

OCT 01 2009

DATE: \_\_\_\_\_



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>JANIS K. STOCKS, CA-SB #62420</b> <b>STOCKS &amp; FENTIN. LLP</b> <b>600 B STREET, STE 2050</b> <b>SAN DIEGO, CA 92101</b>  TELEPHONE NO: (619) 231-2025      FAX NO. (Optional): (619) 231-2024 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <b>KRISTI R. FREDIANELLI</b>	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO</b> STREET ADDRESS: <b>1555 SIXTH AVENUE</b> MAILING ADDRESS: <b>SAME</b> CITY AND ZIP CODE: <b>SAN DIEGO, CA 92101</b> BRANCH NAME: <b>CENTRAL DIVISION FAMILY COURT</b>	
PETITIONER: <b>KRISTI R. FREDIANELLI</b>  RESPONDENT: <b>ANTHONY J. FREDIANELLI</b>	
<b>APPEARANCE, STIPULATIONS, AND WAIVERS</b>	CASE NUMBER: <b>0518220 LAF</b>

1. **Appearance by respondent (you must choose one):**

- a. ☐ By filing this form, the respondent makes a general appearance.
- b. ☒ The respondent has previously made a general appearance.
- c. ☐ The respondent is a member of the military services of the United States of America and waives all rights under the Servicemembers Civil Relief Act (50 U.S.C. Appen. § 501 et seq.). No appearance fee is required.

2. **Agreement, stipulations, and waivers (choose all that apply):**

- a. ☒ The parties agree that this cause may be decided as an uncontested matter.
- b. ☒ The parties waive their rights to notice of trial, a statement of decision, a motion for new trial, and the right to appeal.
- c. ☒ This matter may be decided by a commissioner sitting as a temporary judge.
- d. ☒ We have a written agreement, or a stipulation for judgment will be submitted to the court.
- e. ☒ None of these agreements or waivers will apply unless the court approves the stipulation for judgment or incorporates the written settlement agreement into the judgment.
- f. ☒ This is a parentage case, and both parties have signed an *Advisement and Waiver of Rights Re: Establishment of Parental Relationship* (form FL-235) or its equivalent.

3. **Other (specify):**

Date: 9/14/09

WITNESS: KRISTI R. FREDIANELLI

Signature: [Handwritten Signature]

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): JANIS K. STOCKS, CA-CFLS SB #62420 STOCKS & FENTIN. LLP 600 B STREET, STE 2050 SAN DIEGO, CA 92101  TELEPHONE NO. (619)231-2025      FAX NO. (Optional): (619)231-2024 E-MAIL ADDRESS (Optional): ATTORNEY FOR Name: KRISTI R. FREDIANELLI	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS: 1555 SIXTH AVENUE MAILING ADDRESS: SAME CITY AND ZIP CODE: SAN DIEGO, CA 92101 BRANCH NAME: CENTRAL DIVISION/FAMILY COURT	
PETITIONER: KRISTI R. FREDIANELLI  RESPONDENT: ANTHONY J. FREDIANELLI	
PROOF OF SERVICE OF SUMMONS	
CASE NUMBER: D518220-LAF	

1. At the time of service I was at least 18 years of age and not a party to this action. I served the respondent with copies of:
- a. ☐ Family Law: *Petition* (form FL-100), *Summons* (form FL-110), and blank *Response* (form FL-120)
  - or-
  - b. ☐ Family Law—Domestic Partnership: *Petition—Domestic Partnership* (form FL-103), *Summons* (form FL-110), and blank *Response—Domestic Partnership* (form FL-123)
  - or-
  - c. ☒ Uniform Parentage: *Petition to Establish Parental Relationship* (form FL-200), *Summons* (form FL-210), and blank *Response to Petition to Establish Parental Relationship* (form FL-220)
  - or-
  - d. ☐ Custody and Support: *Petition for Custody and Support of Minor Children* (form FL-260), *Summons* (form FL-210), and blank *Response to Petition for Custody and Support of Minor Children* (form FL-270)
  - and
  - e. ☐ (1) ☐ Completed and blank *Declaration Under Uniform Child Custody Jurisdiction and Enforcement Act* (form FL-105)
  - (2) ☐ Completed and blank *Declaration of Disclosure* (form FL-140)
  - (3) ☐ Completed and blank *Schedule of Assets and Debts* (form FL-142)
  - (4) ☐ Completed and blank *Income and Expense Declaration* (form FL-150)
  - (5) ☐ Completed and blank *Financial Statement (Simplified)* (form FL-155)
  - (6) ☐ Completed and blank *Property Declaration* (form FL-160)
  - (7) ☐ *Order to Show Cause* (form FL-300), *Application for Order and Supporting Declaration* (form FL-310), and blank *Responsive Declaration to Order to Show Cause or Notice of Motion* (form FL-320)
  - (8) ☒ Other (specify): (Conformed) UCCJEA; (Conformed) Family Law Certificate of Assignment; and Notice of Case Assignment

2. Address where respondent was served:  
 600 B Street, Suite 2050  
 San Diego, CA 92101

PETITIONER: KRISTI R. FREDIANELLI

CASE NUMBER:

RESPONDENT: ANTHONY J. FREDIANELLI

D518220-LAF

3. b. (cont.) on (date): \_\_\_\_\_ at (time): \_\_\_\_\_

I thereafter mailed additional copies (by first class, postage prepaid) to the respondent at the place where the copies were left (Code Civ. Proc., § 415.20b) on (date): \_\_\_\_\_

A declaration of diligence is attached, stating the actions taken to first attempt personal service.

- c. ☐ **Mail and acknowledgment service.** I mailed the copies to the respondent, addressed as shown in item 2, by first-class mail, postage prepaid, on (date): \_\_\_\_\_ from (city): \_\_\_\_\_

(1) ☐ with two copies of the *Notice and Acknowledgment of Receipt (Family Law)* (form FL-117) and a postage-paid return envelope addressed to me. (**Attach completed *Notice and Acknowledgment of Receipt (Family Law)* (form FL-117).**) (Code Civ. Proc., § 415.30.)

(4) ☐ to an address outside California (by registered or certified mail with return receipt requested). (**Attach signed return receipt or other evidence of actual delivery to the respondent.**) (Code Civ. Proc., § 415.40.)

- d. ☐ **Other (specify code section):**  
☐ Continued on Attachment 3d.

4. The "NOTICE TO THE PERSON SERVED" on the *Summons* was completed as follows (Code Civ. Proc., §§ 412.30, 415.10, 474):

a. ☒ As an individual or

b. ☐ On behalf of respondent who is a

(1) ☐ minor. (Code Civ. Proc., § 416.60.)

(2) ☐ ward or conservatee. (Code Civ. Proc., § 416.70.)

(3) ☐ other (specify): \_\_\_\_\_

5. **Person who served papers**

Name: Janis K. Stocks

Address: 600 B Street, Suite 2050, San Diego, CA 92101

Telephone number: (619) 231-2025

This person is

a. ☐ exempt from registration under Business and Professions Code section 22350(b).

b. ☒ not a registered California process server.

c. ☐ a registered California process server: ☐ an employee or ☐ an independent contractor

(1) Registration no.: \_\_\_\_\_

(2) County: \_\_\_\_\_

d. The fee for service was (specify): \$ \_\_\_\_\_

6. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

-or-

7. ☐ I am a California sheriff, marshal, or constable, and I certify that the foregoing is true and correct.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): JANIS K. STOCKS, CA-CFLS, SB #62420 STOCKS & FENTIN. LLP 600 B STREET, STE 2050 SAN DIEGO, CA 92101  TELEPHONE NO.: (619)231-2025      FAX NO. (Optional): (619)231-2024 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): KRISTI R. FREDIANELLI	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS: 1555 SIXTH AVENUE MAILING ADDRESS: SAME CITY AND ZIP CODE: SAN DIEGO, CA 92101 BRANCH NAME: CENTRAL DIVISION/FAMILY COURT	
PLAINTIFF/PETITIONER: KRISTI R. FREDIANELLI  DEFENDANT/RESPONDENT: ANTHONY J. FREDIANELLI	
DECLARATION	CASE NUMBER: D518220-LAF

I, KRISTI FREDIANELLI, declare:

Anthony J. Fredianelli and I were married on November 17, 1995. This marriage has never been dissolved. We are living together with our two children. There are no issues of custody, visitation or child support with regards to Mikaella between us for which orders are needed.

MC-031

ATTORNEY OR PARTY WITHOUT ATTORNEY (Print, State Bar Number and address) <b>JAMIS R. STOCKS, CA-CPLS, SB #62420</b> <b>STOCKS &amp; FENTIN, LLP</b> <b>600 B STREET, STE 2050</b> <b>SAN DIEGO, CA 92101</b>  TELEPHONE NO: <b>(619)231-2025</b> FAX NO: <b>(619)231-2024</b> E-MAIL ADDRESS (Optional):	FOR COURT USE ONLY
CITIZEN FOR SERVICE: <b>KRISTI R. FREDIANELLI</b> SUPERIOR COURT OF CALIFORNIA, COUNTY OF <b>SAN DIEGO</b> STREET ADDRESS: <b>1555 SIXTH AVENUE</b> MAILING ADDRESS: <b>SAME</b> CITY AND ZIP CODE: <b>SAN DIEGO, CA 92101</b> BRANCH NAME: <b>CENTRAL DIVISION/FAMILY COURT</b>	
PLAINTIFF/PETITIONER: <b>KRISTI R. FREDIANELLI</b>  DEFENDANT/RESPONDENT: <b>ANTHONY J. FREDIANELLI</b>	
DECLARATION	

I, KRISTI FREDIANELLI, declare:

Anthony J. Fredianelli and I were married on November 17, 1995. This marriage has never been dissolved. We are living together with our two children. There are no issues of custody; visitation or child support with regards to Mikaela between us for which orders are needed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: September 22, 2009



# **EXHIBIT “2”**



STATE OF NEVADA  
OFFICE OF THE ATTORNEY GENERAL  
555 East Washington Ave., Suite 3300  
Las Vegas, Nevada 89101

CATHERINE CORTEZ MASTO  
Attorney General

VICTOR HUGO SCHULZE II  
Sovereign Deputy Attorney General  
Children's Advocate

NEVADA STATE CHILDREN'S ADVOCATE

NEVADA CLEARINGHOUSE FOR  
MISSING AND EXPLOITED CHILDREN

MEMORANDUM

Date: February 2, 2012  
To: Michelle Chase  
From: Victor-Hugo Schulze, II  
Subject: Fredianelli/Martinez

You have sought direction on this case which presents conflicting paternity orders from two different states. A California court, and then a Nevada court, purported to assert lawful jurisdiction over the matter and both made conflicting paternity decisions. The victor in the Nevada paternity case seeks assistance in enforcing a pick-up order issued by the Nevada court. The Nevada court decision and order was entered on September 6, 2011. Among its findings are that Nevada has jurisdiction over the matter under the UCCJEA because Nevada was the home state of the child. The Nevada court found that the California court would not have exercised jurisdiction but for a misrepresentation by the Fredianelli's to the effect that the Nevada case was been dismissed. As I understand the facts, that case had been orally ruled dismissed, and an order to that effect was subsequently entered. That decision was overturned in an appeal. The California paternity matter was initiated after the oral dismissal of the Nevada case. I am further informed that the California judge was, in fact, informed of the Nevada proceedings.



This case presents sad and wholly avoidable issues that we are unable to resolve. Because we enforce custody rights, rather than establish them, it is not our province to become enmeshed in inter-court jurisdictional disputes. Such disputes were the very reason that both the Uniform Child Custody Jurisdiction Act and the later Uniform Child Custody Jurisdiction and Enforcement Act were drafted and adopted. If the subject courts had taken the time to invoke the provisions of this uniform act and conducted a telephonic hearing to resolve these issues, the instant questions would not be present. They apparently failed to do so. Moreover, the parties could also invoke this Act and did not do so.

I cannot conclude which court, if either, had jurisdiction over the case. My better guess is that the California court probably did upon the factual representation that the Fredianelli's lived in California for an extended period of time prior to the matter being litigated. But that is only an educated guess. The inter-court conflict disempowers me from being able to determine more.

Under these sad and strange facts, and the apparent disinclination of the courts to resolve the jurisdictional conflict in a single, easy, and inexpensive telephonic hearing available under the UCCJEA, like the many we have been privy to, I believe it would be a due process violation of the Fredianelli's rights created under the earlier California order to enforce a subsequent order where both courts were aware of the other's exercise of jurisdiction. I do not wholly accept the finding of the Nevada court that the California court's jurisdiction was had by fraud in the representation that the Nevada case was dismissed, due to the earlier oral ruling. Even if the dismissal was final upon a written order, that was accomplished. After the oral action, no further action was taken until the appeal. Again, the application of the provisions of the UCCJEA would have resolved this jurisdictional dispute.

I therefore advise you to take no enforcement action in this matter unless and until the courts themselves take advantage of the above-cited provisions existing in both California and Nevada law to inform us as to who has the lawful power to hear the case. Under the facts as I understand them, I suspect that the California court had that power, but my conclusion is preliminary at best due to the failure of the courts to clarify the question. I am unable to do so.

VHS/cas

**EXHIBIT “3”**

Michelle Chase MChase@ag.nv.gov

10/31/11

to me

Mr. Martinez, I am in receipt of the documents you submitted and they are currently under review. Thank you, Investigator M. Chase Nevada Office of the Attorney General Missing Children's Clearinghouse 555 E. Washington Avenue, Suite 3900 Las Vegas, Nv 89101 702-486-3456 (Office) 702-486-2377 (Fax)

---

Michelle Chase MChase@ag.nv.gov

11/2/11

to me

I have located Ms. Fredianelli. I am still in the midst of the necessary investigation and waiting on requested documentation from various sources. I will be in mandatory training on 11/03/11 and 11/04/11. Investigator M. Chase Nevada Office of the Attorney General Missing Children's Clearinghouse 555 E. Washington Avenue, Suite 3900 Las Vegas, Nv 89101 702-486-3456 (Office) 702-486-2377 (Fax)

sebastian martinez

11/2/11

to Michelle

i just got your email M. Chase what requested documentation? maybe i could be of help? Are they in Las Vegas? Did you use their son joseph to find them? please let me know ASAP so i can pick my daughter up. did you guys get ahold of her?

---

Michelle Chase MChase@ag.nv.gov

11/3/11

to Carolyn, me

Mr. Martinez, The documents I requested are from Law Enforcement sources, though I appreciate your offer to assist. I can not disclose the whereabouts of the parties in question as I utilized law enforcement databases to locate them and that information can not be disseminated. If, after the course of my investigation, my Deputy Attorney General seeks a Warrant to Take Physical Custody of the Child and it is granted, I will pick up your daughter. I have not contacted Ms. Fredianelli. I will let you know when the Investigation is complete. Thank you, Investigator M. Chase Nevada Office of the Attorney General Missing Children's Clearinghouse 555 E. Washington Avenue, Suite 3900 Las Vegas, NV 89101 702-486-3456 (Office) 702-486-2377 (Fax)

sebastian martinez

11/9/11

to Michelle

Hi Michelle Chase its Sebastian Martinez today its been exactly one week since i last heard from you and you said that you had located Ms. Fredianelli, just wanted to know if theres any progress on the case. please let me know thank you Sebastian

---

Michelle Chase MChase@ag.nv.gov

11/9/11

to me

I am waiting for a call back from her Attorney. After I receive the information I need from her, I can submit it to my Deputy Attorney General for review. Investigator M. Chase Nevada Office of the Attorney General Missing Children's Clearinghouse 555 E. Washington Avenue, Suite 3900 Las Vegas, Nv 89101 702-486-3456 (Office) 702-486-2377 (Fax)

---

Michelle Chase MChase@ag.nv.gov

11/10/11

to me

Mr. Martinez, I have attempted to reach Ms. Lubritz, multiple times, since she is the last Attorney on record in an effort to determine why Ms. Fredianelli did not participate in the court-ordered DNA testing and how she was notified of those tests. Ms. Lubritz has returned my calls, but I was not at my desk when she did and visca-versa. It has become apparent that you are not satisfied with the time it takes to conduct these sort of investigations and with Ms. Lubritz's busy schedule, it may just help to speed things up if I just go speak to Ms. Fredianelli myself. Hopefully, I can get the answers to my unresolved questions and you can get the expedited service that you demand. Hopefully, this accommodation will satisfy the time schedule you have set for me. Have a wonderful day, Investigator M. Chase Nevada Office of the Attorney General Missing Children's Clearinghouse 555 E. Washington Avenue, Suite 3900 Las Vegas, Nv 89101 702-486-3456 (Office) 702-486-2377 (Fax)

---

From: sebastian martinez [mailto:sebmar77@gmail.com]

Sent: Monday, November 21, 2011 1:28 PM

To: Michelle Chase

Subject: Spam: Michelle, you mentioned that you can't move forward on the Court's arrest warrant that I provided to you absent your own investigation and issuing of your own warrant for her arrest on new charges of either child abduction or flight or obstruction of justice. While obviously I appreciate your office's interest in a separate criminal investigation and certainly would like to see that continue -- my primary interest at this juncture is to have the Court's warranted for contempt, and production of my child -- based on flight -- executed. If your office can not execute the Court's warrant -- will you at least provide to the Court, under seal, or in whatever form you are comfortable, the information concerning the location of my daughter and Krist -- so that the Court may have her produced on the warrant through it's arresting agents.

Michelle Chase MChase@ag.nv.gov

11/21/11

to me, Victor

Mr. Martinez, Our office has two primary roles in custodial interference/parental abduction cases: After receipt of a prosecution referral from a local police agency, it is reviewed and a criminal warrant is issued for the abducting parent if an abduction, under Nevada Revised Statutes, has actually occurred. We are not in receipt of a prosecution referral at this point in time. Additionally, I did not advise that we would be enforcing a warrant from the District Court, of which I do not even possess. Secondly, we review facts and documentation (if available) related to the aforementioned types of cases and determine, through investigation, if the situation would require a Warrant to Take Physical Custody of a Minor Child (not an arrest warrant). If this action is necessary for the recovery of the minor child in question, it must also meet certain criteria under the law. At this time, I have several areas of concern that I am attempting to sort through, one of which is the fact that there are conflicting orders from NV and CA related to paternity and custody of Mikeala. There are many variables that play into whether or not an Order is valid which necessitates our ability to seek either an arrest warrant or Warrant to Take Physical Custody of a Minor Child (ie proper service, jurisdiction, home state, conflicting orders, etc.). All of these areas must be addressed in the course of the investigation, which is still ongoing. When I have all of the required facts and documentation, I will submit it to my Deputy Attorney General and will advise you on what assistance we will or will not be able to provide. Thank you, Investigator  
Chase Nevada Office of the Attorney General Missing Children's Clearinghouse 555 E. Washington  
Avenue, Suite 3900 Las Vegas, Nv 89101 702-486-3456 (Office)

Burke, Warren R. Warren.Burke@ic.fbi.gov

Jan 31 (10 days ago)

to me

Mr Martinez- Unfortunately, no... that is not the kind of warrant I mean. The document you've attached is a bench warrant for "Contempt of Court," a local misdemeanor. In order for us to become involved, the law requires that the local jurisdiction (Clark County) charge her with the crime of "kidnapping." The local police (LVMPD) would then enter the warrant into the system so that any police department encountering her will see the warrant. Once that warrant is entered, the local police would then reach out to us for assistance. To date, no judge has issued a warrant for kidnapping and until Metro calls us through regular channels, I'm afraid that there is nothing we can do. I recommend you have your lawyer continue to press the courts to do so. Respectfully, SA Warren R BurkeFBI, Las Vegas



Sonia Lucero casemanager@nevadachildseekers.org

12/5/11

to me

I got your e-mail I will let you know when I can get some information for you. Sonia Lucero