

1 27. At the beginning of the hearing on September 29, 2016, Plaintiffs, on
2 behalf of Husband, requested a “closed hearing” pursuant to EDCR 5.02. The request
3 was granted by Judge Elliott and the hearing was closed.

4 28. At the beginning of the hearing on September 29, 2016, Judge Elliott
5 accused Plaintiffs and Husband of misrepresenting financial information on
6 Husband’s Financial Disclosure Form and referred to Plaintiffs as “unethical.” By the
7 end of the one-hour and twelve minute hearing, Judge Elliott learned that she was
8 mistaken on a number of factual matters and retracted her incorrect accusations
9 against Plaintiffs.

10 29. A decision on Plaintiffs’ request for sanctions and fees against
11 Schneider in the “D” Case was deferred and is still pending submission and review of
12 additional briefing.

13 30. The day after the September 29, 2016 hearing, on September 30, 2016
14 at 8:02 am, Schneider sent an email to Kim Gurule at Video Transcription Services
15 stating, in relevant part:

16 Can you please upload the video from yesterday’s hearing?
17 Thank you.
 :)

18 31. Upon information and belief, Schneider provided a copy of the
19 September 29, 2016 “closed hearing” to Defendants Steve W. Sanson and Veterans
20 In Politics International, Inc.

21 32. Upon information and belief, Defendants conspired to affect the
22 outcome of the pending “D” Case by defaming, inflicting emotional distress upon,
23 placing in a false light, disparaging the business of, and harassing Plaintiffs and
24

1 inflicting emotional distress upon Judge Elliott, and threatening to continue doing
2 so.

3 33. On October 5, 2016, Defendants published or caused to be published
4 on YouTube and on veteransinpolitics.org, a website purportedly owned and
5 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
6 Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson
7 Corporation, Karen Steelmon, and Does I through X inclusive, the video from the
8 “closed hearing” on September 29, 2016 in the “D” Case, with an article entitled
9 “Nevada Attorney attacks a Clark County Family Court Judge in Open Court”
10 (hereinafter “the ‘Attack’ article”).¹

11 34. The “Attack” article was published, or republished, or attributed to one
12 another, or disseminated to third parties across state lines, via email across multiple
13 states, including Veterans In Politics International, Inc. sending it directly to the
14 attorneys and paralegals at The Abrams & Mayo Law Firm, and via numerous social
15 media sites including Pinterest, Google+, Twitter, and the following Facebook pages:

16 a. steve.sanson.1

17 b. steve.sanson.3

18 c. veteransinpolitics

19 d. veteransinpoliticsinternational

20 e. eye.on.nevada.politics

21 f. steve.w.sanson

22 g. Veterans-In-Politics-International-Endorsement-for-the-State-of-
23 Nevada

24

¹ A copy of the published “Attack” article is attached as Exhibit 1.

1 h. Veterans in Politics: groups/OperationNeverForget

2 i. Nevada-Veterans-In-Politics

3 35. Within the "Attack" article, Defendants defame Jennifer V. Abrams and
4 her law firm, The Abrams & Mayo Law Firm, with a number of false and misleading
5 statements.

6 36. In the "Attack" article, the Defendants published, or republished, or
7 attributed to one another, or disseminated to third parties across state lines, false
8 and defamatory statements directed against Plaintiffs, including that:

9 a. Plaintiff, Jennifer Abrams "attacked" a Clark County Family Court
10 Judge in open court;

11 b. Abrams has "no boundaries in our courtrooms";

12 c. Abrams is unethical;

13 d. There is a "problem" requiring Abrams to be reported to the Nevada
14 State Bar; and

15 e. That Abrams "crossed the line with a Clark County District Court
16 Judge."

17 37. Despite knowledge that Judge Elliott retracted her accusations at the
18 end of the one hour and twelve minute "closed" hearing, the Defendants published,
19 or republished, or attributed to one another, or disseminated to third parties across
20 state lines, misleading statements about Plaintiffs, directing viewers only to the
21 portion of the video wherein the incorrect and later retracted accusations were made
22 ("Start 12:13:00"), and quoting only those misleading select portions. Although the
23 entire one hour and twelve minute video was posted, Defendants knew or should
24

1 have known that viewers were unlikely to watch the entirety (or any) of the video,
2 instead, relying upon the misleading snippets highlighted by Defendants.

3 38. During a break at another court hearing in the “D” case on October 5,
4 2016 (immediately after the dissemination of the “Attack” article via email),
5 Defendant Schneider said to Brandon K. Leavitt, Esq., of The Abrams & Mayo Law
6 Firm, that a withdrawal of the *Motion for Sanctions and Attorney Fees* would “make
7 this all go away,” or words to that effect.

8 39. Defendants were given the opportunity to voluntarily withdraw the
9 defamatory material. On October 5, 2016 at 6:02 pm, the Honorable Jennifer Elliott
10 sent an email to Defendants beginning with “I was made aware of this video today
11 and would kindly request that VIP please take it down.”

12 40. Defendants refused to voluntarily withdraw the defamatory material.
13 On October 5, 2016 at 11:16 pm, Defendants Steve W. Sanson and Veterans In
14 Politics International, Inc. responded to Judge Elliott stating in relevant part: “. . .
15 once we start a course of action we do not raise our hands in defeat,” and “[i]n
16 combat we never give up and we will not start given (sic) up.” Schneider was copied
17 on these exchanges and, by his silence, acquiesced.

18 41. Defendants were made aware that the information they disseminated
19 was incorrect and again were given an opportunity to withdraw the defamatory
20 material. On October 6, 2016 at 4:00 am, Judge Elliott sent an email to Defendants
21 stating, in relevant part: “I need you to know that I was wrong regarding the finances
22 as they had been disclosed at the outset of the case, from the first filing, albeit late. At
23 the further hearing we had in this matter I put on the record that I believe that he did
24 not hide anything on his financial disclosure form; it was a misunderstanding that

1 was explained and the record was corrected. . . . I understand that VIP does try to
2 educate and provide information to voters so they will be more informed about who
3 they are putting into office. In this case, the dynamic and the record was changed for
4 the better after that hearing. I think that information would be important to the
5 voters as well. It is my hope that you will reconsider your position.”

6 42. Defendants did not take down the article or the video and, instead,
7 continued to publish, republish, and disseminate the article and video they knew to
8 be false and defamatory.

9 43. On October 7, 2016, Defendants published, republished, or attributed
10 to one another, or disseminated to third parties across state lines, an advertisement
11 for Law Offices of Louis C. Schneider, stating “Law Offices of Louis Schneider” and
12 “Friends of Veterans in Politics.”

13 44. Upon information and belief, a payment of money was made by
14 Schneider to Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
15 Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson
16 Corporation, Karen Steelmon, and Does I through X inclusive.

17 45. On October 8, 2016, Defendants were served with an Order Prohibiting
18 Dissemination of Case Material entered by Judge Elliott.

19 46. On October 9, 2016, Defendants published or caused to be published
20 on a website known as veteransinpolitics.org, a website purportedly owned and
21 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
22 Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson
23 Corporation, Karen Steelmon, and Does I through X inclusive, an article entitled
24 “BULLY District Court Judge Bullied by Family Attorney Jennifer Abrams”

1 (hereinafter “the ‘BULLY’ article”) along with a copy of the Order Prohibiting
2 Dissemination of Case Material.²

3 47. The “BULLY” article, containing a link to the “Attack” article, has been
4 re-published numerous times via email across multiple states, including Veterans In
5 Politics International, Inc. sending it directly to the attorneys and paralegals at The
6 Abrams & Mayo Law Firm, posting it on Twitter, Pinterest, Google+ and on the
7 following Facebook pages:

- 8 a. steve.sanson.1
- 9 b. steve.sanson.3
- 10 c. veteransinpolitics
- 11 d. veteransinpoliticsinternational
- 12 e. eye.on.nevada.politics
- 13 f. steve.w.sanson
- 14 g. Veterans-In-Politics-International-Endorsement-for-the-State-of-
15 Nevada
- 16 h. Veterans in Politics: groups/OperationNeverForget
- 17 i. Nevada-Veterans-In-Politics

18 as well as on multiple different Family Court Facebook groups including but not
19 limited to “Nevada COURT Watchers” and “Family Court Support Group (Clark
20 County, NV).”

21 48. Within the “BULLY” article, Defendants defame Jennifer V. Abrams
22 and her law firm, The Abrams & Mayo Law Firm, with a number of false statements.

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² A copy of the published “Bully” article is attached as Exhibit 2.

1 49. The Defendants have published, or republished, or attributed to one
2 another, or disseminated to third parties across state lines, false and defamatory
3 statements directed against Abrams, including:

- 4 a. That Abrams bullied Judge Elliott into issuing the Order Prohibiting
5 Dissemination of Case Material;
6 b. That Abrams' behavior is "disrespectful and obstructionist";
7 c. That Abrams "misbehaved" in court;
8 d. That Abrams' behavior before the judge is "embarrassing"; and
9 e. That Judge Elliott's order appears to be "an attempt by Abrams to hide
10 her behavior from the rest of the legal community and the public."

11 On October 10, 2016 at 4:08 pm, Defendants responded in an email to Judge Elliott
12 stating, in relevant part: "When we expose folks we do it under the umbrella of a
13 journalist and we use the Freedom of information Act (sic)." and "We might have
14 sent out the second article prematurely..(sic) We have also received numerous
15 attorneys pointing us in the direction of other cases Abram's (sic) have had her
16 outburst and bullied other Judges and Attorneys."

17 50. On October 10, 2016, Plaintiffs sent an email to Defendants at 7:03
18 p.m., stating, in relevant part:

19 The Freedom of Information Act is inapplicable – it applies to
20 the Federal Government, not State divorce cases. And most
21 importantly, I am not a public figure or an elected official. I am a
22 private citizen with a private law practice. The umbrella of "a
23 journalist" does not apply as I am not running for public office
24 and there are no "voters" that have any right to know anything
 about my private practice or my private clients.

 I am a zealous advocate and will continue to pursue my client's
 interests without any hesitation whatsoever.

1 51. Upon information and belief, on or around October 11, 2016,
2 Defendants ran a background search on Plaintiff, Jennifer V. Abrams, and did not
3 find anything negative about her.

4 52. Defendants responded on October 10, 2016 at 10:03 p.m. via email,
5 again refusing to voluntarily withdraw the false and defamatory material. The email
6 states, in relevant part: "But what I find intriguing is that you think because you are
7 not elected that you are somehow untouchable to the media, then tell that to Lisa
8 Willardson, David Amesbury, Nancy Quon, David Schubert, Barry Levinson, Noel
9 Gage and Richard Crane all Nevada Attorneys not elected and never ran for public
10 office, just to name a few," and "[d]on't forget you practice law in a taxpayer's
11 courtroom." Unlike Plaintiffs, all of the attorneys mentioned were in some manner
12 involved or related to criminal investigations.

13 53. On or about November 6, 2016, Defendants published or caused to be
14 published on a website known as veteransinpolitics.org, a website purportedly
15 owned and controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina
16 Ortiz, Johnny Spicer, Don Woolbright, Veterans In Politics International, Inc.,
17 Sanson Corporation, Karen Steelmon, and Does I through X inclusive, an article
18 entitled "Law Frowns on Nevada Attorney Jennifer Abrams' 'Seal-Happy' Practices"
19 (hereinafter "the 'Seal-Happy' article") along with a printout of "Family Case Records
20 Search Results" revealing the case numbers, parties' names, filing date, and type of
21 action of many of Abrams' cases.³

22 54. The "Seal-Happy" article, containing a link to the "Attack" article,
23 containing a link to the "BULLY" article, and containing a link to the September 29,
24

³ A copy of the published "Seal-Happy" article is attached as Exhibit 3.

1 2016 “closed hearing” video still posted on YouTube, has been re-published
2 numerous times via email across multiple states, including Veterans In Politics
3 International, Inc. sending it directly to the attorneys and paralegals at The Abrams
4 & Mayo Law Firm, posting it on Twitter, Pinterest, Google+ and on the following
5 Facebook pages:

- 6 a. steve.sanson.1
- 7 b. steve.sanson.3
- 8 c. veteransinpolitics
- 9 d. veteransinpoliticsinternational
- 10 e. eye.on.nevada.politics
- 11 f. steve.w.sanson
- 12 g. Veterans-In-Politics-International-Endorsement-for-the-State-of-
- 13 Nevada
- 14 h. Veterans in Politics: groups/OperationNeverForget
- 15 i. Nevada-Veterans-In-Politics

16 as well as on Family Court Facebook groups including but not limited to “Family
17 Court Support Group (Clark County, NV).”

18 55. Within the “Seal-Happy” article, Defendants defame Jennifer V.
19 Abrams and her law firm, The Abrams & Mayo Law Firm, with a number of false
20 statements.

21 56. The Defendants have published, or republished, or attributed to one
22 another, or disseminated to third parties across state lines, false and defamatory
23 statements directed against Abrams, including that:

- 1 a. Abrams “appears to be ‘seal happy’ when it comes to trying to seal her
- 2 cases”;
- 3 b. That Abrams seals cases in contravention of “openness and
- 4 transparency”;
- 5 c. That Abrams’ sealing of cases is intended “to protect her own
- 6 reputation, rather than to serve a compelling client privacy or safety
- 7 interest”;
- 8 d. That Abrams engaged in “judicial browbeating”;
- 9 e. That Abrams obtained an order that “is specifically disallowed by law”;
- 10 f. That Abrams obtained the order against the “general public” with “no
- 11 opportunity for the public to be heard”;
- 12 g. That “after issuing our initial story about Abrams’ behavior in the
- 13 *Saiter* case, we were contacted by judges, attorneys and litigants eager
- 14 to share similar battle-worn experiences with Jennifer Abrams”;
- 15 h. That Abrams obtained an “overbroad, unsubstantiated order to seal
- 16 and hide the lawyer’s actions”; and
- 17 i. That Abrams is an “over-zealous, disrespectful lawyer[] who
- 18 obstruct[s] the judicial process and seek[s] to stop the public from
- 19 having access to otherwise public documents.”

20 57. On or about November 14, 2016, Defendants published or caused to be
21 published on a website known as veteransinpolitics.org, a website purportedly
22 owned and controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina
23 Ortiz, Johnny Spicer, Don Woolbright, Veterans In Politics International, Inc.,
24 Sanson Corporation, Karen Steelmon, and Does I through X inclusive, an article

1 entitled "Lawyers acting badly in a Clark County Family Court" (hereinafter "the
2 'Acting badly' article") along with another hearing video from the "D" Case.⁴

3 58. The "Acting badly" article, containing a link to the "Attack" article,
4 which contains a link to the "BULLY" article, has been re-published numerous times
5 via email across multiple states, including Veterans In Politics International, Inc.
6 sending it directly to the attorneys and paralegals at The Abrams & Mayo Law Firm,
7 posting it on Twitter, Pinterest, Google+ and on the following Facebook pages:

8 a. steve.sanson.1

9 b. steve.sanson.3

10 c. veteransinpolitics

11 d. veteransinpoliticsinternational

12 e. eye.on.nevada.politics

13 f. steve.w.sanson

14 g. Veterans-In-Politics-International-Endorsement-for-the-State-of-
15 Nevada

16 h. Veterans in Politics: groups/OperationNeverForget

17 i. Nevada-Veterans-In-Politics

18 59. Within the "Acting badly" article, Defendants defame Jennifer V.
19 Abrams and her law firm, The Abrams & Mayo Law Firm, with a number of false
20 statements.

21 60. The Defendants have published, or republished, or attributed to one
22 another, or disseminated to third parties across state lines, false and defamatory
23 statements directed against Abrams, including that:

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⁴ A copy of the published "Acting badly" article is attached as Exhibit 4.

- a. Plaintiffs were “acting badly” in Clark County Family Court;
- b. Abrams’ behavior is “disrespectful and obstructionist”;
- c. Judge Elliott’s order appears to be “an attempt by Abrams to hide her behavior from the rest of the legal community and the public”; and
- d. Abrams engaged in conduct for which she should be held “accountable.”

61. On or about November 16, 2016, Defendants published or caused to be published on a website known as veteransinpolitics.org, a website purportedly owned and controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson Corporation, Karen Steelmon, and Does I through X inclusive, an article entitled “Clark County Family Court Judge willfully deceives a young child from the bench and it is on the record” (hereinafter “Deceives” article”).⁵

62. The “Deceives” article primarily attacks the Honorable Rena Hughes and also states the following: “In an unrelated story we exposed how Judges and Lawyers seal cases to cover their own bad behaviors. This is definitely an example of that.” Following this text is a link “click onto article Law Frowns on Nevada Attorney Jennifer Abrams’ ‘Seal-Happy’ Practices.” The “Deceives” article has been re-published numerous times via email across multiple states, including Veterans In Politics International, Inc. sending it directly to the attorneys and paralegals at The Abrams & Mayo Law Firm, posting it on Twitter, Pinterest, Google+ and on the following Facebook pages:

- a. [steve.sanson.1](#)

⁵ A copy of the published “Deceives” article is attached as Exhibit 5.

- 1 b. steve.sanson.3
- 2 c. veteransinpolitics
- 3 d. veteransinpoliticsinternational
- 4 e. eye.on.nevada.politics
- 5 f. steve.w.sanson
- 6 g. Veterans-In-Politics-International-Endorsement-for-the-State-of-
- 7 Nevada
- 8 h. Veterans in Politics: groups/OperationNeverForget
- 9 i. Nevada-Veterans-In-Politics

10 as well as on Family Court Facebook groups including but not limited to “Family
11 Court Support Group (Clark County, NV).”

12 63. Within the “Deceives” article, Defendants defame Jennifer V. Abrams
13 and her law firm, The Abrams & Mayo Law Firm, with a number of false statements.

14 64. The Defendants have published, or republished, or attributed to one
15 another, or disseminated to third parties across state lines, false and defamatory
16 statements directed against Abrams, including that:

- 17 a. Abrams “appears to be ‘seal happy’ when it comes to trying to seal her
18 cases”; and
- 19 b. Abrams “bad behaviors” were “exposed.”

20 65. On or about December 21, 2016, Defendants published or caused to be
21 published on YouTube, on an account or accounts purportedly managed and
22 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
23 Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson
24 Corporation, Karen Steelmon, and Does I through X inclusive, three videos entitled:

- 1 a. "VIDEO 1 The Abrams Law Firm 10 05 15,"
2 b. "VIDEO 2 The Abrams Law Firm Inspection part 1,"
3 c. "VIDEO 3 The Abrams Law Firm Practices p 2."
4 (hereinafter "the 'Inspection' videos").⁶

5 66. The "Inspection" videos stemmed from another divorce action wherein
6 Plaintiffs represented Husband, this one a 2014 "D" case, number D-14-507578-D.

7 67. Upon information and belief, Defendants obtained copies of the
8 "Inspection" videos from Wife in the 2014 "D" case, Yuliya Fohel F.K.A. Delaney.

9 68. Upon information and belief, Defendants knew, at the time they
10 published, republished, and disseminated the "Inspection" videos, that Yuliya Fohel
11 F.K.A. Delaney had been ordered to remove these same videos from the internet and
12 was prohibited from re-posting said videos either personally or through a third
13 party.

14 69. The "Inspection" videos depict David J. Schoen, IV, a Certified
15 Paralegal employed at The Abrams & Mayo Law Firm and include personal and
16 private information.

17 70. Mr. Schoen spoke with Defendant Steve W. Sanson on or about
18 December 22, 2016 and requested that Sanson remove the "Inspection" videos, or at
19 least blur his face and redact his personal information.

20 71. During the December 22, 2016 conversation with Mr. Schoen,
21 Defendant Steve W. Sanson falsely alleged that Mr. Schoen and Plaintiffs "bullied"
22 and "forced" Yuliya in "unlawfully" entering her home, or words to that effect.

23 ///

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⁶ A printout of the published "Inspection" videos is attached as Exhibit 6.

1 72. During the December 22, 2016 conversation with Mr. Schoen,
2 Defendant Steve W. Sanson falsely alleged that Jennifer Abrams is “unethical and a
3 criminal,” or words to that effect.

4 73. During the December 22, 2016 conversation with Mr. Schoen,
5 Defendant Steve W. Sanson falsely alleged that Jennifer Abrams “doesn’t follow the
6 law,” or words to that effect.

7 74. During the December 22, 2016 conversation, Mr. Schoen said that it
8 was obvious that Schneider provided a copy of the September 29, 2016 “closed
9 hearing” video to Defendant Steve W. Sanson. Defendant Steve W. Sanson did not
10 deny that he received the video from Schneider and responded: “yeah, okay,” or
11 words to that effect.

12 75. During the December 22, 2016 conversation with Mr. Schoen,
13 Defendant Steve W. Sanson falsely alleged that Jennifer Abrams was “breaking the
14 law by sealing her cases,” or words to that effect.

15 76. During the December 22, 2016 conversation with Mr. Schoen,
16 Defendant Steve W. Sanson incorrectly alleged that he had a right under “the
17 Freedom of Information Act” to disseminate the “closed hearing,” despite having
18 been informed that the Freedom of Information Act is inapplicable and despite being
19 served with a court order prohibiting its dissemination.

20 77. During the December 22, 2016 conversation with Mr. Schoen,
21 Defendant Steve W. Sanson said that Jennifer Abrams is on his “priority list”
22 because she “insulted [his] intelligence” by having him served with an order,
23 allegedly “when the court had no jurisdiction over [him],” or words to that effect.

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78. During the December 22, 2016 conversation with Mr. Schoen, Defendant Steve W. Sanson said that Jennifer Abrams “started this war” and, had she just dropped the issue after the initial article and video (i.e., the “Attack” article), he never would have “kept digging,” or words to that effect.

79. During the December 22, 2016 conversation with Mr. Schoen, Defendant Steve W. Sanson said that he is in possession of “dozens of hours” of hearing videos from multiple cases where Jennifer Abrams is counsel of record, or words to that effect.

80. During the December 22, 2016 conversation with Mr. Schoen, Defendant Steve W. Sanson said that “Jennifer is in bed with Marshal Willick, that explains a lot about the kind of person she is,” or words to that effect.⁷

81. The defamatory statements by Defendants were intended to harm Plaintiffs' reputation and livelihood, to harass and embarrass Plaintiffs, and to impact the outcome of a pending action in the "D" case.

82. The defamatory statements by Defendants have caused numerous negative comments to be directed against Plaintiffs.⁸

V.
FIRST CLAIM FOR RELIEF
(DEFAMATION)

83. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

84. Defendants, and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, published one or more oral

7 The relationship between Jennifer V. Abrams and Marshal S. Willick is not being denied.

⁸ For example, one person's comment to the "Acting badly" article and video begins with "Hopefully, the jerk has a heart attack from all that anger and stress," referring to Plaintiff's partner, Vincent Mayo, Esq.

1 or written false or misleading statements which were intended to impugn Plaintiffs
2 honesty, integrity, virtue and/or personal and professional reputation.

3 85. Jennifer Abrams and The Abrams & Mayo Law Firm are not public
4 figures, as some or all of Defendants have acknowledged in writing, or been notified
5 of in writing.

6 86. The referenced defamatory statements would tend to lower the subject
7 in the estimation of the community, excite derogatory opinions about the subject,
8 and hold the subject up to contempt.

9 87. The referenced defamatory statements were not privileged.

10 88. The referenced defamatory statements were published to at least one
11 third party.

12 89. The referenced defamatory statements were published or republished
13 deliberately or negligently by one or more of each of the Defendants.

14 90. Some or all of the referenced defamatory statements constitute
15 defamation *per se*, making them actionable irrespective of special harm.

16 91. Publication of some or all of the referenced defamatory statements
17 caused special harm in the form of damages to Jennifer Abrams and The Abrams &
18 Mayo Law Firm.

19 WHEREFORE, Plaintiffs, Jennifer V. Abrams and The Abrams & Mayo Law
20 Firm, demand judgment against named Defendants for actual, special,
21 compensatory, and punitive damages in an amount deemed at the time of trial to be
22 just, fair, and appropriate in an amount in excess of \$15,000.

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1 VI.
2 **SECOND CLAIM FOR RELIEF**
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

3 92. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
4 stated herein.

5 93. Defendants and/or Defendants' agents, representatives, and/or/
6 employees, either individually, or in concert with others, intentionally and
7 deliberately inflicted emotional distress on Plaintiffs by defaming them to many
8 people, including but not limited to the following: several of Plaintiff's friends, co-
9 workers, colleagues, clients, and an unknown number of persons that were subjected
10 to the defamatory comments on the internet.

11 94. As a result of Defendants' extreme and outrageous conduct, Plaintiff
12 was, is, and, with a high degree of likelihood, will continue to be emotionally
13 distressed due to the defamation.

14 95. As a result of Defendants' extreme and outrageous conduct, Plaintiffs
15 have suffered and will continue to suffer mental pain and anguish, and unjustifiable
16 emotional trauma.

17 WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law
18 Firm, demand judgment against named Defendants for actual, special,
19 compensatory, and punitive damages in an amount deemed by this Court to be just
20 and fair and appropriate, in an amount in excess of \$15,000.

21 VII.
22 **THIRD CLAIM FOR RELIEF**
(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)

23 96. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
24 stated herein.

97. To whatever extent the infliction of emotional distress asserted in the preceding cause of action was not deliberate, it was a result of the reckless and wanton actions of the Defendants, either individually, or in concert with others.

WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law Firm, demand judgment against named Defendants for actual, special, compensatory, and punitive damages in an amount deemed by this Court to be just and fair and appropriate, in an amount in excess of \$15,000.

VIII.
FOURTH CLAIM FOR RELIEF
(FALSE LIGHT)

98. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

99. Defendants and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, intentionally made and published false and misleading statements about Jennifer Abrams and The Abrams & Mayo Law Firm.

100. The statements made by the Defendants against Jennifer Abrams were made with the specific intent to cause harm to Plaintiffs and their pecuniary interests, or, in the alternative, the Defendants published the false and misleading statements knowing its falsity and inaccuracy or with reckless disregard for the truth.

101. The statements made by the Defendants place Jennifer Abrams and The Abrams & Mayo Law Firm in a false light and are highly offensive and inflammatory, and thus actionable.

///

1 WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law
2 Firm, demand judgment against named Defendants for actual, special,
3 compensatory, and punitive damages in an amount deemed at the time of trial to be
4 just, fair, and appropriate in an amount in excess of \$15,000.

5 **IX.**
6 **FIFTH CLAIM FOR RELIEF**
 (BUSINESS DISPARAGEMENT)

7 102. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
8 stated herein.

9 103. Defendants and/or Defendants' agents, representatives, and/or
10 employees, either individually, or in concert with others, intentionally made false
11 and disparaging statements about Jennifer Abrams and The Abrams & Mayo Law
12 Firm and disparaged Jennifer Abrams and The Abrams & Mayo Law Firm's business.

13 104. The referenced statements and actions were specifically directed
14 towards the quality of Jennifer Abrams and The Abrams & Mayo Law Firm's
15 services, and were so extreme and outrageous as to affect the ability of Jennifer
16 Abrams and The Abrams & Mayo Law Firm to conduct business.

17 105. The Defendants intended, in publishing the false and defamatory
18 statements to cause harm to Plaintiffs and its pecuniary interests, or, in the
19 alternative, the Defendants published the disparaging statements knowing their
20 falsity or with reckless disregard for the truth.

21 WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law
22 Firm, demand judgment against named Defendants for actual, special,
23 compensatory, and punitive damages in an amount deemed at the time of trial to be
24 just, fair, and appropriate in an amount in excess of \$15,000.

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X.
SIXTH CLAIM FOR RELIEF
(HARASSMENT)

106. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

107. Defendants and/or Defendants' agents, representatives, and/or employees in concert with one another, have engaged in a defamatory campaign against Plaintiff and has threatened the dissemination of additional defamatory campaigns against Plaintiff.

108. Defendants' making of false and defamatory statements and defamatory campaigns against Plaintiffs were specifically intended to interfere with Plaintiffs' business, and to cause the apprehension or actuality of economic harm to Plaintiffs and Plaintiffs' employees.

109. Defendants' actions were intended to result in substantial harm to the Plaintiffs with respect to their mental health or safety, and to cause economic damage to Plaintiffs.

WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law Firm, demand judgment against named Defendants for actual, special, compensatory, and punitive damages in an amount deemed at the time of trial to be just, fair, and appropriate in an amount in excess of \$15,000.

XI.
SEVENTH CLAIM FOR RELIEF
(CONCERT OF ACTION)

110. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

///

XIII.
NINTH CLAIM FOR RELIEF
(RICO VIOLATIONS)

116. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

117. Defendants and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, engaged in at least two crimes related to racketeering pursuant to NRS 207.360 that have the same or similar pattern, intents, results, accomplices, victims or methods of commission or are otherwise interrelated by distinguishing characteristics and are not isolated incidents.

118. Here, Defendants⁹ have all either committed, conspired to commit, or have attempted to commit the following crime(s):

- a. Bribing or intimidating witness to influence testimony (NRS 199.240(b) – cause or induce witness to withhold true testimony).
- b. Bribing or intimidating witness to influence testimony (NRS 199.240(c) – cause or induce witness to withhold a record, document or other object from the proceeding).
- c. Intimidating public officer, public employee, juror, referee, arbitrator, appraiser, assessor or similar person (NRS 199.300(d) – to do any act not authorized by law and is intended to harm any person other than the person addressing the threat or intimidation with respect to the person's health, safety, business, financial condition or personal relationships).

⁹ The named Defendants—and others—constitute a criminal syndicate as defined in NRS 207.370.

- 1 d. Criminal contempt (NRS 199.340(4) – willful disobedience to the lawful
- 2 process or mandate of a court).
- 3 e. Criminal contempt (NRS 199.340(7) – publication of a false or grossly
- 4 inaccurate report of court proceedings).
- 5 f. Challenges to fight (NRS 200.450).
- 6 g. Furnishing libelous information (NRS 200.550).
- 7 h. Threatening to publish libel (NRS 200.560).
- 8 i. Harrassment (NRS 200.571).
- 9 j. Multiple transactions involving fraud or deceit in the course of an
- 10 enterprise (NRS 205.377).
- 11 k. Taking property from another under circumstances not amounting to
- 12 robbery (NRS 207.360(9)).
- 13 l. Extortion (NRS 207.360(10)).

14 119. Defendants comprise a criminal syndicate: Any combination of
15 persons, so structured that the organization will continue its operation even if
16 individual members enter or leave the organization, which engages in or has the
17 purpose of engaging in racketeering activity. Here, Veterans In Politics International,
18 Inc., Nevada Veterans In Politics, and Veterans in Politics are organizations—
19 headed by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
20 Spicer, Don Woolbright, and Karen Steelmon—that have members that do come and
21 go and the organization continues on. These organizations and their principals have
22 conspired to engage in and have engaged in racketeering activity. These
23 organizations conspire with others, such as Louis C. Schneider and Law Offices of
24

1 Louis C. Schneider, LLC, who come and go, to engage in and have engaged in
2 racketeering activity.

3 120. This group also meets the statutory definition – NRS 207.380 – as an
4 enterprise:

5 Any natural person, sole proprietorship, partnership, corporation,
6 business trust or other legal entity; and, any union, association or other
group of persons associated in fact although not a legal entity.

7 Here Veterans In Politics International, Inc. is a registered not-for-profit business
8 and Nevada Veterans In Politics and Veterans in Politics are sub-units of Veterans In
9 Politics International, Inc. Each can and should be considered individual legal
10 entities.¹⁰

11 121. Law Offices of Louis C. Schneider, LLC is a for-profit law firm in
12 Nevada and is definitionally a separate legal entity.

13 122. Sanson Corporation is also a separate legal entity and is a registered
14 Nevada corporation.

15 123. Even if not all Defendants are members of Veterans In Politics
16 International, Inc., Nevada Veterans In Politics, Veterans in Politics, and Law Offices
17 of Louis C. Schneider, they meet the “association or other group of persons
18 associated in fact” requirements under the statute as an enterprise. The statute
19 explicitly includes both licit and illicit enterprises.

20 124. Racketeering is the engaging in at least two crimes related to
21 racketeering that have the same or similar pattern, intents, results, accomplices,
22 victims or methods of commission, or are otherwise interrelated by distinguishing
23 characteristics and are not isolated incidents, if at least one of the incidents occurred

24 ¹⁰ Nevada Veterans In Politics and Veterans in Politics operate numerous social media sites
where the defamation continues.

1 after July 1, 1983, and the last of the incidents occurred within 5 years after a prior
2 commission of a crime related to racketeering.

3 125. Defendants used threats, intimidation, and deception with the intent to
4 cause or induce Plaintiff and Plaintiff's client to withhold testimony against
5 Schneider in the "D" case. (NRS 199.240)(b)).

6 126. Defendants used threats, intimidation, and deception with the intent to
7 cause or induce Plaintiff and Plaintiff's client to withhold a record, document or
8 other object from the legal proceedings in the "D" case. (NRS 199.240(c)).

9 127. Defendants, directly or indirectly, addressed threats and intimidation
10 to Judge Elliott with the intent to induce Judge Elliott contrary to her duty to make,
11 omit or delay any act, decision or determination, as the threat or intimidation
12 communicated the intent, either immediately or in the future, to do an act not
13 authorized by law and intended to harm Plaintiffs' emotional health, business, and
14 financial condition. (NRS 199.300(d)).

15 128. Defendants willfully disobeyed the lawful process or mandate of a
16 court. (NRS 199.340(4)).

17 129. Defendants published a false or grossly inaccurate report of family
18 court proceedings on numerous occasions, including, but not limited to, the "D"
19 case. (NRS 199.340(7)).

20 130. Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
21 Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson
22 Corporation, Karen Steelmon, and Does I through X inclusive, gave or sent a
23 challenge in writing to fight Richard Carreon and others. (NRS 200.450).

24 ///

1 131. Defendants willfully stated, delivered or transmitted to a manager,
2 editor, publisher, reporter or other employee of a publisher of any newspaper,
3 magazine, publication, periodical or serial statements concerning Plaintiffs which, if
4 published therein, would be a libel. (NRS 200.550).

5 132. Defendants threatened Plaintiffs with the publication of a libel
6 concerning Plaintiffs with the intent to extort the withdrawal of the *Motion for*
7 *Sanctions and Attorney Fees* and related legal proceedings in the "D" case. (NRS
8 200.560).

9 133. Defendants, without lawful authority, knowingly threatened to
10 substantially harm the health or safety of Plaintiff and, by words and conduct placed
11 Plaintiffs in reasonable fear that the threat would be carried out. (NRS 200.571).

12 134. Defendants, in the course of their enterprise, knowingly and with the
13 intent to defraud, engaged in an act, practice or course of business or employed a
14 device, scheme or artifice which operates or would operate as a fraud or deceit upon
15 a person by means of a false representation or omission of a material fact that
16 Defendants know to be false or omitted, Defendants intend for others to rely on, and
17 results in a loss to those who relied on the false representation or omission in at least
18 two transactions that have the same or similar pattern, intents, results, accomplices,
19 victims or methods of commission, or are otherwise interrelated by distinguishing
20 characteristics and are not isolated incidents within 4 years and in which the
21 aggregate loss or intended loss is more than \$650. (NRS 205.377).

22 135. Defendants posted false and defamatory material no less than 130
23 times in six separate defamatory campaigns against Plaintiffs. The total value of
24 time expended by Jennifer Abrams, and The Abrams & Mayo Law Firm staff in

1 responding to inquiries from clients, protecting client privacy, and attempting to
2 have the defamatory material removed from the internet was over \$15,000 and this
3 does not include the costs of missed opportunities or time that should have been
4 spent working on cases for paying clients. (NRS 205.377 and NRS 207.360(9)).

5 136. It was the intent of the Defendants to cause harm to Plaintiffs and
6 Plaintiff's client and the aggregate costs far exceed the \$650 threshold. Each act
7 which violates subsection one constitutes a separate offense and a person who
8 violates subsection one is guilty of a category B felony.

9 137. Additionally, NRS 205.0832 defines the actions which constitute theft
10 as including that which:

11 Obtains real, personal or ***intangible property or the services of***
12 ***another person***, by a material misrepresentation with intent to
13 deprive that person of the property or services. As used in this
14 paragraph, "material misrepresentation" means the use of any
15 pretense, or the making of any promise, representation or statement of
present, past or future fact which is fraudulent and which, when used
or made, is instrumental in causing the wrongful control or transfer of
property or services. The pretense may be verbal or it may be a
physical act.

16 Additionally the statute goes on to define the theft as a person or entity that "Takes,
17 destroys, conceals or disposes of property in which another person has a security
18 interest, with intent to defraud that person." Time is a lawyer's stock in trade.
19 Defendants—with malice—stole valuable time from Plaintiffs. Also, the theft of
20 Jennifer Abrams and The Abrams & Mayo Law Firm's "good will" by the making of
21 false and defamatory comments and placing both Jennifer Abrams and The Abrams
22
23
24

1 & Mayo Law Firm in a false light has diminished the value of the business. These are
2 intangible thefts, but thefts nonetheless.¹¹

3 138. Defendants attempted to extort Plaintiffs to withdraw the *Motion for*
4 *Sanctions and Attorney's Fees* through a series of veiled threats. When Plaintiffs
5 refused to withdraw the motion, Defendants disseminated additional defamatory
6 material with the intent to do damage to Plaintiffs and threatened to continue doing
7 so unless the motion was withdrawn. (NRS 207.360(10)).

8 139. The Defendants have attempted to or did use extortion to influence the
9 outcome of at least one other pending family law case.

10 140. Defendants' illegal conduct resulted in damages to Plaintiffs.

11 WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law
12 Firm, pursuant to NRS 207.470, are entitled to treble damages as a result of
13 Defendants' criminal conduct in the form of actual, special, compensatory, and
14 punitive damages in amount deemed at the time of trial to be just, fair, and
15 appropriate in an amount in excess of \$15,000.

16 **XIV.**
17 **TENTH CLAIM FOR RELIEF**
18 **(COPYRIGHT INFRINGEMENT)**

19 141. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
20 stated herein.

21 142. Defendants have infringed upon Plaintiffs' photographic works owned
22 by Plaintiff, for which copyright registration is being sought, by posting the work on
23 social media websites, including but not limited to, Facebook, Pinterest, Google+,
24

¹¹ Goodwill – "A business's reputation, patronage, and other intangible assets that are considered when appraising the business, especially for purchase." *Black's Law Dictionary* 279 (Bryan A. Garner ed., Pocket ed., West 1996).

1 Twitter, and LinkedIn, without consent, approval or license of Plaintiffs and by
2 continuing to distribute and copy the commercial without compensation or credit to
3 the Plaintiffs.

4 143. As a direct and proximate result of said infringement by Defendants,
5 Plaintiff is entitled to damages in an amount to be proven at trial.

6 144. Defendants' infringement of Plaintiffs' photographic works has yielded
7 Defendants profits in an amount not yet determined.

8 145. Defendants' infringement has been willful and deliberate and was done
9 for the purpose of defaming Plaintiffs and making commercial use of and profit on
10 Plaintiffs' material throughout the country and within this Judicial District.
11 Plaintiffs are entitled to recover increased damages as a result of such willful
12 copying.

13 146. Plaintiffs are entitled to attorneys' fees and full costs pursuant to 17
14 U.S.C. § 505 and otherwise according to law.

15 147. As a direct and proximate result of the foregoing acts and conduct,
16 Plaintiffs have sustained and will continue to sustain substantial, immediate, and
17 irreparable injury, for which there is no adequate remedy at law. Upon information
18 and belief, Plaintiffs believe that unless enjoined and restrained by this Court,
19 Defendants will continue to infringe Plaintiffs' rights in the infringed works.
20 Plaintiffs are entitled to preliminary and permanent injunctive relief to restrain and
21 enjoin Defendants' continuing infringing conduct.

22 WHEREFORE, Plaintiffs, Jennifer V. Abrams and The Abrams & Mayo Law
23 Firm, demand that:

24 ///

- 1 a. Pursuant to 17 U.S.C. § 502(a), Defendants, their agents servants and
2 employees and all parties in privity with them be enjoined permanently
3 from infringing Plaintiff's copyrights in any manner.
- 4 b. Pursuant to 17 U.S.C § 504(b), Defendants be required to pay to the
5 plaintiff, such actual damages as the Plaintiffs may have sustained in
6 consequence of Defendants' infringement and all profits of Defendants
7 that are attributable to the infringement of Plaintiffs' copyrights.
8 Plaintiffs request Defendants account for all gains, profits, and
9 advantages derived by Defendants from their infringement.
- 10 c. Pursuant to 17 U.S.C. § 504(c)(1), Defendants be required to pay an
11 award of statutory damages in a sum not less than \$30,000.
- 12 d. The Court finds the Defendants' conduct was committed willfully.
- 13 e. Pursuant to 17 U.S.C. § 504(c)(2), Defendants be required to pay an
14 award of increased statutory damages in a sum of not less than
15 \$150,000 for willful infringement.
- 16 f. Pursuant to 17 U.S.C. § 505, Defendants be required to pay the
17 Plaintiffs' full costs in this action and reasonable attorney's fees.
- 18 Defendants' conduct was willful or wanton and done in reckless disregard of
19 Plaintiffs' rights thereby entitling Plaintiffs to recover punitive damages in an
20 amount to be determined at trial.

21 **XV.**
22 **ELEVENTH CLAIM FOR RELIEF**
23 **(INJUNCTION)**

23 148. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
24 stated herein.

1 149. Defendants and/or Defendant's agents, representatives, and/or
2 employees, either individually, or in concert with others are attempting to extort a
3 result in the "D" case litigation by unlawful out-of-court means. The "D" case
4 litigation is ongoing and an injunction is necessary to stop the extortion and
5 continuation of harm and damage to Plaintiffs.

6 Defendants and/or Defendants' agents, representatives, and/or employees, either
7 individually, or in concert with others, engaged in acts that were so outrageous that
8 injunctive relief is necessary to effectuate justice.

9 WHEREFORE, Plaintiffs request the following injunctive relief:

10 a. That all defamatory writings, video, postings, or any other documents
11 or public display of the same, concerning Jennifer Abrams, The
12 Abrams & Mayo Law Firm, and the employees of the same, be removed
13 from public view within 10 days of the issuance of the injunction.

14 b. That all innuendo of illegal, immoral, or unethical conduct that has
15 already been attributed by defendants to Plaintiffs, must never be
16 repeated by any named Defendant or any member of any of the named
17 organizations. Generalities toward lawyers in general will constitute a
18 violation of the injunction.

19 c. That a full retraction and apology be authored by Defendants Steve W.
20 Sanson and Louis C. Schneider and disseminated everywhere the
21 defamation occurred, including, but not limited to, the entirety of the
22 mailing list(s), each and every social media site (Facebook, Twitter,
23 Google+, Pinterest, etc.) and anywhere else the defamatory material
24 was disseminated.

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XVI.
CONCLUSION

150. Jennifer Abrams and The Abrams & Mayo Law Firm incorporate and re-allege all preceding paragraphs as if fully stated herein.

WHEREFORE, Jennifer Abrams and The Abrams & Mayo Law Firm respectfully pray that judgment be entered against Defendants, and each of them individually, as follows:

1. General damages in an amount in excess of \$15,000 for each and every claim for relief;
2. Compensatory damages in an amount in excess of \$15,000 for each and every claim for relief;
3. Punitive damages in an amount in excess of \$15,000 for each and every claim for relief;
4. Treble damages for Defendants' RICO violations pursuant to NRS 207.470 in the form of general, compensatory, and/or punitive damages in an amount in excess of \$15,000;
5. All attorney's fees and costs that have and/or may be incurred by Jennifer V. Abrams and The Abrams & Mayo Law Firm in pursuing this action; and

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6. For such other and further relief this Court may deem just and proper.

DATED this 27th day of January, 2017.

Respectfully submitted:

THE ABRAMS & MAYO LAW FIRM

JENNIFER V. ABRAMS, ESQ.
Nevada State Bar Number: 7575
6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
Phone: (702) 222-4021
Email: JVAGroup@theabramslawfirm.com
Attorney for Plaintiffs

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VERIFICATION

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

JENNIFER V. ABRAMS, ESQ., principal of THE ABRAMS & MAYO LAW
FIRM first being duly sworn, deposes and says:

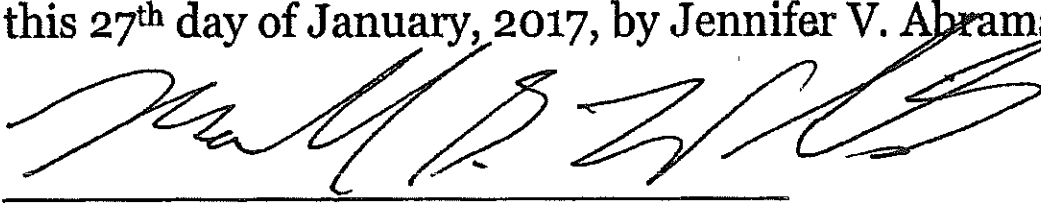
That her business is the Plaintiff in the above-entitled action; that she has
read the above and foregoing *Amended Complaint for Damages* and knows the
contents thereof and that the same is true of her own knowledge, except as to those
matters therein stated on information and belief, and as to those matters, she
believes them to be true.

FURTHER, AFFIANT SAYETH NAUGHT.

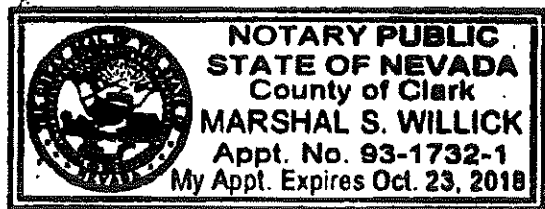


JENNIFER V. ABRAMS, ESQ.

SUBSCRIBED and SWORN to before me
this 27th day of January, 2017, by Jennifer V. Abrams, Esq.



NOTARY PUBLIC



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Amended Complaint for Damages* was filed electronically with the Eighth Judicial District Court in the above-entitled matter on Friday, January 27, 2017. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Maggie McLethcie, Esq.
Attorney for Defendants Steve W. Sanson and
Veterans in Politics International, Inc.

Alex Ghibaud, Esq.
Attorney for Defendants Louis C. Schneider,
Law Offices of Louis C. Schneider, LLC, and
Christina Ortiz

I further certify that on Monday, January 30, 2017, the foregoing *Amended Complaint for Damages* was served on the following interested parties, via 1st Class U.S. Mail, postage fully prepaid:

Heidi J. Hanusa	
2620 Regatta Drive, Suite 102	8908 Big Bear Pines Avenue
Las Vegas, Nevada 89128	Las Vegas, Nevada 89143

Johnny Spicer
3589 East Gowan Road
Las Vegas, Nevada 89115

Don Woolbright
20 Fernwood Drive
Saint Peters, Missouri 63376

Sanson Corporation
c/o Clark McCourt, Registered Agent
7371 Prairie Falcon Road, Suite 120
Las Vegas, Nevada 89128

Karen Steelmon
2174 East Russell Road
Las Vegas, Nevada 89119


An Employee of The Abrams & Mayo Law Firm

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

1/9/2017

Nevada Attorney attacks a Clark County Family Court Judge in Open Court

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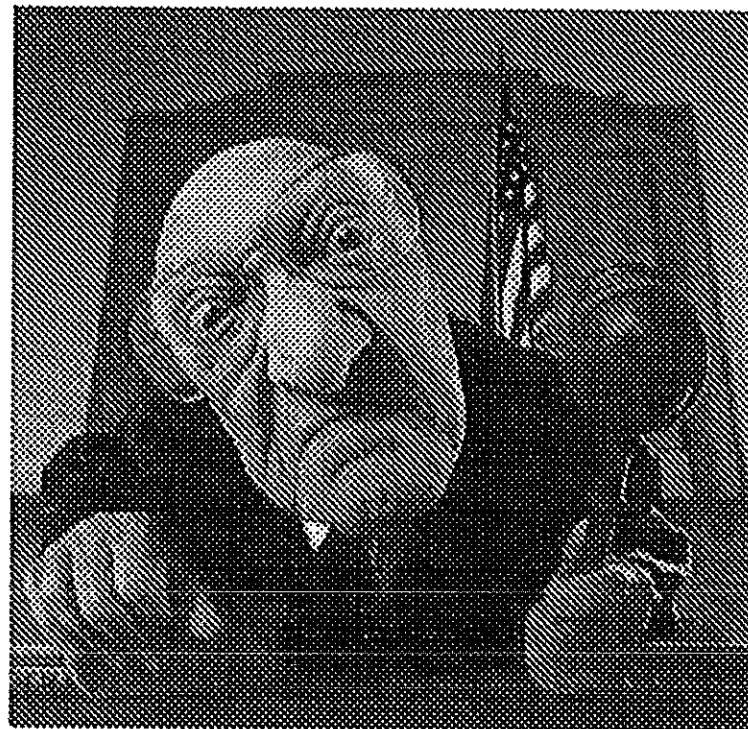


VETERANS
IN POLITICS

Nevada Attorney attacks a Clark County Family Court Judge in Open Court

*A behind the scenes look
inside our courtroom*

FIND OUT MORE



No boundaries in our courtrooms!

In Clark County Nevada, we have noticed Justice of the Peace handcuffing Public Defenders unjustly as well as Municipal Court Judges incarcerating citizens that are not even before their court.

The above are examples of the court room over stepping boundaries. But what happens when a Divorce Attorney

crosses the line with a Clark County District Court Judge Family Division?

In a September 29, 2016 hearing in Clark County Family Court Department L Jennifer Abrams representing the plaintiff with co-council Brandon Leavitt and Louis Schneider representing the defendant. This case is about a 15 year marriage, plaintiff earns over 160,000 annually and defendant receives no alimony and no part of the business.

There was a war of words between Jennifer Abrams and Judge Jennifer Elliot.



Start 12:13:00 in the video the following conversation took place in open court.

Judge Jennifer Elliot:



I find that there is undue influence in the case.

There are enough ethical problems don't add to the problem.

If that's not an ethical problem I don't know what is.

Court is charged to making sure that justice is done.

Your client lied about his finances.

I am the judge and in a moment I am going to ask you to leave.

Your firm does this a lot and attack other lawyers.

I find it to be a pattern with your firm.

You are going to be taking out of here if you don't sit down.

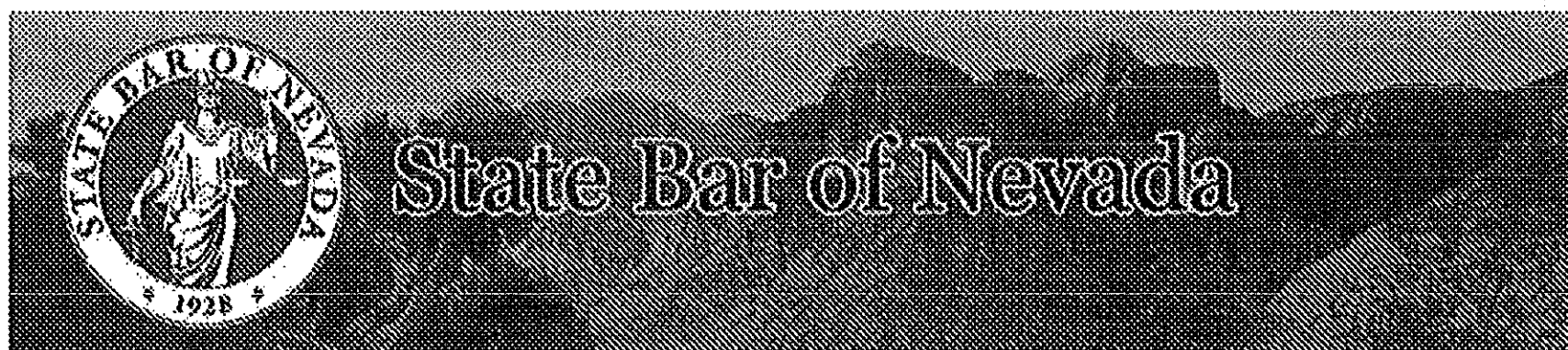
I am the Judge not you.

Jennifer Abrams:



Excuse me I was in the middle of a sentence.

Is there any relationship between you and Louis Schneider?



At what point should a judge sanction an attorney?

Is a judge too comfortable or intimidated by an attorney that they give them leeway to basically run their own courtroom?

If there is an ethical problem or the law has been broken by an attorney the Judge is mandated by law to report it to the

1/9/2017

Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Nevada State Bar or a governing agency that could deal with the problem appropriately.

[Learn More about Nevada State Bar Ethics & Discipline](#)

UPCOMING EVENTS

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Veterans In Politics International Inc.

702-283-8088

devildog1235@cs.com

www.veteransinpolitics.org

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Click the "Like" button.

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2



VETERANS
IN POLITICS

District Court *Judge Bullied* by Family Attorney Jennifer Abrams



FIND OUT MORE

*District Court Judge Jennifer Elliott orders
video of family court case to be removed.*



Clark County, Nevada

October 9, 2016

Yesterday, Veterans In Politics International, Inc. (VIPI) was served with a copy of a Court Order sealing case materials in a family court case on which we have been reporting, Saiter v. Saiter, case no. D-15-521372D.

We had recently posted a videotape of a hearing that took place on September 29, 2016 in the Saiter case. The video exposed the

disrespectful and obstructionist behavior of the husband's lawyer, Jennifer Abrams (click onto Nevada Attorney attacks a Clark County Family Court Judge in Open Court).



After our video posted, Abrams, seeking to stop us from showing the video, obtained a Court Order which stated that "the current post of the September 29, 2016 hearing video, and any and all other hearing video(s) from this case shall be immediately removed from the internet." The Order does not name VIPI but states that it pertains to "all persons or entities."

While we disagree that there is anything private in the video, we are abiding by it out of respect for the Court. The Order states that it is being issued "in the best interest of the four (4) children in the case," however, the focus of the video is the misbehavior of Abrams, not the children. Abrams is not a parent, child or a party in the case. Her embarrassing behavior before the judge has no bearing on the children.

This Order appears to just be an attempt by Abrams to hide her behavior from the rest of the legal community and the public.

We will, however, continue to work on behalf of our community to keep our courts and those working within them, accountable for their actions.

See order:

<p>Case No. 16-000000-000000</p> <p>Case No. 16-000000-000000</p> <p>Case No. 16-000000-000000</p>	
<p>DISTRICT COURT</p> <p>FAMILY COURT DIVISION</p> <p>CLARK COUNTY, NEVADA</p>	
<p>PLAINTIFF: JAMES S. SATER,</p> <p>Defendant</p>	<p>CASE NO. 16-000000-000000</p> <p>DEFENDANT</p>
<p>DEA SATER SATER,</p> <p>Defendant</p>	<p>HEARING DATES: 9/27/16</p> <p>HEARING TIMES: 10:00 AM</p>
<p>ORDER PROHIBITING DISSEMINATION OF CASE MATERIAL</p>	
<p>The stated hearing came before the Court for several pending matters on the 17th day of September at 10:00 a.m. Plaintiff James S. Sater represented by Jennifer Abrams, Esq. and Brandon Leavin, Esq. and Defendant, DEA Sater represented by Louis Alexander, Esq. and the Court hearing preliminary matters, examined and granted Mr. Abrams request for a closed hearing pursuant to LR 16.1, with the exception of permitting the parents of Defendant to remain pursuant to LR 16.1(b)(1)(D).</p>	
<p>Therefore, the release of this hearing was posted on youtube and a link to the video was emailed to the right third parties who involved in the case on or about the 17th day of October, 2016.</p>	
<p>On October 1, 2016, the parties reached all issues related for a Decree of Divorce. Counsel then appeared to seal the case and to disallow any further release of</p>	

Case information and is decreed that the current post of the September 29, 2016 hearing video, or any other hearing video from this case be immediately removed from the internet and to prohibit any portion of these proceedings from being disseminated or published and that any such publication or posting by anyone be immediately removed, as the September 29, 2016 hearing was a closed hearing. Additionally, counsel and the parties recognize that the case has been settled and that such an Order is in the best interest of the four (4) children in this case and is also authorized by NRS 125.080, NRS 125.110, EROR 5.03, and Supreme Court Rules, Part VII, Rule 2.2(a) and 3.4).

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the current post of the September 29, 2016 hearing video, or any and all other hearing video(s) from this case shall be immediately removed from the internet. All persons or entities shall be prohibited from publishing, displaying, showing, or making public any portion of these case proceedings, nothing from the case or that shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed as the Court finds the stipulation of the parties and this Court's Order to be in the best interest of the four (4) children in this case and to be fully supported by law (NRS 125.080, NRS 125.110, EROR 5.03, and Supreme Court Rules, Part VII, Rule 2.2(a) and 3.4).

DATED this 1st day of October, 2016


Jennifer Abrams, District Court Judge
Family Division, Dept. 1

1/9/2017

District Court Judge Bullied by Family Attorney Jennifer Abrams.

Read: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

UPCOMING EVENTS

WEBSITE NEWS GOALS AND VALUES OFFICERS CONTACT US



Veterans In Politics International Inc.

702-283-8088

devildog1285@cs.com

www.veteransinpolitics.org

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EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

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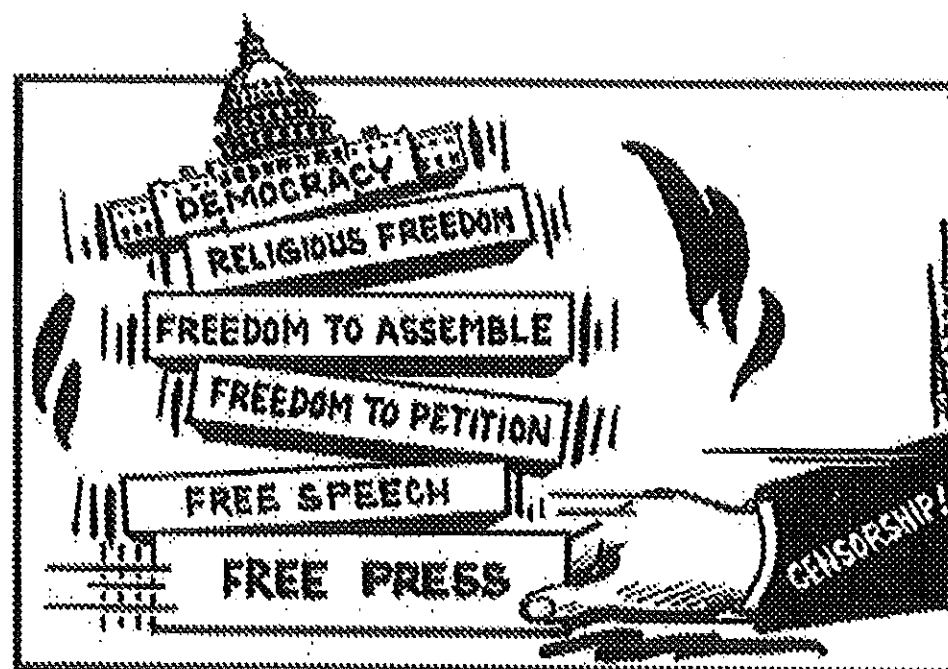
VETERANS
IN POLITICS

Law Frowns on Nevada Attorney Jennifer Abrams' "Seal-Happy" Practices

Clark County, Nevada
November 6, 2016

Free access to civil court proceedings is protected by the First Amendment to the U.S. Constitution.

FIND OUT MORE



Its importance cannot be overstated!

State and federal courts, including Nevada's Supreme Court, recognize that public access to court proceedings serves vital public policy interests, including, serving as a check on corruption, educating the public about the judicial process, promoting informed discussion of government affairs, and enhancing the performance of the judge, the lawyers and all involved.

As former Nevada Supreme Court Justice Nancy Saitta wrote earlier this year regarding the Supreme Court's rules on sealing civil records,

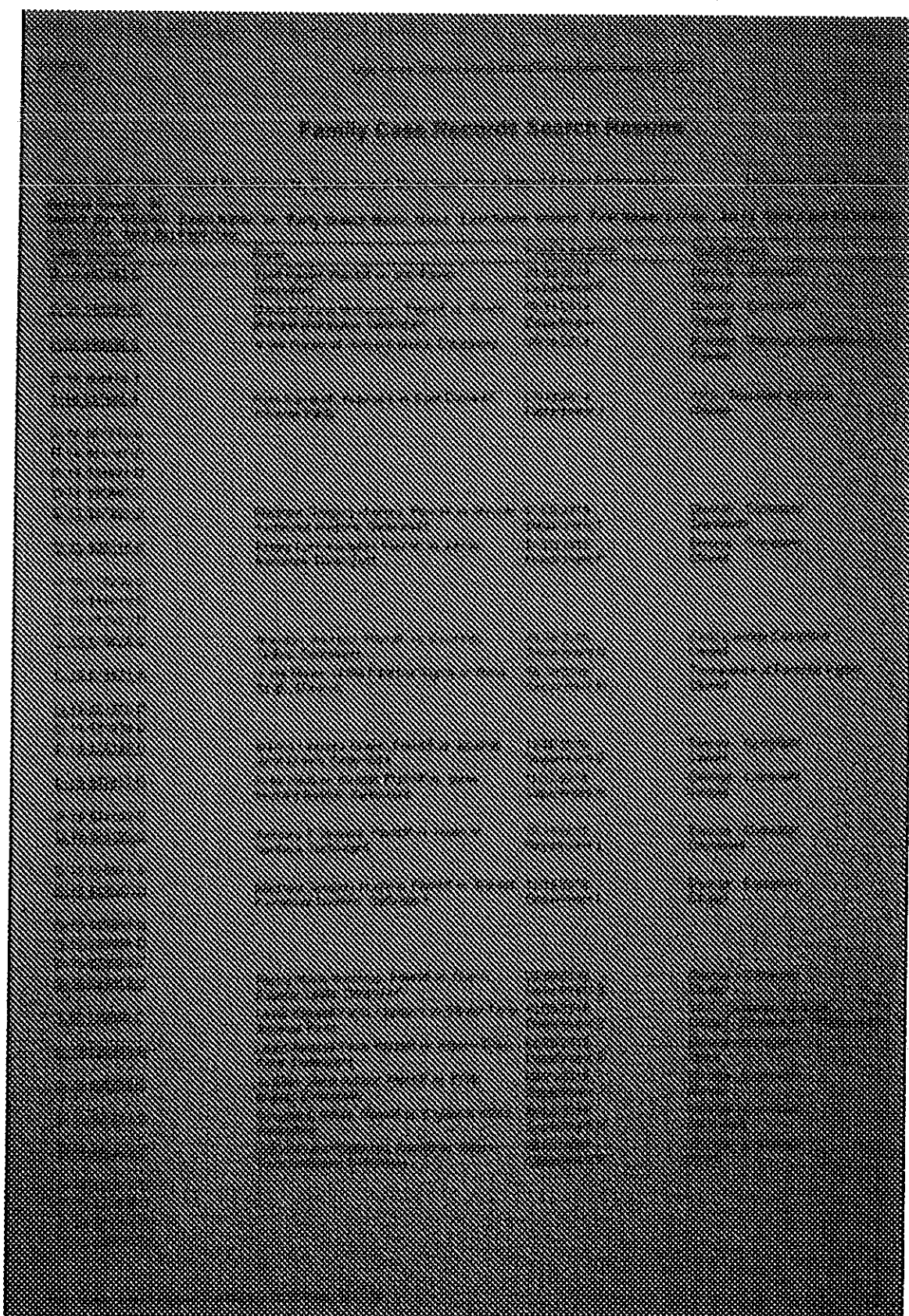
"the cornerstones of an effective, functioning judicial system are openness and transparency. Safeguarding these cornerstones requires public access not only to the judicial proceedings but also to judicial records and documents."



At least one lawyer in Nevada, however, Jennifer Abrams, appears to be "seal happy" when it comes to trying to seal her cases. She appears to have sealed many of her cases in the past few years, including filing a petition to seal in at least four cases just this past week, on 11/3/2016!

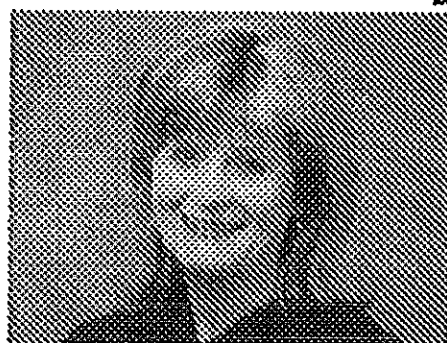


It also appears, however, that at least one of her cases, and perhaps more, may have been sealed to protect her own reputation, rather than to serve a compelling client privacy or safety interest.



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Veterans In Politics International (VIPI) recently released a video of Abrams bullying Judge Jennifer Elliot during a family court hearing in a case entitled Saiter v. Saiter, Case No. D-15-521372-D.



Click onto Nevada Attorney attacks a Clark County Family Court Judge in Open Court

In response to our article, Abrams sought and obtained a court order from Judge Elliott which does not name VIPI, but which purports to apply to the entirety of the general population. VIPI, however, was

served with the Order. The document orders all videos of Abrams' September 29, 2016 judicial browbeating to be taken off the internet.

Click onto District Court Judge Bullied by Family Attorney Jennifer Abrams

The Order further prohibits anyone from "publishing, displaying, showing or making public any portion of these case proceedings." The order goes on to state that "nothing from the case at bar shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed."

While the order claims in a conclusory fashion to be "in the best interests of the children," nothing in the order explains why. Indeed, the September 29, 2016 video of the proceedings that is on the internet focuses on Abrams's disrespectful exchange with the judge, and does not materially involve the children in the case.



Start 12:13:00 in the video the following conversation took place in open court.

Learn More

Moreover, while the Court Order is broadly stated and purports to prohibit the public viewing or dissemination of "any portion of these case proceedings," such blanket prohibition on public access to the entire case is specifically disallowed by law.

Entire cases cannot be sealed. Moreover, even if a judge wants to seal part of the case, the judge must specifically justify such sealing and must seal only the minimum portion necessary to protect a "compelling privacy or safety interest."

The issue of open proceedings is so important that in 2008 the Review Journal reported the Nevada Supreme Court convened a special task force to address the issue of over-sealing.

Click onto Standards for sealing civil cases tougher

The Supreme Court thereafter enacted rules requiring judges to specify in writing why sealing a record or redacting a portion of it is justified. (Supreme Court Rules, Part VII, Rule 3.) Judges must identify *"compelling privacy or safety interests that outweigh the public interest in access to the court record."*



This requirement applies even when a party in a family law case tries to seal a case under NRS 125.110, the statute on which Abrams seems to routinely rely. This statute provides that certain evidence in a divorce case, such as records, exhibits, and transcripts of particular testimony, may be deemed "private" and sealed upon request of one of the parties. However, the Court must justify why these records have to be sealed, and cannot seal the entire case - complaints, pleadings and other documents must remain public.

In the 2009 case of Johansen v. District Court, the Nevada Supreme Court specifically held that broad unsupported orders sealing

documents in divorce cases are subject to reversal given the important public policies involved.

The Court stated:

"We conclude that the district court was obligated to maintain the divorce proceedings' public status under NRS 125.110 and manifestly abused any discretion it possessed when it sealed the entire case file. We further conclude that the district court abused its discretion when it issued an overly broad gag order sua sponte, without giving notice or a meaningful opportunity to be heard, without making any factual findings with respect to the need for such an order in light of any clear and present danger or threat of serious and imminent harm to a protected interest, and without examining the existence of any alternative means by which to accomplish this purpose. Gag orders must be narrowly drawn if no less restrictive means are available; they may be entered only when there exists a serious and imminent threat to the administration of justice. This was certainly not the case here."

Click onto Johanson v. Dist. Ct., 182 P. 3d 94 - Nev: Supreme Court 2008

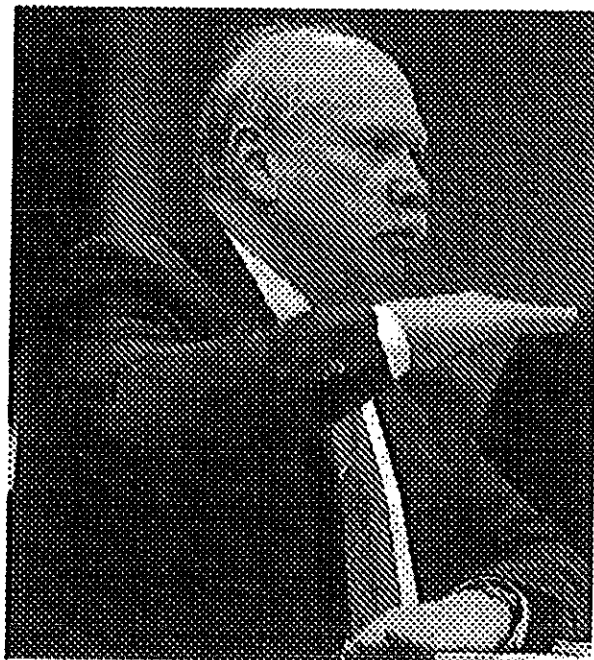
In the *Saiter* case, no notice was given to the general public for a hearing before the Order was issued, there was no opportunity for the public to be heard, no specific findings were made in the Order, and the Order was not drafted narrowly.

Indeed, it was drafted in the broadest possible terms to effectively seal the entire case! It is also questionable whether Judge Elliott had jurisdiction to issue the Order against the general public, who was not before her in court.

This all raises the question: What basis and justifications were given in the other cases which Abrams sought to seal?

Indeed, after issuing our initial story about Abrams' behavior in the *Salter* case, we were contacted by judges, attorneys and litigants eager to share similar battle-worn experiences with Jennifer Abrams.

Sources indicate that when Abrams was asked in one case by Judge Gerald Hardcastle whether she understood his order, *she replied that she only understood that the judge intended to bend over backwards for her opposing counsel.*



In another case, Northern Nevada Judge Jack Ames reportedly stood up and walked off the bench after a disrespectful tirade from Jennifer Abrams.



So, who is to blame here?

Of course Jennifer Abrams should be responsible and accountable for her own actions.

But, what judge allows a lawyer to bully her in court and then gets her to issue an overbroad, unsubstantiated order to seal and hide the lawyer's actions?

Shouldn't we expect more from our judges in controlling their courtrooms, controlling their cases, issuing orders in compliance with the law, and protecting the people against over-zealous, disrespectful lawyers who obstruct the judicial process and seek to stop the public from having access to otherwise public documents?

Surely, we should have this minimum expectation. Even in Nevada.

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CLERK OF DISTRICT COURT
CLARK COUNTY, NEVADA

[Signature]
CLERK OF DISTRICT COURT

DISTRICT COURT
FAMILY COURT DIVISION
CLARK COUNTY, NEVADA

BRANDON PAUL KATTE

Plaintiff

CASE NO. D-15-02117-D

vs.

DEPT NO. 1

TINA MARIE KATTE

Defendant

HEARING DATES: 9/29/16

HEARING TIMES: 10:00am

ORDER PROHIBITING
DISSEMINATION OF CASE MATERIAL

This matter having come before the Court for several pending matters on the 28th day of September at 10:00 a.m., Plaintiff Brandon Katté represented by Jennifer Abrams, Esq. and Brandon Leavitt, Esq. and Defendant Tina Marie Katté represented by Louis Schneider, Esq., and the Court having perused the matters submitted and granted Mr. Abrams request for a closed hearing pursuant to NRS 115.006, with the exception of permitting the parents of Defendant to remain present in NRS 115.006 (3)(d).

Thereafter, the videotape of this hearing was posted on YouTube and a link to the video was emailed to multiple third parties not involved in the case on or about the 3rd day of October, 2016.

On October 3, 2016, the parties received an email request for a Director of Domestic Counsel then obligated to seal the case and to discontinue any further release of

The information and is deemed that the current part of the September 29, 2016 hearing video, or any other hearing video from this case be immediately removed from the internet and to prohibit any portion of these proceedings from being disseminated or published and that any such publication or posting by anyone be immediately removed, as the September 29, 2016 hearing was a closed hearing. Additionally, counsel and the parties recognize that the case has been settled and that such an Order is in the best interest of the four (4) children in this case and is also authorized by NRS 125.080, NRS 125.140, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 2(3)(a) and 3(4).

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the current part of the September 29, 2016 hearing video, or any and all other hearing video(s) from this case shall be immediately removed from the internet. All persons or entities shall be prohibited from publishing, displaying, showing, or making public any portion of these case proceedings, nothing from the case at bar shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed as the Court finds the stipulation of the parties and this Court's Order to be in the best interest of the four (4) children in this case and to be fully supported by law (NRS 125.080, NRS 125.140, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 2(3)(a) and 3(4)).

DATED the 17th day of October, 2016.


Jennifer Elton, District Court Judge
Family Division, Dept. 1

1/9/2017

Law Frowns on Nevada Attorney Jennifer Abrams' "Seal-Happy" Practices

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Lawyers acting badly in a Clark County Family Court

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Steve Sanson
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Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Steve Sanson

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Published on Oct 9, 2016

District Court Judge Bullied by Family Attorney Jennifer Abrams

District Court Judge Jennifer Elliott orders video of family court case to be removed.

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EXHIBIT 5

EXHIBIT 5

EXHIBIT 5

1/9/2017

Clark County Family Court Judge willfully deceives a young child from the bench and it is on the record - Veterans In Politics International

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Deplorable actions by Family Court Judge Rena Hughes against a minor chil...

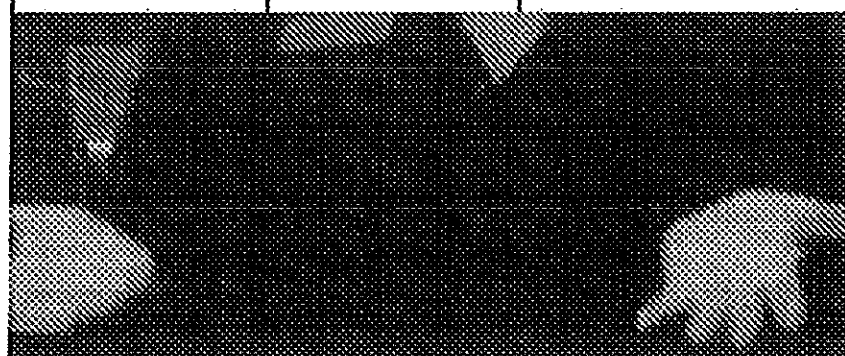


Clark County Family Court Judge willfully deceives a young child from the bench and it is on the record

AT

Case sealed five days "after" we exposed the unlawful behavior of Family Court Judge Rena Hughes

CC

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Clark County Nevada; in a recent article "Deplorable actions by Family Court Judge Rena Hughes against a minor child".

<http://myemail.constantcontact.com/Deplorable-actions-by-Family-Court-Judge-Rena-Hughes-against-a-minor-child.html?soid=1119987097423&aid=cmGgluVljQk>

On October 6, 2016 the Veterans In Politics International (VIPI) highlighted the actions of Family Court Judge Hughes in three separate videos.

After doing more research we discovered that Judge Hughes actually lied to this young child in open court.

Judge Hughes made the following statement: *"it's not fun in Child Haven, they put you in a holding cell, exactly like a jail"...*

Click onto video:

Part 3 threatened the minor child with Child Haven

https://www.youtube.com/watch?v=7Gg-_y2Xjvs

After speaking to the Manager of Child Haven, we were told that this statement made by the Judge is false.

Child Haven Website:



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See other related Videos:

Part 1 on the Record

<https://www.youtube.com/watch?v=wlfJWLABhxo>

Part 2 Heart wrenching video between the Judge Hughes and a minor defenseless child.

<https://www.youtube.com/watch?v=bsDah-cz1uc>

How can a parent helplessly watch their child be chastised by anyone?

Andre Haynes, host of the EMG Radio Show and officer of Veterans In Politics said the following:

When I watched the video of the minor child having a discussion on the record with Family Court Judge Rena Hughes without a parent or child advocate being present, I was shocked and in disagreement. After I saw the manner that Judge Hughes handled the minor child and the child's fearful and distraught emotional reaction, I was angry. I was angry because I pictured my 7 year old son in the same seat as the minor girl, without me, without his mom, without a child advocate and without an attorney. Minor children are often terrified to speak to adults, especially without their parent or someone familiar present and especially if the adult is perceived to be an authority figure.

Does the law allow for Judge Hughes to interview and interrogate a minor child without their parent or an attorney or child advocate present? If the law does allow this are there exceptions to this rule? Is there another way that Judge Hughes could have handled this manner? Those are questions that replay in my mind. My heart goes out to the minor child and especially to her mother. The worst feeling that a parent can experience is being helpless to defend their vulnerable child. If it were my 7 year old son in that video, helpless, distraught and angry is exactly how I would feel. Does the law and a Judge's behavior take precedence or hold more value than the emotions and perceived fear of a child or a parent's ability to protect their child?

We commend Channel 8 I-Team for taking a proactive approach to expose this judge: I-Team: Judge criticized for exchange with child

<http://www.lasvegasnow.com/news/i-team-video-shows-family-court-judge-yelling-at-child-in-courtroom>



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Law Frowns on Nevada Attorney Jennifer Abrams' "Seal-Happy" Practices

<http://myemail.constantcontact.com/Law-Frowns-on-Nevada-Attorney-Jennifer-Abrams---Seal-Happy-Practices.html?soid=1119987097423&aid=72nUXCzZGGM>

Questions and Recommendations

Is this the type of behavior we should continue to expect from our judicial system?

Should judges continue to cover-up and down-play their colleague's bad behaviors?

Does this Family Court Judge have children of her own?

Should this Judge be reprimanded for this?

If you believe that this Judge should face sanctions or/and a public apology join us and file a complaint with the Nevada Judicial Discipline Commission by clicking onto the link below:

State of Nevada Commission on Judicial Discipline:

http://judicial.nv.gov/Discipline/Complaint_Process/

Any Judge that willfully deceives a child and especially on the record should be tossed off the bench!

Please watch the videos in full and come to your own conclusion.

BY STEVE SANSON IN NEWS, PRESS RELEASE TAGS ANDRE HAYNES, CASE SEALED, CLARK COUNTY FAMILY COURT JUDGE, DEPLORABLE ACTIONS, FAMILY COURT JUDGE RENA HUGHES, UNLAWFUL BEHAVIOR

November 17, 2016

1

1/9/2017

Clark County Family Court Judge willfully deceives a young child from the bench and it is on the record - Veterans In Politics International

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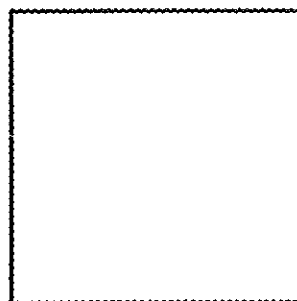
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Killer Whales Vs Great White Shark - National Geographic Documentary (HD)

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Wow didn't see that one coming...this guy can dance!!!

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Veterans In Politics
@VIPSteveSanson
Steve Sanson strong commitment to his country and his community has been demonstrated through his leadership and service in the United States Marine Corps.
Las Vegas, Nevada
veteransinpolitics.org
Joined February 2009
Born on September 22
3,280 Photos and videos



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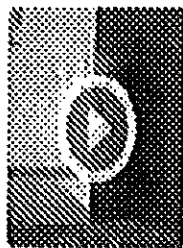
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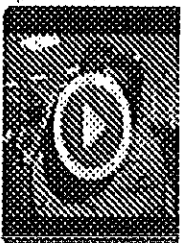
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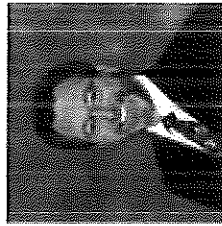
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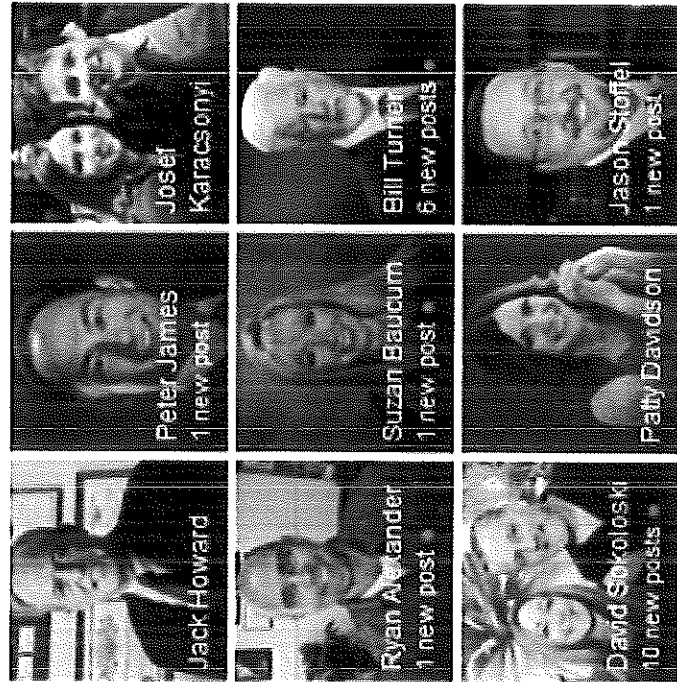
Marshal S. Willick Timeline Recent

- Senior Partner at Willick Law Group
- Studied Law at Georgetown University
- Studied English at University of Nevada, Las Vegas
- Lives in Las Vegas, Nevada
- From Las Vegas, Nevada

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A legal note from Marshal Willick about the impact of approval of "Question 2 - Initiative to Regulate and Tax Marijuana" on child custody matters in Nevada. In 2001, Nevada voters approved the "Nevada Medical Marijuana Act." In 2017, possession of less than 1 ounce...

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Marshal S. Willick

January 6 · 0

Those who have been following the ongoing stream of defamatory postings by Mr. Sanson ("Veterans in Politics International") regarding much of the family court bench and bar might be interested in the response to those accusations. It and the interview referenced in the response are posted at <https://www.willicklawgroup.com/audio/>.

Marshal

Audio | Willick Law Group

Transcript of Marshal Willick interview with Steve Sanson on Veterans In Politics Radio Show Letter to Steve Sanson

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Jane McGuire Steve Sanson is an idiot. He is all hot air.

4 hrs

To Steve Sanson:

You have re-posted the recording of our radio interview, <http://www.willicklawgroup.com/audio/>, accompanied by the false assertion that it somehow indicates “hypocrisy” on my part as to serving the veteran community.

It is possible that you have a problem with definitions. To help you, “hypocrisy” is “the contrivance of a false appearance of virtue or goodness, while concealing real character or inclinations, especially with respect to moral beliefs; hence in general sense, dissimulation, pretense, sham.” You need to gaze in a mirror.

For my part, I write textbooks, teach seminars to the U.S. Army JAG Corps and many other lawyers, and participate in Operation Stand-By and the Military Pro Bono Project (that means “for free” – as in doing actual good for actual service members without payment). I have done so for decades, and that work has saved untold thousands of military members (and their spouses) huge sums by ensuring their lawyers know how military retirement and benefits can be properly handled in family law cases. I helped create the Uniform Deployed Parents Custody Act, which protects members from wrongly losing custody of their kids.

The multiple posted testimonials by real live service members and retirees who I have served over several decades speak for themselves – there is a reason I was awarded the Military Pro Bono Project Outstanding Services Award.

But this isn’t about me – it’s about you.

You don’t appear to have actually achieved . . . **anything** for any actual veterans. Instead, you have created a supposed “non-profit” that from all appearances finances your personal lifestyle, through which you solicit “donations” from politicians, lawyers, and others to generate largely false accusatory online smear campaigns against good people actually doing their jobs honorably. That leads to several observations.

First, defectors from your organization have blown the whistle – there is no legitimate “vetting” of candidates. You pick the “panels,” spoon-feed questions to alter results (and get video footage to mis-use), and control all discussions on endorsements. Directly or indirectly, your recommendations are a pay-to-play exercise to “endorse” your personal selection of whoever hands you cash. The entire premise of your organization is a fraud.

There is no indication that your “non-profit” is actually anything other than a conduit between political donations and your private expenses, or that Form 990 or other tax filings have ever been made. A copy of this note should find its way to the IRS.

You have taken money as part of an unethical scheme to extort concessions in an ongoing case at threat of posting slander against opposing counsel – which you have then done. That is being reported to the State Bar, and will soon result in at least one lawsuit naming you as a co-defendant.

“Nepotism” is another word you use but apparently don’t know; it is no such thing if Eric and Susan Johnson are both appointed or elected, any more than it is for brothers Mark and Michael Gibbons to each serve on Nevada’s appellate courts. You should buy a dictionary.

More to the point, nothing in your postings as to judges Marquis, Harter, Elliott, Hughes, Ochoa, Johnson, etc., has any *trace* of “scandal” or “corruption” – words you really need to look up, both so you can use them correctly, and because your use of such terms to describe professionals doing their jobs appears to be “defamation *per se*,” which can subject you to liability even without proof of actual damages. Any of the lawyers and judges you have wrongfully slimed could – and should – sue you and your various intertwined cover organizations.

You apparently claim to be “totally disabled” – while you simultaneously pose in ads with boxing gloves challenging police officers, selected veterans, and others to “mixed martial arts” fights. The only time you *don’t* claim to be disabled is when you run for public office, when you claim that you are *just fine*.

You don’t actually have a job – while you obviously are capable of applying yourself, your only legitimate income is from the thousands of dollars of disability pay you get every month – *tax free* – for *life*. Your various postings railing about what “the taxpayers” should demand don’t include . . . you. And you have the gall to complain that judges can note the *existence* of all that tax-free income when you get divorced?

In the bigger picture, the oath you took when you put on the uniform was to defend the Constitution. And the “goals and values” page of Veterans In Politics International’s website *claims* that the organization’s purpose is “to protect and defend our Country and our United States Constitution,” etc.

But when I appeared on your show, you openly admitted that you don’t believe in the concept of equal protection under law – the guiding principle of the American legal system. Your co-host – with your apparent approval – added that “the 14th amendment shouldn’t apply to veterans” at all, but instead they should have “special privilege.”

That brings us back to “hypocrite” – see above – but even worse. Your position is revealed as the one warned of by George Orwell in *Animal Farm* – “All animals are equal, but some animals are more equal than others.” The *last* person I knew of (other than you) to publicly reject the concept of equal protection under law was an avowed fascist. Public disavowal of the foundation of the Constitution could be taken as a betrayal of oath or even an expression of treason.

The reason I was invited onto your show was your unhappiness with my testimony before the legislature on topics about which I am an expert and you know very little. You have now decided to attack me on your mailing list, but apparently could not come up with anything to criticize, so you decided to publicize the long-past personal problems of one of my employees. If you have a beef with me, Steve, take it up with me; taking shots at third parties to try to hurt someone is the act of a craven coward.

But since you brought up the subject of what people were doing during the past decade or two, let's take a quick look at *you*. You declared bankruptcy (twice) to run out on the debts you promised to pay, and had a tax lien filed against you for failure to pay your taxes.

And that's just your *financial* life. You've also been arrested on weapons charges for running around the Strip drunk while pointing guns, and at the *exact same time* you recently ran for office claiming your number one qualification was as a "family man" you were seen leaving a bar with your arms wrapped tightly around a woman who is not your live-in companion. Go back a bit further and we see you being hauled into court for restraining orders for domestic violence against your ex-wife – twice.

Despite doing all that, you have the brazen shamelessness to post a personal bio claiming that your character is "beyond reproach" and that you have "honor, integrity, and veracity" – assertions that are either delusional or made in the belief that everyone who might read such tripe is an idiot.

This is a free country, sure – but anyone holding himself out as an arbiter of morality and posing as a public critic of others' personal behavior should not act like a sleazy extra out of "Harper Valley PTA" (<https://www.youtube.com/watch?v=aOZPBuU7Fro>). You want to talk about the past personal problems of the *employees* of those you disagree with? That is the very *definition* of "hypocrite" – not to mention slimy beyond words. Congratulations.

When you were recently put on notice that you were in violation of direct court orders to maintain sealed files as private, your response was to *repeat* the violation and make a foolishly irrelevant citation to "the freedom of information act." You really should get a legal advisor who knows something, Steve, because your recent antics will soon require you to have one.

I asked a few real-world veterans – guys who did decades of actual service to this country and have legitimate disabilities resulting from that lengthy service, about you and your phony "non-profit" organization. Their comments? "He's a complete fraud and a disgrace to the uniform he once wore." "He hasn't done a damned thing for me or for any other veterans. He's totally in it for himself and to fleece the system, the public, and all vets." Other remarks were similar.

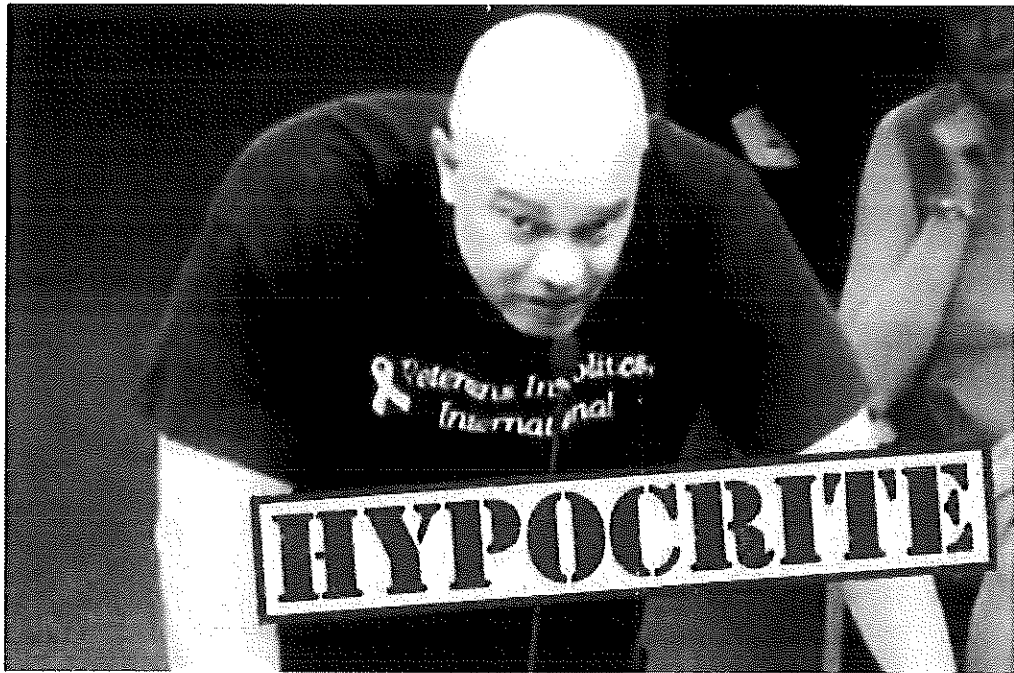
So where does that leave you? A two-bit unemployed hustler taking taxpayer money instead of working for a living who hides behind flag-waving while doing nothing of any actual value to anyone but himself, abusing the honor of the veterans he claims to "serve." You hide a checkered past behind a facade of false virtue while shaking down candidates for cash and conspiring with like-minded cronies to do political hatchet jobs defaming good people of integrity who are working hard to perform their duties, represent their clients, and actually defend the Constitution. You are repugnant.


No elected official or candidate should ever again engage in the fraud which is appearance on your radio show or submit to supposed "review" by your sham organization. And you should be run out of town on a rail from Las Vegas, as you were apparently forced to flee

California – the sooner the better. In the meantime, to the degree possible, you should be ignored.

Marshal S. Willick, Esq.

EXHIBIT 5



 **Willick Law Group**
Like This Page · January 6 ·

Marshal Willick responds to Veterans in Politics Steve Sanson claim of "Hypocrisy"
<http://bit.ly/2hY4iKf>

Like

Comment

Share




191


Chronological


20 shares

20 Comments

View 15 more comments

 **Greg Whalen** Vinni Botz,has a man crush on Steve Sanson Steve Sanson
Like · Reply · 2 · January 13 at 8:22pm
3 Replies

 **Stacy Severson Ghormley** SteveSanson, the proper wording would be Sexual Coercion. Not Sexually Coercion.
Like · Reply · January 14 at 12:26pm

 Write a comment...

1 of 1

AA000200
2/15/2017 11:44 AM

EXHIBIT 6

MCLETCHIE SHELL

ATTORNEYS AT LAW

VIA U.S. MAIL (REGULAR AND CERTIFIED) AND EMAIL

Kelly Grob
9508 Queen Charlotte Dr
Las Vegas NV 89144
Email: kellygrob444gmail.com

Dear Ms. Grob:

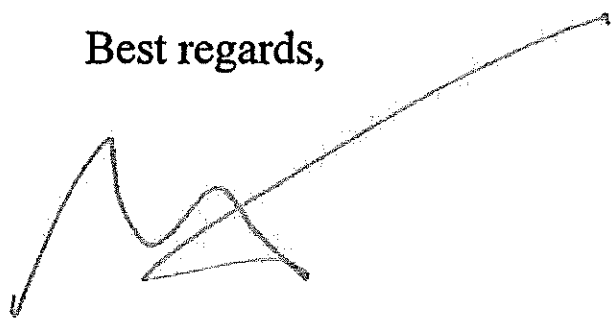
I represent Mr. Sanson and Veterans in Politics International in the above-captioned matter. If you have counsel, please let me know immediately and have him or her contact me directly.

I am writing to you because, on Sunday, January 22, 2017, my client received messages from the phone number (702) 882-8191. According to an internet search that I have run, that number appears to belong to you (*see*: <https://thatsthem.com/phone/702-882-8191>).

In light of the messages that appear to be sent from you and/or your phone, you may be a witness in and may have relevant evidence pertaining to the above-captioned matter. Accordingly, I am writing to request that you retain your phone, its SIM card, and all copies of any text messages or any other communications with or about my clients. That means you should not delete the messages with my clients or any other messages with any other persons about my clients.

Please let me know if you have any questions whatsoever.

Best regards,



Margaret A. McLetchie

cc: file

EXHIBIT 7



VeteransIn Politics

@veteransinpolitics

Home

About

Photos

Likes

Connect With Us

Videos

Join My List

Events

Posts

Reviews

Create a Page

Contact Us

Message Now

veteransinpolitics.org/

Community

Visitor Posts



Linda Renner

January 29 at 3:22pm

Look at the new page I find of that veteran in DC. He's got a lot of awesome new information. Check it out

Like Comment



Mark Wachter

November 11, 2016 at 11:01am

MIA - a Poem by Christopher Towsley

Like Comment



Alan Perri

October 26, 2016 at 12:51am

SHARE THIS TO EVERY MILITARY PERSON YOU KNOW If the reenlistment ... See More

1 Like 1 Comment 1 Share

Like Comment

Liked by This Page



Asian American Repu...

Like



The Gay & Lesbian C...

Like

Have you seen our latest news?

MYEMAIL.CONSTANTCONTACT.COM



Like

Comment

Share

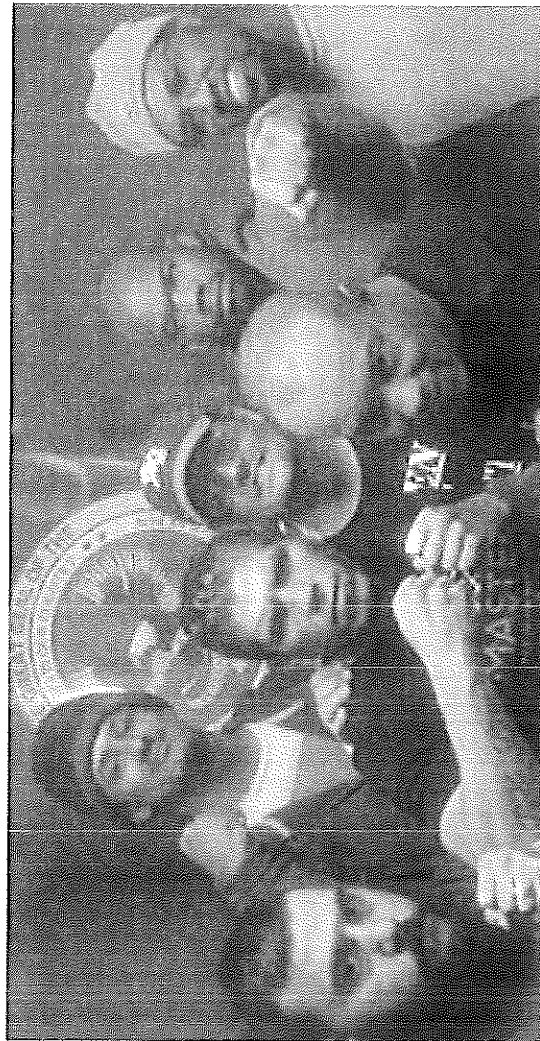


VeteransIn Politics

December 26, 2016

This is the type of hypocrisy we have in our community. People that claim to be for veterans but yet they screw us for profit and power. Listen to this show and decide... For mature audience only!

<https://soundcloud.com/steve-sanson/vip2015-11-14>



Yobanny Sanchez MMA Superstar, Marshall Willick Nevada Attorney, and Randall Powell

Yobanny Sanchez MMA Superstar and Army Veteran, Marshall Willick Nevada Attorney wanted to take Service Connected Disabled Veterans Disability and use...

SOUNDCLOUD.COM | BY STEVE-SANSON

Like

Comment

Share



VeteransIn Politics

December 24, 2016

Steve Sisolak Chairman of Clark County Board of County Commissioners and Represents District A and Isaac E. Barron North Las Vegas City Council Member and Michael David Co. owner Coach Community Network LLC

Anat Levy, Esq. (State Bar No. 12250)
ANAT LEVY & ASSOCIATES, P.C.
5841 E. Charleston Blvd., #230-421
Las Vegas, NV 89142
Phone: (310) 621-1199
E-mail: alevy96@aol.com;
Fax: (310) 734-1538
Attorney for: APPELLANTS, Veterans In Politics International, Inc.
and Steve W. Sanson

Electronically Filed
Aug 21 2017 01:55 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF NEVADA

VETERANS IN POLITICS)	SUP. CT. CASE #: 72778
INTERNATIONAL, INC.; AND STEVE)	
W. SANSON)	
)	DIST. CT. CASE #:
Appellants,)	A-17-750171-C (Dept. 18)
)	
vs.)	
)	
MARSHAL S. WILICK; AND)	
WILICK LAW GROUP,)	
)	
Respondents.)	
)	
)	
)	

APPELLANTS' APPENDIX

VOLUME I OF IX

Appeal from Eight Judicial District Court, Clark County

Senior Judge, Hon. Charles Thompson, Dept. 18

APPELLANTS' APPENDIX

INDEX TO APPELLANTS' APPENDIX

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<i>Abrams v. Schneider:</i> Notice of Entry of Order (Granting Anti-SLAPP Motion)	7/24/2017	IX	AA001970- AA001993
<i>Abrams v. Schneider:</i> Minute Order Re: Special Motion to Dismiss Pursuant to NRS 41.660 (Anti- SLAPP); Schneider Defendants Special Motion to Dismiss Plaintiffs SLAPP Suite Pursuant to NRS 41.660 and Requests for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	6/22/2017	IX	AA001955- AA001957
Affidavit of Marshal S. Willick in Support of Plaintiff's Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs	3/13/2017	VII	AA001504- AA001590
<i>Ansell v. Ansell:</i> Amended Deposition Subpoena Deuces Tecum served on Steve Sanson	7/22/2017	IX	AA001962- AA001966
<i>Ansell v. Ansell:</i> Letter from Verizon advising of and attaching Subpoena Deuces Tecum served on Verizon Wireless	7/13/2017	IX	AA001958- AA001961

<u>DOCUMENT</u>	DATE	VOL.	BATES NUMBERS
<i>Ansell v. Ansell</i> : Motion to Quash Subpoena Duces Tecum and Deposition Subpoena Served on Steve Sanson on July 22, 2017	8/4/2017	IX	AA002009-AA002023
<i>Ansell v. Ansell</i> : Motion to Quash Subpoena Served on Verizon Wireless	7/26/2017	IX	AA001994-AA002008
<i>Ansell v. Ansell</i> : Second Amended Notice of Taking Video Taped Deposition Served on Steve Sanson on 7/22/2017	7/22/2017	IX	AA001967-AA001969
Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.	2/17/2017	I	AA000053-AA000081
Complaint for Damages	1/27/2017	I	AA000001-AA000028
Declaration of Anat Levy in Support of Anti-SLAPP Motion (with Exs.)	2/17/2017	II-V	AA000351-AA000946
Declaration of Anat Levy in Support of Motion to Stay Proceedings Pending Appeal on Denial of Defendants' Anti-SLAPP Motion	4/7/2017	VIII-IX	AA001721-AA001909
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Declaration of Service of Complaint on Veterans in Politics International, Inc.	2/6/2017 (service date)	I	AA000030

<u>DOCUMENT</u>	DATE	VOL.	BATES NUMBERS
Declaration of Steve Sanson in Support of Anti-SLAPP Motion (with Exs.)	2/17/2017	I-II	AA000082- AA000350
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APPELLANTS' APPENDIX

<u>DOCUMENT</u>	DATE	VOL.	BATES NUMBERS
Motion to Stay Proceedings Pending Appeal on Denial of Defendants' Anti-SLAPP Motion	4/7/2017	VIII	AA001709- AA001720
Motion to Strike	2/24/2017	V	AA000984- AA000992
Motion to Strike and Response to Plaintiff's Untimely Supplemental Brief	3/13/2017	VII	AA001591- AA001598
Notice of Appeal	4/3/2017	VIII	AA001707- AA001708
Notice of Association of Counsel	3/13/2017	VII	AA001599- AA001601
Notice of Entry of Order Denying: (i) The VIPI Defendants' Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; (ii) the Willick Parties' Countermotion for Attorney's Fees and Costs	3/31/2017	VIII	AA001682- AA001691
Notice of Entry of Order Shortening Time	4/11/2017	IX	AA001921- AA001926
Notice of Entry of Order Staying Proceedings	5/9/2017	IX	AA001950- AA001954
Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs	3/8/2017	VII	AA001422- AA001445

<u>DOCUMENT</u>	DATE	VOL.	BATES NUMBERS
Plaintiffs' Opposition to Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s Motion to Stay Proceedings Pending Appeal on Order Denying Defendants' Anti-SLAPP Motion	4/14/2017	IX	AA001927-AA001933
Plaintiffs' Response to Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s (i) Motion to Dismiss Ninth Cause of Action for Copyright Infringement for Lack of Subject Matter Jurisdiction (N.R.C.P. 12(b)(1)); (ii) Motion to Dismiss for Failure to State a Claim (N.R.C.P. 12(b)(5)); and (iii) Motion to Strike	3/20/2017	VIII	AA001671-AA001673
Reply in Support of Defendants' Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.	3/9/2017	VII	AA001480-AA001498
Reply in Support of Motion to Stay Proceedings Pending Appeal on Order Denying Defendants' Anti-SLAPP Motion	4/18/2017	IX	AA001934-AA001949
Request for Judicial Notice in Support of Motion to Dismiss for Failure to State a Claim (with Exs.)	2/24/2017	V-VI	AA000993-AA001288

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<i>Saiter v. Saiter</i> : Declaration of Steve Sanson in Opposition to Motion for Order to Show Cause Re: Contempt	3/6/2017	VI-VII	AA001306-AA001421
<i>Saiter v. Saiter</i> : Notice of Entry of Order	3/21/2017	VIII	AA001787-AA001809
<i>Saiter v. Saiter</i> : Motion for an Order to Show Cause	2/13/2017	I	AA000031-AA000052
<i>Saiter v. Saiter</i> : Opposition to Motion for Order to Show Cause Re: Contempt	3/6/2017	VI	AA001289-AA001305
Supplemental Declaration of Steve Sanson in Support of Anti-SLAPP Motion	3/9/2017	VII	AA001499-AA001503
Transcript of Proceedings Re: Defendants' Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq. and Countermotion for Attorney's Fees and Costs	3/14/2017	VIII	AA001604-AA001670

1 **COMP**

2 JENNIFER V. ABRAMS, ESQ.
3 Nevada State Bar Number: 7575
4 THE ABRAMS & MAYO LAW FIRM
5 6252 South Rainbow Boulevard, Suite 100
6 Las Vegas, Nevada 89118
7 Phone: (702) 222-4021
8 Email: JVAGroup@theabramslawfirm.com
9 Attorney for Plaintiffs

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01/27/2017 10:03:49 AM


CLERK OF THE COURT

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

8 MARSHAL S. WILLICK and WILLICK)
9 LAW GROUP,)

10 Plaintiff,)

11 vs.)

12 STEVE W. SANSON; HEIDI J. HANUSA;)
13 CHRISTINA ORTIZ; JOHNNY SPICER;)
14 DON WOOLBRIGHT; VETERANS IN)
15 POLITICS INTERNATIONAL, INC.;)
16 SANSON CORPORATION; KAREN)
17 STEELMON; and DOES I THROUGH X,)

18 Defendant.)

Case No.: A-17-750171-C

Department: XIX

Hearing Date: N/A

Hearing Time: N/A

ACTION IN TORT

ARBITRATION EXEMPTION
CLAIMED

16 **COMPLAINT FOR DAMAGES**

17 **I.**
18 **INTRODUCTION**

19 1. Plaintiffs Marshal S. Willick and Willick Law Group ("Plaintiffs") by
20 and through their attorney of record, Jennifer V. Abrams of The Abrams & Mayo
21 Law Firm bring this action for damages based upon, and to redress, Defendant's
22 Intentional Defamation of the character of the Plaintiffs through libelous writings
23 and speech, for Intentional Infliction of Emotional Distress, Negligent Infliction of
24 Emotional Distress, False Light, Business Disparagement, Harassment, Concert of

1 Action, Civil Conspiracy and violations of RICO, all of which were perpetrated
2 individually and in concert with others by defendants Steve W. Sanson, Heidi J.
3 Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Veterans in Politics
4 International, Inc., Sanson Corporation, Karen Steelmon, and Does I through X
5 (collectively "Defendants").

6
7 **II.**
8 **VENUE AND JURISDICTION**

9 2. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
10 stated herein.

11 3. Jurisdiction is proper in Nevada State court as all alleged claims were
12 transmitted to or performed in Nevada by the Defendants individually or in concert
13 with others.

14 **III.**
15 **PARTIES**

16 4. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
17 stated herein.

18 5. Plaintiff Marshal S. Willick is a natural person and an attorney licensed
19 to practice law in the State of Nevada. He practices exclusively in the field of
20 Domestic Relations and is A/V rated, a peer-reviewed and certified (and re-certified)
21 Fellow of the American Academy of Matrimonial Lawyers, and a Certified Specialist
22 in Family Law.

23 6. Willick Law Group is a d.b.a. of Marshal S. Willick P.C., a duly formed
24 professional corporation in the State of Nevada.

25 ///

26 ///

1 7. Upon information and belief, Steve W. Sanson is a natural person, the
2 President of Veterans in Politics International, Inc., and the Treasurer and Director
3 of Sanson Corporation.

4 8. Upon information and belief, Heidi J. Hanusa is a natural person, the
5 Treasurer of Veterans in Politics International, Inc., and the President and Secretary
6 of Sanson Corporation.

7 9. Upon information and belief, Christina Ortiz is a natural person and
8 the Director of Veterans in Politics International, Inc.

9 10. Upon information and belief, Johnny Spicer is a natural person and
10 Secretary of Veterans in Politics International, Inc.

11 11. Upon information and belief, Don Woolbright is a natural person and
12 Secretary of Veterans in Politics International, Inc.

13 12. Upon information and belief, Veterans in Politics International, Inc. is
14 a duly formed Domestic Non-Profit Corporation that claims its purpose is "[t]o
15 educate, organize, and awaken our veterans and their families to select, support and
16 intelligently vote for those candidates whom would help create a better world, to
17 protect ourselves from our own government(s) in a culture of corruption, and to be
18 the political voice for those in other groups who do not have one."

19 13. Upon information and belief, Sanson Corporation is a duly formed
20 Domestic Corporation in the State of Nevada.

21 14. Upon information and belief, Karen Steelmon is a natural person and
22 is the Registrant of the Domain veteransinpolitics.org.

23 ///

24 ///

4 16. Marshal S. Willick and Willick Law Group are informed and believe,
5 and therefore allege, that each of the Defendants designated herein as Steve W.
6 Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Veterans
7 in Politics International, Inc., Sanson Corporation, Karen Steelmon, and Does 1
8 through X inclusive, are in some way legally responsible and liable for the events
9 referred to herein, and directly or proximately caused the damages alleged herein.

17. At all times material hereto, and in doing the acts and omissions alleged herein, the Defendants, and each of them, including Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Veterans in Politics International, Inc., Sanson Corporation, Karen Steelmon, and Does I through X inclusive, acted individually and/or through their officers, agents, employees and co-conspirators, each of whom was acting within the purpose and scope of that agency, employment, and conspiracy, and these acts and omissions were known to, and authorized and ratified by, each of the other Defendants.

IV. FACTUAL ALLEGATIONS

18. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
stated herein.

19. On or about November 14, 2015, Mr. Willick appeared by invitation on a radio show hosted by Mr. Sanson, in his capacity of President of Veterans in Politics International, Inc., for the purpose of answering questions relating to

1 Assembly Bill 140 (2015) and other issues involving veterans issues in Family Law
2 (hereinafter "the Interview").

3 20. On or about December 25, 2016, Defendants published or caused to be
4 published on the veteransinpolitics.com, a website purportedly owned and
5 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
6 Spicer, Don Woolbright, Veterans in Politics International, Inc., Sanson Corporation,
7 Karen Steelmon, and Does I through X inclusive, a post entitled "Dr. Robin L. Titus
8 & Ron Q. Quilang to Appear on the Veterans in Politics video-talk show."

9 21. Included in this post, is a re-post of the "Interview" with the headline
10 "Veterans in Politics defense [sic] Military Veterans Service Connected Disability
11 Benefits" (hereinafter "the Defense post"). This re-post contains a link that re-
12 directs to a Soundcloud.com page with audio of the interview. This re-post also
13 contains a link to a Review-Journal article regarding Richard Crane, an employee of
14 the Willick Law Group (hereinafter "the Article").

15 22. Within the "Defense post," Defendants defame Mr. Willick and his law
16 firm, Willick Law Group, with false and misleading statements published, or
17 republished, or attributed to one another, or disseminated to third parties across
18 state lines, false and defamatory statements directed against Plaintiffs including
19 that:

- 20 a. "This is the type of hypocrisy we have in our community. People that
21 claim to be for veterans but yet they screw us for profit and power."

22 23. On or about December 31, 2016, Mr. Sanson sent an email blast with
23 the "Interview" and the "Article" (hereinafter "the E-mail blast").

24 ///

1 24. Within the "E-mail blast," Defendants defame Mr. Willick and his law
2 firm, Willick Law Group, with false and misleading statements.¹

3 25. The "Defense" post and the "E-mail blast" were published, republished,
4 or attributed to one another, or disseminated to third parties across state lines, via
5 email across multiple states, and via numerous social media sites including
6 Pinterest, Google+, Twitter, and the following Facebook pages:

7 a. steve.sanson1

8 b. steve.sanson.3

9 c. veteransinpolitics

10 d. veteransinpoliticsinternational

11 e. eye.on.nevada.politics

12 f. steve.w.sanson

13 g. Veterans-In-Politics-International-Endorsement-for-the-State-of-
14 Nevada

15 h. Veterans in Politics: groups/OperationNeverForget

16 i. Nevada-Veterans-In-Politics

17 26. On or about January 12, 2017, Defendants published or caused to be
18 published on veterensinpolitics.com, a website purportedly owned and controlled by
19 Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny Spicer, Don
20 Woolbright, Veterans in Politics International, Inc., Sanson Corporation, Karen
21 Steelmon, and Does I through X inclusive, a post entitled "Mark Amodei & Debra
22 March to appear on the Veterans In Politics video-talk show."

23 ///

24 ¹ The E-mail blast has identical language to the Defense post and so will not be repeated in the
interest of economy.

1 27. Included in this post is a link with the title "Attorney Marshall [sic]
2 Willick and his pal convicted of sexually coercion [sic] of a minor Richard Crane was
3 found [sic] guilty of defaming a law student in a United States District Court Western
4 District of Virginia signed by US District Judge Norman K. Moon." (Hereinafter "the
5 Virginia post").²

6 28. Within the "Virginia post," Defendants defame Mr. Willick and his law
7 firm, Willick Law Group, with false and misleading statements published, or
8 republished, or attributed to one another, or disseminated to third parties across
9 state lines, false and defamatory statements directed against Plaintiffs including
10 that:

- 11 a. "Attorney Marshall [sic] and his pal convicted of sexually [sic] coercion
12 [sic] of a minor."
13 b. "Richard Crane was found guilty of defaming a law student."
14 c. The "Virginia post" was accompanied by pages of a legal decision by a
15 Virginia judge stating on its face that using the word "guilty" to
16 describe a judgment in a civil case for damages constitutes defamation
17 *per se*.

18 29. The "Virginia post" was published, republished, or attributed to one
19 another, or disseminated to third parties across state lines, via email across multiple
20 states, and via numerous social media sites including Pinterest, Google+, Twitter,
21 and the following Facebook pages:

- 22 a. `steve.sanson1`

23
24 ² The link in the "Virginia post" re-directs to *Vaile v. Willick*, No. 6:07cv00011, 2008 U.S. Dist.
LEXIS 53619 (W.D. Va. July 14, 2008), a skirmish in a lengthy multi-state pursuit of Mr. Vaile, the
most infamous international child kidnapper and deadbeat dad in Nevada for whom an arrest warrant
is outstanding, for over a million dollars in back child support, attorney's fees, and tort damages.

- 1 b. steve.sanson.3
- 2 c. veteransinpolitics
- 3 d. veteransinpoliticsinternational
- 4 e. eye.on.nevada.politics
- 5 f. steve.w.sanson
- 6 g. Veterans in Politics: groups/OperationNeverForget
- 7 h. Nevada-Veterans-In-Politics

8 30. On or about January 14, 2017, Defendants published or caused to be
9 published on the Veterans in Politics International Facebook page, a Facebook page
10 purportedly controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina
11 Ortiz, Johnny Spicer, Don Woolbright, Veterans in Politics International, Inc.,
12 Sanson Corporation, Karen Steelmon, and Does I through X inclusive, a post
13 containing eight (8) photographs (hereinafter "VIPI Facebook post").

14 31. Within the "VIPI Facebook post," Defendants defame Mr. Willick and
15 his law firm, Willick Law Group, with false and misleading statements published, or
16 republished, or attributed to one another, or disseminated to third parties across
17 state lines, false and defamatory statements directed against Plaintiffs including
18 that:

- 19 a. "Would you have a Family Attorney handle your child custody case if
20 you knew a sex offender works in the same office? Welcome to The
21 [sic] Willick Law Group."

22 32. On or about January 14, 2017, Defendants published or caused to be
23 published on the Veterans in Politics Facebook page, a Facebook page purportedly
24 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny

1 Spicer, Don Woolbright, Veterans in Politics International, Inc., Sanson Corporation,
2 Karen Steelmon, and Does I through X inclusive, a post entitled "Nevada Attorney
3 Marshall [sic] Willick gets the Nevada Supreme Court Decision" to which he
4 attached 12 photos of the *Leventhal v. Lobello* decision (hereinafter "VIP Facebook
5 post #1").³

6 33. Within the "VIP Facebook post #1," Defendants defame Mr. Willick
7 and his law firm, Willick Law Group, with false and misleading statements
8 published, or republished, or attributed to one another, or disseminated to third
9 parties across state lines, false and defamatory statements directed against Plaintiffs
10 including that:

- 11 a. "From looking at all these papers It's [sic] obvious that Willick
12 scammed his client and later scammed the court by misrepresenting
13 that he was entitled to recover property under his lien and reduce it to
14 judgement [sic]."
- 15 b. "He did not recover anything. The property was distributed in the
16 Decree of Divorce."
- 17 c. "Willick tried to get his client to start getting retirement benefits faster.
18 It was not with [sic] 100,000 [sic] in legal bills."
- 19 d. "Then he pressured his client into allowing him to continue with the
20 appeal."

21 34. On or about January 14, 2017, Defendants published or caused to be
22 published on the Veterans in Politics Facebook page, a Facebook page purportedly
23 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny

24 ³ Mr. Sanson's intent to defame, denigrate, and harm the plaintiffs is so great that he completely ignores the fact that Plaintiffs had absolutely nothing to do with the *Lobello* decision.

1 Spicer, Don Woolbright, Veterans in Politics International, Inc., Sanson Corporation,
2 Karen Steelmon, and Does I through X inclusive, a post "Attorney Marshall [sic]
3 Willick loses his appeal to the Nevada Supreme Court," to which he attached 10
4 photos of the *Holyoak* decision (hereinafter "VIP Facebook post #2").

5 35. Within the VIP Facebook post #2, Defendants defame Mr. Willick and
6 his law firm, Willick Law Group, with false and misleading statements published, or
7 republished, or attributed to one another, or disseminated to third parties across
8 state lines, false and defamatory statements directed against Plaintiffs including
9 that:

10 a. "Attorney Marshall [sic] Willick loses his appeal to the Nevada
11 Supreme Court."

12 36. The defamatory statements by Defendants were intended to harm
13 Plaintiffs' reputation and livelihood, to harass, and to embarrass Plaintiffs.

14 37. The defamatory statements by Defendants have caused numerous
15 negative comments to be directed against Plaintiffs.⁴

16 38. Defendants have expressed the intention to continue attempts to harm
17 Plaintiff reputation and business to whatever degree they are able to achieve.

18 39. On January 24, 2017, Defendants posted online an offer to pay "up to
19 \$10,000 for verifiable information on Nevada Family Court Attorney Marshall
20 Willick."

21 ///

22 ///

23 ///

24 ⁴ For example, a comment to the "Virginia post" states "Well well well, [sic] this always catches
up to those that try and perceive [sic] they are good [sic]."

V.
FIRST CLAIM FOR RELIEF
(DEFAMATION)

40. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

41. Defendants, and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, published one or more oral or written false statements which were intended to impugn Mr. Willick's honesty, integrity, virtue and/or personal and professional reputation.

42. Mr. Willick and the Willick Law Group are not public figures, as some or all of Defendants have acknowledged.

43. The statements imputed by Defendants to Mr. Willick and published by Defendants are slurs on Mr. Willick's character including his honesty, integrity, virtue, and/or reputation.

44. The referenced false and defamatory statements would tend to lower the subject in the estimation of the community, excite derogatory opinions about the subject, and hold the subject up to contempt.

45. The referenced false and defamatory statements were unprivileged.

46. The referenced false and defamatory statements were published to at least one third party.

47. The referenced false and defamatory statements were published or republished deliberately or negligently by or under the authority and direction of one or more of each of the Defendants.

48. Some or all of the referenced false and defamatory statements constitute defamation *per se*, making them actionable irrespective of special harm.

49. Publication of some or all of the referenced false and defamatory statements caused special harm in the form of damages to Mr. Willick and the Willick Law Group.

WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group demand judgment against named Defendants for actual, special, compensatory, and punitive damages in an amount deemed at the time of trial to be just, fair, and appropriate in an amount in excess of \$15,000.

VI.
SECOND CLAIM FOR RELIEF
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

50. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

51. Defendants and/or Defendants' agents, representatives, and/or/ employees, either individually, or in concert with others, intentionally and deliberately inflicted emotional distress on Plaintiffs by defaming them to many people, including but not limited to the following: several of Mr. Willick's friends, co-workers, colleagues, clients, and an unknown number of persons that were subjected to the defamatory comments on the internet.

52. As a result of Defendants' extreme and outrageous conduct, Mr. Willick and the Willick Law Group was, is, and, with a high degree of likelihood, will continue to be emotionally distressed due to the defamation.

53. As a result of Defendants' extreme and outrageous conduct, Mr. Willick and the Willick Law Group have suffered and will continue to suffer mental pain and anguish, and unjustifiable emotional trauma.

///

1 and/or the Defendants published the false statements knowing their falsity or with
2 reckless disregard for the truth.

3 59. The statements made by the Defendants place Mr. Willick and the
4 Willick Law Group in a false light and are highly offensive and inflammatory, and
5 thus actionable.

6 WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group
7 demand judgment against named Defendants for actual, special, compensatory, and
8 punitive damages in an amount deemed at the time of trial to be just, fair, and
9 appropriate in an amount in excess of \$15,000.

10 IX.
11 FIFTH CLAIM FOR RELIEF
(BUSINESS DISPARAGEMENT)

12 60. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
13 stated herein.

14 61. Defendants and/or Defendants' agents, representatives, and/or
15 employees, either individually, or in concert with others, intentionally made false
16 and disparaging statements about Mr. Willick and the Willick Law Group and
17 disparaged Mr. Willick's business, the Willick Law Group.

18 62. The referenced statements and actions were specifically directed
19 towards the quality of Mr. Willick and the Willick Law Group's services.

20 63. The statements and actions were so extreme and outrageous as to
21 affect the ability of Mr. Willick and the Willick Law Group to conduct business.

22 64. The Defendants intended, in publishing the false and defamatory
23 statements, to cause harm to Plaintiffs and its pecuniary interests, and/or the
24

1 Defendants published the disparaging statements knowing their falsity or with
2 reckless disregard for the truth.

3 65. The false and defamatory statements by the Defendants resulted in
4 damages to Mr. Willick and the Willick Law Group.

5 WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group
6 demand judgment against named Defendants for actual, special, compensatory, and
7 punitive damages in an amount deemed at the time of trial to be just, fair, and
8 appropriate in an amount in excess of \$15,000.

9 X.
10 **SIXTH CLAIM FOR RELIEF**
(CONCERT OF ACTION)

11 66. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
12 stated herein.

13 67. Defendants and/or Defendants' agents, representatives, and/or
14 employees in concert with one another, based upon an explicit or tacit agreement,
15 intentionally committed a tort against Mr. Willick.

16 68. Defendants' concert of action resulted in damages to Mr. Willick and
17 the Willick Law Group.

18 WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group
19 demand judgment against named Defendants for actual, special, compensatory, and
20 punitive damages in an amount deemed at the time of trial to be just, fair, and
21 appropriate in an amount in excess of \$15,000.

22 ///

23 ///

24 ///

XI.
SEVENTH CLAIM FOR RELIEF
(CIVIL CONSPIRACY)

69. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

70. Defendants and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, based upon an explicit or tacit agreement, intended to accomplish an unlawful objective for the specific purposes of harming Mr. Willick and the Willick Law Group's pecuniary interests.

71. Defendants' civil conspiracy resulted in damages to Mr. Willick and the Willick Law Group.

WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group demand judgment against named Defendants for actual, special, compensatory, and punitive damages in an amount deemed at the time of trial to be just, fair, and appropriate in an amount in excess of \$15,000.

XII.
EIGHTH CLAIM FOR RELIEF
(RICO VIOLATIONS)

72. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

73. Defendants and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, engaged in at least two crimes related to racketeering pursuant to NRS 207.360 that have the same or similar pattern, intents, results, accomplices, victims or methods of commission or are otherwise interrelated by distinguishing characteristics and are not isolated incidents.

1 74. Here, Defendants have either committed, conspired to commit, or have
2 attempted to commit the following crime(s):

- 3 a. Criminal contempt (NRS 199.340(7), publication of a false or grossly
4 inaccurate report of court proceedings).
5 b. Challenges to fight (NRS 200.450).
6 c. Furnishing libelous information (NRS 200.550).
7 d. Harassment (NRS 200.571).
8 e. Multiple transactions involving fraud or deceit in the course of an
9 enterprise (NRS 205.377).
10 f. Taking property from another under circumstances not amounting to
11 robbery. (NRS 207.360(9)).
12 g. Extortion of "contributions" by implied threat of the mounting of
13 similar defamation campaigns against candidates and officials.

14 75. Defendants comprise a criminal syndicate: Any combination of
15 persons, so structured that the organization will continue its operation even if
16 individual members enter or leave the organization, which engages in or has the
17 purpose of engaging in racketeering activity. Here, Veterans in Politics
18 International, Inc., Nevada Veterans in Politics, and Veterans in Politics are
19 organizations that has members—headed by Defendants Steve Sanson, Heidi
20 Hanusa, Christina Ortiz, Johnny Spicer, and Don Woolbright—that do come and go
21 and the organization continues on. These organizations and their principals have
22 conspired to engage in and have engaged in racketeering activity.

23 76. This group also meets the statutory definition—NRS 207.380—as an
24 enterprise:

1 Any natural person, sole proprietorship, partnership, corporation, business
2 trust or other legal entity; and, Any union, association or other group of
persons associated in fact although not a legal entity.

3 Here Veterans in Politics International is a registered not for profit business
4 and Nevada Veterans in Politics and Veterans in Politics are sub-units of Veterans in
5 Politics International, Inc. Each can and should be considered individual legal
6 entities.⁵

7 77. Sanson Corporation is also a separate legal entity and is a registered
8 Nevada Corporation.

9 78. Even if not all Defendants are members of Veterans in Politics
10 International, Inc., Nevada Veterans in Politics, Veterans in Politics, and Sanson
11 Corporation, they meet the "association or other group of persons associated in fact"
12 requirements under the statute as an enterprise. The statute explicitly includes both
13 licit and illicit enterprises.

14 79. Racketeering is the engaging in at least two crimes related to
15 racketeering that have the same or similar pattern, intents, results, accomplices,
16 victims or methods of commission, or are otherwise interrelated by distinguishing
17 characteristics and are not isolated incidents, if at least one of the incidents occurred
18 after July 1, 1983, and the last of the incidents occurred within 5 years after a prior
19 commission of a crime related to racketeering.

20 80. Defendants published a false or grossly inaccurate report of court
21 proceedings on numerous occasions, including, but not limited to, the "Virginia
22 post," "VIP Facebook Post #1," and "VIP Facebook Post #2." (NRS 199.340(7)).

23 ///

24 ⁵ Nevada Veterans in Politics and Veterans in Politics operate numerous social media sites
where the defamation continues.

1 81. Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny
2 Spicer, Don Woolbright, Veterans in Politics International, Inc. Sanson Corporation,
3 Karen Steelmon, and Does I through X inclusive, gave or sent a challenge in writing
4 to fight Richard Carreon and others. (NRS 200.450).

5 82. Defendants willfully stated, delivered or transmitted to a manager,
6 editor, publisher, reporter or other employee of a publisher of any newspaper,
7 magazine, publication, periodical or serial statements concerning Plaintiffs which, if
8 published therein, would be a libel. (NRS 200.550).

9 83. Defendants, without lawful authority, knowingly threatened to
10 substantially harm the health or safety of Plaintiff and, by words and conduct placed
11 Plaintiffs in reasonable fear that the threat would be carried out. (NRS 200.571).

12 84. Defendants, in the course of their enterprise, knowingly and with the
13 intent to defraud, engaged in an act, practice or course of business or employed a
14 device, scheme or artifice which operates or would operate as a fraud or deceit upon
15 a person by means of a false representation or omission of a material fact that
16 Defendants know to be false or omitted, Defendants intend for others to rely on, and
17 results in a loss to those who relied on the false representation or omission in at least
18 two transactions that have the same or similar pattern, intents, results, accomplices,
19 victims or methods of commission, or are otherwise interrelated by distinguishing
20 characteristics and are not isolated incidents within 4 years and in which the
21 aggregate loss or intended loss is more than \$650. (NRS 205.377).

22 85. Defendants posted false and defamatory material no less than 50 times
23 in 10 separate defamatory campaigns against Plaintiffs. The total value of time
24 expended by Marshal S. Willick, and the Willick Law Group staff in responding to

1 inquiries from clients and attempting to have the defamatory material removed from
2 the internet was over \$15,000 and this does not include the cost of missed
3 opportunities or time that should have been spent working on cases for paying
4 clients. (NRS 2015.377 and NRS 207.360(9)).

5 86. It was the intent of the Defendants to cause harm to Plaintiffs and the
6 aggregate costs far exceed the \$650 threshold. Each act which violates subsection
7 one constitutes a separate offense and a person who violates subsection one is guilty
8 of a category B felony.

9 87. Additionally, NRS 205.0832 defines the actions which constitute theft
10 as including that which:

11 Obtains real, personal or intangible property or the services of another
12 person, by a material misrepresentation with intent to deprive that person of
13 the property or services. As used in this paragraph, "material
14 misrepresentation" means the use of any pretense, or the making of any
15 promise, representation or statement of present, past or future fact which is
16 fraudulent and which, when used or made, is instrumental in causing the
17 wrongful control or transfer of property or services. The pretense may be
18 verbal or it may be a physical act.

19 The statute goes on to define the theft as a person or entity that "Takes, destroys,
20 conceals or disposes of property in which another person has a security interest, with
21 intent to defraud that person." Here, as Abraham Lincoln famously pointed out 150
22 years ago, time is a lawyer's stock in trade. Defendants—with malice—stole valuable
23 time from Mr. Willick. Also, the theft of Mr. Willick's and Willick Law Group's "good
24 will" by the making of false and defamatory comments and placing both Mr. Willick
and Willick Law Group in a false light has diminished the value of the business.
These are intangible thefts, but thefts nonetheless.

///

1 Plaintiffs are entitled to recover increased damages as a result of such willful
2 copying.

3 94. Plaintiffs are entitled to attorneys' fees and full costs pursuant to 17
4 U.S.C. § 505 and otherwise according to law.

5 95. As a direct and proximate result of the foregoing acts and conduct,
6 Plaintiffs have sustained and will continue to sustain substantial, immediate, and
7 irreparable injury, for which there is no adequate remedy at law. Upon information
8 and belief, Plaintiffs believe that unless enjoined and restrained by this Court,
9 Defendants will continue to infringe Plaintiffs' rights in the infringed works.
10 Plaintiffs are entitled to preliminary and permanent injunctive relief to restrain and
11 enjoin Defendants' continuing infringing conduct.

12 WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group
13 demand that:

- 14 a. Pursuant to 17 U.S.C. § 502(a), Defendants, their agents servants and
15 employees and all parties in privity with them be enjoined permanently
16 from infringing Plaintiff's copyrights in any manner.
- 17 b. Pursuant to 17 U.S.C § 504(b), Defendants be required to pay to the
18 plaintiff, such actual damages as the Plaintiffs may have sustained in
19 consequence of Defendants' infringement and all profits of Defendants
20 that are attributable to the infringement of Plaintiffs' copyrights.
21 Plaintiffs request Defendants account for all gains, profits, and
22 advantages derived by Defendants from their infringement.
- 23 c. Pursuant to 17 U.S.C. § 504(c)(1), Defendants be required to pay an
24 award of statutory damages in a sum not less than \$30,000.

- d. The Court finds the Defendants' conduct was committed willfully.
- e. Pursuant to 17 U.S.C. § 504(c)(2), Defendants be required to pay an award of increased statutory damages in a sum of not less than \$150,000 for willful infringement.
- f. Pursuant to 17 U.S.C. § 505, Defendants be required to pay the Plaintiffs' full costs in this action and reasonable attorney's fees.
- g. Defendants' conduct was willful or wanton and done in reckless disregard of Plaintiffs' rights thereby entitling Plaintiffs to recover punitive damages in an amount to be determined at trial.

XIV.
TENTH CLAIM FOR RELIEF
(INJUNCTION)

96. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully stated herein.

97. Defendants and/or Defendants' agents, representatives, and/or employees, either individually, or in concert with others, engaged in acts that were so outrageous that injunctive relief is necessary to effectuate justice.

WHEREFORE, Plaintiffs request the following injunctive relief:

- a. That all named Defendants and members of the listed organizations be enjoined from approaching within 1000 feet, of the person of Marshal S. Willick, his vehicle, his home, the Willick Law Group offices and all of its employees, and their places of residence and vehicles.
- b. That all defamatory writings, video, postings, or any other documents or public display of the same, concerning Mr. Willick, the Willick Law

1 Group, and the employees of the same, be removed from public view
2 within 10 days of the issuance of the injunction.

3 c. That all innuendo of illegal, immoral, or unethical conduct that has
4 already been attributed by Defendants to Mr. Willick, must never be
5 repeated by any named Defendant or any member of any of the named
6 organizations, with generalities toward lawyers in general to constitute
7 a violation of the prohibition.

8 d. That a full retraction and apology be authored by Defendants Steve W.
9 Sanson, approved by the Court, and disseminated everywhere the
10 defamation occurred, including, but not limited to, the entirety of the
11 mailing list(s), each and every social media site (Facebook, Twitter,
12 Google+, Pinterest, LinkedIn, etc.) and anywhere else the defamatory
13 material was disseminated.

14
15 **XV.**
CONCLUSION

16 98. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
17 stated herein.

18 **WHEREFORE**, Marshal S. Willick and the Willick Law Group respectfully
19 pray that judgment be entered against Defendants, and each of them individually, as
20 follows:

- 21 a. General damages in an amount in excess of \$15,000 for each and every
22 claim for relief;
- 23 b. Compensatory damages in an amount in excess of \$15,000 for each
24 and every claim for relief;

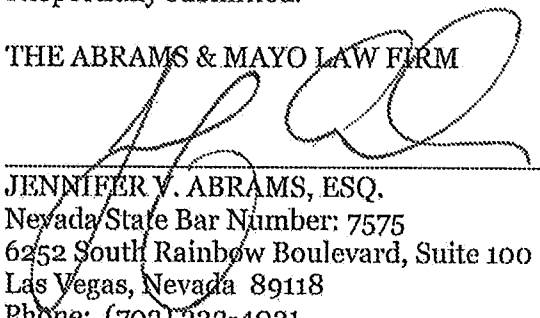
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- c. Punitive damages in an amount in excess of \$15,000 for each and every claim for relief;
- d. All attorney's fees and costs that have and/or may be incurred by Marshal S. Willick and the Willick Law Group in pursuing this action; and
- e. For such other and further relief this Court may deem just and proper.

DATED this 27th day of January, 2017.

Respectfully submitted:

THE ABRAMS & MAYO LAW FIRM



JENNIFER V. ABRAMS, ESQ.
Nevada State Bar Number: 7575
6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
Phone: (702) 222-4021
Email: JVAGroup@theabramslawfirm.com
Attorney for Plaintiffs

1 VERIFICATION

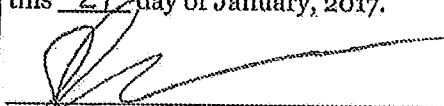
2 STATE OF NEVADA)
3) ss:
4 COUNTY OF CLARK)

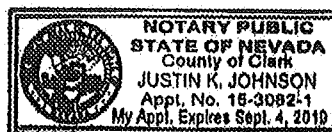
5 MARSHAL S. WILICK, ESQ., principal of WILICK LAW GROUP first being
6 duly sworn, deposes and says:

7 That himself and his business are the Plaintiffs in the above-entitled action;
8 that he has read the above and foregoing *Complaint for Damages* and knows the
9 contents thereof and that the same is true of his own knowledge, except as to those
10 matters therein stated on information and belief, and as to those matters, he believes
11 them to be true.

12 
13 MARSHAL S. WILICK, ESQ.

14 SUBSCRIBED and SWORN to before me
15 this 27th day of January, 2017.

16 
17 NOTARY PUBLIC in and for said
18 County and State



IAFD

JENNIFER V. ABRAMS, ESQ.

Nevada State Bar Number: 7575

THE ABRAMS & MAYO LAW FIRM

6252 South Rainbow Boulevard, Suite 100

Las Vegas, Nevada 89118

Phone: (702) 222-4021

Email: JVAGroup@theabramslawfirm.com

Attorney for Plaintiffs

DISTRICT COURT
CLARK COUNTY, NEVADA

MARSHAL S. WILICK and WILICK LAW) Case No.:
GROUP,)

Plaintiff,

Department:

vs.

STEVE W. SANSON; HEIDI J. HANUSA;
CHRISTINA ORTIZ; JOHNNY SPICER;
DON WOOLBRIGHT; VETERANS IN
POLITICS INTERNATIONAL, INC.;
SANSON CORPORATION; KAREN
STEELMON; and DOES I THROUGH X,

Defendant.

INITIAL APPEARANCE FEE DISCLOSURE (NRS CHAPTER 19)

Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are
submitted for parties appearing in the above entitled action as indicated below:

New Complaint Fee	1 st Appearance Fee
[] \$1530 [] \$520 [] \$299 [x] \$270.00	[] \$1483.00 [] \$473.00 [] \$223.00
Name: MARSHAL S. WILICK	
WILICK LAW GROUP	[x] \$30
	[] \$30

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[] \$30


[] \$30

TOTAL REMITTED: (Required)	Total Paid	\$ 300
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DATED this 26th day of January, 2017.

Respectfully submitted:

THE ABRAMS & MAYO LAW FIRM



JENNIFER V. ABRAMS, ESQ.
Nevada State Bar Number: 7575
6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
Phone: (702) 222-4021
Email: JVAGroup@theabramslawfirm.com
Attorney for Plaintiffs

DISTRICT COURT
CLARK COUNTY, NEVADA

DECLARATION OF SERVICE

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MARSHAL S. WILLICK and WILLICK LAW
GROUP

Alvin D. Burton

Case No: A-17-750171-C

CLERK OF THE COURT

Plaintiff/Petitioner,

vs.

STEVE W. SANSON, et al.,

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK

ss.:

SUMMONS; COMPLAINT FOR DAMAGES; INITIAL APPEARANCE FEE DISCLOSURE Received by NOW! Services, Inc. on 02/03/2017 with instructions to serve STEVE W. SANSON at 2402 Tenaya Way, Las Vegas, NV.

I, **Craig Burton**, being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made.

I am authorized to serve this process in the circuit/county it was served in.

On 02/04/2017 at 1:55 PM, I served the within **SUMMONS; COMPLAINT FOR DAMAGES; INITIAL APPEARANCE FEE DISCLOSURE** on STEVE W. SANSON at 2402 Tenaya Way, Las Vegas, NV in the manner indicated below:

INDIVIDUAL: By delivering to the within named person a true copy of this process and informing the person of the contents.

A description of the Recipient is as follows:

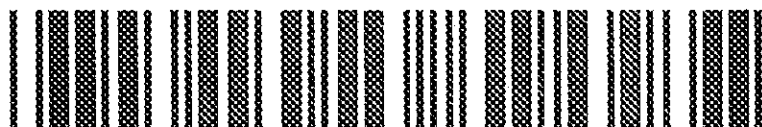
Sex	Color of skin/race	Color of hair	Age	Height	Weight
Male	African American	Black	50	6'1"	205
Other Features:					

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

Executed this 6 day of Feb, 2017.

No Notary is required per NRS 53.045.

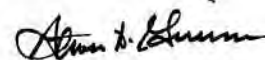
X *Craig Burton*
Craig Burton
License#: 1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV 89102
(702) 669-7378



15399

View Document - Declaration of Service

The Abrams Law Firm, LLC

DISTRICT COURT
CLARK COUNTY, NEVADA
DECLARATION OF SERVICEElectronically Filed
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CLERK OF THE COURT

MARSHAL S. WILLICK and WILLICK LAW
GROUP

Case No :A-17-750171-C

Plaintiff/Petitioner,
vs.
STEVE W. SANSON, et al.,

Defendant/Respondent,

STATE OF NEVADA,
COUNTY OF CLARK ss.:**SUMMONS; COMPLAINT FOR DAMAGES; INITIAL APPEARANCE FEE DISCLOSURE** Received by NOW! Services, Inc. on 02/03/2017 with instructions to serve **VETERANS IN POLITICS INTERNATIONAL, INC. c/o Registered Agent: Clark McCourt at 7371 Prairie Falcon Rd., Ste. 120, Las Vegas, NV89128.**I, **Eddie Guzman**, being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made.

I am authorized to serve this process in the circuit/county it was served in.

On 02/06/2017 at 3:38 PM, deponent served the within **SUMMONS; COMPLAINT FOR DAMAGES; INITIAL APPEARANCE FEE DISCLOSURE** on **VETERANS IN POLITICS INTERNATIONAL, INC. c/o Registered Agent: Clark McCourt at 7371 Prairie Falcon Rd., Ste. 120, Las Vegas, NV89128** in the manner indicated below:By personally delivering and leaving a true copy of this process with **Brian P. Clark**, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which is the address of the Resident Agent as shown on the current certificate of designation filed with the Secretary of State.A description of the **Defendant(s)**, or other person served on behalf of the **Defendant(s)** is as follows:

Sex	Color of skin/race	Color of hair	Age(Approx)	Height(Approx)	Weight(Approx)
Male	Caucasian	silver	late 40's	6'1"	180
Other Features:					

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

Executed this 07th day of Feb., 2017.

No Notary is required per NRS 53.045.



15313

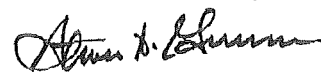
X 
Eddie Guzman
License#: NVPILB#1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV89102
(702) 669-7378

Client File No:

Back

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AA000030



CLERK OF THE COURT

1 **MOT**

Jennifer V. Abrams, Esq.

2 Nevada State Bar Number: 7575

Brandon K. Leavitt, Esq.

3 Nevada State Bar Number: 11834

THE ABRAMS & MAYO LAW FIRM

4 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

5 Tel: (702) 222-4021

Fax: (702) 248-9750

6 Email: bklgroup@theabramslawfirm.com

Attorneys for Plaintiff

7 Eighth Judicial District Court

Family Division

8 Clark County, Nevada

9 BRANDON PAUL SAITER,

) Case No.: D-15-521372-D

10 Plaintiff,

) Department: L

11 vs.

12 TINA MARIE SAITER,

) Hearing date: 03/30/17

) Hearing time: 9:00 AM

13 Defendant.

) ORAL ARGUMENT REQUESTED

14 NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION
15 WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH
16 A COPY OF YOUR RESPONSE WITHIN 10 DAYS OF YOUR RECEIPT OF THIS
17 MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE
18 COURT WITHIN 10 DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN
19 THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT A
20 HEARING PRIOR TO THE SCHEDULED HEARING DATE.

18 **MOTION FOR AN ORDER TO SHOW CAUSE**

19 **COMES NOW** Plaintiff, BRANDON PAUL SAITER, by and
20 through his attorney of record, Jennifer V. Abrams, Esq., of The Abrams
21 & Mayo Law Firm, and hereby submits his *Motion for an Order to Show*

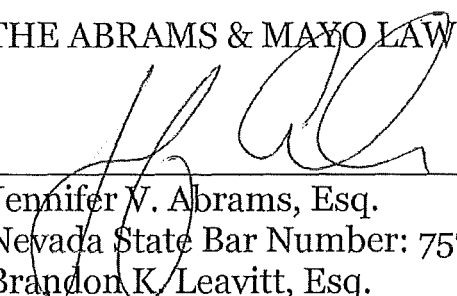
1 Cause, asking that this Court issue an Order to Show Cause against
2 Defendant's counsel of record, LOUIS C. SCHNEIDER, ESQ., and
3 STEVE W. SANSON, and ordering Defendant, TINA MARIE SAITER, to
4 personally appear at the hearing on this matter.

5 This motion is made and based upon the following Points and
6 Authorities, the affidavits and exhibits attached hereto, all papers and
7 pleadings on file herein, and any oral argument adduced at the hearing
8 of this matter.

9 DATED Monday, February 13, 2017.

10 Respectfully Submitted,

11 THE ABRAMS & MAYO LAW FIRM

12 
13 Jennifer W. Abrams, Esq.
14 Nevada State Bar Number: 7575
15 Brandon K. Leavitt, Esq.
16 Nevada State Bar Number: 11834
17 6252 South Rainbow Blvd., Suite 100
18 Las Vegas, Nevada 89118
19 Tel: (702) 222-4021
20 Attorneys for Plaintiff
21

1 NOTICE OF MOTION

2 TO: TINA SAITER, Defendant;

3 TO: LOUIS C. SCHNEIDER, ESQ., attorney for Defendant; and

4 TO: STEVE W. SANSON, 8908 Big Bear Pines Avenue, Las Vegas,
5 Nevada 89143;

6 PLEASE TAKE NOTICE that the foregoing Motion will be heard on

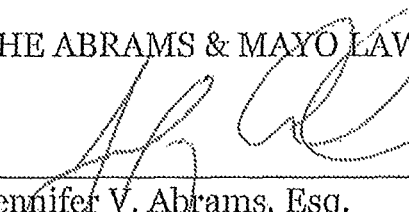
7 March 30, 2017 at 9:00 AM, in

8 Department L of the above-entitled court.

9 DATED Monday, February 13, 2017.

10 Respectfully Submitted,

11 THE ABRAMS & MAYO LAW FIRM

12 
13 Jennifer V. Abrams, Esq.
14 Nevada State Bar Number: 7575
15 Brandon K. Leavitt, Esq.
16 Nevada State Bar Number: 11834
17 6252 South Rainbow Blvd., Suite 100
18 Las Vegas, Nevada 89118
19 Tel: (702) 222-4021
20 Attorneys for Plaintiff
21

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 Louis Schneider and Steve Sanson continue to harass and violate
4 the privacy of the Saiter family. This motion is filed for the protection of
5 the Saiter family from further harm.

6 On October 6, 2016, after Mr. Sanson disseminated videos on the
7 internet of the September 29, 2016 hearing, this Court entered an *Order*
8 *Prohibiting Dissemination of Case Material*. That order was personally
9 served on Mr. Sanson on October 8, 2016 and the Declaration of Service
10 was filed on October 14, 2016. Rather than abide by this Court's
11 directive, Mr. Sanson and VIPI continued to disseminate the Saiter case
12 materials repeatedly.

13 ***After*** having been served with this Court's *Order Prohibiting*
14 *Dissemination of Case Material*, a series of campaigns were launched by
15 Mr. Sanson and VIPI via email blast, YouTube, numerous Facebook
16 pages, Twitter accounts, Google+ accounts, and on various blogs and
17 Facebook "Groups" as well as unknown other avenues. These postings
18 included ***paid placements*** to more widely disseminate the Saiter
19 family's private material.¹ Mr. Sanson re-posted the embedded hearing

20

21 ¹ While the video was still on YouTube, it garnered **thousands** of views in a
short few weeks. The extent of Mr. Sanson's Facebook and other social media reach
is unknown without data only accessible by Mr. Sanson; however, even a small

1 videos, copies of this Court's orders, *and named Brandon and Tina*
2 *Saiter personally*, listing their case number repeatedly. Mr. Sanson
3 continues to comment on Mr. Saiter's income and business information,
4 Ms. Saiter's emotional state, and commentary by this Court on very
5 sensitive, personal matters—which, frankly, have no place in the public
6 forum.²

7 The emotional well-being of everyone in the family (including their
8 four minor children) has been compromised by Mr. Schneider and Mr.
9 Sanson. **Both** parties, who both expressed to this Court that they
10 desperately wanted this case to be over so they could move on with their
11 lives and with raising their children, were mortified to learn that the
12 videos from their private divorce case were being repeatedly
13 disseminated all over the internet. Mr. Saiter expressed that he was
14 especially concerned about his four minor children, and the possibility
15 that either they, or their friends, would see their parents' private case
16 materials and false allegation that their father lied about his finances, as
17 three of the four Saiter children have Facebook accounts.

18 Mr. Saiter has attempted—for months—to resolve this problem
19 without litigation. After Mr. Sanson published the videos of two of the
20 amount of advertising spending on Facebook can reach tens, if not hundreds, of
thousands of people.

21 ² See, for example, Exhibit 1.

1 Saiter hearings on YouTube,³ Mr. Saiter submitted two privacy
2 complaints. As a result, YouTube removed the videos.⁴ When Mr. Sanson
3 learned that the videos were removed, he announced that he would
4 continue to post whatever he wanted and he posted the two Saiter videos
5 on vimeo.⁵ When Mr. Saiter learned that his private divorce hearings
6 were again being disseminated on the internet, he submitted two privacy
7 complaints to vimeo and they removed the videos.⁶ Again, as soon as Mr.
8 Sanson learned that the videos were removed, he found yet another
9 forum to violate the Saiter family's privacy—he posted them on a
10 Russian website and disseminated links to that website.⁷ In an interview
11 on February 2, 2017, Mr. Sanson admitted to posting the video to a
12 Russian website and stated “I’ll be damned if anyone can get that one
13 down!”⁸ The link to the Russian-hosted video continues to be repeatedly
14 shared on social media.

15 ///

16 ///

17

18 ³ Mr. Sanson also published the false assertion that Mr. Saiter lied on his
Financial Disclosure Form.

19 ⁴ See Exhibit 2.

20 ⁵ See Exhibit 3.

21 ⁶ See Exhibit 4.

⁷ See Exhibit 5.

⁸ See Exhibit 6.

1 In an email blast dated January 25, 2017, Mr. Sanson stated that
2 this matter “involves an order by Judge Elliot (sic) *who is the only*
3 *one who can enforce that order or issue sanctions.*”⁹

4 Until Mr. Schneider and Mr. Sanson are compelled to remove and
5 stop re-posting private case information from the internet pursuant to
6 this Court’s order, the pain of the divorce will continue for the Saiters.

7 The only person (by Mr. Sanson’s own logic, as explained below)
8 with the authority to stop these continued invasions of privacy and
9 harassment of the Saiter family is this Court. Mr. Saiter therefore asks
10 that this Court issue Orders to Show Cause against Mr. Schneider and
11 Mr. Sanson, and issue an Order to Personally Appear in Court to Ms.
12 Tina Saiter.

13 **II. LAW AND ARGUMENT**

14 **A. This Honorable Court should has jurisdiction over all**
15 **named individuals. Mr. Schneider and Mr. Sanson**
16 **should be held in contempt for violations of this Court’s**
Order Prohibiting Dissemination of Case Material.

17 NRS 22.010 states:

18 **Acts or omissions constituting contempt.** The
19 following acts or omissions shall be deemed contempt: . . .
20

21 ⁹ Emphasis added. See Exhibit 7.

1 3. Disobedience or resistance to any lawful writ, order,
2 rule or process issued by the court or judge at
 chambers.

3 Case law provides guidance when assessing the matter of
4 contempt. In addition to having a final order or judgment, in order for a
5 party to be held in contempt and sanctioned for that acts of contempt,
6 the Court must find:

- 7 1. There is a clear and unambiguous order. “An order on which a
8 judgment of contempt is based must be clear and unambiguous,
9 and must spell out the details of compliance in clear, specific
10 and unambiguous terms so that the person will readily know
11 exactly what duties or obligations are imposed on him.”¹⁰
- 12 2. The person accused of contempt had the ability to comply with
13 the order.
- 14 3. The person willfully violated the clear order or judgment.
15 “Proof of contempt requires a showing that the defendant
16 wilfully violated the court order.” This is true even if the statute
17 does not mention wilfulness.¹¹

18 This Court’s order was crystal clear—all videos related to this case
19 needed to be removed from the internet and any case material is
20 prohibited from being disseminated by *anyone*. That order has been
21 ignored and ridiculed by Mr. Sanson. While there can be no question
that this Court has *in rem* jurisdiction over the case materials in the

20 ¹⁰ *Cunningham v. District Court*, 102 Nev. 551, 559-60, 729 P.2d 1328, 1333-34
(1986)

21 ¹¹ *State of Iowa v. Lipcamon*, 438 N.W.2d 605 (Iowa 1992)

1 Saiter matter, and there can be no question that this Court has
2 jurisdiction to enter any orders in the best interest of the four minor
3 Saiter children, Mr. Sanson has repeatedly alleged in his postings that
4 this Court has no jurisdiction over him and therefore, he believes he is
5 justified in continuing to blatantly flout this Court's orders.

6 If this Court really wants Mr. Saiter to interplead Mr. Sanson as a
7 named defendant in this case, he will do so, but such is not necessary for
8 this Court to exercise jurisdiction over him in this matter. Mr. Sanson
9 ***interjected himself into this case*** by taking possession of and
10 disseminating a closed hearing video ***for the purpose of impacting***
11 ***the outcome of the litigation in exchange for Mr. Schneider's***
12 ***payment to him*** (purportedly for "advertising") and by continually re-
13 posting two hearing videos after being personally served with an order
14 prohibiting their dissemination. Mr. Sanson has voluntarily brought
15 himself within the jurisdiction of this Court and should be held both
16 civilly and criminally accountable for his willful disregard of this Court's
17 orders. In an email blast dated January 25, 2017, Mr. Sanson even stated
18 that this matter "involves an order by Judge Elliot (sic) ***who is the***
19 ***only one who can enforce that order or issue sanctions.***"¹²

20 ///

21 ¹² Emphasis added. See Exhibit 7.

1 There is also the Court's duty to control the proceedings before it
2 so as to protect the integrity of the record. Courts have the inherent
3 power to protect and defend their cases and decrees and to give effect to
4 their orders; "[t]he power of courts to punish for contempt and to
5 maintain decency and dignity in their proceedings is inherent, and is as
6 old as courts are old."¹³

7 Further, by providing and publishing these videos, Attorney
8 Schneider and Mr. Sanson likely violated (and continue to violate) EDCR
9 5.301, which prohibits the publishing of case materials—either
10 personally or through a third party—in a place where it is likely or
11 foreseeable that any minor child will access those materials.¹⁴

12 In anticipation of Attorney Schneider and Mr. Sanson's response,
13 this Court should note that none of this is "free speech." First, the
14 hearing was "closed" which is defined as a hearing that is "closed to the
15 public." Next, the dissemination of the hearing videos was done in
16 conjunction with "smear campaigns" stemming from Mr. Schneider's
17 written threat to "take action beyond the opposition" in an effort to

18 ¹³ *In re Chartz*, 29 Nev. 110, 85 P. 352 (1907); *Halverson v. Hardcastle*, 123
Nev. 245, 163 P.3d 428 (2007).

19 ¹⁴ Formerly EDCR 5.03 which contained the same prohibitions. Of the four
20 Saiter children, the three oldest daughters have Facebook accounts. Based on Mr.
21 Sanson's paid advertising campaign along with using the last name "Saiter" in many
of these posts, it is likely that Mr. and Ms. Saiter's attempts to shield their children
from this litigation has been thwarted by Mr. Sanson's unilateral decision to
disseminate these private matters in an broad public forum.

1 coerce the withdrawal of the sanctions motion we filed against him.¹⁵
2 And, as stated in the initial email from the undersigned to this Court and
3 Mr. Schnieder on this topic, the information being disseminated with the
4 video is inaccurate and is “**intended** to place [the undersigned] in a bad
5 light.” In other words, there is **no legitimate purpose** for the invasion
6 of Mr. Saiter’s privacy or the risk of harm to his children—the
7 dissemination was the carrying out of a threat to coerce the withdrawal
8 of the sanctions motion filed against Mr. Schneider.

9 Accordingly, this Court should issue an Order to Show Cause
10 against Mr. Schneider and Mr. Sanson, requiring them to appear and
11 show cause as to why they should not be held in contempt for violating
12 this Court’s *Order Prohibiting Dissemination of Case Material*.

13 While Mr. Saiter does not believe that Tina Saiter has anything to
14 do with the disseminations of the videos (as she has expressed
15 unhappiness about their dissemination), both parties, both counsel, and
16 Mr. Sanson should **all** be required to appear in court for adjudication of
17 these issues to avoid false allegations or finger-pointing to anyone not
18 present.

19 ///

20
21 ¹⁵ See *Abrams, et al. v. Schneider, et al.*, Eighth Judicial District Court case
number A-17-749318-C.

1 **C. Mr. Schneider and Mr. Sanson must be afforded the**
2 **Constitutional protections associated with criminal**
3 **contempt.**

4 The Nevada Supreme Court has held that contempt proceedings,
5 while usually called civil or criminal, are, strictly speaking, neither. They
6 may best be characterized as sui generis, and may partake of the
7 characteristics of both.¹⁶

8 Whether a contempt proceeding is classified as criminal or civil in
9 nature depends on whether it is directed to punish the contemnor or,
10 instead, coerce his compliance with a court directive.¹⁷ The Nevada
11 Supreme Court has articulated the difference between criminal and civil
12 contempt in the following manner:

13 Criminal sanctions are punitive in that they serve the
14 purpose of preserving the dignity and authority of the court
15 by punishing a party for offensive behavior. In contrast, civil
16 contempt is said to be remedial in nature, as the sanctions
17 are intended to benefit a party by coercing or compelling the
18 contemnor's future compliance, not punishing them for past
19 bad acts. Moreover, a civil contempt order is indeterminate
20 or conditional; the contemnor's compliance is all that is
21 sought and with that compliance comes the termination of
any sanctions imposed. Criminal sanctions, on the other
hand, are unconditional or determinate, intended as
punishment for a party's past disobedience, with the

16 ¹⁶ *Warner v. Second Judicial Dist. Court*, 111 Nev. 1379, 1382, 906 P.2d 707,
709 (1995)(quoting *Marcisz v. Marcisz*, 65 Ill.2d 206, 312, 357 N.E.2d 477, 479
(1976))

17 ¹⁷ *Rodriguez v. Eighth Judicial Dist. Court ex rel. County of Clark*, 120 Nev.
798, 804-05, 102 P.3d 41, 45-46 (2004).

1 contemnor's future compliance having no effect on the
2 duration of the sentence imposed.¹⁸

3 For example, ordering a tribal council to post a \$10,000 bond only
4 if it violated the injunctions in the contempt order was designed to
5 coerce compliance and was, therefore, a civil contempt order regardless
6 of the district court's motive.¹⁹ Likewise, sentencing a husband to a
7 suspended jail sentence conditioned upon paying support arrearages
8 was intended to ensure compliance with a court order, and, therefore,
9 the process was deemed to be coercive in nature rather than punitive.²⁰
10 On the other hand, a set term of eleven months imprisonment for eleven
11 violations of court orders was held to be punishment rather than
12 coercive. Therefore, the contempt proceeding was deemed to be criminal
13 in nature.²¹

14 The character of the contempt proceeding is significant in that
15 criminal proceedings will invoke certain procedural safeguards. A
16 criminal contempt order issued to punish violation of an order requires
17

18 ¹⁸ *Id.*, *supra*. at 804-05, 102 P.3d at 45-46.

19 ¹⁹ *In re Humboldt River Stream*, 118 Nev. 901, 909, 59 P.3d 1226, 1231 (2002)

20 ²⁰ *Hildahl v. Hildahl*, 95 Nev. 657, 663, 601 P.2d 58, 62 (1979)

21 ²¹ *See Warner* at 1379, P.2d at 709; see also *City Council of City of Reno v. Reno Newspapers, Inc.*, 105 Nev. 886, 893-94, 784 P.2d 974, 979 (1989) (holding that, where a fine is imposed as punishment for violation of an injunction, the proceeding is criminal in nature)

1 proof beyond a reasonable doubt that the conduct was contemptuous.²²
2 Further, the Nevada Supreme Court recently held that any contempt
3 order that does not contain a purge clause is criminal in nature and,
4 therefore, the accused has a Constitutional right to counsel.²³

5 Here, the alleged contempt cannot be completely purged—the
6 videos were already posted on the internet and it is impossible to erase
7 history. The damage is already done. The only proactive remedy this
8 Court can take is to use civil sanctions to compel the accused to remove
9 any remaining videos on the internet. Thus, any contempt order entered
10 by this Court would need to be punitive rather than to coerce compliance
11 and Constitutional safeguards described herein must be implemented.

12 **D. Brandon should be awarded attorney's fees and costs.**

13 Brandon is forced to file this motion to ensure compliance with
14 this Court's orders. Attorney Schneider and Mr. Sanson are 100%
15 responsible for the actions leading up to these postings, and Brandon
16 should be made whole for the fees and costs associated with addressing
17 same.

18 In addition to the cases where an allowance of fees is authorized by
19 specific statute, an award of attorney's fees to a prevailing party is lawful

20 ²² *Hicks v. Feiock*, 485 U.S. 624, 631B32 (1988); *City Council of Reno v. Reno*
Newspapers, 105 Nev. 886, 893B94, 784 P.2d 974, 979 (1989)

21 ²³ *Lewis v. Lewis*, 132 Nev. ___, 373 P.3d 878 (2016)

1 under NRS 18.010 and EDCR 7.60. This matter is ripe for an award of
2 attorney's fees to Brandon. The parties must identify the legal basis for
3 the award, and the District Court must evaluate the *Brunzell* factors for
4 the attorney and their support staff.²⁴

5 As counsel of record for Tina, Mr. Schneider is further personally
6 liable for Brandon's attorney's fees and costs under NRS 7.085.

7 NRS 7.085 allows a district court to make an attorney personally
8 liable for the attorney fees and costs an opponent incurs when the
9 attorney files, maintains or defends a civil action that is not well-
10 grounded in fact or is not warranted by existing law or by a good-faith
11 argument for changing the existing law."²⁵

12 In *Watson Rounds, P.C.*, the Nevada Supreme Court held that
13 NRCP 11 and NRS 7.085 each represent a distinct, independent
14 mechanism for sanctioning attorney misconduct.²⁶ NRCP 11 sanctions
15 are designed to deter future misconduct by an attorney, while NRS 7.085
16 is designed to hold the attorney liable for fees incurred by the other party
17 as a result of the misconduct. Michael does not suggest that NRCP 11

18
19 ²⁴ *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969); *Las Vegas Metropolitan Police Department v. Yeghiazarian*, 129 Nev. 770, 790, 312 P.3d 503, 510 (2013).

20 ²⁵ *Watson Rounds, P.C., v. Eight Judicial Dist. Ct. (Himelfarb & Associates)*, 131 Nev. Adv. Op. 79, 10 (September 24, 2015)

21 ²⁶ *Id.* at 1.

1 sanctions are appropriate, as these posting are not related to
2 representations made to the Court; however, there is no doubt that Mr.
3 Schneider's actions maintained these unnecessary proceedings out of
4 bad faith and someone should be responsible for Brandon's attorney's
5 fees and costs associated with same.

6 A Memorandum of Attorney's Fees and Costs will be
7 supplemented at this Court's direction.

8 **III. CONCLUSION**

9 Based on the foregoing, Brandon respectfully requests that this
10 Court issue an Order to Show Cause against Mr. Schneider and Mr.
11 Sanson, issue an Order to Personally Appear in Court to Ms. Tina Saiter,
12 and at the evidentiary hearing on this matter, grant the following relief:

13 1. Find that Mr. Schneider and Mr. Sanson are individually in
14 contempt of this Court's *Order Prohibiting Dissemination of*
15 *Case Material*, entered on October 6, 2016;

16 2. Order sanctions against Mr. Schneider and Mr. Sanson, as
17 follows:

18 a. An order requiring the removal of the videos from the
19 internet, including removal from the Russian website;

20 b. \$500 in monetary sanctions for each violation of this
21 Court's order; and

1 c. 12 hours incarceration²⁷ for each violation of this
2 Court's order;

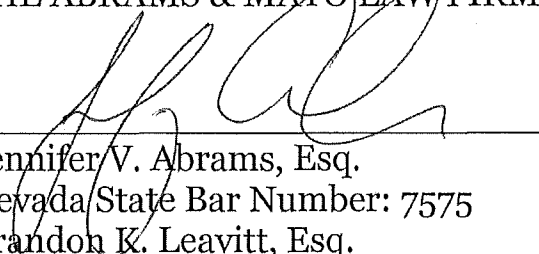
3 3. Award Brandon attorney's fees and costs; and

4 4. For any other relief this Court deems fit and proper.

5 DATED Monday, February 13, 2017.

6 Respectfully Submitted,

7 THE ABRAMS & MAYO LAW FIRM

8 
9 Jennifer V. Abrams, Esq.

10 Nevada State Bar Number: 7575

11 Brandon K. Leavitt, Esq.

12 Nevada State Bar Number: 11834

13 6252 South Rainbow Blvd., Suite 100

14 Las Vegas, Nevada 89118

15 Tel: (702) 222-4021

16 Attorneys for Plaintiff

17
18
19 ²⁷ As of this motion, the undersigned has been able to log 108 distinct posts
20 made by Mr. Sanson in violation of this Court's order. See Exhibit 8. If this Court
21 were to apply the maximum penalty of 25 days allowed by law and ordered the
sentence to be served consecutively, the term of incarceration would be 7 years, 4
months and 24 days. By only applying 12 hours per violation, the maximum term
results in a more reasonable 54 days.

1 **AFFIDAVIT OF BRANDON PAUL SAITER**

2 STATE OF NEVADA)
) ss:
3 COUNTY OF CLARK)

4 I, BRANDON PAUL SAITER, do solemnly swear to testify herein
5 to the truth, the whole truth and nothing but the truth.

6 1. I am the Plaintiff in the above-entitled action. I am above
7 the age of majority and am competent to testify to the facts contained in
8 this affidavit.

9 2. I make this affidavit in support of the foregoing *Motion for*
10 *an Order to Show Cause.*

11 3. On October 6, 2016, after Mr. Sanson disseminated videos
12 on the internet of the September 29, 2016 hearing, this Court entered an
13 *Order Prohibiting Dissemination of Case Material.* That order was
14 personally served on Mr. Sanson on October 8, 2016 and the Declaration
15 of Service was filed on October 14, 2016. Rather than abide by this
16 Court's directive, Mr. Sanson and VIPI continued to disseminate the
17 Saiter case materials repeatedly.

18 4. After having been served with this Court's *Order Prohibiting*
19 *Dissemination of Case Material*, a series of campaigns were launched by
20 Mr. Sanson and VIPI via email blast, YouTube, numerous Facebook
21 pages, Twitter accounts, Google+ accounts, and on various blogs and

1 Facebook "Groups" as well as unknown other avenues. These postings
2 included paid placements to more widely disseminate my family's
3 private material. Mr. Sanson re-posted the embedded hearing videos,
4 copies of this Court's orders, and named myself and Tina Saiter
5 personally, listing our case number repeatedly. Mr. Sanson continues to
6 comment on my income and business information, Ms. Saiter's
7 emotional state, and commentary by this Court on very sensitive,
8 personal matters—which, frankly, have no place in the public forum.

9 5. The emotional well-being of everyone in my family
10 (including our four minor children) has been compromised by Mr.
11 Schneider and Mr. Sanson. Both myself and Ms. Saiter, who both
12 expressed to this Court that we desperately wanted this case to be over
13 so we could move on with our lives and with raising our children, were
14 mortified to learn that the videos from our private divorce case were
15 being repeatedly disseminated all over the internet. I am especially
16 concerned about my four minor children, and the possibility that either
17 they, or their friends, would see their parents' private case materials, as
18 three of our children have Facebook accounts.

19 6. I have attempted—for months—to resolve this problem
20 without litigation. After Mr. Sanson published the videos of two of the
21 hearings from our case on YouTube, I submitted two privacy complaints.

1 As a result, YouTube removed the videos. When Mr. Sanson learned that
2 the videos were removed, he announced that he would continue to post
3 whatever he wanted and he posted the same two videos on vimeo. When
4 I learned that my private divorce hearings were again being
5 disseminated on the internet, I submitted two privacy complaints to
6 vimeo and they removed the videos. Again, as soon as Mr. Sanson
7 learned that the videos were removed, he found yet another forum to
8 violate my family's privacy—he posted them on a Russian website and
9 disseminated links to that website. In an interview on February 2, 2017,
10 Mr. Sanson admitted to posting the video to a Russian website and
11 stated “I’ll be damned if anyone can get that one down!” The link to the
12 Russian-hosted video continues to be repeatedly shared on social media.

13 7. Until Mr. Schneider and Mr. Sanson are compelled to
14 remove and stop re-posting private case information from the internet
15 pursuant to this Court’s order, the pain of my divorce will continue for
16 myself and my family.

17 8. For the remaining points, I have read said motion and
18 hereby certify that the facts set forth in the Points and Authorities
19 attached thereto are true of my own knowledge, except for those matters
20 therein contained stated upon information and belief, and as to those
21

1 matters, I believe them to be true. I incorporate said facts into this
2 Affidavit as though fully set forth herein.

3 FURTHER, AFFIANT SAYETH NAUGHT.

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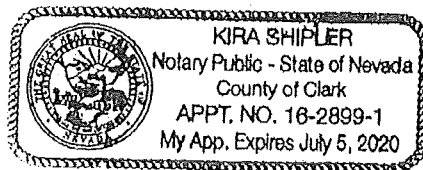
BRANDON PAUL SAITER

State of Nevada County of Clark

SUBSCRIBED AND SWORN to before
me this 10th day of February, 2017.

by Brandon Paul Saiter

NOTARY PUBLIC



MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

BRANDON PAUL SAITER

Plaintiff/Petitioner

v.

TINA MARIE SAITER

Defendant/Respondent

Case No. D-15-521372-D

Dept. L

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

<input checked="" type="checkbox"/> \$25	The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
-OR-	
<input type="checkbox"/> \$0	The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
<input type="checkbox"/>	The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
<input type="checkbox"/>	The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
<input type="checkbox"/>	The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
<input type="checkbox"/>	Other Excluded Motion (must specify) _____.

Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.

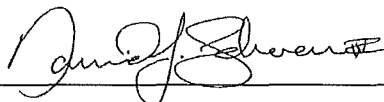
<input checked="" type="checkbox"/> \$0	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>	The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>	The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
-OR-	
<input type="checkbox"/> \$129	The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
-OR-	
<input type="checkbox"/> \$57	The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

Step 3. Add the filing fees from Step 1 and Step 2.

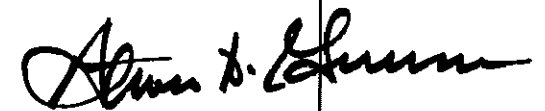
The total filing fee for the motion/opposition I am filing with this form is:	
<input type="checkbox"/> \$0	<input checked="" type="checkbox"/> \$25
<input type="checkbox"/> \$57	<input type="checkbox"/> \$82
<input type="checkbox"/> \$129	<input type="checkbox"/> \$154

Party filing Motion/Opposition: Plaintiff/Petitioner Date 02/13/2017

Signature of Party or Preparer



AA000052



CLERK OF THE COURT

1 MDSM
2 Anat Levy, Esq. (State Bar No. 12550)
3 ANAT LEVY & ASSOCIATES, P.C.
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5 Las Vegas, NV 89142
6 Phone: (310) 621-1199
7 E-mail: alevy96@aol.com; Fax: (310) 734-1538
8 Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND
9 STEVE SANSON

10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 MARSHALL S. WILICK and WILICK LAW) CASE NO. A-17-750171-C
13 GROUP,)
14) DEPT. NO.: XIX (19)
15 Plaintiffs,)
16)
17 vs.)
18)
19 STEVE W. SANSON; HEIDI J. HANUSA;)
20 CHRISTINA ORTIZ; JOHNNY SPICER; DON)
21 WOOLBRIGHTS; VETERNAS IN POLITICS)
22 INTERNATIONAL, INC.; SANSON)
23 CORPORATION; KAREN STEELMON; and)
24 DOES 1 THROUGH X)
25 Defendants.)

26 **ANTI-SLAPP SPECIAL MOTION TO DISMISS**

27 **PURSUANT TO NRS 41.650 et. seq.**

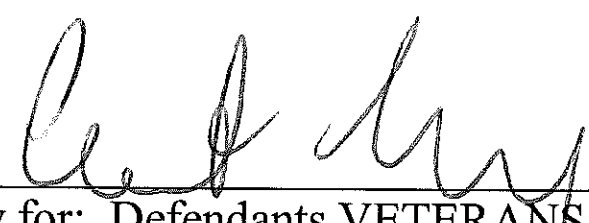
28 Defendants Veterans in Politics International, Inc. and Steve W. Sanson hereby move to
dismiss the complaint pursuant to Nevada's Anti-SLAPP Statutes, NRS 41.650 et al.

The motion should be granted because:

1. Defendants can establish by a preponderance of the evidence each of the requirements for dismissing the case under Nevada's anti-SLAPP statutes;
2. Plaintiffs cannot meet their evidentiary burden of establishing a prima facie case of a probability of prevailing on their claims.

1 This motion is made pursuant to NRS 41.650 et. seq., and is based on this motion, the
2 notice, the accompanying Memorandum of Points and Authorities, the pleadings and records on
3 file with the Court, and on such oral and documentary argument and evidence as the Court may
4 consider in support thereof.


5
6 DATED: February 17, 2017

By: 
Attorney for: Defendants VETERANS IN
POLITICS INTERNATIONAL, INC. and
STEVE W. SANSON
Anat Levy, Esq.
NV Bar No. 12250
Anat Levy & Associates, P.C.
5841 E. Charleston Blvd., #230-421
Las Vegas, NV 89142
Cell: (310) 621-1199
Alevy96@aol.com

13
14 **NOTICE OF MOTION**

15 PLEASE TAKE NOTICE that the undersigned counsel will appear at the Clark County
16 Courthouse, Eighth Judicial District Court, Las Vegas, Nevada on the 14 day of
17 March, 2017 at 9:00am .m. in Department XIX, or as soon
18 thereafter as counsel may be heard, to bring this ANTI-SLAPP MOTION TO DISMISS
19 PURSUANT TO NRS 41.650 et seq. on for hearing.

20
21 DATED: February 17, 2017

By: 
Attorney for: VETERANS IN POLITICS
INTERNATIONAL, INC. and STEVE W.
SANSON
Anat Levy, Esq.
NV Bar No. 12250
Anat Levy & Associates, P.C.
5841 E. Charleston Blvd., #230-421
Las Vegas, NV 89142
Cell: (310) 621-1199
Alevy96@aol.com

1 MEMORANDUM OF POINTS AND AUTHORITIES

2
3 I. INTRODUCTION

4 This is a classic example of a SLAPP lawsuit -- a Strategic Lawsuit Against Public
5 Participation ("SLAPP"). "A SLAPP suit is a meritless lawsuit that a party initiates primarily to
6 chill a defendant's exercise of his or her First Amendment free speech rights." (Panicaro v.
7 Crowley, NV Ct of Appeals, 1/5/2017). Nevada's anti-SLAPP statute, NRS 41.650, shields from
8 civil liability "a person who engages in a good faith communication in furtherance of the right to
9 petition or the right to free speech in direct connection with an issue of public concern . . . for
10 claims based upon the communication."

11 Defendants Veterans in Politics International, Inc. ("VIPI) and its President, Steve
12 Sanson, are being sued by Plaintiffs Marshal Willick and his firm, Willick Law Group, for five
13 statements that VIPI made online about Plaintiffs from December 25, 2016 to January 14, 2017.
14 Defendants hereby move to dismiss this suit as they hereby establish by a preponderance of the
15 evidence all the requirements of Nevada's anti-SLAPP statutes.

16 Specifically, each of Defendants' communications was made in good faith in that they
17 were either true, constituted non-actionable opinion which is not subject to a truth evaluation, or
18 was privileged. All of the statements were in good faith hyperlinked to the relevant source
19 documents, and there is no evidence, nor do Plaintiffs allege any facts that Defendants acted in
20 reckless disregard for the truth of the statements.

21 Moreover, each of the statements was directly related to an issue of "public concern" or
22 involved reporting on judicial or legislative proceedings. Defendants' statements pertained to a
23 Virginia Court's finding that Plaintiffs engaged in defamation per se against an opposing party,
24 Plaintiffs' views on then-pending legislation about shielding veteran disability pay from spousal
25 support calculations, Plaintiffs' employment of a suspended sex offender in its family law
26 offices, and Plaintiffs' actions in a case in which he sought unsuccessfully to overturn
27 precedence making an ex-wife ineligible to obtain survivorship benefits in her ex-husband's
28 pension plan, and his efforts to obtain attorneys' fees in that case. Defendants' statements were

1 also made in a public forum as they were made on publicly available websites on the internet.
2 And, although it is not necessary for an anti-SLAPP motion, it should be noted that Plaintiff
3 Willick and his firm are “public figures” as defined by the Supreme Court in Gertz v. Robert
4 Welch, Inc., infra. (see Section VI.A.3 herein). This further heightens the public concern of the
5 statements.

6 Given that Defendants can prove the elements for this motion by a preponderance of the
7 evidence, the burden then legally shifts to Plaintiffs to establish a prima facie case of a
8 probability of success on their claims, which they will be unable to do for the following reasons:

9 a. Plaintiffs’ first cause of action for defamation, which is the gravamen of the
10 complaint, fails because Defendants’ statements were true, substantially true, constituted non-
11 actionable opinion, or were absolutely privileged. Moreover, Plaintiffs are public figures, and
12 are unable to establish “malice” by Defendants as required to establish the claim.

13 b. Plaintiffs’ fourth and fifth causes of action for “false light” and “business
14 disparagement,” respectively, fail for the same reason. The statements are true or constitute
15 opinion or are privileged.

16 c. Plaintiffs’ second and third causes of action for intentional and negligent
17 infliction of emotional distress fail because the claims are based on the same protected speech
18 and cannot therefore serve as a basis for these claims. Moreover, Defendants’ statements do not
19 amount to the type of “outrageous” and socially unacceptable conduct required for a claim of
20 emotional distress. And, contrary to the allegations in the complaint, plaintiff Willick Law
21 Group, a corporate entity, is incapable of suffering emotional distress.

22 d. Plaintiffs’ eighth cause of action for purported RICO violations is frivolous. First,
23 only one of the predicate crimes alleged in the complaint fall within the crimes listed in NRS
24 207.360 that can support a RICO claim. And that one crime is pleaded with no facts whatsoever.
25 The rest of the crimes alleged are not RICO related crimes and cannot support a RICO claim.
26 Indeed, some of the purported “crimes,” such as wasting Willick’s time in having to deal with
27 Defendant’s postings, do not even constitute a crime.
28

1 e. Plaintiffs' ninth cause of action for copyright infringement fails for lack of subject
2 matter jurisdiction, because federal courts have exclusive original jurisdiction over copyright
3 claims. (28 U.S.C. 1338(a).) Moreover, Plaintiffs failed to register their purported copyrights, a
4 prerequisite to filing a copyright infringement case (17 U.S.C. §411(a)), and ignore that that
5 Defendants' use of the purportedly copyrighted work falls under the Copyright Act's "fair use"
6 exception.

7 f. With each of the above causes of action failing, plaintiffs' sixth and seventh
8 causes of action for "concert of action" and "civil conspiracy" must necessarily fail as well.

9 Finally, the court should note the context in which this case was filed. This suit is but
10 one part of Plaintiffs' aggressive campaign to stifle VIPI's free speech rights. As detailed in
11 Section II below, Plaintiffs' campaign includes, among other things, (a) the filing by Jennifer
12 Abrams (counsel herein and Willick's fiancé) of another lawsuit pending against VIPI and its
13 officers and directors for the exact same causes of action, but pertaining to statements about her
14 behavior in court proceedings (b) Plaintiffs publishing false statements about VIPI and Sanson
15 on line, and (c) Plaintiffs and Abrams sending "take down" notices to VIPI's online vendors so
16 that VIPI can no longer use services on which it depends to communicate (on any matter) with
17 its members and audience.

18 Moreover, filing suit now appears be a "pattern and practice" by Plaintiffs as a way to
19 stifle speech. In 2012, Plaintiff filed another defamation case, again alleging the exact same
20 causes of action, against another veterans group that was critical of Plaintiffs' views on certain
21 veteran-related matters. (See complaint in Willick v. Jere Beery et. al, attached as Ex. 1 to Levy
22 Dec.). In that case, the principal defendants were unrepresented by counsel, and after years of
23 litigation, the case ended in a non-monetary settlement with those defendants.

24 This court should therefore put a fast and complete end to this case. Consistent with the
25 policies underlying Nevada's anti-SLAPP statutes, this Court should not let our judicial system
26 become a financial sledgehammer that lawyers use to stifle constitutionally protected speech.
27
28

1 **II. BACKGROUND AND PLAINTIFFS' CAMPAIGN TO**
2 **STIFLE DEFENDANTS' FREE SPEECH RIGHTS**

3 Plaintiffs Willick and Willick Law Group, and Willick's fiancée, Jennifer Abrams, have
4 mounted an aggressive campaign to harass, attempt to intimidate and attempt to financially "hit"
5 VIPI and its officers to get VIPI to stop posting constitutionally protected articles, court videos
6 and documents online.

7 In October 2016, VIPI, which is a non-profit corporation that advocates on behalf of
8 veterans and which works to expose public corruption and wrongdoing, published a court video
9 of a family court proceeding showing Abrams berating a judge and the judge arguing with
10 Abrams but failing to effectively control her courtroom. (Sanson Decl., ¶¶ 2-3.)

11 Abrams thereafter sought to have VIPI take down the video. She sent VIPI an email and
12 per her urging, had the judge do the same, asking VIPI to take the video down. (*Id.*, ¶ 4 Ex. 1.)
13 VIPI, a media entity and strong advocate of free speech, refused to do so. (*Id.*, ¶ 4.)

14 Abrams then obtained a court order from the same family court judge, purporting to seal
15 all documents in the case (even, impermissibly, the pleadings), including the court video, on a
16 retroactive basis. Abrams served the order on VIPI (*Id.*, ¶ 5, Ex. 2), but since family court does
17 not have jurisdiction over VIPI, the purported order was ineffective. VIPI therefore lawfully
18 kept the court video and its articles online. (*Id.*, ¶ 5.)

19 On January 9, 2017, unable to get VIPI to take the video down, Abrams sued VIPI and
20 each of its officers and directors (including one in Missouri), and another corporation that the
21 Sanson family owns (Sanson Corp.) but is unrelated to VIPI and has nothing to do with VIPI's
22 activities. (See, *Abrams v. Schneider et. al.*, Case no. A-17-749318-C complaint attached as Ex.
23 6 to Sanson Decl.) (the "Abrams Complaint"). Suing this broad brush of defendants appears to
24 have been calculated to maximize the financial pain of litigation for VIPI. Abrams' suit alleged
25 the same causes of actions as are involved in the present lawsuit, albeit pertaining to the
26 publication of the court video and VIPI's comments about it. (Sanson Decl., Ex. 3.) Abrams'
27 fiancé, plaintiff Willick, is representing her in that case.
28

1 Willick then started posting the Abrams Complaint on various internet websites,
2 including on Willick Law Group's website. He also issued a letter to Sanson, which he did not
3 send to Sanson but which he posted on the Willick Law Group website, Facebook, and other
4 online locations. (Sanson Decl., ¶ 7, Ex. 4.)

5 Ironically, Willick's letter to Sanson disparages VIPI and Sanson using the same or worse
6 language than of which Willick complains in this present lawsuit. Specifically, Willick accuses
7 VIPI of manipulating its candidate interview process (Ex. 4, p. 3), Sanson of using VIPI's
8 income for his personal expenses, not filing tax returns for VIPI, and using VIPI as an "unethical
9 scheme to extort concessions." (Ex. 4, p. 3) He further accuses Sanson of being a
10 "hypocrite...but even worse," "a sleazy extra out of 'Harper Valley PTA,'" states that Sanson is
11 the very definition of "hypocrite – not to mention slimy beyond words." (Ex 4., p. 5) Willick
12 also calls Sanson "two-bit unemployed hustler," and accuses him of "shaking down candidates
13 for cash and conspiring with like-minded cronies." (Ex. 4, p. 5) He calls Sanson "repugnant,"
14 and states that VIPI's radio show is a "fraud" and that VIPI is a "sham organization." (*Id.*)
15 Willick further states that Sanson was "forced to flee California." (*Id.*, pp. 5-6.) None of the
16 above statements are true and they are clearly worse than the statements of which Willick
17 complains in this action.
18

19 When Willick's letter and postings did not intimidate VIPI into taking down its posts,
20 Willick filed the instant action on January 27, 2017, alleging the exact same causes of action as
21 in the Abrams Complaint, but pertaining to a handful of sentences (with hyperlinked court
22 documents or news articles) that VIPI posted online about Willick from December 25, 2016 to
23 January 14, 2017. Not coincidentally, Abrams is representing Willick in this case, and like
24 Abrams, Willick not only sued VIPI and its president Sanson, but each of VIPI's officers and
25 directors and Sanson Corp., again apparently to maximize VIPI's financial burden of litigation.

26 Willick also posted Sanson's picture online with the word "hypocrite" across it, again,
27 one of the same descriptions for which he is suing Sanson in this lawsuit. (Sanson Decl., ¶ 10,
28 Ex. 5.)

1 When VIPI still didn't succumb to Willick's tactics, Abrams and Willick started sending
2 "take down" notices to VIPI's online vendors, including to YouTube, Facebook, Vimeo and
3 Constant Contact claiming that VIPI was somehow engaging in copyright violations under the
4 Digital Millennium Copyright Act ("DMCA") and/or were somehow violating privacy rights.
5 (Sanson Decl., ¶15 , Ex. 15.) These notices caused those vendors to shut down VIPI's access to
6 those services pending their investigations or pursuant to their pre-set policies under the DMCA.
7 (Id., ¶ 16.) VIPI has spent and continues to spend considerable time dealing with these shut
8 downs which affect not just its postings on Willick and Abrams, but also its other business
9 activities such as announcing guests on its weekly radio show, announcing its upcoming
10 endorsement interviews for municipal races, circulating news about legislation and politics and
11 its general operations. (Id., ¶ 16.)¹

13 III. THE ALLEGEDLY DEFAMATORY STATEMENTS

14 Willick is suing defendants for the following five written statements made by Steve
15 Sanson in his capacity as VIPI's President:

16 1. A December 25, 2016 statement on the VIPI website stating "[t]his is the type of
17 hypocrisy we have in our community. People that claim to be for veterans but yet the screw us
18 for profit and power." (Cmplt.¶¶ 20-25.) (A copy of this statement is attached as Ex. 7 to
19 Sanson Decl.) The statement was hyperlinked to the November 14, 2015 interview that Plaintiff
20 gave on Defendant VIPI's weekly radio show regarding Willick's views on Assembly Bill 140, a
21 proposed law that VIPI supported and that Willick testified against before the legislature. See
22 testimony attached as Ex. 8 to Sanson Declaration. The bill pertained to excluding a veteran's
23 disability benefits from spousal support calculations. Willick had also specifically written to
24 Sanson about the bill, which letter was the impetus for VIPI inviting Willick on its radio show to
25 discuss his views. (Sanson Decl., ¶ 14a, Ex. 9.)

26
27 ¹ Sanson also recently received texts from a phone number that appears upon initial investigation
28 to belong to someone with the same name as Abrams' daughter (Sanson Decl., ¶ 12, Ex. 6), and
had the SIM card from his cell phone recently stolen (Sanson Decl., ¶ 13). It is unknown at this
time whether these events are related to plaintiffs or Abrams.

1 2. A January 12, 2017 post on the VIPI website stating “Attorney Marshall [sic]
2 Willick and his pal convicted of sexually coercion of a minor Richard Crane was found [sic]
3 guilty of defaming a law student in United States District Court Western District of Virginia
4 signed by US District Judge Norman K. Moon.” (Cmplt., ¶¶ 26-29.) This article was
5 hyperlinked to a Review Journal article about Crane’s conviction for child sexual malfeasance
6 and suspension from the practice of law, the State Bar’s Order of Suspension of Crane, and
7 Judge Moon’s Order finding that Willick committed defamation per se. (Sanson Decl., Ex.10.)

8 3. A January 14, 2017 post on the VIPI website stating “[w]ould you have a Family
9 Attorney handle your child custody case if you knew a sex offender works in the same office?
10 Welcome to The [sic] Willick Law Group.” (Cmplt., ¶¶30-31.) The statement was hyperlinked
11 to several documents showing that Crane was working for Willick despite Crane’s suspension
12 from the practice of law. (A copy of this statement is attached as Ex.12 to Sanson Decl.)

13 4. Two January 14, 2017 Facebook postings pertaining to a recent case that Willick
14 handled, entitled Holyoak v. Holyoak.

15 a. One posting stated: “Nevada Attorney Marshall Willick gets the Nevada
16 Supreme Court decision: From looking at all these papers It’s obvious that Willick scammed his
17 client, and later scammed the court by misrepresenting that he was entitled to recover property
18 under his lien and reduce it to judgement. He did not recover anything. The property was
19 distributed in the Decree of Divorce. Willick tried to get his client to start getting retirement
20 benefits faster. It was not with 100,000 in legal bills. Then he pressured his client into allowing
21 him to continue with the appeal.” (Cmplt., ¶¶ 32-33.) The posting was hyperlinked to a
22 Supreme Court decision in Leventhal v. Lobello. (A copy of this statement is attached as Ex. 13
23 to Sanson Decl.)

24 b. The other posting stated: “Attorney Marshall [sic] Willick loses his appeal to the
25 Nevada Supreme Court.” A copy of the Nevada Supreme Court’s decision in Holyoak v.
26 Holyoak was hyperlinked to the statement. (Cmplt., ¶¶ 34-35.) (A copy of this statement is
27 attached as Ex. 14 to Sanson’s Decl.)
28

1 Tellingly, although Plaintiffs allege that the above statements are defamatory, they fail to
2 allege *any facts* in the complaint stating how or why these statements are untrue or defamatory.
3

4 **IV. STANDARD FOR GRANTING ANTI-SLAPP MOTIONS**

5 NRS 41.650, Nevada’s anti-SLAPP statute, states as follows: “A person who engages in
6 a good faith communication in furtherance of the right to petition or the right to free speech in
7 direct connection with an issue of public concern is immune from any civil action for claims
8 based upon the communication.”

9 NRS 41.637 (3) and (4), respectively, define such a “good faith communication” in
10 relevant part as a “[w]ritten or oral statement made in direct connection with an issue under
11 consideration by a legislative, executive or judicial body or any other official proceeding
12 authorized by law,” or a “[c]ommunication made in direct connection with an issue of public
13 interest in a place open to the public or in a public forum.”

14 The communication at issue must be made in good faith, i.e., it must either be “truthful or
15 made without knowledge of its falsehood.” (NRS 41.637; *see also*, Moonin v. Nevada ex rel.
16 Department of Public Safety Highway Patrol, 960 F. Supp. 2d 1130, 1146 (D. Nev. 2014).)

17 Defendants must show by a preponderance of the evidence that their communications
18 meet the above criteria. (NRS 41.660(3)(a).)

19 Once met, the burden then shifts to Plaintiffs “to demonstrate with prima facie evidence a
20 probability of prevailing on the claim.” (NRS 41.660(3)(b).) Absent such prima facie
21 evidentiary showing, the case must be dismissed with prejudice. (NRS 41.660(5): “dismissal
22 operates as an adjudication on the merits.”)
23

24 **V. DEFENDANTS MEET THE ANTI-SLAPP CRITERIA TO** 25 **HAVE THIS MOTION GRANTED.**

26 Each of the statements at issue meets the criteria for granting this anti-SLAPP motion.
27 They were made in good faith, they furthered Defendants’ exercise of free speech, and they were
28 directly connected to an issue of public concern and/or to legislative or judicial issues. And, they

1 were all made on publicly available websites, therefore “a place open to the public or in a public
2 forum.”

3 **A. DEFENDANTS MADE THE COMMUNICATIONS IN GOOD FAITH**

4 Each of the statements at issue were made in good faith in that they were either true or
5 substantially true and therefore protected (Gillespie v. Council, (Nev. App., 2016)), or they
6 constituted non-actionable opinion that is not subject to a truthfulness evaluation (Lubin v.
7 Kunin, 17 P.3d 422, 117 Nev. 107 (2001)), or they were privileged as further discussed in
8 Section VI.A.2 herein.

9 Moreover, each of the statements was hyperlinked to relevant source materials, thereby
10 further showing Defendants’ good faith. Courts have routinely held that hyperlinking to source
11 materials undercut defamation claims as the reader is free to personally review the materials and
12 evaluate the statements made.

13 1. What Constitutes Non-Actionable Opinion?

14 The determination of whether a statement is a protected “opinion” is a question of law for
15 the Court to decide. (Celle v. Fillipino Reporter Enterprises Inc., 209 F.3d 163, 178 (2d Cir.
16 2000).)

17 A statement “will receive full constitutional protection” if it is not a “provably false”
18 statement. (Milkovich v. Lorain Journal Co., 497 U.S. 1, 20, 110 S. Ct. 2695 (1990).) “Loose,
19 figurative, or hyperbolic language” is protected by the First Amendment, as it cannot reasonably
20 be interpreted as stating actual, provable facts about an individual. (Milkovich, 497 U.S. at 21-
21 23.) The more imprecise the meaning is of a statement, the more likely it will be viewed as
22 protected “opinion.” (Id.)

23 For example, in McCabe v. Rattiner, 814 F.2d 839, 842 (1st Cir. 1987), the word “scam”
24 was held to be imprecise and therefore constituted protected opinion. In Wait v. Beck’s N.Am.
25 Inc., 241 F.Supp.2d 172, 183 (N.D.N.Y. 2003) the court found that “a statement that someone
26 has acted...unethically generally [is] constitutionally protected statements of opinion.” In Biro,
27 883 F.Supp.2d at 453, the court held that the use of the terms “shyster,” “con man,” and finding
28 an “easy mark” is the type of “rhetorical hyperbole” and “imaginative expression” that is

1 typically understood as a statement of opinion. (Milkovich, 497 U.S. at 20.) In Adelson v.
2 Harris, 973 F.Supp.2d 471, 493 (SDNY 2013) (applying NV law), the court held that
3 “characterization of Adelson's money as “dirty” and “tainted” is the sort of rhetorical hyperbole
4 and unfalsifiable opinion protected by the First Amendment.” Likewise, in Buckley v. Littell,
5 539 F.2d 882, 893 (2d Cir. 1976), the words “fascist,” “fellow traveler,” and ‘radical right’ were
6 held to be political labels that were too imprecise to be provable facts and were therefore
7 opinions.

8 Moreover, political speech in particular is typically found to be protected “opinion.”
9 Courts “shelter strong, even outrageous political speech,” on the ground that “the ordinary reader
10 or listener will, in the context of political debate, assume that vituperation is some form of
11 political opinion neither demonstrably true nor demonstrably false.” (Sack, Sack on Defamation
12 at §4:3:1[B], 4-43; Planned Parenthood of the Columbia/Willamette, Inc. v. Am. Coal. of Life
13 Activists, 244 F.3d 1007, 1019 (9th Cir. 2001) (acknowledging the well-recognized principle that
14 political statements are inherently prone to exaggeration and hyperbole.) As stated in Koch v.
15 Goldway, 817 F.2d 507, 509 (9th Cir. 1987), where the “circumstances of a statement are those of
16 a heated political debate ... certain remarks are necessarily understood as ridicule or
17 vituperation, or both, but not as descriptive of factual matters.”

18 2. Using Hyperlinks to Link to Underlying Source Materials Turns A Statement Into
19 Non-Actionable Opinion.

20 The use of hyperlinks to disclose underlying source documents in a statement is
21 encouraged and legally turns the statement into one of non-actionable opinion. In Nicosia v. De
22 Rooy, 72 F.Supp.2d 1093 (N.D. Cal. 1999), the Court considered the ability of hyperlinks to
23 transform a statement into constitutionally protected opinion. In that case, the plaintiff accused
24 the defendant of defamation for accusing him of embezzlement even though the internet article at
25 issue hyperlinked to yet two other internet articles and did not even provide a direct link to the
26 source materials. The court nonetheless found that even the more remote articles were part of
27 the context of the embezzlement accusation and the statement therefore did not constitute
28 defamation.

1 In Franklin v. Dynamic Details, Inc., 116 Cal.App.4th 375, 379, 10 Cal.Rptr.3d 429
2 (2004) the Court held that “[t]he e-mails disclosed the facts upon which the opinions were based
3 by directing the reader to the FCC Web site and (via a Web link on the FCC Web site) to another
4 company’s Web site... A reader of the emails could view those Web sites and was free to accept
5 or reject Axton’s opinions based on his or her own independent evaluation.”

6 Similarly, in Agora Inc. v. Axxess, Inc., 90 F.Supp.2d 697, 702-05 (D.Md. 2000) the
7 court dismissed plaintiff’s defamation claim based in part on facts disclosed in hyperlinked
8 documents.

9 In Jankovic v. Inter’l Crisis Grp., 429 F.Supp.2d 165, 177 n.8 (D.D.C. 2006) the court
10 noted that even if the meaning of an allegedly defamatory statement was unclear, it was clarified
11 by the “two internet links” at the end of the sentence. The Court stated “[w]hat little confusion
12 the sentence could possibly cause is easily dispelled by any reader willing to perform minimal
13 research.”

14 As stated in Adelson v. Harris, 973 F.Supp.2d 471, 485 (S.D. NY 2013), applying
15 Nevada law:

16 “Protecting defendants who hyperlink to their sources is good public policy, as it
17 fosters the facile dissemination of knowledge on the Internet. It is true, of course,
18 that shielding defendant who hyperlink to their sources makes it more difficult to
19 redress defamation in cyberspace. But this is only so because Internet readers
20 have far easier access to a commentator’s sources. It is to be expected, and
celebrated, that the increasing access to information should decrease the need for
defamation suits.”

21 Here, each of Defendants’ statements at issue contained hyperlinks to source materials,
22 whether to the VIPI radio show, Court Orders, newspaper articles or other documents.

23 Accordingly, as a matter of law, it makes no difference if Plaintiff believes that VIPI’s
24 opinions were unfair or unwarranted so as to effectively turn it into a statement of false fact, as
25 the readers were free to read the source materials and opine on it for themselves.

26 3. Analysis Showing That Each of the Statements Were Either True, Substantially True
27 or Constituted Non-Actionable Opinion:

28 a. VIPI’s December 25, 2016 statement “[t]his is the type of hypocrisy we have in
our community. People that claim to be for veterans but yet they screw us for profit and power”

1 is opinion. As with the word “scam” in the McCabe case or “unethical” in the Wait case, the
2 words “hypocrisy” and “screw us for profit and power” are so imprecise that they cannot be
3 proven one way or the other as established fact and therefore constitute opinion.

4 *Tellingly, Willick himself posted a picture of Defendant Sanson on its website with the*
5 *word “hypocrite” written across Sanson’s body. (Sanson Decl., Ex. 5.) Willick also wrote and*
6 *published a letter calling Sanson a “hypocrite...but even worse,” “hypocrite – not to mention*
7 *slimy beyond words,” a “two-bit unemployed hustler,” accused Sanson of “shaking down*
8 *candidates for cash and conspiring with like-minded cronies,” called the VIPI radio show a*
9 *“fraud” and VIPI “a sham organization.”* If Willick believes that “hypocrite” is defamatory,
10 then he too is liable for defamation against VIPI and Sanson. (Sanson Decl., Ex. 4.) Surely, at a
11 minimum, the court should not give relief to someone who engages in the same or worse actions
12 that of which he complains.

13 Moreover, the statement pertained to political speech and should be given even more
14 consideration as non-actionable opinion. Willick admits that his appearance on the VIPI show
15 was to discuss Assembly Bill 140: “the reason I was invited onto your show was your
16 unhappiness with my testimony before the legislature on topics about which I am an expert and
17 you know very little.” (Sanson Decl., Ex. 4. p. 4.) VIPI’s statement at issue was made in direct
18 response to, and was hyperlinked to, Plaintiff Willick’s 2015 VIPI radio interview in which
19 Willick explained why he challenged Assembly Bill 140 before the Nevada state legislature. (See
20 also, legislative minutes showing Willick’s testimony attached as Sanson Decl., Ex. 8).

21 Willick had also sent a letter to the legislature on AB 140, again making remarks about
22 others similar to the ones he finds objectionable in this case. He states: “*So-Called ‘Veteran*
23 *Support Groups’ Seek to Pervert Family Law For Their Personal Enrichment,*” he calls veteran
24 *groups that disagree with him “hack-jobs,” “nut jobs,” claims that they have “un-American*
25 *political agendas,” are “fringe groups,” and “flag-wrapped militants.”* (Sanson Decl., Ex. 9.)
26 Clearly, VIPI’s December 25, 2016 posting pertained to political speech and should be afforded
27 wide discretion for constituting permissible opinion.
28

1 b. The January 12, 2017 post stating: “[a]ttorney Marshall [sic] Willick and his pal
2 convicted of sexually coercion of a minor Richard Crane was found [sic] guilty of defaming a
3 law student in United States District Court Western District of Virginia signed by US District
4 Judge Norman K. Moon,” was also true. This statement, however, was inadvertently issued
5 without commas and consequently became ambiguous. (Sanson Decl., ¶ 14b.) The post was
6 intended to read: “Attorney Marshall [sic] Willick, and his pal convicted of sexually coercion of
7 a minor Richard Crane, was found guilty of defaming a law student in United States District
8 Court Western District....” (Sanson Decl., ¶ 14b.) VIPI clarified the post on January 18, 2017,
9 just six days later, rectifying any ambiguity. (*Id.*; see Clarification attached as Ex. 11 to Sanson
10 Decl.) Notably, NRS 41.337 requires media to make public corrections within *20 days of*
11 *demand*; this clarification was done within *6 days of publication*, without a demand.) Moreover,
12 any ambiguity caused by the statement should not be actionable since Defendants hyperlinked to
13 the relevant court orders and newspaper article in both the original and clarified posts. (*Id.*; see
14 also, Jankovic v. Inter’l Crisis Grp., 429 F.Supp.2d 165, 177 n.8 (D.D.C. 2006)[“what little
15 confusion the sentence could possibly cause is easily dispelled by any reader willing to perform
16 minimal research.”].)

17 The post was truthful as Willick was indeed found to have committed defamation per se
18 on an opposing party as shown by the Court Order to which it was hyperlinked (Sanson Decl.,
19 Exs. 10, 11) and his colleague Richard Crane was indeed found to have engaged in sexual
20 coercion of a minor and was suspended from the practice of law as shown from the Review
21 Journal Article and State Bar Suspension Orders also attached to the statement. (*Id.*)

22 Indeed, Willick acknowledges the truthfulness of the Crane portion of the statement in his
23 online letter to Sanson in which he states “[y]ou have now decided to attack me on your mailing
24 list, but apparently could not come up with anything to criticize, so you decided to publicize the
25 long-past personal problems of one of my employees.” (Sanson Decl., Ex. 4, p. 4.)

26 c. The January 14, 2017 Facebook post stating “[w]ould you have a Family Attorney
27 handle your child custody case if you knew a sex offender works in the same office? Welcome
28 to the [sic] Willick Law Group,” was also true. The question hyperlinked to source materials

1 from which the reader could see that Richard Crane was indeed still working with Willick even
2 though Crane was suspended from the practice of law due to sexual malfeasance with a child.
3 (Sanson Decl., ¶ 14c, Ex. 12.)

4 Moreover, as indicated above Willick confirms in his online letter to Sanson that Crane is
5 one of his employees. (Sanson Decl., Ex. 4 p. 4: "...the long-past personal problems of one of
6 my employees."

7 d. The two January 14, 2017 Facebook posts pertaining to Willick's actions in his case
8 Holyoak v. Holyoak were also protected good faith speech.

9 (1) The January 14, 2017 VIPI Facebook post stating "[a]ttorney Marshall
10 [sic] Willick loses his appeal to the Nevada Supreme Court" was true or substantially true. The
11 statement was hyperlinked to the Nevada Supreme Court's ruling in Holyoak v. Holyoak, Case
12 no. 67490, dated May 19, 2016 in which Willick represented the Respondent. (Cmplt., ¶¶ 34-35;
13 see Ex. 14 to Sanson's Decl.) In that case, Willick sought to have the Nevada Supreme Court
14 overturn prior precedent to find that his client was entitled to survivorship rights in her husband's
15 pension plan. (See, Willick's Supreme Court brief attached as Ex. 2 to Levy Dec., and his
16 opponent's Reply brief attached as Ex. 3 to Levy Decl.) The Supreme Court declined to overturn
17 its prior precedent as Willick failed to properly raise the issue by way of a counter-appeal. (See
18 Footnote 3 in Supreme Court opinion, attached as Ex. 14 to Sanson Decl.) In addition, Willick
19 had filed a motion for partial remand to the District Court pending the appeal, and the Supreme
20 Court denied his motion. (See motion and the court's ruling, attached as Exs. 4 and 5 to Levy
21 Decl.)

22 (2) The other January 14, 2017 VIPI Facebook post was related to the
23 Holyoak statement mentioned above, and was either true or constituted non-actionable opinion:

24 "Nevada Attorney Marshall Willick gets the Nevada Supreme Court decision:
25 From looking at all these papers it's obvious that Willick scammed his client, and
26 later scammed the court by misrepresenting that he was entitled to recover
27 property under his lien and reduce it to judgement. He did not recover anything.
28 The property was distributed in the Decree of Divorce. Willick tried to get his
client to start getting retirement benefits faster. It was not with 100,000 in legal
bills. Then he pressured his client into allowing him to continue with the appeal."

1 The Court in McCabe v. Rattiner, 814 F.2d 839, 842 (1st Cir. 1987), held that the word
2 “scam” constitutes opinion. The statement of whether Willick’s services were worth \$100,000 in
3 legal fees is obviously opinion. The rest of the statement is true, in that Willick’s client in the
4 Holyoak case had already divided the property pursuant to a settlement with her husband before
5 retaining Willick (see Supreme Court opinion which was hyperlinked to VIPI’s statement and
6 which recites the facts of the case, attached as Ex. 14 to Sanson Decl.), and Willick did try to get
7 his client to start getting retirement benefits faster (see Willick’s Supreme Court brief, attached
8 as Ex. 2 to Levy’s Decl.).

9 VIPI’s posting also hyperlinked to the Lobello decision in which the Supreme Court laid
10 out the requirements for attorneys to recover on a fee lien. (Sanson Decl., Ex. 13.) There’s no
11 reason that Sanson on behalf of VIPI would not be entitled to express an opinion about whether
12 the fees that Willick sought were appropriate. Indeed, Willick’s motion for fees in that case and
13 his client’s objections to his request demonstrate how contentious the issue was. (See Willick’s
14 motion for fees and his client’s opposition in the Holyoak case, attached as Exs. 6 and 7 to Levy
15 Decl.)

16 Tellingly, the complaint fails to allege *any facts* to support its conclusory allegations that
17 the statements at issue were made with reckless disregard of their falsity. VIPI at all times
18 believed the statements to be true (Sanson Decl., ¶ 15), provided hyperlinks to its source
19 materials (Id.) and immediately clarified the single statement that was inadvertently posted
20 without the intended commas. (Sanson Decl., ¶ 14b.) Accordingly, there is no plausible
21 showing that the communications were made in anything other than good faith.

22 **B. THE COMMUNICATIONS WERE DIRECTLY RELATED TO A**
23 **MATTER OF “PUBLIC INTEREST” (INCLUDING JUDICIAL OR LEGISLATIVE**
24 **MATTERS).**

25 Recognizing that California’s anti-SLAPP laws are similar to those of Nevada’s, Nevada
26 recently adopted California’s standard for determining whether a particular speech is a matter of
27 “public interest.” (Shapiro v. Welt, 133 Nev., Adv. Op. 6, Case no. 67596, filed Feb. 2, 2017
28

1 ["We take this opportunity to adopt California's guiding principles as enunciated in *Piping Rock*
2 *Partner*, for determining whether an issue is of public interest under NRS 41.637(4)."].)

3 Under the California, now Nevada, standard the Court must consider the following
4 factors in determining whether the statements are of public interest:

5 (1) "public interest" does not equate with mere curiosity;

6 (2) a matter of public interest should be something of concern to a substantial
7 number of people; a matter of concern to a speaker and a relatively small specific
8 audience is not a matter of public interest;

9 (3) there should be some degree of closeness between the challenged statements
10 and the asserted public interest – the assertion of a broad and amorphous public
11 interest is not sufficient;

12 (4) the focus of the speaker's conduct should be the public interest rather than a
13 mere effort to gather ammunition for another round of private controversy; and

14 (5) a person cannot turn otherwise private information into a matter of public
15 interest simply by communicating it to a large number of people.

16 (Piping Rock Partners, Inc. v. David Lerner Assoc., 946 F.Supp.2d 957, 968 (N.D. Cal. 2013),
17 *aff'd*, 609 F. App'x 497 (9th Cir. 2015))

18 Under the above test, each of the statements at issue was of public interest:

19 1. The December 25, 2016 statement pertained to the 2015 interview that Willick
20 gave to VIPI in which Willick espoused his viewpoint that a veteran's disability pay should be
21 taken into account in determining the amount of spousal support that the veteran should pay
22 upon divorce. Since VIPI's comments were about then-pending legislation, they were of broad
23 public concern. Moreover, Willick had voluntarily injected himself into this issue by writing to
24 and testifying before the Nevada legislature on the topic (Sanson Decl., Exs. 8, 9), and Willick
25 appeared on the VIPI radio show expressly to discuss his viewpoints on the matter (Sanson
26 Decl., ¶ 14a, Ex. 4, p.4: "The reason I was invited onto your show was your unhappiness with
27 my testimony before the legislature...") VIPI's statement was directly related to the issue and
28 affected a large number of people -- all disabled divorcing veterans in Nevada (and to the extent
the proposed legislation was precedential, all such veterans in other states as well). This also

1 falls under NRS 41.637(3) of the anti-SLAPP statute as being in direct connection with an issue
2 under consideration by a legislative proceeding.

3 2. The January 12, 2017 statement, about a federal judge in Virginia finding that
4 Willick committed defamation per se against a law student who was opposing his client in a
5 divorce case, and Willick's colleague, Richard Crane, being suspended from the practice of law
6 for committing sexual coercion on a minor, likewise was of public concern.

7 Given Willick's notoriety in family law (see Levy Decl., Exs. 8-10), the articles written
8 about him in the Review Journal, the Las Vegas Sun, and numerous other newspapers and
9 publication, his activism on the State Bar of Nevada, the numerous state and national awards he
10 received for his work, his numerous publications on divorce law and practice including 3 books,
11 his status as a public figure and his many years of litigating family law cases, the finding by a
12 judge that Willick had defamed an opposing party and that one of his partners had been disbarred
13 for sexual misconduct with a child are clearly issues of public concern. Indeed, the conviction of
14 Willick's employee, Richard Crane, was reported in the Review Journal precisely because it was
15 of public concern.

16 3. The January 14, 2017 post also refers to the conviction and suspension of Richard
17 Crane and the fact that Richard Crane appeared to be continuing to work at Willick's offices
18 despite his suspension. The post was accompanied by links to relevant documents showing such
19 employment. Again, given Willick's notoriety, the nature of the Willick Law Group's practice
20 being in family law, the fact that Crane's conviction and suspension was reported in newspapers,
21 this statement was of "public interest."

22 4. The two January 14, 2017 Facebook posts pertaining to Willick's work on the
23 Holyoak case, how he lost his bid to overturn Supreme Court precedent and how he sought
24 \$100,000 for his work on the case is likewise of public concern. It concerned a notorious public
25 figure in the area of divorce law in Nevada and it involved a Supreme Court case in which
26 Willick sought to overturn prior Supreme Court precedent.

1 **C. THE COMMUNICATIONS WERE MADE IN A PLACE OPEN TO THE**
2 **PUBLIC OR IN A PUBLIC FORUM.**

3 As admitted in the complaint, Defendants statements were posted on the internet,
4 including on VIPI's publicly accessible website, and redistributed via publicly accessible
5 Facebook pages and/or via Constant Contact group emails. (See, Cmplt., ¶¶ 20-35, repeating in
6 part: "[The statements] were published, republished, or attributed to one another, or disseminated
7 to third parties across state lines, via email across multiple states, and via numerous social media
8 sites including Pinterest, Google, Twitter and the following Facebook pages...")

9 Accordingly, Defendants meet this final criteria for their anti-SLAPP motion in that each
10 of the communications was made in "a place open to the public or in a public forum."
11 The burden now shifts to Plaintiffs.

12
13 **VI. PLAINTIFFS CANNOT MEET THEIR EVIDENTIARY BURDEN OF**
14 **ESTABLISHING A PRIMA FACIE CASE OF A PROBABILITY**
15 **OF PREVAILING ON THEIR CLAIMS.**

16 The complaint purports to allege causes of actions for defamation, intentional and
17 negligent infliction of emotional distress, false light, business disparagement, concert of action,
18 civil conspiracy, RICO violations and copyright infringement. Plaintiffs cannot establish an
19 evidentiary prima facie case for succeeding on any of these claims.

20 Further, each of the Plaintiffs' claims, except for RICO and copyright infringement,
21 appear to be based solely on the same five statements published by Defendants. Consequently, if
22 these statements constitute protected speech, each of these dependent causes of action must fail.

23 **A. PLAINTIFFS CANNOT ESTABLISH A PRIMA FACIE CASE OF**
24 **DEFAMATION.**

25 The issue of whether a statement is "defamatory" is a question of law for the Court to
26 decide. (Branda v. Sanford, 97 Nev. 643, 637 P.2d 1223, 1225 (1981).) If the Court needs to
27 make findings of fact in connection with such determination, its findings will not be disturbed if
28

1 they are supported by substantial evidence. (Whitemaine v. Aniskovich, 124 Nev. 29, 183 P.3d
2 137, 141 (2008).)

3 The elements of a claim of defamation are: (1) a false and defamatory statement of fact
4 by defendant concerning the plaintiff; (2) an unprivileged publication to a third person; (3) fault,
5 amounting to malice if the plaintiff is a public figure (negligence if the plaintiff is not a public
6 figure); and (4) actual or presumed damages. (Chowdhry v. NLVH, Inc., 109 Nev. 478, 483, 851
7 P.2d 459, 462 (1993); emphasis added.)

8 1. Each of Defendants' Statements is Either Protected True Statements of Fact, or is
9 Non-Actionable Opinions.

10 As set forth in Section V.A above, each of the statements at issue were either true or
11 substantially true, or constituted non-actionable opinion. None are actionable in a defamation
12 case.

13 Moreover, Defendants' use of hyperlinks to its source materials undermines a defamation
14 claim. As stated in the Restatement of Torts (Second), "[a] simple expression of opinion based
15 on disclosed...nondefamatory facts is not itself sufficient for action of defamation, no matter
16 how unjustified and unreasonable the opinion may be or how derogatory it is. Restatement
17 (Second) of Torts §566 cmt. c

18 "The rationale behind this rule is straightforward: When the facts underlying a statement
19 of opinion are disclosed, the readers will understand that they are getting the author's
20 interpretation of the facts presented; they are therefore unlikely to construe the statement as
21 insinuating the existence of additional, undisclosed facts." (Standing Committee on Discipline v.
22 Yagman, 55 F.3d 1430, 1439 (9th Cir. 1995).)

23 Here, each of the statements at issue contained hyperlinks to source materials, whether to
24 the VIPI radio show, Court Orders, newspaper articles or other documents. (Sanson Decl., Exs.
25 7, 10-14.) Accordingly, no defamation case should be sustained based on these communications.

26 2. At Least Three of the Communications Are Subject to the Fair Reporting
27 Privilege.

1 Nevada “has long recognized a special privilege of absolute immunity from defamation
2 given to the news media and the general public to report newsworthy events in judicial
3 proceedings.” (Sahara Gaming Corp. v. Culinary Workers Union Local 226, 115 Nev. 212, 984
4 P.2d 164, 166 (1999).) This privilege extends to online reporting. (O’Grady v. Superior Court,
5 139 Cal.App.4th 1423 (2006).)

6 To benefit from the fair reporting privilege, (1) it must be “apparent either from specific
7 attribution or from the overall context that the article is quoting, paraphrasing or otherwise
8 drawing upon official documents and proceedings; and (2) the statement must constitute a “fair
9 and accurate” description of the underlying proceeding.”

10 In this case, three of the five communications at issue are subject to the privilege:

11 VIPI’s January 12, 2017 statement regarding a Virginia Court’s finding that Willick
12 committed defamation per se against an opposing party, with the accompanying hyperlink to the
13 applicable Court Order is fair, accurate and should be absolutely privileged. Likewise, VIPI’s
14 statement that Willick’s colleague, Richard Crane, was found guilty of sexual coercion of the
15 minor and was suspended from the practice of law should be absolutely privileged as the
16 statement is true hyperlinked to the State Bar judicial proceeding and a Review Journal article
17 reporting on Crane’s criminal conviction.

18 VIPI’s two January 14, 2017 Facebook posts regarding Willick’s actions in the Holyoak
19 case and the Supreme Court decision are also substantially accurate and fair, with hyperlinks to
20 the source materials.

21 Accordingly, the three above statements are subject to Nevada’s absolute Fair Reporting
22 Privilege, and cannot therefore serve as the basis for a defamation claim.

23 3. Plaintiffs are Public Figures and Must Show Actual Malice by Defendants.

24 The issue of whether Plaintiffs are public figures is a matter of law for the Court to
25 decide. (Bongiovi v. Sullivan, 138 P.3d 433, 122 Nev. 556 (Nev., 2006).)

26 The United States Supreme Court defines “public figures” as “[t]hose who, by reason of
27 the notoriety of their achievements...seek the public’s attention,” and therefore, “have
28 voluntarily exposed themselves to increased risk of injury from defamatory falsehood concerning

1 them.” (Gertz v. Robert Welch, Inc., 418 U.S. 323, 342 (1974); see also, Wynn v. Smith, 117
2 Nev. 6, 16 P.3d 424 (Nev., 2001) (Wynn held to be a public figure.))

3 Here, Willick touts his firm as “the premiere Family Law firm in Nevada.” He
4 voluntarily thrusts himself in the public eye by testifying before the Nevada legislature on
5 proposed legislation (Sanson, Exs. 8, 9), has written dozens of articles on family law matters
6 (see resume, Levy Decl., Ex. 8), has written 3 books on family law matters (Levy Decl., Ex. 9),
7 is extensively quoted in the Las Vegas Review Journal and other publications (Levy Decl., Ex.
8 10), has received local and national awards for his work (Levy Decl., Ex. 8) and makes public
9 appearances to promote his work and firm. His firm also has a large public billboard right across
10 the street from family court (Levy Decl., Ex. 12) marketing his firm to the public.

11 In his 2015 radio interview with VIPI, Willick described himself as follows: “In every
12 state there tends to be one guy who tends to write the instruction manuals and the text books and
13 teach the courses. For here in Family Law that’s pretty much my role.” (See relevant page of
14 Plaintiffs’ transcription of the radio show, attached as Ex. 11 to Levy Decl.)

15 It cannot seriously be doubted that Willick and his firm are “public figures” for purposes
16 of defamation law by reason of the notoriety of their achievements, and their voluntary injection
17 into matters of public discourse.²

18 As public figures, Plaintiffs must show by clear and convincing evidence that any
19 purportedly defamatory statement was “made with ‘actual malice’ – that is, with knowledge that
20 it was false or with reckless disregard of whether it was false or not.” New York Times Co. v.
21 Sullivan, 376 U.S. 254 (1964); Harte-Hanks Communications, Inc. v. Connaughton, 109 S.Ct.
22 2678, 2696 (1989).

23 A showing of “reckless disregard” for the truth “requires more than a departure from
24 reasonably prudent conduct.” (Harte-Hanks Communications, Inc. v. Connaughton, 109 S.Ct.
25 2678, 2696 (1989).) Evidence must exist sufficient to suggest that the defendant “in fact
26 entertained serious doubts as to the truth of his publication,” (St. Amant v. Thompson, 390 U.S.

27
28 ² At a minimum, Plaintiffs are “limited public figures” -- i.e., “a person who voluntarily injects
himself or is thrust into a particular public controversy or public concern” with regard to
anything having to do with family law issues.

1 727, 731 (1968), or had a “high degree of awareness of ... probable falsity.” (Harte-Hanks
2 Communications, 109 S. Ct. at 2696.)

3 Here, there is no evidence or factual allegation of malice. As shown above, all of the
4 statements at issue are either true, substantially true, constitute non-actionable opinion, or are
5 privileged. Further, each of the statements was accompanied by hyperlinks to their source
6 materials, and the one statement that was ambiguous was promptly in good faith clarified and
7 redistributed.

8 Accordingly, Plaintiffs cannot make a showing of actual malice, let alone by clear and
9 convincing evidence as required to sustain a claim of defamation.

10 **B. PLAINTIFFS CANNOT ESTABLISH A PRIMA FACIE CASE FOR**
11 **EMOTIONAL DISTRESS, FALSE LIGHT, BUSINESS DISPARAGEMENT OR**
12 **CONSPIRACY.**

13 Plaintiffs’ purported causes of action for emotional distress, false light, business
14 disparagement and conspiracy fail as they are all predicated on the same protected speech as in
15 their defamation claim. Specifically, the complaint alleges that Defendants “inflicted emotional
16 distress on Plaintiffs by defaming them...” (Cmplt., ¶¶ 51, 55), that “the statements...place Mr.
17 Willick and the Willick Law Group in a false light” (Cmplt., ¶ 59), the statements caused
18 “business disparagement” to Plaintiffs (Cmplt., 61-65), and were part of a “concert of action”
19 and “civil conspiracy” by all of the Defendants (Cmplt., ¶¶ 66-71). Consequently, since the
20 speech at issue is protected, each of these causes of action must necessarily fail.

21 Moreover, the complaint alleges no facts to support a claim of emotional distress. To
22 state a cause for emotional distress, the acts complained of must be so “extreme or outrageous”
23 that they are outside of all possible bounds of decency and are regarded as utterly intolerable in a
24 civilized community. (Maduike v. Agency Renta-A-Car, 114 Nev. 1, 953 P.2d 24 (1998).) The
25 publication of Defendants’ five statements is nowhere near this type of conduct. Nor can the
26 conduct have resulted in extreme emotional distress as required to maintain this cause of action.
27
28

1 **C. PLAINTIFFS CANNOT ESTABLISH A PRIMA FACIE CASE FOR RICO.**

2 Plaintiff's purported RICO claim is nothing short of frivolous.

3 Only one of the predicate acts alleged in the complaint is among those enumerated in
4 NRS 207.360 which expressly identifies the crimes that may legally serve as the basis of a RICO
5 claim. The allegation of that one enumerated act, however, is completely devoid of any facts and
6 should therefore be disregarded.

7 The only allegation in the complaint that appears to refer to a RICO related crime is
8 paragraph 84, which states as follows:

9 “Defendants, in the course of their enterprise, knowingly and with the intent to
10 defraud, engaged in an act, practice or course of business or employed a device,
11 scheme or artifice which operates or would operate as a fraud or deceit upon a
12 person by means of a false representation or omission of a material fact that
13 Defendants know to be false or omitted, Defendants intend for others to rely on,
14 and results in a loss to those who relied on the false representation or omission in
15 at least two transactions that have the same or similar pattern, intents, results,
16 accomplices, victims or methods of commission, or are otherwise interrelated by
17 distinguishing characteristics and are not isolated incidents within 4 years and in
18 which the aggregate loss or intended loss is more than \$650. (NRS 205.377).”

16 The allegation is completely devoid of any facts to support it, and does not even allege that the
17 crime somehow happened to Plaintiffs as required in a RICO claim. (Hale v. Burkhardt, 104
18 Nev. 632, 637-638, 764 P.2d 866 (1988).) The allegation fails to identify any particular instance
19 or circumstance of such purported criminal act. It is well established that RICO claims must be
20 alleged with the “same degree of specificity is called for as in a criminal indictment or
21 information.” (Id.) This mere recitation of “legalese” simply cannot stand as a credible basis for
22 a RICO claim.

23 The remaining “crimes” alleged in the complaint and listed below aren’t even RICO
24 related crimes as required by NRS 207.360. In fact, some are not crimes at all:

25 1. “Defendants published a false or grossly inaccurate report of court proceedings on
26 numerous occasions, including, but not limited to, the “Virginia post,” “VIP Facebook Post #1,”
27 and “VIP Facebook Post #2. (NRS 199.340(7)).” (Cmplt., ¶ 80.) NRS 199.340(7) relates to
28

1 “criminal contempt” and is not one of the enumerated crimes in NRS 207.360. (Moreover,
2 nothing about the statements at issue constitutes criminal contempt.)

3 2. Defendants “gave or sent a challenge in writing to fight Richard Carreon and
4 others. (NRS 200.450).” (Cmplt., ¶ 81). A purported violation of NRS 200.450 likewise is not
5 one of the crimes listed in NRS 207.360. Moreover, to be a predicate act under RICO, the crime
6 must have been committed to the Plaintiff. (Hale v. Burkhardt, 104 Nev. 632, 637-638, 764 P.2d
7 866 (1988).) Richard Carreon has nothing to do with Plaintiffs. In actuality, Defendant Steve
8 Sanson “challenged” Carreon to a corporate sponsored amateur Mixed Martial Arts fight, which
9 fight was to take place at a public ticket-selling event at Sam’s Town Casino, with all proceeds
10 going to charity. (Sanson Decl., ¶ 17.) These MMA events take place every four months at
11 Sam’s Town and are professionally produced and eminently legal. (Id.) A challenge to fight in a
12 charitable sports event is not a crime, let alone one that would support a RICO claim.

13 3. “Defendants willfully stated, delivered or transmitted to a manager, editor,
14 publisher, reporter or other employee of a publisher of any newspaper, magazine, publication,
15 periodical or serial statements concerning Plaintiffs which, if published therein, would be a
16 liable. (NRS 200.550).” (Cmplt., ¶ 82.) Again, a purported violation of NRS 200.550 is not
17 one of the enumerated crimes in NRS 207.360 that can support a RICO claim.

18 4. “Defendants, without lawful authority, knowingly threatened to substantially
19 harm the health or safety of Plaintiff and, by words and conduct placed Plaintiffs in reasonable
20 fear that the threat would be carried out. (NRS 200.571.)” (Cmplt., ¶ 83.) NRS 200.571 pertains
21 to the crime of “harassment.” Again, this crime is not one of the listed crimes that can support a
22 RICO claim under NRS 207.360. In addition, the complaint is completely devoid of any facts
23 whatsoever to support this allegation.

24 5. “Defendants posted false and defamatory material no less than 50 times in 10
25 separate defamatory campaigns against Plaintiffs. The total value of time expended by Marshal
26 S. Willick, and the Willick Law Group staff in responding to inquiries from clients and
27 attempting to have the defamatory material removed from the internet was over \$15,000 and this
28 does not include the cost of missed opportunities or time that should have been spent working on

1 cases for paying clients. (NRS 2015.377 and NRS 207.360(9).” (Cmplt., ¶ 85.) Again, neither
2 NRS 2015.377 nor NRS 207.360(9) is RICO related crimes under NRS 207.360.

3 6. “Defendants – with malice – stole valuable time from Mr. Willick. Also, the theft
4 of Mr. Willick’s and Willick Law Group’s “good will” by making of false and defamatory
5 comments and placing both Mr. Willick and Willick Law Group in a false light has diminished
6 the value of the business. These are intangible thefts, but thefts nonetheless,” citing NRS
7 205.0832. (Cmplt., ¶ 87). Again, NRS 205.0832 is not one of the enumerated RICO related
8 crimes.³

9 Accordingly, Plaintiffs cannot establish a factual prima facie case of RICO and this claim
10 should be dismissed.

11 **D. THIS COURT DOES NOT HAVE SUBJECT MATTER JURISDICTION**
12 **OVER PLAINTIFFS’ PURPORTED COPYRIGHT INFRINGEMENT CLAIM.**

13 Claims for copyright violations are subject to the exclusive original jurisdiction of the
14 federal courts. 28 U.S.C. 1338(a) states in pertinent part as follows:

15
16 “The district courts shall have original jurisdiction of any civil action arising
17 under any Act of Congress relating to patents, plant variety protection, copyrights
18 and trademarks. No State court shall have jurisdiction over any claim for relief
arising under any Act of Congress relating to patents, plant variety protection, or
copyrights.”

19 Consequently, this Court cannot hear matters pertaining to this purported claim.

20 Even if it could, however, the claim would fail for the following reasons:

21 1. Plaintiffs cannot file copyright infringement claim before registering their
22 copyrights with the U.S. Copyright Office. 17 U.S.C. 411(a) states “no civil action for
23 infringement of the copyright in any United States work shall be instituted until . . . registration
24

25 ³ Moreover, Plaintiffs misapply NRS 205.0832. The statute requires defendant to “obtain real,
26 personal or intangible property or the services of another person . . .” (emphasis added). There is
27 no allegation whatsoever that Defendants obtained anything. Willick alleges that he wasted his
28 time, but not that Defendant obtained his services. Willick’s flawed reading of the statute would
essentially turn every litigation in which a litigant felt he was wasting time, and every business
dispute in which a company’s good will could be diminished, into a criminal act. Not only is
that not the law, but it would be an absurd result.

1 of the copyright claim has been made in accordance with this title.” Plaintiffs admit that they
2 have not yet obtained copyright registrations for their works: “Defendants have infringed upon
3 Plaintiffs’ photographic works owned by Plaintiff, for which copyright registration is being
4 sought...”. (Cmplt. ¶ 90.)

5 2. Defendant’s use of publicly available pictures of Plaintiffs in connection with its
6 statements and articles falls under the “fair use” exception to the Copyright Act; and

7 3. Plaintiffs are unlikely to own the copyrights in professional pictures taken of
8 them.

9 Accordingly, Plaintiffs cannot establish a prima facie case of copyright infringement.

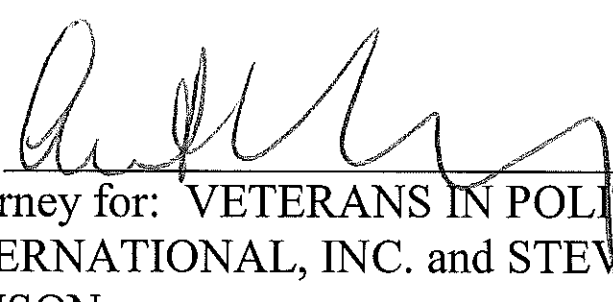
10 VII. CONCLUSION

11 For the reasons stated above, Defendants respectfully request that the Court:

- 12 a) grant this anti-SLAPP motion in its entirety;
13 b) dismiss the action in its entirety with prejudice;
14 c) award reasonable attorneys’ fees and costs to Defendants pursuant to NRS
15 41.670(1)(a) in an amount to be shown in a separate hearing;
16 d) award additional sums to Defendants in the sum of \$10,000 pursuant to NRS
17 41.670(1)(b); and
18 e) order such further relief as the Court deems appropriate.

19
20 Respectfully submitted,

21
22 DATED: February 17, 2017

23 By: 
24 Attorney for: VETERANS IN POLITICS
25 INTERNATIONAL, INC. and STEVE W.
26 SANSON
27 Anat Levy, Esq.
28 NV Bar No. 12250
Anat Levy & Associates, P.C.
5841 E. Charleston Blvd., #230-421
Las Vegas, NV 89142
Cell: (310) 621-1199
Alevy96@aol.com

1
2 CERTIFICATE OF SERVICE
3

4 I am over the age of 18 and am not a party to the within action.

5 On this date I caused to be served a true and correct copy of the document entitled ANTI-
6 SLAPP MOTION TO DISMISS on the below listed recipients by requesting the court's wiznet
7 website to E-file and E-serve such document at emails listed below.
8

9 Jennifer Abrams, Esq.
10 The Abrams & Mayo Law Firm
11 6252 S. Rainbow Blvd., Ste. 100
12 Las Vegas, NV 89118
(702) 222-4021
JVAGroup@theabramslawfirm.com

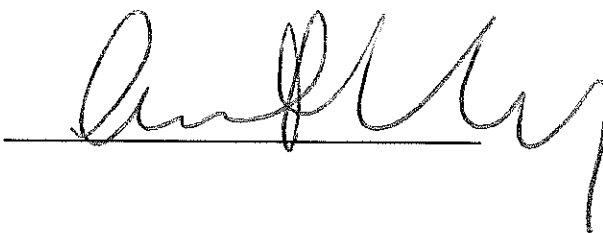
Alex Ghoubadi, Esq.
G Law
320 E. Charleston Blvd., Ste. 105
Las Vegas, NV 89104
(702) 217-7442
alex@alexglaw.com

13
14 Courtesy Copy:

15 Maggie McLetchie, Esq.
16 McLetchie Shell
17 702 E. Bridger Ave., Ste. 520
18 Las Vegas, NV 89101
(702) 728-5300
Maggie@nvlitigation.com

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

21 Executed this 17th day of February 2017, in Las Vegas, NV

22
23 
24
25
26
27
28

1 MDSM
2 Anat Levy, Esq. (State Bar No. 12550)
3 ANAT LEVY & ASSOCIATES, P.C.
4 5841 E. Charleston Blvd., #230-421
5 Las Vegas, NV 89142
6 Phone: (310) 621-1199
7 E-mail: alevy96@aol.com; Fax: (310) 734-1538
8 Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND
9 STEVE SANSON

10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

MARSHALL S. WILICK and WILICK LAW)	CASE NO. A-17-750171-C
GROUP,)	
)	DEPT. NO.: XIX (19)
Plaintiffs,)	
)	
vs.)	
)	
STEVE W. SANSON; HEIDI J. HANUSA;)	
CHRISTINA ORTIZ; JOHNNY SPICER; DON)	
WOOLBRIGHTS; VETERNAS IN POLITICS)	
INTERNATIONAL, INC.; SANSON)	
CORPORATION; KAREN STEELMON; and)	
DOES 1 THROUGH X)	
)	
Defendants.)	

19 **DECLARATION OF STEVE SANSON**
20 **IN SUPPORT OF ANTI-SLAPP MOTION**
21

22
23 I, STEVE SANSON, hereby declare as follows:

24 1. I am a defendant in the within action and am the President of defendant Veterans
25 in Politics International, Inc.. I make this declaration in support of VIPI's and my anti-SLAPP
26 motion. I make this declaration based on my personal knowledge, except as to matters stated to
27 be based on information and belief. I am competent to testify as to the truth of these statements
28 if called upon to do so.

DECLARATION OF STEVE SANSON IN SUPPORT OF
ANTI-SLAPP MOTION TO DISMISS

1 2. VIPI is a non-profit corporation that advocates on behalf of veterans and that
2 works to expose public corruption and wrongdoing. We routinely publish blog articles online on
3 our VIPI website, various Facebook pages and through Constant Contact group emails. We also
4 host and broadcast online a weekly internet talk show in which we discuss veterans, political and
5 judicial issues and have guests that we interview about those topics.

6 3. In October 2016, acting in my capacity as President of VIPI, I posted a court
7 transcript video of Jennifer Abrams and family court Judge Elliot online. The video showed
8 what I believed was Abrams being disrespectful of the judge and the Judge failing to adequately
9 control her courtroom.

10 4. I thereafter received an email from Jennifer Abrams telling me to take down the
11 video, and then one from the judge in the case, Judge Elliott, which lead to a string of emails
12 about it. Since VIPI was within its rights to post a video of a public proceeding, I did not take it
13 down. Attached as Ex. 1 is a true and correct copy of the relevant emails between them and me.

14 5. I then received a Court Order signed by Judge Elliott purporting seal all of the
15 documents and proceedings in the case on a retroactive basis. While I did not agree that the
16 records should be sealed or that there was a legal basis to take the video down, out of an
17 abundance of caution, I took the video down temporarily until I could get further legal advice.
18 Once I learned that the family court judge had no jurisdiction over VIPI, and had no legal basis
19 for sealing the records, I reposted the video online, along with a blog article reporting on what
20 had taken place and analyzing the practice of sealing court documents. Attached as Ex. 2 is a
21 copy of the VIPI article and the Order which was hyperlinked to it.

22 6. Shortly after January 9, 2017, I was served with a complaint in which Abrams
23 was suing VIPI and each of its officers and directors, its former web administrator and her
24 opposing counsel in the family law proceeding that was depicted in the video. She even sued a
25 VIPI officer who lives in Missouri. None of those officers or directors had anything to do with
26 the postings I made on behalf of VIPI, nor did they know about the posting in advance. In
27
28

1 addition, Abrams sued Sanson Corp., an entity which has nothing to do with VIPI or its
2 activities. Attached as Ex. 3 is a true and correct copy of the operative complaint in that case.

3 7. I thereafter learned of a letter that Willick addresses to me, but which he never
4 sent to me. Instead he posted it on his firm's website, on Facebook and perhaps other online
5 locations. A true and correct copy of the letter and the links to it on his website is attached as
6 Ex. 4.

7 8. In the letter, he accuses VIPI of manipulating its candidate interview process,
8 using VIPI's income for my personal expenses, not filing tax returns for VIPI, and using VIPI as
9 an "unethical scheme to extort concessions in an ongoing case." He further accuses me of being
10 a "hypocrite...but even worse," "a sleazy extra out of 'Harper Valley PTA," states that I am the
11 very definition of "hypocrite – not to mention slimy beyond words," calls me a "two-bit
12 unemployed hustler," accuses me of "shaking down candidates for cash and conspiring with like-
13 minded cronies" and says "you are repugnant." He also accuses VIPI's radio show of being a
14 "fraud," claims that VIPI is a "sham organization," and claims that I was "forced to flee
15 California." None of those statements are true.

16 9. Willick also posts copies of Abrams' complaint and his present complaint online
17 and I am informed and believe made them available to other family law lawyers on the Family
18 Law List Serve at NVFamilyLaw@Lists.nvbar.org. A true and correct copy of the links to these
19 posting as it appears on Willick Law Group's website is attached as Ex. 4.

20 10. Willick also posted my picture on his website and perhaps other online locations
21 with the word "hypocrite" across it. A true and correct copy of this post is attached as Exhibit 5.

22 11. On February 4, 2017, I was served with the complaint in the instant case. On
23 February 6, 2017, VIPI was served with the complaint as well. As with the Abrams' case, the
24 complaint names all of the officers and directors of VIPI, including the one in Minnesota, none
25 of who have been involved with VIPI's internet posts. Sanson Corp. was again named as well,
26 and has nothing to do with VIPI or VIPI's statements at issue in this case.
27
28

1 12. On January 22, 2017, I received texts from phone number 702-882-8191, asking
2 me to take down a courtroom video that VIPI posted about Family Court Judge Rena Hughes.
3 Our initial investigation as to who the texts were from revealed that the phone number belonged
4 to someone named Kelly Grob. I am informed and believe that Jennifer Abrams' daughter's
5 name is Kelly Grob. I do not know at this point if these texts were from Jennifer Abrams, her
6 daughter, or anyone acting with their permission or on their behalves. Nonetheless my lawyer in
7 the Abrams lawsuit has now written to Ms. Grob to preserve potential evidence. See Ex. 6
8 hereto.

9 13. On January 29, 2017, I had the SIM card stolen from my cell phone. I filed a
10 police report on the incident. I do not know at this point whether Willick or Abrams was
11 involved in this theft.
12

13 14. The instant lawsuit appears to be based on the following posts that I made about
14 Marshal Willick or his firm in my capacity as VIPI's President:

15 a. Attached as Ex. 7 is a true and correct copy of VIPI's post dated
16 December 25, 2016 in which I state that "This is the type of hypocrisy we have in our
17 community. People that claim to be for veterans buy yet they screw us for profit and power."
18 This statement reflected my opinion of Willick's views on Assembly Bill 140 that dealt with
19 keeping veteran disability pay from being taken into account in calculating spousal support
20 payments. I hyperlinked my statement to Willick's VIPI's November 14, 2015 interview about
21 the subject. Willick had testified orally and in writing before the state legislature about AB140
22 and had written a letter to me about it, which had prompted me to invite him on the VIPI show to
23 discuss his views. Attached as Ex. 8 is a true and correct copy of Willick's testimony on AB140,
24 and attached as Ex. 9 is a true and correct copy of Willick's letter to me about the subject.

25 b. Attached as Ex. 10 is a true and correct copy of VIPI's January 12, 2017
26 posting stating "Attorney Marshall Willick and his pal convicted of sexually coercion of a minor
27 Richard Crane was found guilty of defaming a law student in United States District Court
28 Western District of Virginia signed by US District Judge Norman K. Moon." The statement was

1 hyperlinked to Judge Moon's written Order, and to Richard Crane's suspension from the practice
2 of law. I had, however, inadvertently omitted two commas from the statement, and the statement
3 should have read as follows: Attorney Marshall Willick, and his pal convicted of sexually
4 coercion of a minor Richard Crane, was found guilty of defaming a law student in United States
5 District Court Western District of Virginia signed by US District Judge Norman K. Moon." A
6 few days later, I re-wrote the post to clarify it and redistributed it through the same channels as
7 the original post. Attached as Ex. 11 is the clarified re-posting of this statement. This revised
8 statement was also hyperlinked to the same documents as the original.

9
10 c. Attached as Ex. 12 is a true and correct copy of a January 14, 2017 post stating
11 "Would you have a Family Attorney handle your child custody case if you knew a sex offender
12 works in the same office?" This statement was hyperlinked to several documents showing that
13 Richard Crane was still working for Willick despite Crane's suspension from the practice of law.

14 d. Attached as Exs. 13 and 14 are a true and correct copies of two January
15 14, 2017 Facebook postings that pertained to a case that Willick was handling called Holyoak v.
16 Holyoak. Ex 13 stated the following:

17 "Nevada Attorney Marshall Willick gets the Nevada Supreme Court decision:
18 From looking at all these papers it's obvious that Willick scammed his client, and
19 later scammed the court by misrepresenting that he was entitled to recover
20 property under his lien and reduce it to judgement. He did not recover anything.
21 The property was distributed in the Decree of Divorce. Willick tried to get his
22 client to start getting retirement benefits faster. It was not with 100,000 in legal
23 bills. Then he pressured his client into allowing him to continue with the appeal."

24 This post was hyperlinked to the Lobello decision which sets out circumstances under which a
25 lawyer can get fees pursuant to a lien. The above reflected my opinion that Willick should not
26 have been able to get the amount of fees he asked for.

27 e. Also at the same time, I posted Exhibit 14, also relating to the Holyoak
28 case, stating: "Attorney Marshall Willick loses his appeal to the Nevada Supreme Court."
According to the documents in that case, Willick argued that certain supreme court precedent

1 having to do with survivorship benefits in a spouse's pension plan should be overturned. Yet the
2 court did not overturn it as they found that Willick did not properly raise the issue.

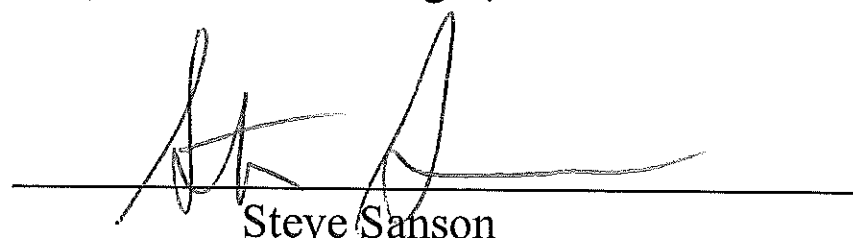
3 15. I made each of the above postings on behalf of VIPI in good faith, believing them
4 to be true or believing them to constitute my valid good faith opinion on the subject. I at all
5 times hyperlinked my statements to the documents I believed were relevant so that readers would
6 be able to judge for themselves. The postings also gave readers the case numbers in case they
7 wanted to look further into the cases to make up their own minds about VIPI's postings.

8 16. Starting on January 6, 2017 and continuing into February, I have received emails
9 from VIPI's online service providers advising that Jennifer Abrams sent "take down" letters to
10 them and that they were either taking materials off my site or shutting down my service until an
11 investigation could be made. Attached as Exhibit 15 are true and correct copies of take down
12 notices that I received from YouTube which took down the court transcript video of Abrams in
13 the family court proceeding, Facebook which took down numerous of VIPI's posts on Abrams,
14 Vimeo, and Constant Contact. Constant Contact has shut down VIPI's account so that VIPI
15 could no longer send emails using that account to its followers and members. I have spent
16 considerable time and aggravation dealing with these take down notices that I believe are
17 completely unwarranted and that are disrupting VIPI's operations.

18 17. With regard to Richard Carreon, he is a former officer of VIPI and I challenged
19 him to an amateur Mixed Martial Arts ("MMA") fight that was to take place at the Sam's Town
20 Casino as part of a sponsored, open to the public MMA event that takes place once per quarter at
21 Sam's Town's event center. I proposed that all of the proceeds of our fight go to charity. Mr.
22 Carreon did not accept the challenge.

23 I declare under penalty of perjury under the laws of the State of Nevada that the
24 foregoing is true and correct to the best of my knowledge and belief.

25 DATED this 16 day of February, 2017 in Las Vegas, NV.

26
27
28 
Steve Sanson

DECLARATION OF STEVE SANSON IN SUPPORT OF
ANTI-SLAPP MOTION TO DISMISS

EXHIBIT 1

COMPOSE

Reply

Reply All

Forward

Delete

Spam

More

Search Mail

Today's Features

- Inbox1004
- Drafts3
- Sent
- Spam11
- Trash
- Contacts
- Calendar

My Folders

- Saved Mail
- Saved Chats
- Junk E-mail

- Notebook
- Outbox

I am unsure why I am copied on these e-mails.
I don't want anything to do with this.

Louis
Law Office of Louis C. Schneider
Nevada Bar No. 9683
430 South Seventh Street
Las Vegas, Nevada 89101
Phone: 702-435-2121
Fax: 702-431-3807

CONFIDENTIALITY WARNING: This e-mail and any attachments are for th
this missive. If you have received this in error, please notify the sender imm
other privilege by sending this email or attachment.

From: Jennifer Abrams <jabrams@theabramslawfirm.com>
To: "veteransinpoliti@cs.com" <veteransinpoliti@cs.com>; "ElliottJ@clarkcountycou
Cc: "lcsllawllc@yahoo.com" <lcsllawllc@yahoo.com>; "vipipresident@cs.com" <vipipr
Sent: Monday, October 10, 2016 7:03 PM
Subject: RE: Nevada Attorney attacks a Clark County Family Court Judge in Open C

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential a
recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle b

START CHATTING

Keep me signed in

Mr. Sanson,

Whoever provided you with the legal analysis below is mistaken. I am not p
very beginning. See EDCR 5.02, NRS 125.080, and NRS 125.110. I had th
see his private divorce proceedings broadcast on the internet.

The Freedom of Information Act is inapplicable – it applies to the Federal G
The umbrella of “a journalist” does not apply as I am not running for public c

From: Louis Schneider <lcslawllc@yahoo.com>

To: Jennifer Abrams <jabrams@theabramslawfirm.com>; 'veteransinpoliti@cs.com' <veteransinpoliti@cs.com>; ElliottJ <ElliottJ@clarkcountycourts.us>

Cc: vipipresident <vipipresident@cs.com>

Subject: Re: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Date: Tue, Oct 11, 2016 10:10 am

I am unsure why I am copied on these e-mails.
I don't want anything to do with this.

Louis

Law Office of Louis C. Schneider

Nevada Bar No. 9683

430 South Seventh Street

Las Vegas, Nevada 89101

Phone: 702-435-2121

Fax: 702-431-3807

CONFIDENTIALITY WARNING: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this missive. If you have received this in error, please notify the sender immediately by reply e-mail and delete this message and its attachments from your computer system. We do not waive any attorney-client, work product or other privilege by sending this email or attachment.

From: Jennifer Abrams <jabrams@theabramslawfirm.com>

To: "'veteransinpoliti@cs.com'" <veteransinpoliti@cs.com>; "ElliottJ@clarkcountycourts.us" <ElliottJ@clarkcountycourts.us>

Cc: "lcslawllc@yahoo.com" <lcslawllc@yahoo.com>; "vipipresident@cs.com" <vipipresident@cs.com>

Sent: Monday, October 10, 2016 7:03 PM

Subject: RE: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

PERSONAL AND CONFIDENTIAL

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

Mr. Sanson,

Whoever provided you with the legal analysis below is mistaken. I am not providing you with legal advice here but the authority you cite deals with civil, not family law cases. The hearing was closed and such was announced at the very beginning. See EDCR 5.02, NRS 125.080, and NRS 125.110. I had the case sealed at my client's request because he does not want his children, their friends, or anyone in his circle of friends, family, or business associates to see his private divorce proceedings broadcast on the internet.

The Freedom of Information Act is inapplicable – it applies to the Federal Government, not State divorce cases. And most importantly, I am not a public figure or an elected official. I am a private citizen with a private law practice. The umbrella of “a journalist” does not apply as I am not running for public office and there are no “voters” that have any right to know anything about my private practice or my private clients.

I am a zealous advocate and will continue to pursue my client's interests without any hesitation whatsoever.

Sincerely,

Jennifer V. Abrams, Esq.
Board Certified Family Law Specialist
Fellow of the American Academy of Matrimonial Lawyers
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
www.TheAbramsLawFirm.com

From: veteransinpoliti@cs.com [mailto:veteransinpoliti@cs.com]
Sent: Monday, October 10, 2016 4:08 PM
To: ElliottJ@clarkcountycourts.us
Cc: Jennifer Abrams; lcslawllc@yahoo.com; vipipresident@cs.com
Subject: Re: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Judge Elliot and all involved.

I have to admit this seal that was done on this case is the fastest I have ever seen family court or any court in this state move. Now, I know they have the capability to be fast.

I have talked to many lawyers and Judges, I even spoke to a Justice in DC just to make sure I had all my facts correct.

I must say that you can not seal a case just to seal a case, especially if one of the reasons its been done is to shield the attorney and not the litigants I am referring to Abrams email to you Judge, she said the following (Further, the information is inaccurate and intended to place me in a bad light). Is she protecting herself? Absolutely.

When we expose folks we do it under the umbrella of a journalist and we use the Freedom of information Act.

The case was sealed without a hearing and the video was requested, paid for and posted prior to the sealing. The order to seal the case can not be retroactive.

I have also taking the liberty to investigate the following, general rules on sealing: http://www.leg.state.nv.us/courtrules/SCR_RGSRCR.html (see particularly 3-1 and 4). The entire case cannot be sealed. RJ article: <http://www.reviewjournal.com/news/standards-sealing-civil-cases-tougher> from when current rules went in. Policy discussion in a criminal case, first couple of pages of https://scholar.google.com/scholar_case?case=6580253056313342241&q=seal+court+record&hl=en&as_sdt=4,29 A unanimous NV opinion keeping records of a divorce open (involving a former judge) https://scholar.google.com/scholar_case?case=3787817847563480381&q=seal+court+record&hl=en&as_sdt=4,29.

It looks like the Nevada State Supreme Court has strict rules on sealing cases as well.

We might have sent out the second article prematurely.. We have also received numerous

attorneys pointing us in the direction of other cases Abram's have had her outburst and bullied other Judges and Attorneys. Is she going asked for those cases to be sealed as well?

In addition, we are going to ask for an opinion from the Nevada Judicial Discipline Commission and Nevada State Bar in regards to the sealing of this case.

Steve Sanson
President Veterans In Politics International
702 283 8088

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

From: Elliott, Jennifer <ElliottJ@clarkcountycourts.us>

To: veteransinpoliti <veteransinpoliti@cs.com>

Cc: jabrams <jabrams@theabramslawfirm.com>; lcslawllc <lcslawllc@yahoo.com>; vipipresident <vipipresident@cs.com>

Sent: Thu, Oct 6, 2016 4:00 am

Subject: Re: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Hi Steve, thank you for your quick response. I need you to know that I was wrong regarding the finances as they had been disclosed at the outset of the case, from the first filing, albeit late. At the further hearing we had in this matter I put on the record that I believe that he did not hide anything on his financial disclosure form; it was a misunderstanding that was explained and the record was corrected. We thereafter worked out all the remaining financial matters in the Decree. The hearing that you have was the pinnacle of the conflict between counsel and unfortunately this was affecting the resolution of the case.

A case always goes much better when the attorneys are able to work well together and develop more trust from the beginning. The ability to build trust in this case went south from the gate and created a dynamic that was toxic to seeing and reaching the merits of the case. Thus pleadings filed were accusatory on both sides and a court only knows what comes before it through papers properly filed or reports that have been ordered.

At this juncture it is my belief that both sides felt all financial information had truly been revealed and that both adjusted their positions enough to achieve a solution that was acceptable to both parties.

I understand that VIP does try to educate and provide information to voters so they will be more informed about who they are putting into office. In this case, the dynamic and the record was changed for the better after that hearing. I think that information would be important to the voters as well. It is my hope that you will reconsider your position. Thank you Steve!

Sent from my iPhone

On Oct 5, 2016, at 11:16 PM, "veteransinpoliti@cs.com" <veteransinpoliti@cs.com> wrote:

Hi Judge;

I respect you reaching out and asking us to take the video down. We have known you for a very long time, and I know that you understand once we start a course of action we do not raise our hands in defeat. However, with that said we have no intentions on making the litigants uncomfortable, but our job is the expose folks that have lost their way.. Maybe the attorney for the plaintiff should have put her client before her own ego and be respectful of the court, be respectful of her client, advise her client not to perjure himself, treat people with respect (her own co-council she told him to sit down), the years we have been doing this we are tired of attorneys running a tax payers courtroom. They feel that they are entitled and they will walk over anybody to

make a buck.

In combat we never give up and we will not start given up, because we exposed someone.

Steve Sanson
President Veterans In Politics International
www.veteransinpolitics.org
702 283 8088

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

From: Elliott, Jennifer <ElliottJ@clarkcountycourts.us>
To: veteransinpoliti <veteransinpoliti@cs.com>; jabrams <jabrams@theabramslawfirm.com>
Sent: Wed, Oct 5, 2016 6:02 pm
Subject: Fwd: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Hi Steve,

I was made aware of this video today and would kindly request that VIP please take it down. Since this hearing the court and parties worked further on resolving the issues and the case was resolved. Leaving this video up can only serve to inflame and antagonize where the parties are trying to move on with terms that will help them restructure their lives in two different homes. We all hope for the best post-divorce atmosphere; the parties will be working together to co-parent their children and I would loath to think they or their friends would encounter this and have to feel the suffering of their parents or relive their own uncomfortable feelings of loss. I know you care about children and families as much as you do about politics and justice, and I appreciate your courtesy in this regard. Thank you for your anticipated cooperation, Judge Jennifer Elliott

Begin forwarded message:

From: Jennifer Abrams <jabrams@theabramslawfirm.com>
Date: October 5, 2016 at 1:48:20 PM PDT
To: "elliottj@clarkcountycourts.us" <elliottj@clarkcountycourts.us>
Cc: Louis Schneider <lcsllawllc@yahoo.com>
Subject: Fwd: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

PERSONAL AND CONFIDENTIAL

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

Judge Elliott,

The below was brought to my attention. These parties don't need a video or other information about their personal divorce posted on the internet. Further, the information is inaccurate and intended to place me in a bad light. I ask that you please demand that this post, video, etc. be immediately removed.

Mr. Schneider is copied on this email.

JVA

AA000093

Begin forwarded message:

From: Marshal Willick <marshal@willicklawgroup.com>
Date: October 5, 2016 at 11:02:11 AM PDT
To: "Jennifer V. Abrams Esq. (jabrams@theabramslawfirm.com)"
<jabrams@theabramslawfirm.com>, "yafasedek3@gmail.com"
<yafasedek3@gmail.com>
Subject: FW: [Junk released by Allowed List] Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Thought you ought to know about this as soon as I saw it.

Marshal S. Willick

From: Veterans In Politics International Inc. [<mailto:devildog1285@cs.com>]
Sent: Wednesday, October 05, 2016 9:59 AM
To: Marshal Willick
Subject: [Junk released by Allowed List] Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Having trouble viewing this email? [Click here www.veteransinpolitics.org](http://www.veteransinpolitics.org)

Hi, just a reminder that you're receiving this email because you have expressed an interest in Veterans In Politics International Inc.. Don't forget to add devildog1285@cs.com to your address book so we'll be sure to land in your inbox!

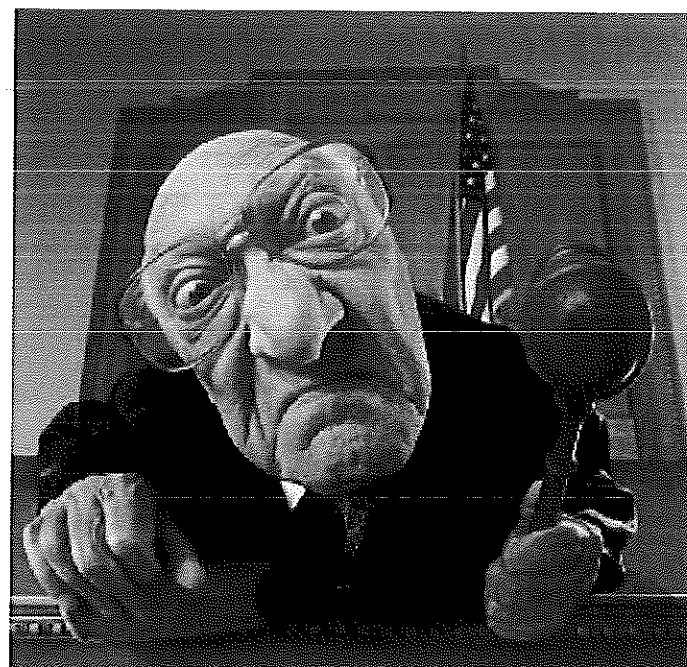
You may [unsubscribe](#) if you no longer wish to receive our emails.



Nevada Attorney attacks a Clark County Family Court Judge in Open Court

**A behind the scenes look
inside our courtroom**

FIND OUT MORE



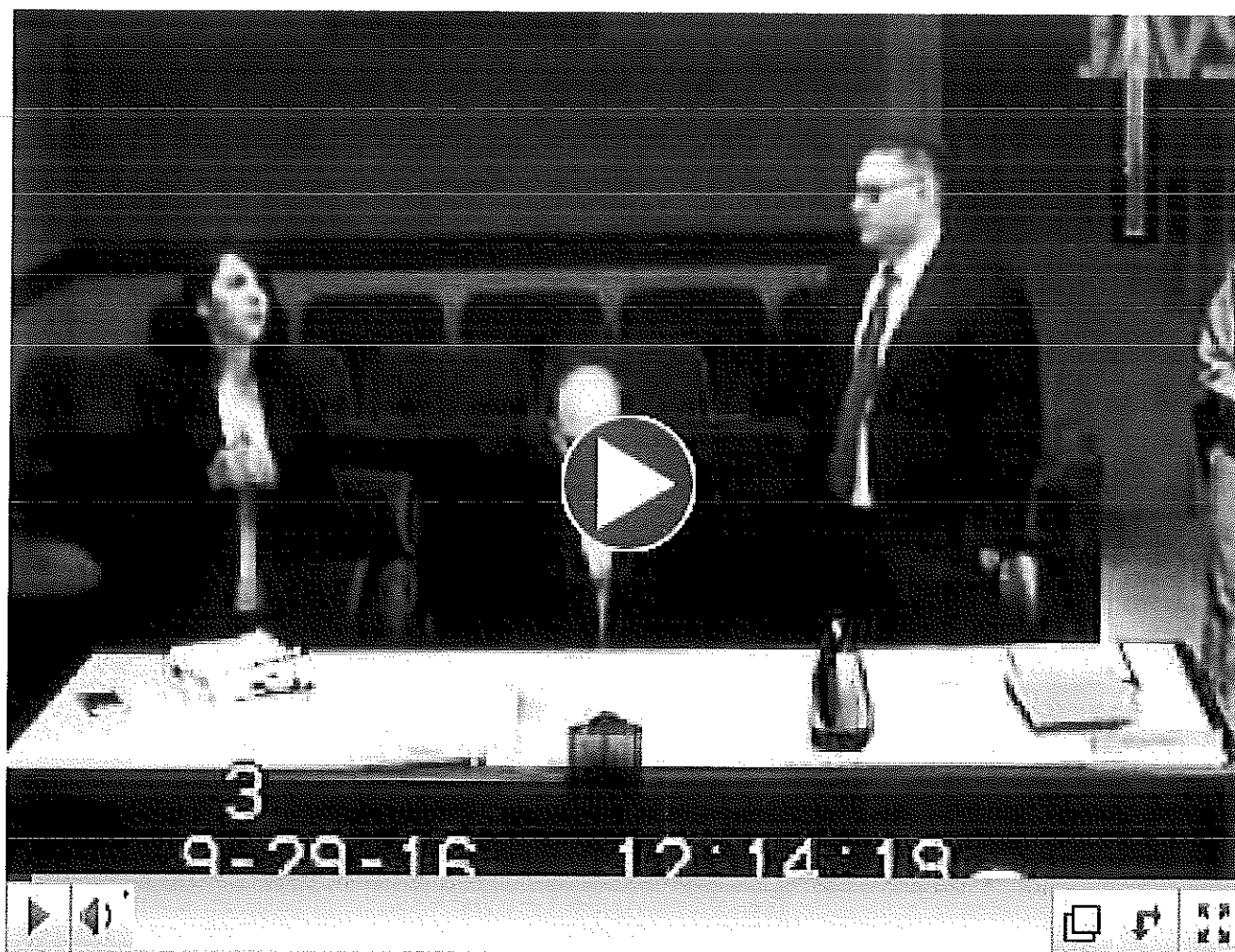
No boundaries in our courtrooms!

In Clark County Nevada, we have noticed Justice of the Peace handcuffing Public Defenders unjustly as well as Municipal Court Judges incarcerating citizens that are not even before their court.

The above are examples of the court room over stepping boundaries. But what happens when a Divorce Attorney crosses the line with a Clark County District Court Judge Family Division?

In a September 29, 2016 hearing in Clark County Family Court Department L Jennifer Abrams representing the plaintiff with co-council Brandon Leavitt and Louis Schneider representing the defendant. This case is about a 15 year marriage, plaintiff earns over 160,000 annually and defendant receives no alimony and no part of the business.

There was a war of words between Jennifer Abrams and Judge Jennifer Elliot.



Start 12:13:00 in the video the following conversation took place in open court.

Judge Jennifer Elliot:



I find that there is undue influence in the case.

There are enough ethical problems don't add to the problem.

If that's not an ethical problem I don't know what is.

Court is charged to making sure that justice is done.

Your client lied about his finances.

I am the judge and in a moment I am going to ask you to leave.

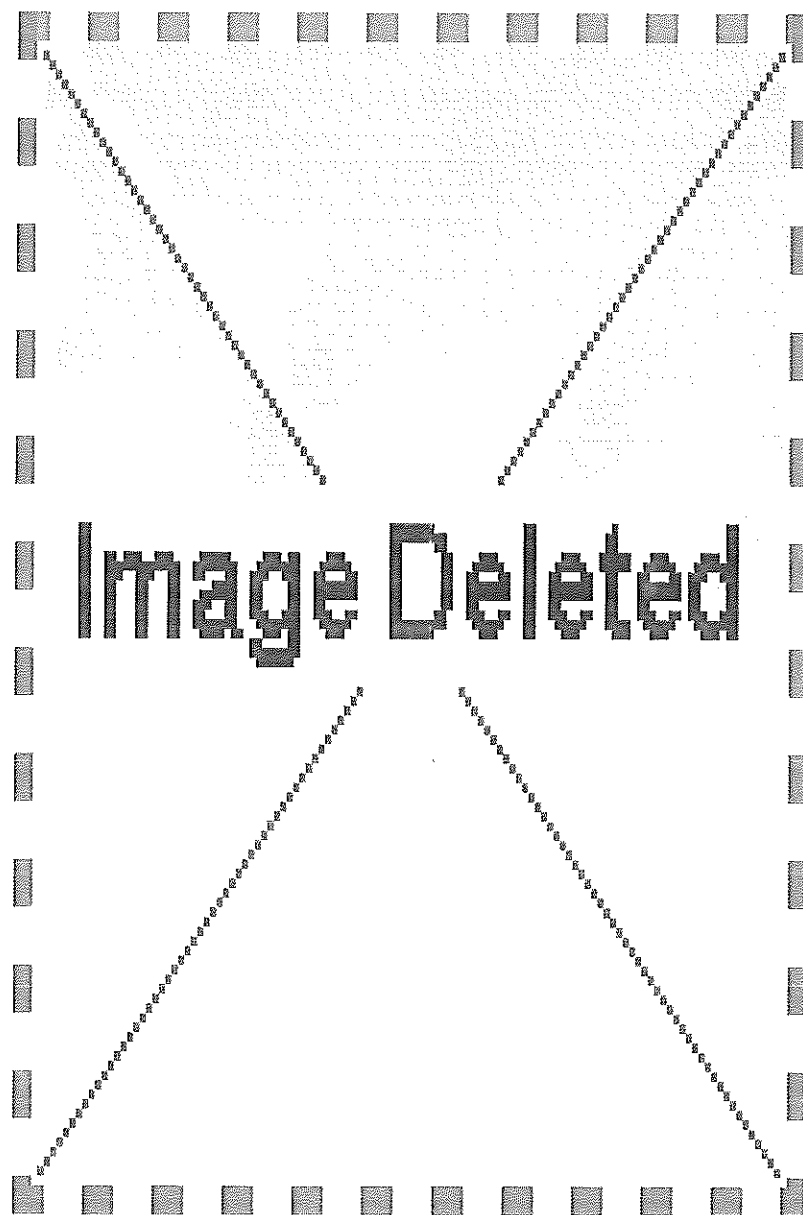
Your firm does this a lot and attack other lawyers.

I find it to be a pattern with your firm.

You are going to be taking out of here if you don't sit down.

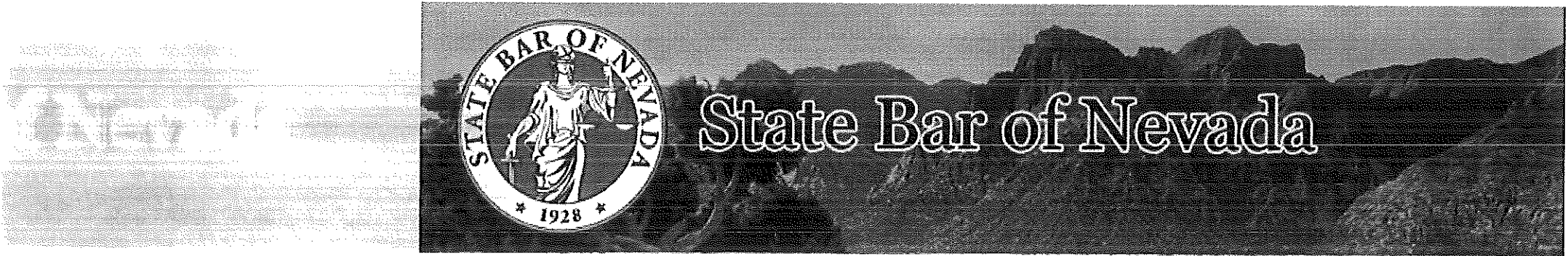
I am the Judge not you.

Jennifer Abrams:



Excuse me I was in the middle of a sentence.

Is there any relationship between you and Louis Schneider?



At what point should a judge sanction an attorney?

Is a judge too comfortable or intimidated by an attorney that they give them leeway to basically run their own courtroom?

If there is an ethical problem or the law has been broken by an attorney the Judge is mandated by law to report it to the Nevada State Bar or a governing agency that could deal with the problem appropriately.

[Learn More about Nevada State Bar Ethics & Discipline](#)

[UPCOMING EVENTS](#)

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Veterans In Politics International Inc.

702-283-8088

devildog1285@cs.com

www.veteransinpolitics.org

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Veterans In Politics International Inc., PO Box 28211, Las Vegas, NV 89126

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EXHIBIT 2

 Like 30  Share:

Tweet

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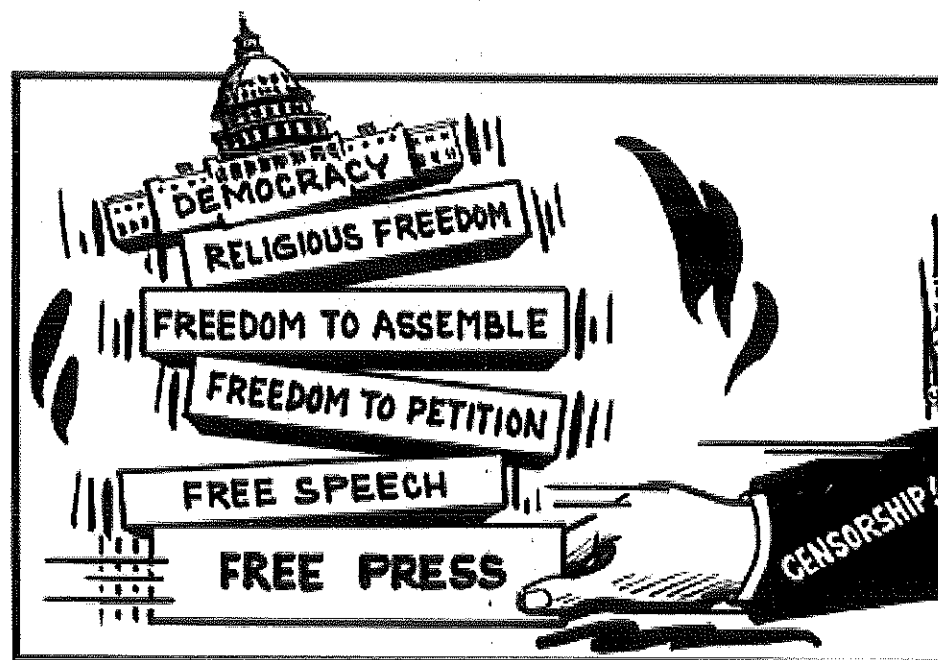
**VETERANS
IN POLITICS**

Law Frowns on Nevada Attorney Jennifer Abrams' "Seal-Happy" Practices

Clark County, Nevada
November 6, 2016

Free access to civil court proceedings is protected by the First Amendment to the U.S. Constitution.

FIND OUT MORE



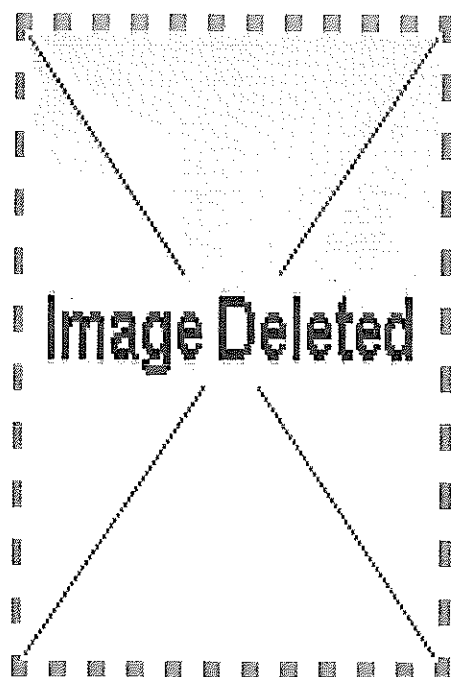
Its importance cannot be overstated!

State and federal courts, including Nevada's Supreme Court, recognize that public access to court proceedings serves vital public policy interests, including, serving as a check on corruption, educating the public about the judicial process, promoting informed discussion of government affairs, and enhancing the performance of the judge, the lawyers and all involved.

As former Nevada Supreme Court Justice Nancy Saitta wrote earlier this year regarding the Supreme Court's rules on sealing civil records, *"the cornerstones of an effective, functioning judicial system are openness and transparency. Safeguarding these cornerstones requires public access not only to the judicial proceedings but also to judicial records and documents."*



At least one lawyer in Nevada, however, Jennifer Abrams, appears to be **"seal happy"** when it comes to trying to seal her cases. She appears to have sealed many of her cases in the past few years, including filing a petition to seal in at least four cases just this past week, on 11/3/2016!



It also appears, however, that at least one of her cases, and perhaps more, may have been sealed to protect her own reputation, rather than to serve a compelling client privacy or safety interest.

[illegible]

Learn More

Veterans In Politics International (VIPI) recently released a video of Abrams bullying Judge Jennifer Elliot during a family court hearing in a case entitled Saiter v. Saiter, Case No. D-15-521372-D.



[Click onto Nevada Attorney attacks a Clark County Family Court Judge in Open Court](#)

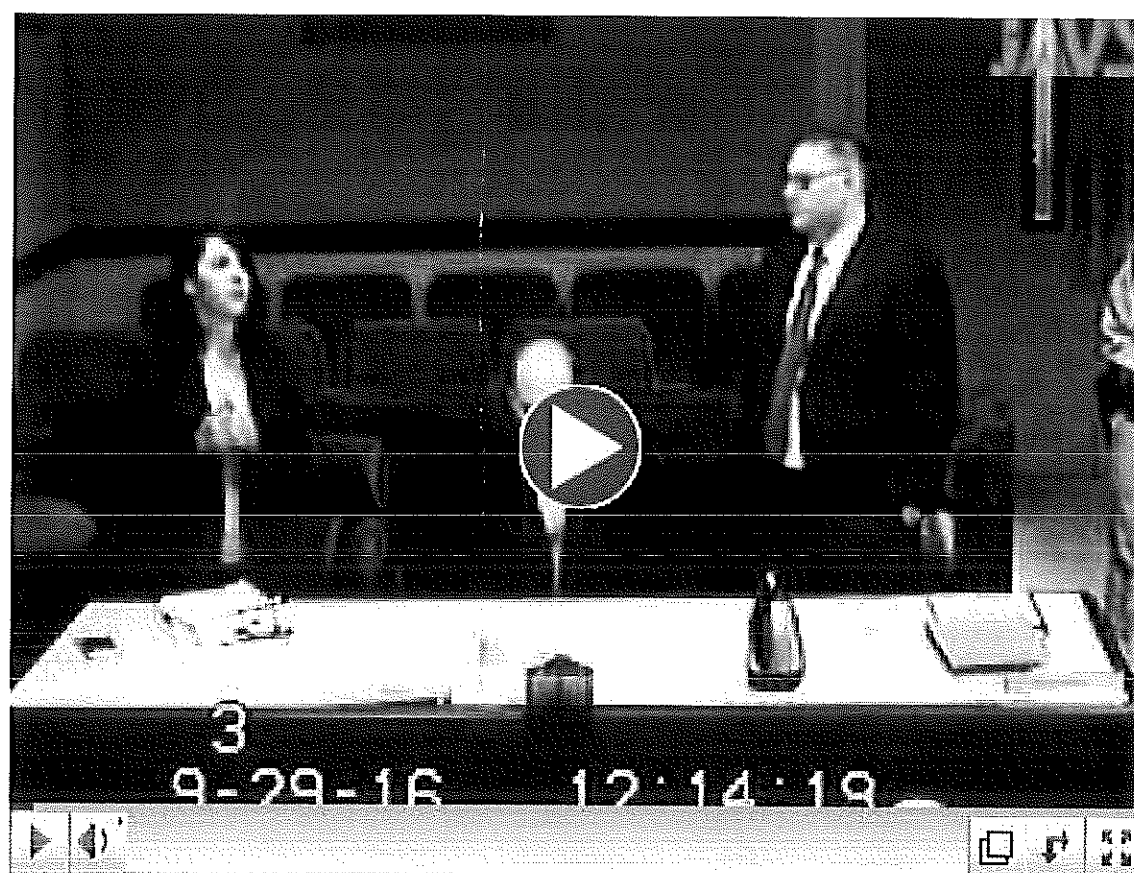
In response to our article, Abrams sought and obtained a court order from Judge Elliott which does not name VIPI, but which purports to

apply to the entirety of the general population. VIPI, however, was served with the Order. The document orders all videos of Abrams' September 29, 2016 judicial browbeating to be taken off the internet.

Click onto District Court Judge Bullied by Family Attorney Jennifer Abrams

The Order further prohibits anyone from "publishing, displaying, showing or making public any portion of these case proceedings." The order goes on to state that "nothing from the case at bar shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed."

While the order claims in a conclusory fashion to be "in the best interests of the children," nothing in the order explains why. Indeed, the September 29, 2016 video of the proceedings that is on the internet focuses on Abrams's disrespectful exchange with the judge, and does not materially involve the children in the case.



Start 12:13:00 in the video the following conversation took place in open court.

Learn More

Moreover, while the Court Order is broadly stated and purports to prohibit the public viewing or dissemination of "any portion of these

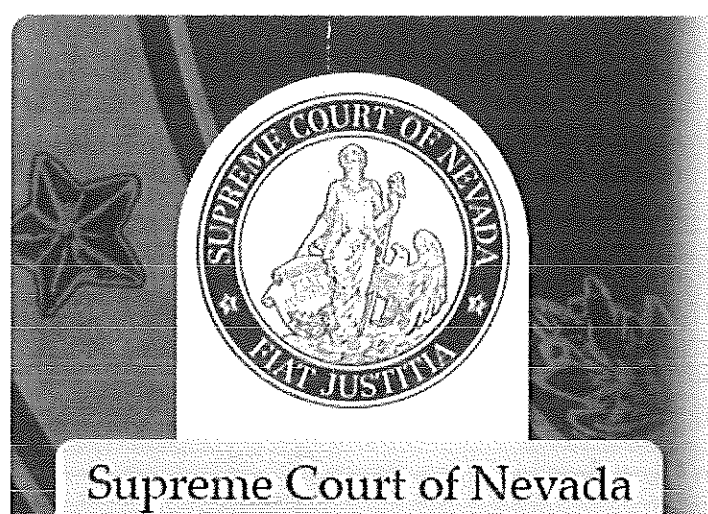
case proceedings," such blanket prohibition on public access to the entire case is specifically **disallowed by law.**

Entire cases cannot be sealed. Moreover, even if a judge wants to seal part of the case, the judge must specifically justify such sealing and must seal only the minimum portion necessary to protect a "compelling privacy or safety interest."

The issue of open proceedings is so important that in 2008 the Review Journal reported the Nevada Supreme Court convened a special task force to address the issue of over-sealing.

Click onto Standards for sealing civil cases tougher

The Supreme Court thereafter enacted rules requiring judges to specify in writing why sealing a record or redacting a portion of it is justified. (Supreme Court Rules, Part VII, Rule 3.) Judges must identify ***"compelling privacy or safety interests that outweigh the public interest in access to the court record."***



This requirement applies even when a party in a family law case tries to seal a case under NRS 125.110, the statute on which Abrams seems to routinely rely. This statute provides that certain evidence in a divorce case, such as records, exhibits, and transcripts of particular testimony, may be deemed "private" and sealed upon request of one of the parties. However, the Court must justify why these records

have to be sealed, and cannot seal the entire case - complaints, pleadings and other documents must remain public.

In the 2009 case of Johansen v. District Court, the Nevada Supreme Court specifically held that broad unsupported orders sealing documents in divorce cases are subject to reversal given the important public policies involved.

The Court stated:

"We conclude that the district court was obligated to maintain the divorce proceedings' public status under NRS 125.110 and manifestly abused any discretion it possessed when it sealed the entire case file. We further conclude that the district court abused its discretion when it issued an overly broad gag order sua sponte, without giving notice or a meaningful opportunity to be heard, without making any factual findings with respect to the need for such an order in light of any clear and present danger or threat of serious and imminent harm to a protected interest, and without examining the existence of any alternative means by which to accomplish this purpose. Gag orders must be narrowly drawn if no less restrictive means are available; they may be entered only when there exists a serious and imminent threat to the administration of justice. This was certainly not the case here."

Click onto Johanson v. Dist. Ct., 182 P. 3d 94 - Nev: Supreme Court 2008

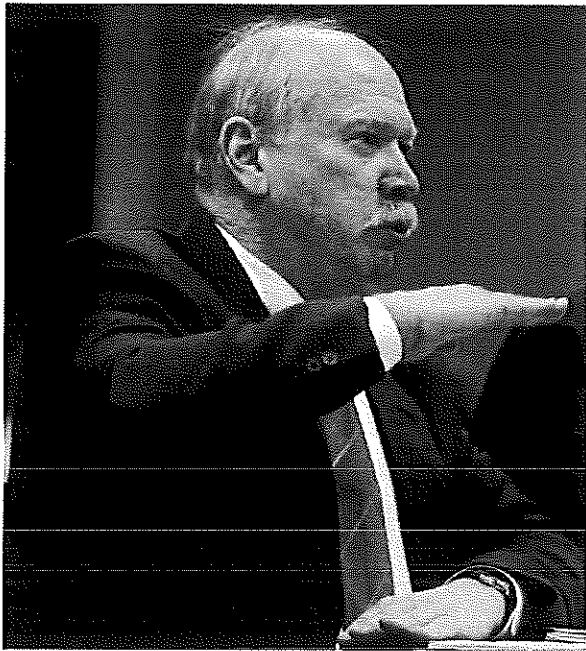
In the *Saiter* case, no notice was given to the general public for a hearing before the Order was issued, there was no opportunity for the public to be heard, no specific findings were made in the Order, and the Order was not drafted narrowly.

Indeed, it was drafted in the broadest possible terms to effectively seal the entire case! It is also questionable whether Judge Elliott had jurisdiction to issue the Order against the general public, who was not before her in court.

This all raises the question: What basis and justifications were given in the other cases which Abrams sought to seal?

Indeed, after issuing our initial story about Abrams' behavior in the *Saiter* case, we were contacted by judges, attorneys and litigants eager to share similar battle-worn experiences with Jennifer Abrams.

Sources indicate that when Abrams was asked in one case by Judge Gerald Hardcastle whether she understood his order, *she replied that she only understood that the judge intended to bend over backwards for her opposing counsel.*



In another case, Northern Nevada Judge Jack Ames reportedly stood up and walked off the bench after a disrespectful tirade from Jennifer Abrams.



So, who is to blame here?

Of course Jennifer Abrams should be responsible and accountable for her own actions.

But, what judge allows a lawyer to bully her in court and then gets her to issue an overbroad, unsubstantiated order to seal and hide the lawyer's actions?


Shouldn't we expect more from our judges in controlling their courtrooms, controlling their cases, issuing orders in compliance with the law, and protecting the people against over-zealous, disrespectful lawyers who obstruct the judicial process and seek to stop the public from having access to otherwise public documents?

Surely, we should have this minimum expectation. Even in Nevada.

Learn More

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CLERK OF THE COURT

DISTRICT COURT
FAMILY COURT DIVISION
CLARK COUNTY, NEVADA

BRANDON PAUL SAITER,

Plaintiff,
vs.

TINA MARIE SAITER,

Defendant.

CASE NO: D-15-521372-D
DEPT NO: L

HEARING DATES: 9/29/16
HEARING TIMES: 10:00 A.M.

ORDER PROHIBITING
DISSEMINATION OF CASE MATERIAL

This matter having come before the Court for several pending matters on the 29th day of September at 10:00 a.m., Plaintiff Brandon Saiter represented by Jennifer Abrams, Esq. and Brandon Leavitt, Esq. and Defendant, Tina Marie Saiter represented by Louis Schneider, Esq., and the Court hearing preliminary matters, entertained and granted Ms. Abrams request for a closed hearing pursuant to EDCR 5.02, with the exception of permitting the parents of Defendant to remain pursuant to NRS 125.080 (2) (c).

Thereafter, the videotape of this hearing was posted on youtube and a link to the video was emailed to multiple third parties not involved in the case on or about the 3rd day of October, 2016.

On October 5, 2016, the parties resolved all issues required for a Decree of Divorce. Counsel then stipulated to seal the case and to disallow any further release of


1

AA000108
2/15/2017 11:10 AM

case information and to demand that the current post of the September 29, 2016 hearing video, or any other hearing video from this case be immediately removed from the internet and to prohibit any portion of these proceedings from being disseminated or published and that any such publication or posting by anyone be immediately removed, as the September 29, 2016 hearing was a closed hearing. Additionally, counsels and the parties recognize that the case has been settled and that such an Order is in the best interest of the four (4) children in this case and is also authorized by NRS 125.080, NRS 125.110, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 2(2)(a) and 3(4).

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS
HEREBY ORDERED that the current post of the September 29, 2016 hearing video, or any and all other hearing video(s) from this case shall be immediately removed from the internet. All persons or entities shall be prohibited from publishing, displaying, showing, or making public any portion of these case proceedings; nothing from the case at bar shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed as the Court finds the stipulation of the parties and this Courts' Order to be in the best interest of the four (4) children in this case and to be fully supported by law (NRS 125.080, NRS 125.110, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 2(2)(a) and 3(4)).

DATED this 6th day of October, 2016.


Jennifer Elliott, District Court Judge,
Family Division, Dept. L

Learn More

UPCOMING EVENTS

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Veterans In Politics International Inc.

702-283-8088

devildog1285@cs.com

www.veteransinpolitics.org

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Confirm that you like this.

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EXHIBIT 3



CLERK OF THE COURT

1 **ACOM**
JENNIFER V. ABRAMS, ESQ.
2 Nevada State Bar Number: 7575
THE ABRAMS & MAYO LAW FIRM
3 6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
4 Phone: (702) 222-4021
Email: JVAGroup@theabramslawfirm.com
5 Attorney for Plaintiffs

6
7 **DISTRICT COURT**
CLARK COUNTY, NEVADA

8 JENNIFER V. ABRAMS and THE ABRAMS)	Case No.:	A-17-749318-C
9 & MAYO LAW FIRM,)		
Plaintiff,)	Department:	XXI
10 vs.)		
11)		
12 LOUIS C. SCHNEIDER; LAW OFFICES OF)	Hearing Date:	N/A
LOUIS C. SCHNEIDER, LLC; STEVE W.)	Hearing Time:	N/A
13 SANSON; HEIDI J. HANUSA; CHRISTINA)		
ORTIZ; JOHNNY SPICER; DON)		
14 WOOLBRIGHT; VETERANS IN POLITICS)		
INTERNATIONAL, INC.; SANSON)		
15 CORPORATION; KAREN STEELMON; and)		
DOES I THROUGH X,)		
16 Defendant.)		

ACTION IN TORT

ARBITRATION EXEMPTION
CLAIMED

17
18 **AMENDED COMPLAINT FOR DAMAGES**

19 **I.**
INTRODUCTION

20 1. Plaintiffs, Jennifer V. Abrams and The Abrams & Mayo Law Firm
21 ("Plaintiffs") bring this action for damages based upon, and to redress, Defendants'
22 Intentional Defamation of the character of the Plaintiffs through libelous writings
23 and slander, for Intentional Infliction of Emotional Distress, Negligent Infliction of
24 Emotional Distress, False Light, Business Disparagement, Harassment, Concert of

1 Action, Civil Conspiracy, and violations of RICO, all of which were perpetrated
2 individually and in concert with others by defendants Louis C. Schneider, Louis C.
3 Schneider, LLC, Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny Spicer,
4 Don Woolbright, Veterans In Politics International, Inc., Sanson Corporation, Karen
5 Steelmon, and Does I Through X (collectively "Defendants").

6 **II.**
7 **VENUE AND JURISDICTION**

8 2. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
9 stated herein.

10 3. Jurisdiction is proper in Nevada State court as all alleged claims were
11 transmitted to or performed in Nevada by the Defendants individually or in concert
12 with others.

13 **III.**
14 **PARTIES**

15 4. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
16 stated herein.

17 5. Plaintiff Jennifer V. Abrams, is a natural person and an attorney
18 licensed to practice law in the State of Nevada. She practices exclusively in the field
19 of Domestic Relations and is a peer-reviewed and certified Fellow of the American
20 Academy of Matrimonial Lawyers, and a Certified Specialist in Family Law.

21 6. The Abrams & Mayo Law Firm is a dba of The Abrams Law Firm, LLC,
22 a duly formed Limited Liability Company in the State of Nevada.

23 7. Upon information and belief, Louis C. Schneider is a natural person
24 who is admitted to practice law in the State of Nevada and is the managing member
of Law Offices of Louis C. Schneider, LLC.

1 8. Upon information and belief, Law Offices of Louis C. Schneider, LLC is
2 a duly formed Limited Liability Company located in Las Vegas, Nevada.

3 9. Upon information and belief, Steve W. Sanson is a natural person, the
4 President of Veterans In Politics International, Inc., and the Treasurer and Director
5 of Sanson Corporation.

6 10. Upon information and belief, Heidi J. Hanusa is a natural person, the
7 Treasurer of Veterans In Politics International, Inc., and the President and Secretary
8 of Sanson Corporation.

9 11. Upon information and belief, Christina Ortiz is a natural person and
10 the Director of Veterans In Politics International, Inc.

11 12. Upon information and belief, Johnny Spicer is a natural person and
12 Secretary of Veterans In Politics International, Inc.

13 13. Upon information and belief, Don Woolbright is a natural person and
14 Secretary of Veterans In Politics International, Inc.

15 14. Upon information and belief, Veterans In Politics International, Inc. is
16 a duly formed Domestic Non-Profit Corporation whose purported purpose is "[t]o
17 educate, organize, and awaken our veterans and their families to select, support and
18 intelligently vote for those candidates whom would help create a better world, to
19 protect ourselves from our own government(s) in a culture of corruption, and to be
20 the political voice for those in other groups who do not have one."

21 15. Upon information and belief, Sanson Corporation is a duly formed
22 Domestic Corporation in the State of Nevada.

23 16. Upon information and belief, Karen Steelmon is a natural person and
24 is the Registrant of the Domain veteransinpolitics.org.

1 17. Upon information and belief, additional persons and entities have been
2 working with the above named Defendants either individually or in concert and have
3 been added as Doe Defendants in this action until they are personally identified.

4 18. Jennifer V. Abrams and The Abrams & Mayo Law Firm are informed
5 and believe, and therefore allege, that each of the Defendants designated herein as
6 Louis C. Schneider, Law Offices of Louis C. Schneider, LLC, Steve W. Sanson, Heidi
7 J. Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Veterans In Politics
8 International, Inc., Sanson Corporation, Karen Steelmon, and Does I through X
9 inclusive, are in some way legally responsible and liable for the events referred to
10 herein, and directly or proximately caused the damages alleged herein.

11 19. At all times material hereto, and in doing the acts and omissions
12 alleged herein, the Defendants, and each of them, including Louis C. Schneider, Law
13 Offices of Louis C. Schneider, LLC, Steve W. Sanson, Heidi J. Hanusa, Christina
14 Ortiz, Johnny Spicer, Don Woolbright, Veterans In Politics International, Inc.,
15 Sanson Corporation, Karen Steelmon, and Does I through X inclusive, acted
16 individually and/or through their officers, agents, employees and co-conspirators,
17 each of whom was acting within the purpose and scope of that agency, employment,
18 and conspiracy, and these acts and omissions were known to, and authorized and
19 ratified by, each of the other Defendants.

20
21 **IV.**
 FACTUAL ALLEGATIONS

22 20. Plaintiffs incorporate and re-allege all preceding paragraphs as if fully
23 stated herein.

24 ///