

highly malleable standard with "an inherent subjectiveness about it which would allow a jury to impose liability on the basis of the jurors' tastes or views, or perhaps on the basis of their dislike of a particular expression." *Hustler*, 485 U. S., at 55 (internal quotation marks omitted). In a case such as this, a jury is "unlikely to be neutral with respect to the content of [the] speech," posing "a real danger of becoming an instrument for the suppression of... 'vehement, caustic, and sometimes unpleasan[t]" expression. *Bose Corp.*, 466 U. S., at 510 (quoting *New York Times*, 376 U. S., at 270). Such a risk is unacceptable; "in public debate [we] must tolerate insulting, and even outrageous, speech in order to provide adequate 'breathing space' to the freedoms protected by the First Amendment." *Boos v. Barry*, 485 U. S. 312, 322 (1988) (some internal quotation marks omitted). What Westboro said, in the whole context of how and where it chose to say it, is entitled to "special protection" under the First Amendment, and that protection cannot be overcome by a jury finding that the picketing was outrageous.

Snyder v. Phelps, 131 S.Ct. 1207, 179 L. Ed. 2d 172 (2011), Slip Op. at 12-13.

Plaintiffs' argument that their emotional distress claim should survive because the court in Branda v. Sanford, 97 Nev. 643, 648, 637 P.2d 1223, 1227 (1981) held that severe emotional distress could manifest as "hysterical and nervous... nightmares, great nervousness and bodily illness and injury" is irrelevant – Plaintiffs don't even allege that level of emotional distress. Indeed, the Complaint, and now the Opposition, is completely devoid of any factual evidence of emotional distress actually incurred by Plaintiff Willick. And of course, despite its claims to the contrary, his corporation law firm cannot have emotional distress since it is not even human!

Astonishingly, Plaintiffs also claim that the emotional impact of Defendants' speech on Plaintiffs is subject to "discovery" (Opp. At 19:23-20:1). One would hope that Plaintiffs' own emotional state would be well known to them – it is certainly not subject to discovery from Defendants!

## 2. False Light.

A cause of action for "false light" invasion of privacy requires that "(a) the false light in which the other was placed would be highly offensive to a reasonable person, and (b) the actor had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which the other would be placed. Franchise Tax Bd., of Cal., v. Hyatt, 130 Nev. Adv. Op. 71, 335 P.3d 125, 141 (2014). Here there is no privacy that was intruded, there is no

1 false statement of fact, and there is no evidence that Defendants knew or acted in reckless  
2 disregard as to the falsity of the publicized matter.

3 **3. Business Disparagement.**

4 The tort of business disparagement requires a falsity, and requires proving special  
5 damages. As stated in NRCP 9(g) “[w]hen items of special damage are claimed, they shall be  
6 specifically stated. “Proof of special damages is an essential element of business  
7 disparagement.” Clark Cty. Sch. Dist. v. Virtual Ed. Software, 125 Nev. 374, 387, 213 P.3d 496,  
8 505 (2009). Here there is no proof whatsoever of any damages.

9 Consequently, the claim of conspiracy must also necessarily fail.

10 **C. PLAINTIFFS FAILED TO MAKE A PRIMA FACIE CASE FOR RICO.**

11 Plaintiffs’ Opposition appears to “throw away” their RICO claim. Their sole argument  
12 for maintaining this ridiculous cause of action is: “Defendant admit that Plaintiffs have pled at  
13 least one crime under the RICO umbrella. This alone should be substantial evidence for a prima  
14 facie showing that the Plaintiffs will prevail on their claims.” (Opp., at 20:13-15.)

15 First, a conclusory recitation of legal elements in a Complaint does not constitute “prima  
16 facie evidence.” Not only is the Complaint utterly devoid any factual support for a RICO claim,  
17 but now so is the Opposition. The following is the sole allegation in the Complaint for RICO  
18 cause of action that would qualify as a “RICO related crime” under NRS 207.360:

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

Yet, the allegation is completely devoid of any facts to support it, and does not even allege that  
the crime somehow happened to Plaintiffs as required in a RICO claim. (Hale v. Burkhardt, 104  
Nev. 632, 637-638, 764 P.2d 866 (1988).) The allegation fails to identify any particular instance

1 or circumstance of such purported criminal act. It is certainly a far cry from the requirement that  
2 RICO claims be alleged, let alone proven, with the “same degree of specificity is called for as in  
3 a criminal indictment or information.” (Id.)

4 Plaintiffs also do not dispute that the remaining “crimes” alleged in the complaint are not  
5 even RICO related crimes as required by NRS 207.360.

6 **D. PLAINTIFFS ADMIT THAT THE COURT SHOULD DISMISS THEIR**  
7 **NINTH CAUSE OF ACTION FOR COPYRIGHT INFRINGEMENT FOR LACK OF**  
8 **SUBJECT MATTER JURISDICTION.**

9 Plaintiffs fail to even address Defendants’ argument that this Court should dismiss  
10 Plaintiffs’ ninth cause of action for copyright infringement for lack of subject matter jurisdiction.  
11 Such failure is an implied admission.

12 Federal courts clearly have original and exclusive jurisdiction over copyright claims (28  
13 U.S.C. 1338(a)). There is no excuse whatsoever, other than to try to unnecessarily run up  
14 Defendants’ legal bills, for Plaintiffs to have included this purported claim in their complaint.

15 **VII. PLAINTIFFS’ COUNTER-MOTION FOR FEES SHOULD BE DENIED, AND**  
16 **DEFENDANTS’ REQUEST FOR FEES, COSTS, AND \$10,000 PURSUANT TO NRS**  
17 **41.670(1)(B) SHOULD BE GRANTED.**

18 Plaintiffs’ counter-motion for fees and costs and their request for another \$10,000  
19 pursuant to NRS 41.670(b)(2) and 41.670 (3)(a)-(b) is meritless. The Court can only grant such  
20 motion if it finds that Defendants’ anti-SLAPP motion is “frivolous or vexatious.” Given the  
21 myriad of evidence and legal authority proffered by Defendants in connection with their motion,  
22 such finding would be unsupportable.

23 By contrast, however, Plaintiffs’ complaint and Opposition to this motion are the very  
24 definition of frivolous. Other than the recitation of parties and the statements at issue, the 26  
25 page Complaint simply recites legal elements, or fails to even do that (see for example,  
26 Plaintiffs’ second cause of action for negligent infliction of emotional distress that fails to allege  
27 a duty, a breach or causation; see also, the RICO allegations that recites a myriad of non-RICO  
28 related crimes and only one RICO related crime, and then does so with absolutely no facts; see

1 also Plaintiffs' ninth cause of action for the copyright infringement over which the Court has no  
2 subject matter jurisdiction). (More details on the inadequacy of the Complaint are set forth in  
3 Defendant's pending 12(b)(5) motion to dismiss for failure to state a claim.)

4 Moreover, when faced with Defendants' present anti-SLAPP motion, which this Court  
5 must, and Plaintiffs certainly should have, treated as one for summary judgment, the Opposition  
6 appears to been "slapped together" without meeting any of the evidentiary requirements needed  
7 to defeat the anti-SLAPP motion. The Opposition was "supported" by a single short declaration  
8 from Plaintiff Willick who in a conclusory single sentence purported to attest to "everything."  
9 That type of "evidence" is inadmissible – it lacks foundation for the factual claims made in the  
10 Opposition, constitutes hearsay as to others, constitutes inadmissible character evidence as to  
11 others, and the list of objections goes on...

12 The Opposition also fails to even attempt to support its RICO claim with facts, fails to  
13 address the Court's lack of subject matter jurisdiction over federal copyright claims, fails to  
14 address the fact that numerous of the statements at issue have been expressly found to constitute  
15 "opinion" as a matter of law as set forth in Defendants' moving papers, fails to allege any facts  
16 constituting emotional distress, fails to list any facts of financial damages, fails to address its  
17 claim for business disparagement except as part of a title in a section of the Opposition, among  
18 other deficiencies. It also fails to explain how Plaintiffs can with a straight face maintain this  
19 lawsuit while disseminating their own (worse) disparaging statements about Defendants as set  
20 forth in the moving papers at 7:5-18).

21 Indeed, under these circumstances, the Court can also award fees and costs to Defendants  
22 pursuant to Eighth Judicial Court Rule 7.60(b) or Rule 11 which permit the payment of  
23 attorney's fees and costs in the form of sanctions for filing frivolous oppositions and for  
24 unreasonably and vexatiously increasing litigation costs for their opponent.

25 As discussed in the moving papers, Plaintiffs have filed identical lawsuits, are a romantic  
26 couple who are representing each other in the suits (clearly to be able to recover attorneys' fees),  
27 and are pursuing this case despite their obvious lack of evidence to support their claims.  
28



1 This nowrepetitive tactic by Plaintiffs, who are both lawyers and do not have to pay for  
2 legal representation, to stifle legally permitted criticism of them should be stopped.

3 The Court, indeed free societies, should not tolerate this type of behavior by anyone, let  
4 alone by officers of the Court.

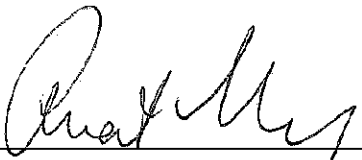
5 **VIII. CONCLUSION**

6  
7 For the reasons stated above and in Defendants' moving papers, Defendants respectfully  
8 request that the Court:

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

17 Respectfully submitted,

18 DATED: March 9, 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](mailto:Alevy96@aol.com)

1 **CERTIFICATE OF SERVICE**

2

3 I am over the age of 18 and am not a party to the within action.

4 On this date I caused to be served a true and correct copy of the document entitled **REPLY IN**  
5 **SUPPORT OF DEFENDANTS' ANTI-SLAPP SPECIAL MOTION TO DISMISS**  
6 **PURSUANT TO NRS 41.650 et. seq.** on the below listed recipients by requesting the court's  
7 wiznet website to E-file and E-serve such document at emails listed below.

8

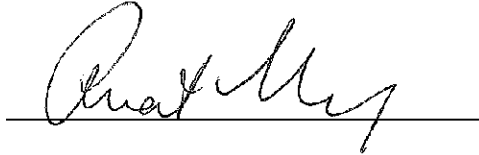
9 Jennifer Abrams, Esq.  
10 The Abrams & Mayo Law Firm  
11 6252 S. Rainbow Blvd., Ste. 100  
12 Las Vegas, NV 89118  
13 (702) 222-4021  
14 JVAGroup@theabramslawfirm.com

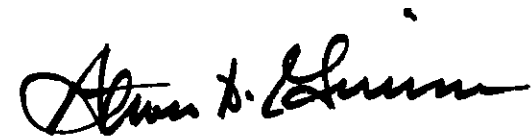
Alex Ghoubadi, Esq.  
G Law  
320 E. Charleston Blvd., Ste. 105  
Las Vegas, NV 89104  
(702) 217-7442  
alex@alexglaw.com

14 Courtesy Copy:  
15 Maggie McLetchie, Esq.  
16 McLetchie Shell  
17 702 E. Bridger Ave., Ste. 520  
18 Las Vegas, NV 89101  
19 (702) 728-5300  
20 Maggie@nvlitigation.com

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

23 Executed this 9<sup>th</sup> day of March, 2017, in Las Vegas, NV

24   
25  
26  
27  
28



CLERK OF THE COURT

SUPP

Anat Levy, Esq. (State Bar No. 12550)

ANAT LEVY & ASSOCIATES, P.C.

5841 E. Charleston Blvd., #230-421

Las Vegas, NV 89142

Phone: (310) 621-1199

E-mail: [alevy96@aol.com](mailto:alevy96@aol.com); Fax: (310) 734-1538

Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND  
STEVE SANSON

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

MARSHALL S. WILICK and WILICK LAW  
GROUP,

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.

CASE NO. A-17-750171-C

DEPT. NO.: XVIII (18)

Hearing Date: 3/14/2017

Time: 9:00 a.m.

[Filed concurrently with Reply in  
Support of Defendants' anti-SLAPP  
motion.]

**SUPPLEMENTAL DECLARATION OF STEVE SANSON**

**IN SUPPORT OF ANTI-SLAPP MOTION**

I, STEVE SANSON, hereby declare as follows:

1. I am a defendant in the within action. I make this Supplemental Declaration in support of VIPI's and my anti-SLAPP motion. I make this Supplemental Declaration based on my personal knowledge, except as to matters stated to be based on information and belief. I am competent to testify as to the truth of these statements if called upon to do so.

SUPPLEMENTAL DECLARATION OF STEVE SANSON IN SUPPORT OF  
ANTI-SLAPP MOTION TO DISMISS

1           2.       I am a decorated U.S. veteran who served in active battle in the U.S. Marine Corp.  
2 for six years in Desert Shield and Desert Storm. I also served an additional six years as an active  
3 reservist with the U.S. Army. Contrary to Plaintiffs' allegation, I have not been diagnosed with  
4 PTSD; I am however, 100% combat-related disabled. I have seen the best and the worst in  
5 people under extreme circumstances, including as a former chaplain for the Veterans of Foreign  
6 Wars and the Marine Corps League.

7           3.       In 2005, I became the President of VIPI, a non-profit, non-partisan 501(c)(4)  
8 corporation. To my knowledge, VIPI is not in violation of any charitable organization laws, and  
9 I do not have any idea to what Plaintiffs are referring by making such a statement.

10          4.       Since becoming President of VIPI, I have made it our "mission" to ensure that  
11 VIPI advocates on behalf of Veterans and roots out corruption wherever it may hide. VIPI's  
12 philosophy is that veterans did not die overseas, get maimed and put their lives on the line to  
13 preserve our democracy, just to have it corroded by our own corrupt public servants.

14          5.       In my capacity as VIPI's President, I routinely testify on VIPI's behalf before the  
15 Nevada State Legislature. I participate in Town Hall meetings, County Commission meetings,  
16 Planning Commission meetings, City Council meetings, Judicial Selection Committee meetings  
17 and other government meetings. I am also often called upon to give the invocation at public  
18 meetings.

19          6.       VIPI and I (through my work for VIPI) have received numerous commendations  
20 and awards from local, state and federal officials and bodies. Among them are certificates of  
21 recognition and/or appreciation from the Las Vegas City Council, the North Las Vegas City  
22 Council, the Henderson City Council, former U.S. Representative for Nevada, Jon Porter, former  
23 U.S. Representative for Nevada, Shelley Berkeley, and former U.S. Senator for Nevada, John  
24 Ensign. I also was the third veteran named "Veteran of the Month" by Governor Brian  
25 Sandoval, Governor Gibbons appointed me to the Southern Nevada Veterans Cemetery Advisory  
26 Board, and I was named one of Nevada's Distinguished Men in the 2016 Distinguished Men and  
27 Women Magazine.  
28

1           7.       VIPI's accomplishments are significant as well. Under my leadership, VIPI was  
2 instrumental in, among other things, creating Veterans' Court in Nevada. It got laws passed  
3 preventing veteran disability pay from being used in calculating spousal support. It got the  
4 passage of DMV veteran identification stickers to be put on Nevada drivers' licenses so that  
5 police who stop veterans can de-escalate potential violence. It got veteran de-escalation classes  
6 to become mandatory in police academy training, and worked to get a USO lounge at McCarran  
7 Airport for service personnel to use between flights.

8           8.       VIPI also puts out a blog and writes articles, and hosts a weekly internet radio  
9 show that my colleagues at VIPI host, in which we interview government officials and election  
10 candidates to educate the public about pressing issues. Guests have included almost every public  
11 official in Nevada. VIPI has also developed a candidate endorsement process where  
12 distinguished guests from the community moderate and interview judicial and political  
13 candidates and vote on who to endorse based on their qualifications and moral fortitude to refuse  
14 corruption. To ensure the independence of the panel, I disqualify myself from voting and do not  
15 provide any questions to any panel members or to candidates either directly or indirectly. VIPI  
16 has developed such a strong local following that Nevada whistleblowers now seek  
17 out VIPI to help them expose wrongdoing. Over the years, VIPI has exposed numerous corrupt  
18 politicians, political and judicial candidates and others, including most recently, Judge Rena  
19 Hughes who is, on information and belief, now being investigated by the Judicial Disciplinary  
20 Commission for the actions that VIPI exposed.

21           9.       Plaintiffs' claim that VIPI never exposed anyone because it purportedly didn't  
22 comment on former Judge Steve Jones and present Education Trustee Kevin Childs' alleged  
23 wrongdoing is simply wrong. Both Jones and Childs appeared on VIPI's radio show, both were  
24 the subject of articles disseminated by VIPI, I attended parts of former Judge Jones' trial and sent  
25 a letter to the federal judge in the case on behalf of VIPI regarding Jones' sentencing. And, I  
26 spent over seven hours in a recent Trustee meeting to try to speak publicly regarding the Kevin  
27 Childs controversy.  
28

10. Also, contrary to Plaintiff's allegations, I do all this for free. I believe that "if you turn a blind eye or a deaf ear to corruption, you are just as guilty of the wrongdoing as the perpetrators." VIPI has never taken payment in exchange for writing or exposing any story and I do not draw a salary from VIPI. And, contrary to Plaintiff's allegations, VIPI has never been hired by Louis Schneider or anyone else to issue a "smear campaign" against Abrams or Plaintiff.

11. As stated in my Initial Declaration filed with the moving papers, I took down the January 12, 2017 post which inadvertently omitted the intended commas as soon as I realized, just a few days later, the ambiguity caused by the error. I then promptly issued a clarification on behalf of VIPI and circulated the clarified statement to all the same entities who received the original statement. To my knowledge, there are no more copies of the original ambiguous statement available for public view through any venues that VIPI or I control or administer. If there are, then VIPI would be willing to take them down.

12. I have never met nor do I know the defendants in the 2012 defamation case that Plaintiffs filed other veterans entitled Willick v. Jere Beery et. al., case no. A12661766-C.

Dated this 9th day of March, 2017 in Las Vegas, NV.

Steve Sanson

1 **CERTIFICATE OF SERVICE**

2  
3 I am over the age of 18 and am not a party to the within action.

4 On this date I requested that a true and correct copy of the document entitled  
5 SUPPLEMENTAL DECLARATION OF STEVE SANSON IN SUPPORT OF ANTI-SLAPP  
6 MOTION TO DISMISS be E-served via the Eighth Judicial District Court's wiznet E-file and E-  
7 serve online system to the below recipients at their below-stated Email addresses:

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 Ghoubado, 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 9th day of March 2017, in Las Vegas, NV

22  
23 //AL//  
24  
25  
26  
27  
28

1 **AFFT**

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 MARSHAL S. WILICK and WILICK LAW ) Case No.: A-17-750171-C  
GROUP, )

9 Plaintiff, )

10 vs. )

11 STEVE W. SANSON; HEIDI J. HANUSA; ) Hearing date: March 14, 2017

12 CHRISTINA ORTIZ; JOHNNY SPICER; )

DON WOOLBRIGHT; VETERANS IN )

13 POLITICS INTERNATIONAL, INC.; )

SANSON CORPORATION; KAREN )

14 STEELMON; and DOES I THROUGH X, )

15 Defendant. )

16  
17 **AFFIDAVIT OF MARSHAL S. WILICK IN SUPPORT OF PLAINTIFF'S**  
18 **OPPOSITION TO ANTI-SLAPP SPECIAL MOTION TO DISMISS**  
**PURSUANT TO NRS 41.650 et. seq.;**

**AND**

19 **COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS**

20 STATE OF NEVADA )

21 COUNTY OF CLARK )

22 I, MARSHAL S. WILICK, do solemnly swear to testify herein to the truth, the  
23 whole truth and nothing but the truth.  
24



1 On February 11, 2015, Assembly Bill 140 was introduced. I and several other  
2 attorneys testified against portions of the bill and Steve Sanson testified in favor of  
3 the bill. After much of the legally objectionable provisions were removed, it was  
4 passed in a significantly altered form around May 17, 2015; the legislative session  
5 ended shortly thereafter.

6 Approximately **six months** later, I saw Steve Sanson at the courthouse. I am  
7 familiar with Steve Sanson and VIPI's "smear campaigns" as I am on his email list  
8 and receive his mass defamatory e-mail blasts about judges and other elected  
9 officials on a regular basis.

10 I have regularly assisted legitimate military and veteran's groups in many  
11 ways over many years,<sup>1</sup> and I had no interest in having any inadvertent conflict with  
12 anyone claiming to be in favor of working for veteran's issues, so when I saw Mr.  
13 Sanson I said "hello." We spoke briefly, he invited me on his radio show on the  
14 proposed subject of "military members in family court," and again in an effort to de-  
15 escalate any perceived conflict with him, I accepted his invitation.

16 On November 14, 2015, I appeared on the VIPI radio show. I was  
17 immediately sandbagged with profanity-laced shouting, but I nevertheless attempted  
18 to explain the concept of "equal protection under law" despite the interviewers'

19  
20  
21  
22  
23 <sup>1</sup> For example, I am one of the creators of the "Deployed Parents' Custody Act" (now part of  
24 NRS chapter 125C), my office has repeatedly been named the recipient of the ABA Military  
Pro Bono Project Outstanding Services Award, and I have been a long-standing participant  
in "Operation Stand By," providing free legal assistance to military members and JAG  
officers worldwide.

1 cursing, claims of "special privilege," and assertions that the "14<sup>th</sup> Amendment  
2 should not apply" to them.<sup>2</sup>

3 I don't know whether the interview was ever actually posted on the internet  
4 because when I later clicked the link to the interview, a message appeared indicating  
5 that the recording "could not be found." Apparently this is because the interview  
6 contained so much of Sanson's foul-mouthed screaming that it reflected badly on  
7 him and his organization.

8 I heard nothing from the VIPI Defendants thereafter about the interview, AB  
9 140, or anything else. The VIPI Defendants did not post any articles or material and  
10 the recording of the interview was not accessible from their website. In other words,  
11 for about 18 months after AB 140 was passed, there was nothing (other than the  
12 interview which was not accessible online) disseminated by the VIPI defendants on  
13 the matter. No further legislation or other issue was or is pending on that subject.

14 On December 25, 2016, *over a year and a half after* AB 140 had any  
15 significance to the public or was given any attention by the VIPI defendants, they  
16 were paid by Louis Schneider, Esq. to launch a "smear campaign" against my fiancé,  
17 Jennifer V. Abrams, Esq. in an effort to coerce and intimidate her into withdrawing a  
18 sanctions motion she filed against Schneider in a divorce case that I have no part of.  
19 After the VIPI Defendants disseminated a series of defamatory material against Ms.  
20 Abrams, it is my understanding that they ran a background check on Ms. Abrams to  
21 find information about her, and found nothing disparaging.

22  
23  
24 <sup>2</sup> The interview is posted at <http://www.willicklawgroup.com/audio/> and a transcript of it is  
attached hereto as Exhibit 1. The contents of both the audio and transcript are incorporated  
here by reference.

1 During their quest to find information about Ms. Abrams to use in the "smear  
2 campaign" intended to malign her reputation, the VIPI Defendants learned about my  
3 personal relationship with Ms. Abrams.<sup>3</sup>

4 Not having found any additional material against Ms. Abrams, the VIPI  
5 defendants began targeting *me*, in an effort to find a way to hurt *her*. They first  
6 posted the "hypocrisy" article calling me a "hypocrite" who "screw[s veterans] for  
7 profit and power," no part of which is true. As explained briefly above, I volunteer  
8 my time and go out of my way to actually assist veterans, and have done so for  
9 decades. It is no coincidence that this defamatory material was broadcast shortly  
10 after the VIPI defendants were paid by Louis Schneider to disseminate "smear  
11 campaigns" against my fiancé and immediately after they learned of the relationship  
12 between me and Ms. Abrams.<sup>4</sup>

13 Those unlawful activities, and others, led to the filing of this lawsuit, *Willick v.*  
14 *Sanson, et al.* Contrary to the assertions in the Motion, there have been *many* more  
15 than "five defamatory statements" made by the VIPI Defendants against me; the  
16 actual total is in the hundreds of communications to thousands of people, including a  
17 one-hour radio show on February 25, 2017, dedicated entirely to defaming me  
18 further. To this day, the "smear campaign" by VIPI against me continues.

19 While the timing and focus of the "hypocrisy" article evidences the VIPI  
20 Defendants' actual malice against me, the "sexually coercion" article and the VIPI  
21 Defendants' comments regarding that article leave no doubt that the purpose of the

22  
23 <sup>3</sup> In a December 22, telephone conversation with David Schoen, Steve Sanson admitted that  
he became aware of the personal relationship between me and Ms. Abrams.

24 <sup>4</sup> Sanson later posted a "reward" of up to \$10,000 for anyone who would come up with  
additional defamatory material about me. There can be no question of intent to cause harm.  
A true and correct copy of the postings are attached hereto as Exhibit 2.

1 repeated publications was to try to find some way to injure me personally and  
2 professionally.

3 Beginning on January 12, 2017, the VIPI Defendants posted an article with the  
4 title:

5 Attorney Marshall Willick and his pal convicted of sexually coercion of  
6 a minor, Richard Crane was found guilty of defaming a law student in a  
United States District Court Western District of Virginia signed by US  
District Judge Norman K. Moon.<sup>5</sup>

7 This was posted on the following social media sites on the dates and times indicated:

8			
9	1/12/17	11:04 pm	Steve.Sanson1 Facebook Page
	1/12/17	11:42 pm	Twitter
	1/12/17	11:51 pm	Nevada Court Watchers Facebook Page
10	1/12/17	11:52 pm	Veterans In Politics Facebook Page
11	1/12/17	11:57 pm	Veterans In Politics: Operation Never Forget Facebook Page
	1/12/17	11:58 pm	Nevada Veterans in Politics Facebook Page
12	1/12/17	11:59 pm	Eye on Nevada Politics Facebook Page
	1/12/17	11:59 pm	Steve W. Sanson Facebook Page
13	1/13/17	12:00 am	Veterans in Politics International Facebook Page
	1/13/17	12:06 am	Twitter
14	1/13/17	12:07 am	Steve.Sanson3 Facebook Page
	1/13/17	12:22 am	Family Court Support Group Facebook Page
15	1/13/17	12:32 am	Twitter
	1/14/17	3:33 pm	Steve.Sanson1 Facebook page
16	1/14/17	3:33 pm	Veterans In Politics Facebook page
	1/14/17	3:33 pm	Veterans In Politics International Facebook Page
17	1/14/17	3:33 pm	Eye on Nevada Politics Facebook page
	1/14/17	3:33 pm	Steve W. Sanson Facebook page
18	1/14/17	3:33 pm	Veterans In Politics: Operation Never Forget
	1/14/17	3:33 pm	Nevada Veterans in Politics Facebook page
19	1/14/17	3:34 pm	Twitter
	1/14/17	4:07 pm	Twitter
20	1/16/17	10:00 am	Steve.Sanson1 Facebook page
	1/16/17	10:00 am	Veterans in Politics Facebook page
21	1/16/17	10:00 am	Steve W. Sanson Facebook page
	1/16/17	10:03 am	Eye on Nevada Politics Facebook page
22	1/16/17	10:03 am	Veterans In Politics International Facebook Page

23 <sup>5</sup> This post also appeared with the title, "Attorney Marshall Willick and his pal convicted of  
24 sexually coercion of a minor Richard Crane was found guilty of defaming a law student in a  
United States District Court Western District of Virginia signed by US District Judge  
Norman K. Moon"

1	1/16/17	10:03 am	Veterans In Politics: Operation Never Forget
	1/16/17	10:03 am	Veterans In Politics Facebook page
2	1/18/17	11:00 am	Steve W. Sanson Facebook page
	1/18/17	11:00 am	Eye on Nevada Politics Facebook page
3	1/18/17	11:00 am	Veterans In Politics: Operation Never Forget
	1/18/17	11:00 am	Veterans in Politics Facebook page
4	1/18/17	11:00 am	Twitter
	1/18/17	11:00 am	Veterans In Politics Facebook page
5	1/20/17	1:20 am	Twitter
	1/20/17	1:22 am	Steve.Sanson3 Facebook page
6	1/21/17	9:32 am	Twitter
	1/21/17	12:20 pm	Veterans In Politics International Facebook Page
7	1/21/17	12:30 pm	Steve.Sanson1 Facebook page
	1/21/17	12:30 pm	Veterans In Politics Facebook page
8	1/21/17	12:30 pm	Eye on Nevada Politics Facebook page
	1/21/17	12:30 pm	Steve W. Sanson Facebook page
9	1/21/17	12:30 pm	Veterans In Politics: Operation Never Forget
	1/21/17	12:30 pm	Veterans In Politics Facebook page

It is likely that the VIPI Defendants posted and disseminated this defamatory material in other locations as well, of which I won't be aware until discovery is conducted. Given the VIPI Defendants' payment of money to Facebook and possibly other services to "boost" and spread defamatory material as far and wide as possible, it is likely that I will never know how many thousands of people were provided false accusations against me.

Contrary to the false assertion disseminated by the VIPI Defendants, I have never been "convicted of sexual coercion of a minor child." And while the VIPI Defendants, admitting that the post saying so is false and defamatory, seek to take cover behind the alleged posting of a "correction," (a) the VIPI Defendants did not delete the defamatory postings, many of which (detailed below) still remain visible, (b) the VIPI Defendants repeatedly disseminated the original, admittedly defamatory posting *after* the posting of the "correction," making it worthless, and (c) the correction itself is defamatory.

1 Of the postings noted above, the following are still visible in their original  
2 form, unchanged and uncorrected, as of Friday, March 10, 2017:

3	1/12/17	11:42 pm	Twitter
	1/12/17	11:51 pm	Nevada Court Watchers Facebook Page
4	1/12/17	11:57 pm	Veterans In Politics: Operation Never Forget Facebook Page
5	1/12/17	11:59 pm	Steve W. Sanson Facebook Page
	1/13/17	12:06 am	Twitter
6	1/13/17	12:22 am	Family Court Support Group Facebook Page
	1/13/17	12:32 am	Twitter
7	1/14/17	3:33 pm	Steve.Sanson1 Facebook page
	1/14/17	3:33 pm	VeteransIn Politics Facebook page
8	1/14/17	3:33 pm	Veterans In Politics International Facebook Page
	1/14/17	3:33 pm	Eye on Nevada Politics Facebook page
9	1/14/17	3:33 pm	Steve W. Sanson Facebook page
	1/14/17	3:33 pm	Veterans In Politics: Operation Never Forget
10	1/14/17	3:33 pm	Nevada Veterans in Politics Facebook page
	1/14/17	3:34 pm	Twitter
11	1/14/17	4:07 pm	Twitter
	1/16/17	10:00 am	Steve.Sanson1 Facebook page
12	1/16/17	10:00 am	Veterans in Politics Facebook page
	1/16/17	10:00 am	Steve W. Sanson Facebook page
13	1/16/17	10:03 am	Eye on Nevada Politics Facebook page
	1/16/17	10:03 am	Veterans In Politics International Facebook Page
14	1/16/17	10:03 am	Veterans In Politics: Operation Never Forget
	1/16/17	10:03 am	VeteransIn Politics Facebook page
15	1/18/17	11:00 am	Steve W. Sanson Facebook page
	1/18/17	11:00 am	Eye on Nevada Politics Facebook page
16	1/18/17	11:00 am	Veterans In Politics: Operation Never Forget
	1/18/17	11:00 am	Veterans in Politics Facebook page
17	1/18/17	11:00 am	Twitter
	1/18/17	11:00 am	VeteransIn Politics Facebook page
18	1/20/17	1:20 am	Twitter
	1/20/17	1:22 am	Steve.Sanson3 Facebook page
19	1/21/17	9:32 am	Twitter
	1/21/17	12:20 pm	Veterans In Politics International Facebook Page
20	1/21/17	12:30 pm	Steve.Sanson1 Facebook page
	1/21/17	12:30 pm	VeteransIn Politics Facebook page
21	1/21/17	12:30 pm	Eye on Nevada Politics Facebook page
	1/21/17	12:30 pm	Steve W. Sanson Facebook page
22	1/21/17	12:30 pm	Veterans In Politics: Operation Never Forget
	1/21/17	12:30 pm	Veterans in Politics Facebook page

23 True and correct copies of these postings are attached hereto as Exhibit 3.  
24 Again, there may be others of which I am unaware.

1 Despite there **currently** being at least 35 known postings containing the  
2 false and defamatory allegation that I was "convicted of sexually coercion of a  
3 minor," Steve Sanson falsely states in his "Supplemental Declaration of Steve Sanson  
4 In Support of Anti-SLAPP Motion to Dismiss" that "[t]o my knowledge, there are no  
5 more copies of the original ambiguous statement available for public view through  
6 any venues that VIPI or I control or administer." In other words, Steve Sanson has  
7 recently and directly lied to this Court, and is fully aware of that lie.<sup>6</sup>

8 Of the (at least) 41 times that the VIPI Defendants posted and/or  
9 disseminated the false and defamatory allegation that I was "convicted of sexually  
10 coercion of a minor," the VIPI Defendants removed only six (6).<sup>7</sup>

11 Notably, the "correction" was posted on January 18, 2017. However, the  
12 original admittedly defamatory posting was **re-posted** and/or **re-disseminated**  
13

14 <sup>6</sup> Mr. Sanson's affidavit contains several deliberate falsehoods. For example, speaking of the  
15 Beery and Simes case, in which we eventually received a public apology and posted  
16 retraction for their defamation campaign conducted a couple years ago, Mr. Sanson now  
17 claims to have no connection to them. But he previously claimed that they were his  
18 "friends." See true and correct copy of January 13, 2017 Facebook posts by Steve Sanson on  
19 the Willick Law Group Facebook page, attached as Exhibit 4, wherein Steve Sanson says: "By  
the way don't forget my veteran friends protested at your office and you cowardly filed suit  
against them. Because you hide behind a keyboard. You are the biggest COWARD that has  
passed the bar." Mr. Sanson's personal animus and malice against me is also evident in these  
postings wherein, for example, Mr. Sanson says to me: "You should have came (sic) to  
Carson City, we where (sic) waiting for you."

20 <sup>7</sup> The only 6 that were deleted were:

21 1/12/17 11:04 pm Steve.Sanson1 Facebook page  
22 1/12/17 11:52 pm VeteransIn Politics Facebook page  
23 1/12/17 11:58 pm Nevada Veterans In Politics Facebook page  
24 1/12/17 11:59 pm Eye on Nevada Politics Facebook page  
1/13/17 12:00 am Veterans In Politics International Facebook page  
1/13/17 12:07 am Steve.Sanson3 Facebook page



1 no less than **sixteen (16) times** between January 18, 2017 and the date of Mr.  
2 Sanson's false Declaration, as follows:

3	1/18/17	11:00 am	Steve W. Sanson Facebook page
	1/18/17	11:00 am	Eye on Nevada Politics Facebook page
4	1/18/17	11:00 am	Veterans In Politics: Operation Never Forget
	1/18/17	11:00 am	Veterans in Politics Facebook page
5	1/18/17	11:00 am	Twitter
	1/18/17	11:00 am	Veterans In Politics Facebook page
6	1/20/17	1:20 am	Twitter
	1/20/17	1:22 am	Steve.Sanson3 Facebook page
7	1/21/17	9:32 am	Twitter
	1/21/17	12:20 pm	Veterans In Politics International Facebook Page
8	1/21/17	12:30 pm	Steve.Sanson1 Facebook page
	1/21/17	12:30 pm	Veterans In Politics Facebook page
9	1/21/17	12:30 pm	Eye on Nevada Politics Facebook page
	1/21/17	12:30 pm	Steve W. Sanson Facebook page
10	1/21/17	12:30 pm	Veterans In Politics: Operation Never Forget
	1/21/17	12:30 pm	Veterans in Politics Facebook page

11 The "correction" is really no correction at all. It says: "CLARIFICATION: Attorney  
12 Marshall Willick's letters against opposing party found defamatory per se in 2008;  
13 Willick settled before trial on issue privilege." It says nothing to retract, correct, or  
14 withdraw the false allegation that "Attorney Marshall Willick and his pal convicted of  
15 sexually coercion of a minor."

16 In addition to being defamatory per se because they falsely allege that I was  
17 "convicted of sexually coercion of a minor," the postings / disseminations are  
18 defamatory because they allege I was "found guilty" (of defamation) which on its face  
19 constitutes an allegation of criminal conduct. Slander and libel are, in fact, **crimes**  
20 in the State of Virginia, and saying someone is "guilty" of them is an assertion that  
21 the person committed and was found guilty of that crime:

22 2016 Code of Virginia § 18.2-417. Slander and libel.

23 Any person who shall falsely utter and speak, or falsely write and  
24 publish, of and concerning any female of chaste character, any words  
derogatory of such female's character for virtue and chastity, or



1 imputing to such female acts not virtuous and chaste, or who shall  
2 falsely utter and speak, or falsely write and publish, of and concerning  
3 another person, any words which from their usual construction and  
4 common acceptation are construed as insults and tend to violence and  
breach of the peace or shall use grossly insulting language to any  
female of good character or reputation, shall be guilty of a Class 3  
misdemeanor.

5 The defendant shall be entitled to prove upon trial in mitigation of the  
6 punishment, the provocation which induced the libelous or slanderous  
words, or any other fact or circumstance tending to disprove malice, or  
lessen the criminality of the offense.

7 Slander and libel are likewise **crimes** in the State of Nevada:

8 NRS 200.510 Definition; penalties; truth may be given in  
9 evidence; jury to determine law and fact.

10 1. A libel is a malicious defamation, expressed by printing, writing,  
11 signs, pictures or the like, tending to blacken the memory of the dead,  
12 or to impeach the honesty, integrity, virtue, or reputation, or to publish  
the natural defects of a living person or persons, or community of  
persons, or association of persons, and thereby to expose them to  
public hatred, contempt or ridicule.

13 2. Every person, whether the writer or publisher, convicted of the  
offense is guilty of a gross misdemeanor.

14 3. In all prosecutions for libel the truth may be given in evidence to  
15 the jury, and, if it shall appear to the jury that the matter charged as  
libelous is true and was published for good motive and for justifiable  
ends, the party shall be acquitted, and the jury shall have the right to  
determine the law and the fact.

16 I was not found "guilty" of the crimes of slander or defamation in Virginia, or  
17 Nevada, or anywhere else. In fact, the lawsuit at issue was a **civil** lawsuit that was  
18 settled by my insurance company<sup>8</sup> after the denial of a motion to dismiss without  
19

20  
21 <sup>8</sup> It was a minor skirmish in a long-running series of cases involving Scotlund Vaile, the most  
22 notorious international child kidnaper and deadbeat dad in Nevada, from whom I rescued  
23 the two kidnaped children and returned them to their mother in Norway in 2001, and who  
24 we have been pursuing for back child support, tort damages, and fees ever since. See *Vaile v.*  
*District Court*, 118 Nev. 262, 44 P.3d 506 (2002); *Vaile v. Porsboll*, 128 Nev. 27, 268 P. 3d  
1272, 128 Nev. 27 (2012); *Vaile v. Porsboll*, No. 61415/62797, Order Affirming in Part,  
Dismissing in Part, Reversing in Part, and Remanding (Unpublished Disposition Dec. 29,  
2015). Mr. Sanson has apparently taken up the cause of Mr. Vaile in an effort to defame me.

1 any admission of any liability of any kind -- there was no actual final adjudication at  
2 all.

3 Given that the VIPI Defendants posted the decision from the West Virginia  
4 case, they cannot claim to be ignorant of its contents. It states:

5 "Under Virginia law, it is defamatory per se to make false statements  
6 that among other things, (1) impute the commission of a criminal  
7 offense involving moral turpitude, for which the party, if the charge is  
8 true, may be indicted and punished; (2) impute that a person is unfit to  
perform the duties of an office or employment of profit, or want of  
integrity in the discharge of the duties of such an office or employment;  
or (3) prejudice a person in his or her profession or trade." *Shupe v.*  
*Rose's 6 Stores, Inc.*, 192 S.E.2d 766, 767 (Va. 1972).

9 In Nevada, defamation per se is essentially identical:

10 To constitute slander *per se*, the alleged defamation must be oral and  
11 must fall into one of four categories: (1) that the plaintiff committed a  
12 crime; (2) that the plaintiff has contracted a loathsome disease; (3) that  
a woman is unchaste; or, (4) the allegation must be one which would  
tend to injure the plaintiff in his or her trade, business, profession or  
office.<sup>9</sup>

13  
14 The VIPI Defendants cannot claim that they "didn't know" that the claims  
15 they made were defamatory *per se*, or that they just "accidentally" wrote the  
16 headlines they re-posted hundreds of times to falsely accuse me of having committed  
17 and having been found guilty of crimes. A comment was posted by one of their own  
18 followers (one Lee Pudemonhuchin Gilford) confirming that the message they  
19 broadcast was the false assertion that I had committed a crime against children:

20 And this is how the defamation lawsuits begin. Nothing you shared  
21 indicates that Willick did anything but employ a nasty bastard. You  
22 have intentionally indicated that he was convicted.<sup>10</sup> I offer you a  
couple of choices to correct this, because as someone claiming to  
represent veterans, I would appreciate it at least done in a legal way.  
A) provide evidence that Willick was convicted.

23 <sup>9</sup> *Nevada Ind. Broadcasting v. Allen*, 99 Nev. 404, 409, 664 P.2d 337, 341 (1983), citing  
24 *Branda v. Sanford*, 97 Nev. 643, 637 P.2d 1223 (1981).

<sup>10</sup> Mr. Gilford is describing "actual malice."

1 B) change your caption

2 C) take this crap to your personal page.

3 You stand before political figures in this state, indicating that you  
4 represent veterans (me) here in Las Vegas. You therefore have an  
5 obligation to take our representation responsibly. Getting in to pissing  
6 wars<sup>11</sup> and getting sued for libel does nothing but discredit the image of  
7 veterans, that some of us pride ourselves in maintaining

8 Sansons' response was nothing short of extreme and outrageous **by itself**:

9 Look Lee you are a Marine correct.. Everything we put out is true.. If  
10 you don't believe that don't engage in our page. We been doing this for  
11 over a decade.. Maybe you should do your own reserach [sic] before  
12 you engage in another conversation with our group. Semper Fi<sup>12</sup>

13 The blatantly false representation that "[e]verything we put out is true" and  
14 "[m]aybe you should do your own reserach [sic]," **implies that there is proof**  
15 **that I was convicted of sexual coercion of a minor child and implies that**  
16 **there is proof that I was found "guilty"** (implying criminal conduct) of  
17 defamation under either the Virginia, Nevada, or both States' **criminal** statutes.<sup>13</sup>

18 Those statements are not true, they are not "substantially true," and they are  
19 not even **remotely** true. None of it is "hyperbole" – they are outright lies. They are  
20 not "opinions" – they are the blatant assertion of knowingly false "facts." They were  
21 not made within any legal proceedings and are not privileged. They are **not**  
22 "protected speech." They are defamation *per se*.

23 ///

24 ///

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///

<sup>11</sup> Mr. Gilford is describing personal animus and the lack of any perceived "public interest."

<sup>12</sup> See Exhibit 5.

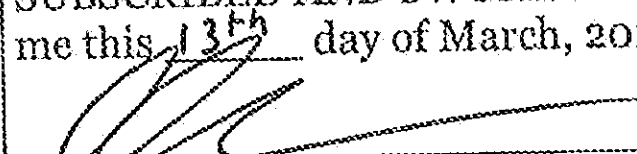
<sup>13</sup> See *Lubin v. Kumin*, 117 Nev. 107, 17 P.3d 422 (2001). "Everything we put out is true" is  
even more extreme than the "It DID!" comment that was found to be actionably defamatory  
in that case.

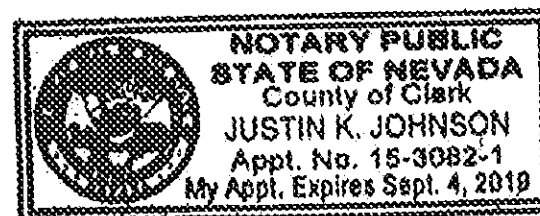
1 In short, I have been made the target of a months-long campaign of  
2 defamation having nothing to do with any issue of public concern, and having  
3 nothing to do with any legislation, testimony, or anything else with which I am  
4 remotely connected. The Defendants are a criminal syndicate engaged in extortion  
5 against my fiancé, and defamation against me.<sup>14</sup> It is inexcusable, unlawful, and  
6 should be both stopped and punished accordingly.

7 FURTHER, AFFIANT SAYETH NAUGHT.

8   
9  
10 MARSHAL S. WILICK

11 SUBSCRIBED AND SWORN to before  
12 me this 13<sup>th</sup> day of March, 2017.

13   
14  
15 NOTARY PUBLIC



16  
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23 <sup>14</sup> They have proudly proclaimed their actual purpose and methods in their own postings.  
24 Attached as Exhibit 6 are true and correct copies of several of the VIPI Defendants' postings  
wherein they admit that "when people need[ ] someone to get dirty so they can stay  
nameless, we do it without hesitation."

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *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* was filed electronically with the Eighth Judicial District Court in the above-entitled matter on Monday, March 13, 2017. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Anat Levy, Esq.  
Alex Ghoubadi, Esq.  
Attorneys for Defendants

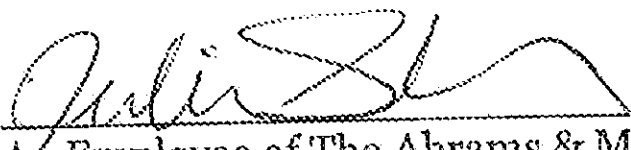
  
An Employee of The Abrams & Mayo Law Firm

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



## Order

Client	Richard Crane
Order #	TC0951279015

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Steven: Hi and good afternoon. Tell us about you.

Mr. Willick: I am a local domestic relations attorney, family law attorney. I've been in practice here since 1982. I don't know what else you want to know.

Steven: Well, I've done a lot of research on you, Mr. Willick, and I've known you throughout the years. A lot of the attorneys look at you as the Professor of Family Law. How do you feel about that because you wrote a lot of books and thesis and you've done a lot of instructional seminars and stuff like that?

Mr. Willick: In every state there tends to be one guy who tends to write the instruction manuals and the text books and teach the courses. For here in Family Law that's pretty much my role.

Steven: I just want to get right down to the chase. You and I have been opposite sides of the service connected disability benefits that are ... The Federal law is that you cannot use service-connected disability benefits for anything. Two sessions ago you were on satellite from the Grand Sawyer. You testified on the opposite side of the service connected disability benefits. This session you also testified on the opposite side.

I forgot where you were. You were in one of the rurals. I was in Carson City testifying. You were in one of the rurals. You had a couple folks that showed up in Carson City testifying committee for you. I have your letter that you gave. You wrote specifically when we were talking about Assembly Bill 140, which is the bill to stop Nevada Family Court judges for using service connected disability benefits for alimony. You said it would prevent courts from using the actual income of a small group of people as opposed to everyone else who gets divorced. I've got to ask you something before I continue Mr. Willick, have you ever served in the military?

Mr. Willick: No, sir.

Steven: Okay. In another part of this letter you wrote as testimony you said, "I have studied these issues and taught courses to other lawyers on this subject for over 20 years. Assembly Bill 140 is awful in every way, masquerading as a flag waving exercise." I've got to ask because there was another statement you write in your testimony. You were comparing a spouse with their PTSD to a military veteran with his. I've got to ask you something, Mr. Willick. Have you ever shot anybody?

Mr. Willick: No.

Steven: Have you ever taken a life?



Mr. Willick: Not that I know of.

Steven: Have you ever stuck a knife in somebody and killed them?

Mr. Willick: No.

Steven: Then how the fuck do you know what the fucking PTSD does to our veterans?

Mr. Willick: That's not it.

Steven: How do you know that? How could you compare a spouse who's domestically back here in Garrison, in the states, to the man and woman on the God Damned combat field that is sticking knives in people, that is watching their brothers and sisters blow the fuck up, that seen hands fly. I was a Huey gunner. I fired a 50/60 caliber machine gun. I tell you what, when you put one of those striker rounds in them, any part of their body is flying off.

Mr. Willick: Sure, Steven.

Steven: How, I just can't fathom, how are you going to compare somebody that's here to somebody that's a thousand miles away fighting for this country's freedom?

Mr. Willick: Not a matter of comparison. It's a matter of a [crosstalk 00:04:29]

Steven: You compared it. I read it.

Mr. Willick: To answer the question, the question from a family law perspective is the question of equal protection of the law and equal treatment under law because that's the underlying directive of what's going on here. It's not a matter of comparing the relative worth of people. We don't do value judgments. The problem, the point, is the equal protection of everybody before the court. There's a handful of places where military service of one sort or another and military involvement of one sort of or another, impacts the family law system. Jurisdictionally, child custody, visitation and support, property division, alimony, child support, even procedural matters. They are each not intended to compare a military member with the non-military member. The point is to prevent military service, or former military service, from being an impediment to the equal protection of the laws. That doesn't mean superior rights. It means equal rights. That's the whole point.

Speaker 3: I guess to follow up, okay. Where I'm getting confused on this issue then is, from a legal aspect, if it's Federal law that you can't use service-connected disability for alimony, then why should the state not follow Federal law, because the last time I checked, Federal law trumped state law. Am I reading that wrong?

Mr. Willick: To some degree. You're talking about the concept of Federal preemption.

Speaker 3: Right.

Mr. Willick: The statute in question, Section 5301, has as its second line, except as otherwise provided by laws. It's right built into the statute. The United States Supreme Court decided a long time ago that VA disability benefits, it's also built into multiple other pieces of the Federal law, are not truly, solely for the veteran but for the veteran's family, as well. That's why, for instance, the amount that somebody on such a disability program gets, goes up if they have children or dependent spouses or various other people. The reason is that the benefit package itself, although it's grossly inadequate for the support of those people, is intended to reflect the support of those people.

That's not the only place, you know, that the Federal law intersects with the family law system. For instance, even on that benefit, there's a specific piece of the Social Security Act that allows for garnishment of unpaid child support or alimony from that same benefit stream, to the degree that it remains unpaid despite a court order. There's an intersection between the laws. It's not a matter of a total exemption and it was never intended to be.

Speaker 3: Okay. I guess where, obviously, Steve had already talked about your background. Obviously, you're extremely knowledgeable in the law. Otherwise, you wouldn't be in the position you're in. Here's the issue that I have, not just with this particular issue, but just in general with lawyers in general and the law. Specifically is because I understand we're a land of laws. We are also a land of people. I think it's just interesting. I think it's very, as somebody who hasn't served in the military, I just find some of this stuff very hypocritical to me personally that it's interesting, like reading Matthew's book and some of the stuff that Steve [Stanson 00:08:11] and I have talked about when, you know, when Matthew comes back and he's talking about all these people cheering him at McCarran Airport. He's treated the way he should have been treated, like a hero. Then now, all of a sudden, we're going to mince words on the law. For me personally, I think that somebody who is willing to sacrifice their life for this nation, they should have special privilege. I don't think the Fourteenth Amendment should apply to them.

Mr. Willick: Well, obviously, you're entitled to your own opinion.

Speaker 3: Right.

Mr. Willick: You're just not entitled to your own facts. The fact is that the concept, the entire ... Anybody that puts on the uniform, that goes off to war, there's a reason they're doing it. They're not doing it for a square cloth. They're doing it for the concepts that underlie the American flag. Those concepts, right there at the top of it, is the equal protection of the laws. I mean no disrespect to anybody.

Speaker 3: Right.

Mr. Willick: You are simply not entitled to greater protection of the legal system than any other person under law. That's the concept, Black or White, male or female, mom or dad, veteran or non-veteran. The idea is that once you walk into that courtroom, you have the same rights as everybody else. No one has special privilege. Nobody has special exemption. You are entitled to equality. That's why when we designed ... I'm one of the people that helped design the Uniform Deployed Parents Custody Act. The concept was not to give military members who are going off on deployment to various other places, superior rights relating to their children.

The idea was to make sure that their military service didn't prevent them from having equal rights to be able to parent their children, to have contact with their children, to be the parents that they intended to be regardless of putting on the uniform. It wasn't intended to give them a leg up. It was intended to make sure that the playing field is level. We developed a whole bunch of safe guards to make sure that they could appear remotely, that they could get expedited hearings, that they could appear electronically. I mean, there's a lot of things in it, but the concept was not to say you're more important than your wife or she's more important than you. The idea was to make sure that the best interest of the child was served by making sure the parents were treated equally.

Steven: Mr. Willick, somebody that's never served in the military, how could you sit there and say that? You have no fucking idea. None. You have no fucking idea what we go through. Absolutely none. How could you sit there and say that? Because of us, you get to sit there and say that. Because of what we did. Because of what we sacrificed, you get to sit there and say that. When you put on that uniform, you put a gun in your hand and you put a bullet in somebody, then you can come back and say that. Until then, how could you say that?

Mr. Willick: Because we are in ...

Steven: You have no idea. You've been in the courtroom. You've been making your money in the courtroom.

Mr. Willick: Because we are a nation of laws, not men.

Steven: Because of men and women like us, gave you the opportunity not to go into the military, gave you the opportunity to go to school, to get your education, to make 'x' amount of dollars a year. What you make? A little over, probably \$2-300 thousand a year. Probably even more. You own your own law firm, so I'm sure you make a lot of money because you've got employees, and you've got lawyers that probably make about a hundred and something thousand dollars working for you. You got to make way more than them. How could you sit there and say that?

Mr. Willick: Because this country was founded on this purpose. That's the reason you go into the military.

Steven: Could you go to a rape victim and tell her, I know how you feel?

Mr. Willick: It's not a matter of my knowledge of how you feel. The notion is equal protection under law. If you go to the United States Supreme Court, that building's been there for what, a 150 years. You look up at the top of it, as you're walking in the main front door, it says in large letters ...

Steven: I know what it says. If it wasn't for men and women that defend this country, it wouldn't even be up there to begin with. Let me ask you something. If I lose my arm, okay, something that you can see, because apparently you can't see PTSD. If I lose my arm, and I'm getting disability because of my lost arm. Okay? My spouse should get half of my disability benefit because I lost my arm?

Mr. Willick: No, and that's never been the law. The case that you were eluding to earlier is a case called Brownell. The facts are pretty stark and pretty illustrative. We had a couple of people with almost no income and virtually no ability to get by. He was a military vet with PTSD who was getting, I think the total was something like 2500 bucks a month in combined benefits from a couple of different programs. She was a completely disabled spouse who had as her entire income 200 bucks in food stamps. That's it. When they go into a courtroom, the function of the court is to treat them equally under law. It doesn't make any difference whether one of them was a trust fund baby or one of them was getting military benefits or one of them had a separate property estate of some sort or mommy or daddy was giving them the money. It doesn't make any difference why they have separate property assets. It's not a matter of saying that they don't have separate property assets. That income stream is separate.

The court's obligation is to make sure everybody stays alive and is equally treated under law. What the court did in that case is not say I'm going to pretend that this benefit stream doesn't exist, but I'm going to treat that one as if it does. The court took cognizance of the actual facts of the actual people in front of him. There they tried to do equity between them. Now that wasn't a Nevada case. It's a, I think, New Hampshire. The same principle applies here as applies there.

Speaker 3: I think here's the thing. This is my last question on this. It's obviously a very emotional issue for everybody. What Steve is ... I mean, here's where and I obviously would not be a part of this organization if I wasn't very passionate about veterans' issues. It's hard for me because Steve Stanson is like one of my best friends. Here's my issue with this. It's what you said. You were talking about the law and you're very articulate and you understand the law very well. I think that more to the issue is that we were trying, this organization was trying to get a bill passed to amend current state law. This organization was trying to do it the right way. We were trying to, because we obviously don't agree with current law, so we were trying to amend it. I think where the passion comes from, understandably enough from Steve, is that why would you go against it?

Mr. Willick: The original provisions of this act would have done violence to the concept of equal protection under law, which is why I was there. As you know, as I told you, and as anybody that's done a research knows, I represent men and women, fathers and mothers, vets and non-vets. It depends on who hires me. I'm on both sides of all of these cases. It's not a matter of a personal matter. It's a matter of my knowledge of what the legal system is and what the impact of the statute would have been. It would have done violence to the concept of equal protection under law. That was the reason for the opposition. It has been amended so that basically that has been taken out of it. It's still somewhat problematic in its phrasing but I wasn't involved.

I read the article that was in the last Nevada Lawyer by the woman who negotiated the final version of the language. I understand what she is saying. We just have to hope now that the judges interpret the language correctly. No, the people that were trying to pass the original version of this act were trying to do something which just isn't right under the concept of equal protection of law. That was the reason for the opposition and the amendments to try to make it something which fits within the Constitutional realm of family law, which is to treat everybody equally.

Speaker 3: I'm just going to say I respect you for coming on the show. I respectfully disagree. Honestly, this is one of the issues that I have with attorneys just in general, is that they just seem very callous. In general. There's no. I guess you have to be at some level. You just read and interpret law. I mean, I just think your position is pretty callous. [crosstalk 00:16:54] I'm entitled to my opinion. [crosstalk 00:16:57] ... what your opinion.

Mr. Willick: You don't want lawyers to only represent one side. If your shopping for a lawyer, be very careful of looking at somebody who says, oh yeah, we value men's rights or veteran's rights, or only women or whatever the deal is. Those are marketing ploys. What you want in a lawyer, and when you talk about callous, you're looking for somebody dispassionate. You're looking for somebody who knows and knows what to do. I tell you, the best lawyers are the ones that represent both sides of most kinds of cases because you only learn what the arguments really are and how to apply them if you appear on both sides of most issues. There's an old saying that he is no lawyer who cannot take both sides. That's not a matter of being callous. That's a matter of doing your job. As somebody who's been in the military, I'm sure you understand that the job ...

Speaker 3: I've never been in the military.

Mr. Willick: Oh, I'm sorry.

Speaker 3: No, don't. That's one thing I'm very passionate about. I'm a part of this organization because I care very much about veterans. I make it very clear, I've

never served. It was one of my biggest regrets in life. That's why I am a part of this organization. I am so passionate about this.

Mr. Willick: Sorry about that. I didn't know. The point is that you're looking for somebody who can do the job. There's a job to do. Not somebody who empathizes or feels for you or has a ... You're not looking for commiseration. You're looking for representation. To do that, you want somebody who's as good as they can be at what they do. He is no good lawyer who gets sucked in the emotional vortex of his client's situation. Part of the reason you hire counsel is to find somebody with enough emotional distance that they can accurately perceive the merits of the situation so they don't go off on an emotional bent because that won't help you. You want somebody who understands enough to be able to do the job for which you hired him. That's why people need lawyers.

Speaker 4: I got a question for you.

Mr. Willick: Sure.

Speaker 4: I don't really know your past experience. I did a little due diligence before I came up here. Being a veteran, I saw a lot of negative information on the web, which I'm not going to entertain because I want to ask you person to person, what drives you to be an expert in this field?

Mr. Willick: Sure.

Speaker 4: [crosstalk 00:19:05] What drives you to kind of help out veterans or even more, what do you have to say to opponents that say you're just shitting on veterans, you're taking advantage of veterans, and like you said ... ?

Mr. Willick: Well, I'll tell them that they're misperceiving. My dad's a disabled vet. I employ two of them. One just retired. One from Vietnam; one from Iraq. I have a long-standing history of service to the veteran community, both formally and informally. One on one. For instance, there's a group that I'm in called Operation Standby. I get questions from all over the world, military bases all over the world. There's some guy stationed at some base out in Seoul or wherever, who has a family law problem in Nevada and needs to know somebody he can call. It's all pro bono. We answer their questions for free in order to give them access to the legal system. Now, there's no personal agenda.

People that have their own agendas that are trying to do things to the law perceive anybody with a different opinion as the enemy. I'm not the enemy. I am somebody who knows what the system is and I tell the truth. Some people don't want to hear that truth. If it disagrees with their pre-conceptions, sometimes they get upset about it. As to why I do this, it started with a pro bono case. That means a case that you do without being paid ... that I took in 1985. I took it through the Nevada Supreme Court. That took two years and I got a really bad decision. Frankly, it's taken 27 years to finally fix it. We just did it

in the last legislative session through a different enactment, 362. It was a matter of, when you talk about a passion, I was trying to make it right for those people that were involved. I think we finally did.

My work in that case led to the chair of the American Bar Association Family Law Section asking me to write a book, because he thought there needed to be one to instruct attorneys representing military members and spouses of military members, how all this stuff works, because nobody knew. They asked me to write a book. I did. It came out in 1998. That led to teaching courses. That led to other things.

Speaker 3: It sort of built on its own.

Speaker 4: Right. That's what I saw on the Internet, a lot of that.

Mr. Willick: Basically, I was asked to and I did as a service to the military community and to the people on both sides of the cases.

Speaker 4: You understand that veterans like Steve, they're very emotional, very passionate about this subject because it resonates so strongly with them.

Mr. Willick: Sure.

Speaker 3: We're out of time.

Speaker 4: I understand you being separate from emotional and the business but the connection there is a little bit more resilient than ...

Mr. Willick: That's fine and people are entitled to their emotions just like they're entitled to their opinions. This is not an emotional question. This is an intellectual question. This is a legal question. The last thing you want when you're asking somebody for a legal opinion is somebody who comes out of emotion, regardless of [crosstalk 00:21:55]

Speaker 4: ... or acts like they understand other emotions on the other side.

Mr. Willick: Sure. You want somebody to actually reflect the reality of their situation. For me, it's what the law is.

Steven: Well, now this is the law. The bill passed. Right?

Mr. Willick: AB140 in its final form is the law of the State of Nevada. It does do actually not much because the existing decisional law already reflected what Section 5301 reflects, that you can't directly levy, attach, garnish, etc..

Steven: Before I let you go, Marshall Willett, thank you for coming on the program.

Mr. Willick: Your welcome. Thank you for inviting me.

Steven: One thing I don't understand is how the Federal government can't even tax these dollars but a county judge in family court can take it for alimony. That's just ...

Mr. Willick: I'll answer the question if you want to know.

Steven: Real quickly.

Mr. Willick: Sure. There's a lot of Federal and non-Federal benefits that are non-taxable. Lots of disability streams are non-taxable, but that doesn't mean that they don't exist. A District Court judge trying to say, support a child, is entitled to take knowledge of the facts as they actually exist. The fact that they're not being taxed is not relevant to the question of whether they exist.

Steven: Like I testified in the last several times on this bill for the past four years now, if you're going to touch my service connected disability payments, then you fucking take the pain and suffering that goes along with those dollars. If you can't take the pain and suffering that goes along with those dollars, don't fucking touch my money. That's how I'll end it.

Mr. Willick: That is the emotional reaction of everybody that has a separate property income stream.

Steven: Exactly. Until you wear that uniform and you go to combat, then you come back and you talk to me about your experience. I'll tell you what. You'll be over with me saying, Goddamn right, Steve. Where was I lost in this legal bullshit all these years? I say, see Marshall. See what happens. When you go to combat, it's a whole fucking different story than when you're never been there before. You have no idea. None. I'll tell you this from experience. You have no idea what we go through. None at all.

Mr. Willick: That's true.

Steven: Because if you did, you wouldn't be saying what you're saying right now. I guarantee you that.

Mr. Willick: Steven. I don't know what a lot of people go through.

Steven: You wouldn't be saying what you're saying right now if you did. I'm just saying. You wouldn't be saying what you're saying right now.

Mr. Willick: I sure hope that I would be and I'm sure that anybody who has taken the oath that I have.



Steven:

You'd commit suicide if you say that. You'd be committing suicide. Well, thank you Marshall Willick for coming to the program. That's Marshall Willick, the owner of Willick Law. Don't go away folks. We're going to have Randall Powell. He's going to talk about how he got screwed over.

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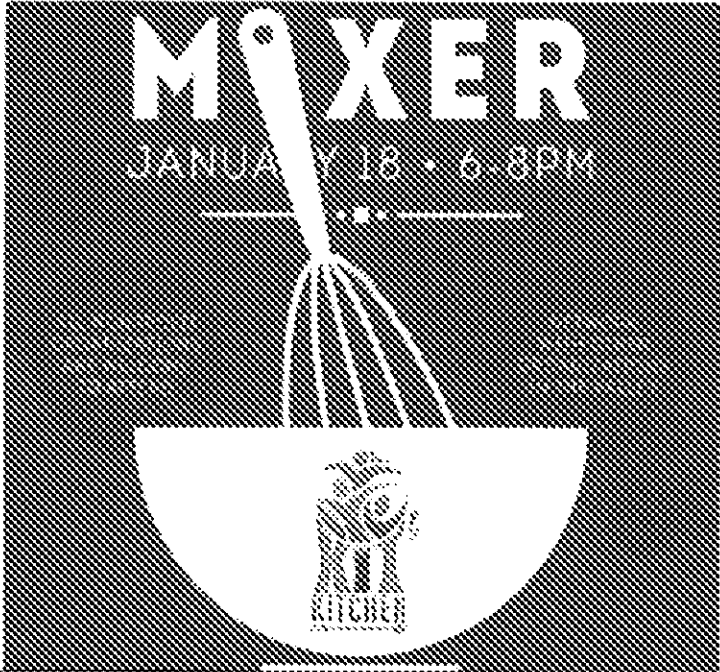
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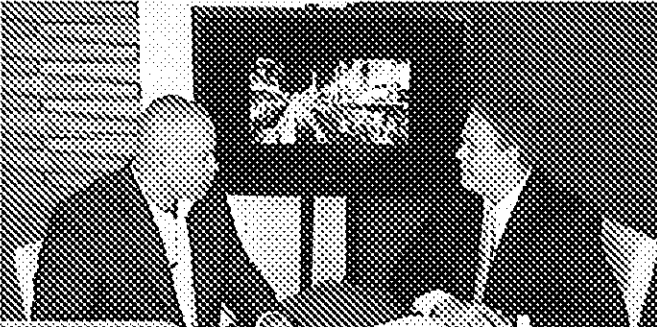
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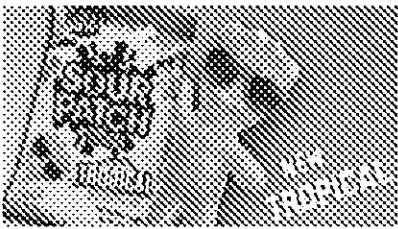
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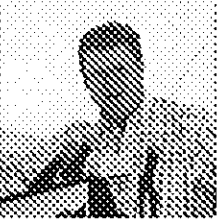
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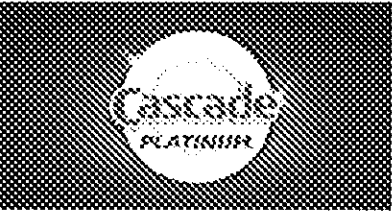
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
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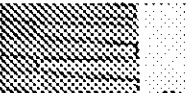



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
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
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
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
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
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
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
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September 22, 2011 at 12:28pm · 41




Old Rose Mexico

September 22, 2011 at 12:28pm · 41




Old Rose Mexico

September 22, 2011 at 12:28pm · 41




Old Rose Mexico

September 22, 2011 at 12:28pm · 41




Old Rose Mexico

September 22, 2011 at 12:28pm · 41




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
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September 22, 2011 at 12:28pm · 41




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September 22, 2011 at 12:28pm · 41




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
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
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
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
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Old Rose Mexico

September 22, 2011 at 12:28pm · 41




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Old Rose Mexico

September 22, 2011 at 12:28pm · 41




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
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@SteveW.Sanson

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January 16 · 45

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**Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show**  
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VIDEO: [http://www.youtube.com/watch?v=Kd8yUk3h1p4](#)

**Steve W. Sanson**  
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Veterans in Politics video Talk Show proudly announces that Janice S. Marshall Las Vegas Justice of the Peace Department 3 and Rick Workman candidate for Mayor of Henderson Nevada

<https://www.youtube.com/watch?v=Kd8yUk3h1p4>

**Veterans in Politics 01-14-17**  
Guests: Judge Janice S. Marshall, Rick Workman  
Candidate for Henderson Mayor

I have strong commitment to my country and my community this has been demonstrated through my leadership and service in the United States Marine Corps

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👤 Public Figure

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**Go-Rite Mexico**  
September 22, 2016 at 12:00pm · 0

👤 See profile

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**Doc Street GoodFoot Look**  
June 6, 2016 at 5:15pm · 0

👤 None of the other candidates will give specific plans for NV-12 public... See More

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1:28 PM  
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**Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show**  
Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show

VIDEO: [http://www.youtube.com/watch?v=Kd8yUk3h1p4](#)

**Steve W. Sanson**  
January 16 · 45

I am at the funeral of North Las Vegas Police Detective Chan Parque. This is the officer that was recently killed in the head-on collision.

Life... Live it to the fullest. You can't take anything with you, but you can

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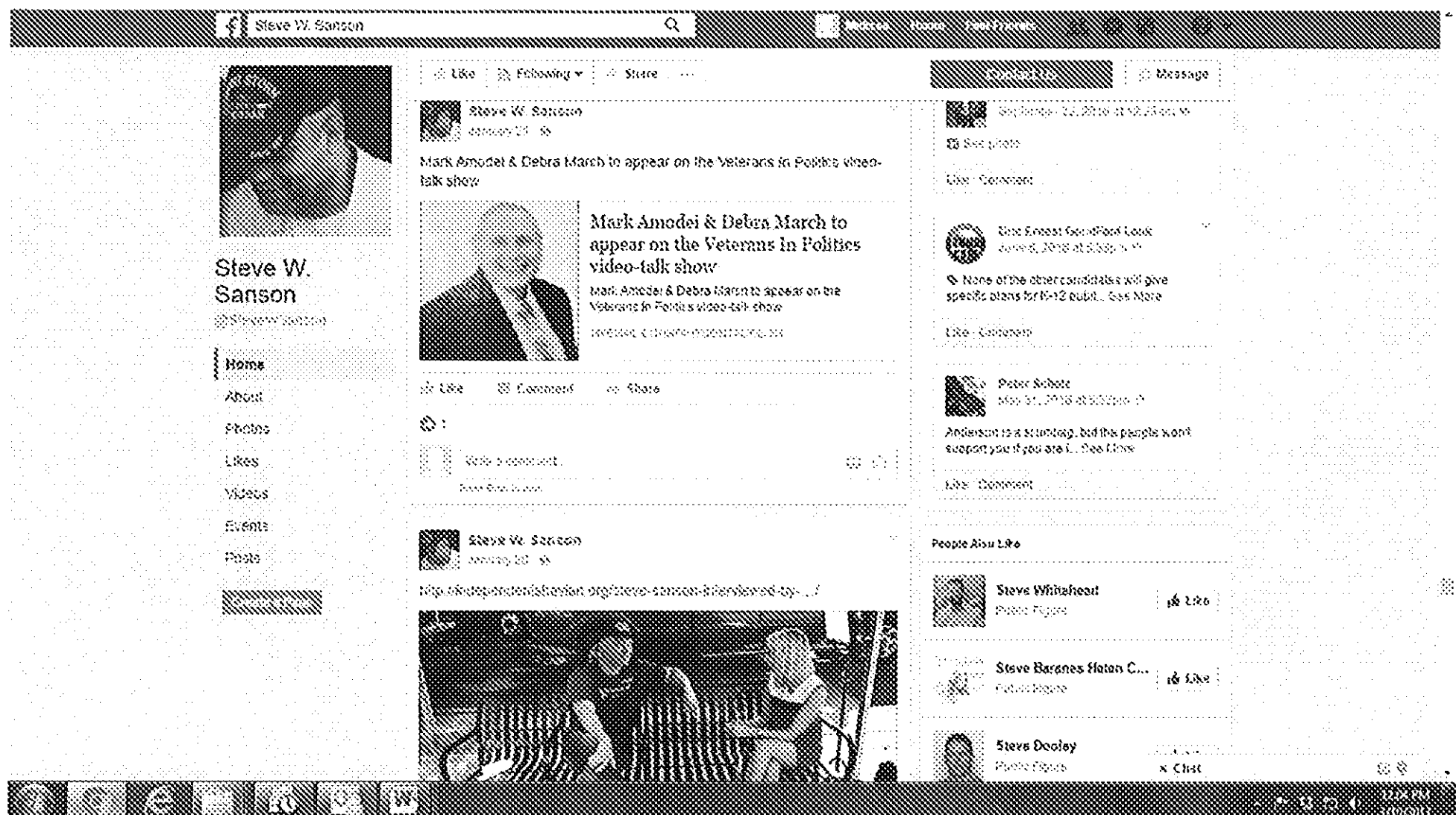
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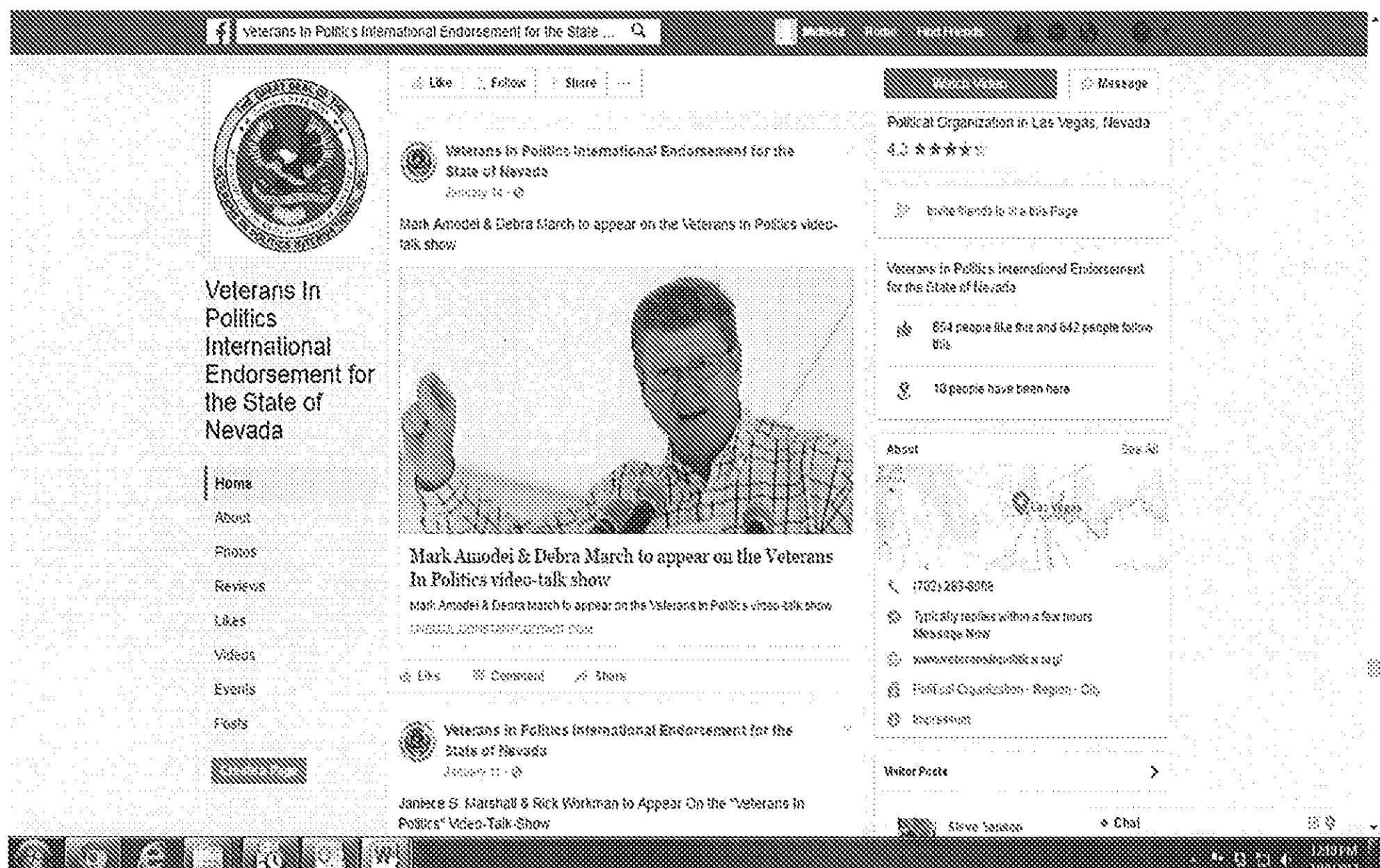
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
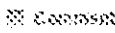




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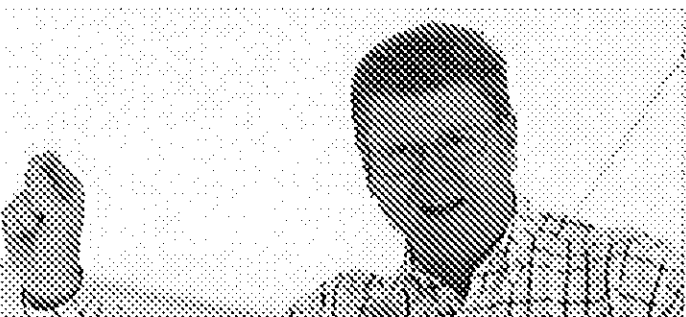
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Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show



**Political Organization**

4.3 ★★★★★

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Steve Santzen  
February 19 at 2:04pm · 🌐


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12:11 PM  
2/19/2017



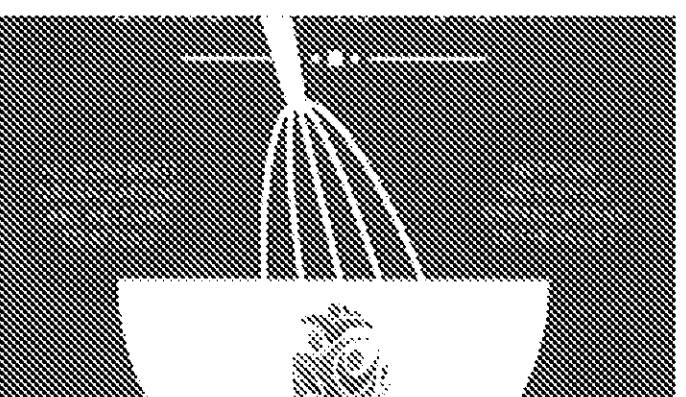
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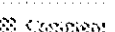




**Veterans in Politics International Endorsement for the State of Nevada**  
January 19 · 🌐

Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show



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Steve Sanson

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Steve Sanson · Timeline · 2017 · All Posts ·

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**Info**

Strong commitment to country and community has been demonstrated through his leadership in USMC.

Self-Employed

Follower by 6+ people

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 January 14 · Single Share by General Contact ·

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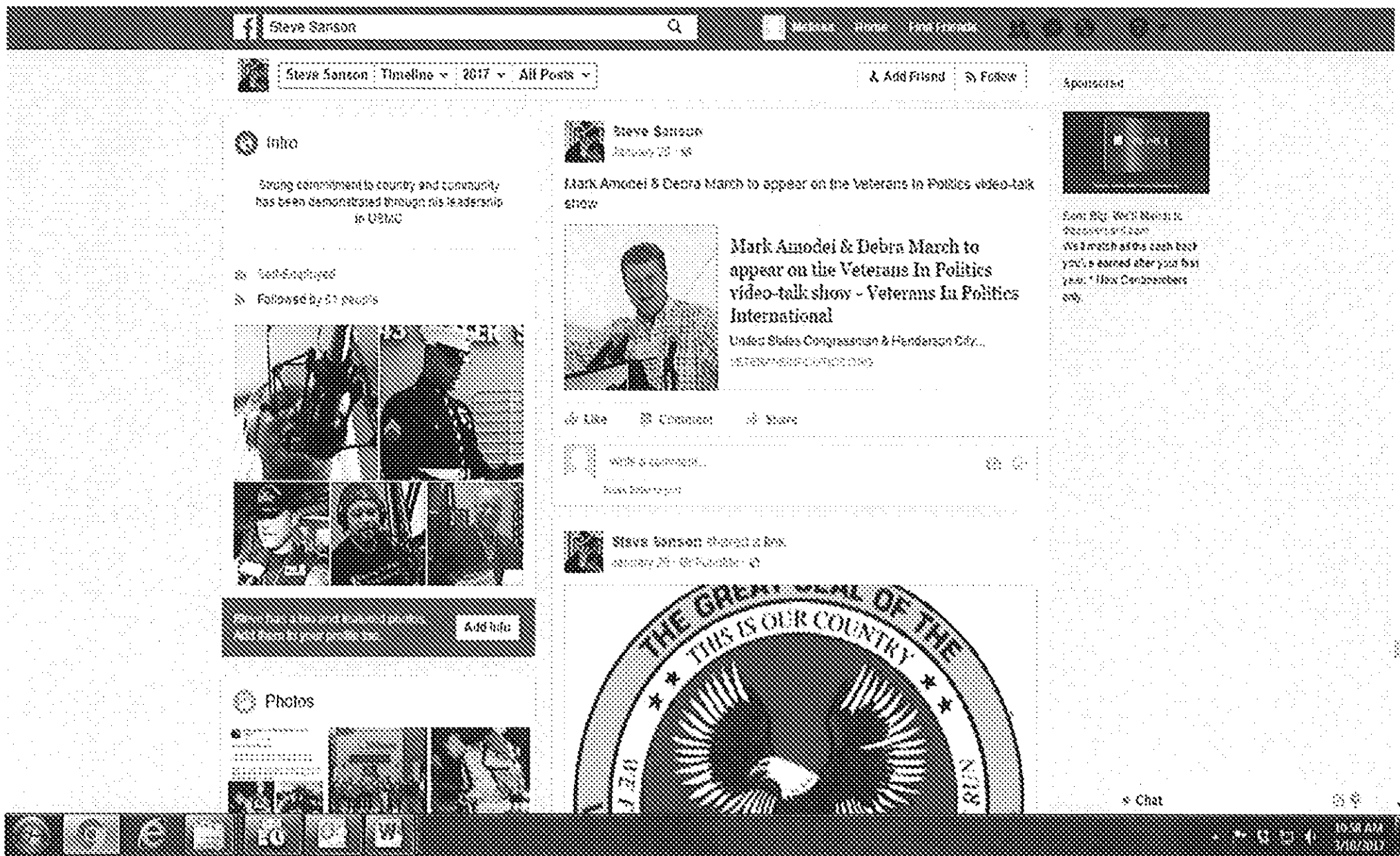
Post something

**Photos**

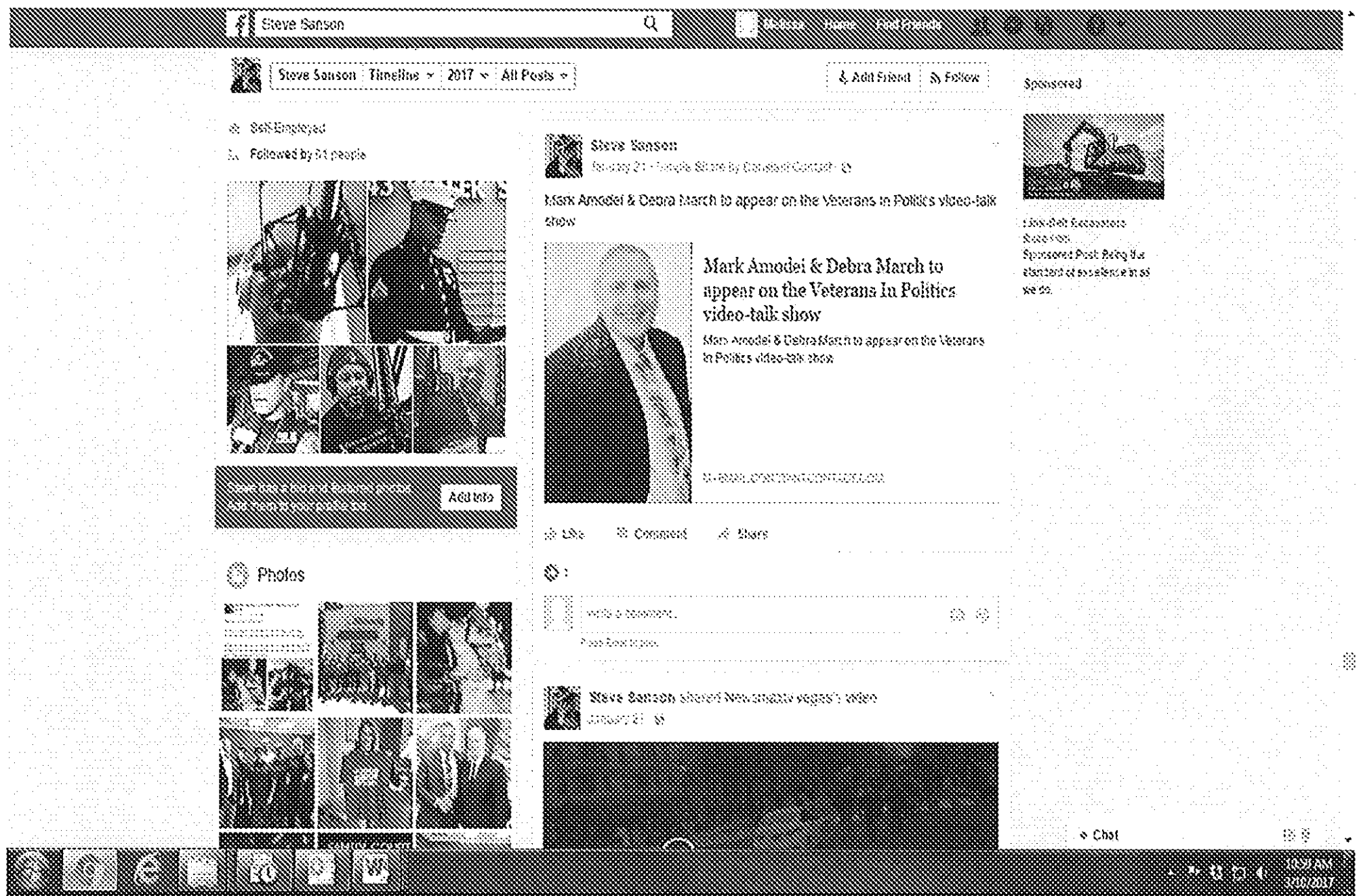
**Steve Sanson uploaded 1 new photo**

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Melissa Moore

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Steve Sanson shared a link  
January 12

Attorney Marshall Willick and his pal convicted of sexual coercion of a minor Richard Crane was found guilty of defaming a law student in a United States District Court Western District of Virginia signed by US District Judge Norman K. Moon

Attorney Marshall Willick and his pal convicted of sexual coercion of a minor Richard Crane was found guilty of defaming a law student in a United States District Court Western DISTRICT OF VIRGINIA

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Winward Brooks
 For the sake of fairness, it needs to be said that this summary of Judge Moon's order is not accurate. I read his order. Judge Moon entered an order in a civil case, not a criminal case. There is no criminal conviction. Judge Moon granted partial summary judgment on a point of law pertaining to an alleged defamation. Judge Moon also granted partial summary judgment on a point of law favorable to Willick. And the Judge did not conclude that defamation actually occurred because such a finding requires a jury finding on yet another point of law. It's an interesting decision, and well worth the time of people interested in the civil law of defamation.  
Like · 1 January 12 at 12:15pm

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January 12

Lawsuit accuses Las Vegas lawyer, veterans group leader of defamation

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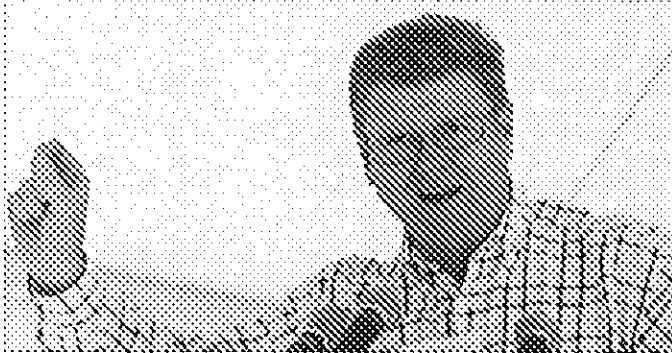
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January 13 · 18

Mark Amodei & Debra March to appear on the veterans in Politics video-talk show



**Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show**


Mark Amodei & Debra March to appear on the Veterans in Politics video-talk show

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Veteransin Politics

January 14 · 18

Janiece S. Marshall & Rick Workman to Appear On the "Veterans in Politics" Video-Talk-Show



**Janiece S. Marshall & Rick Workman to Appear On the**

**Workman to Appear On the**

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Veteran Posts



Linda Reuter  
January 13 at 3:22pm

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

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Mark Wachter  
November 11, 2016 at 11:00am

12 MIA - a Poem by Christopher Rowley

Like · Comment

11:28 AM

1/13/2017



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January 16 · 18

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**Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show**

Have you seen our latest news?

<http://www.youtube.com/watch?v=125j41hp-g>


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<http://www.youtube.com/watch?v=125j41hp-g>



**Veterans in Politics 01-14-17**

Guests: Judge Janiece S. Marshall, Rick Workman  
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January 16 at 3:22pm

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Mark Wachter  
November 11, 2016 at 11:00am

13 MIA - a Poem by Christopher Rowley

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Alan Poff  
October 20, 2016 at 12:51a

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11:34 AM

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January 17 · @

Nevada Attorney Marshall Willick up in his old tricks, across State Line.

Linda Renner

January 29 at 11:32pm · @

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Mark Wochter

November 11, 2015 at 11:00am · @

et MIA - a Poem by Christopher Jewley

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Alan Patti

October 20, 2015 at 12:51pm · @

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January 16 · @

Nevada Attorney attacks Clark county Family court Judge in Open Court

Linda Renner

January 29 at 11:32pm · @

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Mark Wochter

November 11, 2015 at 11:00am · @

et MIA - a Poem by Christopher Jewley

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January 15 · 12

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Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show

INTERVIEW: CONSTANTINE CHARLTON.COM

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**Veterans In Politics International**  
January 15 · 15

A lawyer managed to get YouTube to delete my videos that was obtained by the Freedom of Information Act, before the case was sealed. The lawyer in this matter sent the presiding judge an email demanding that she persuade me to take the videos down, because it puts her in a "bad light". Once I refused the lawyer sealed the case. Since the videos were obtained

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March 2 at 5:05pm · 12

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**Peter Danvers**  
March 1 at 2:03pm · 12

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11:27 AM 1/15/2017

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Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show

INTERVIEW: CONSTANTINE CHARLTON.COM

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**Veterans In Politics International**  
January 20 · 12

Nevada Attorney attacks Clark county Family court Judge in Open Court

Rule 5.02 only makes a hearing private, but does not prohibit anything else. The Order that was served does not apply because it was based on "Supposition of the Parties." WE are not a party to the case. The fact the case was sealed after the fact is prospective not retrospective and cannot change what has already happened. Next, First Amendment and good faith participation in public processes are absolute... See More

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**Peter Danvers**  
March 1 at 2:03pm · 12

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11:30 AM 1/20/2017



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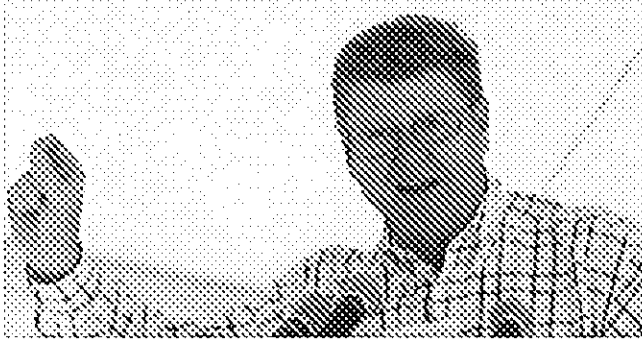
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Lawsuit accuses Las Vegas mayor, veterans group leader of defamation

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Guests: Judge Janiece S. Marshall, Rick Workman Candidate for Henderson Mayor

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Artist

Yoni Carr

December 12, 2016 at 6:00am · NV

We citizens of this state really need to look into passing Family co... Continue Reading

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Chop Evans

October 28, 2016 at 11:00am · NV

Listen to my latest interview with Noah Glick, reporter for KUNR (NPR)... See more

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Frank Minnoway

August 5, 2016 at 11:40am · NV

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<https://www.youtube.com/watch?v=Vt5Yt1mp-g>

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Yoni Carr

December 12, 2016 at 6:00am · NV

We citizens of this state really need to look into passing Family co... Continue Reading

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Frank Minnoway

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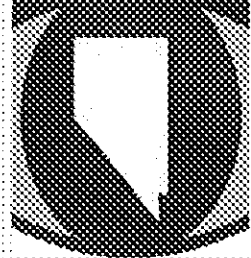
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
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**Eye On Nevada Politics**

@eyonnevadapolitics

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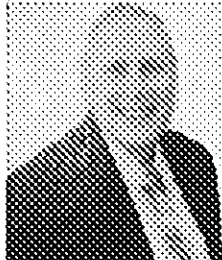
**Eye On Nevada Politics**  
 January 21 · US

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Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show



**Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show**

Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show

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**Eye On Nevada Politics**

January 20 · US

Nevada Attorney attacks Clark county Family court Judge in Open Court Rule 5.02 only makes a hearing private, but does not prohibit anything else. The Order that was served does not apply because it was based on "Stipulation of the Parties " WE are not a party to the case. The fact the case was sealed after the fact is prospective not retrospective and cannot change what has already happened. Next, Fast Amendment and good faith participation in public processes are absolute!... See More



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Artist


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**Visitor Posts**

 **Tom Carr**  
 Tuesday 19, 2016 at 8:00am

We citizens of this state really need to look into passing Family co..Domestic Reading

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 **Chap Evans**  
 October 28, 2015 at 2:15pm

Listen to my latest interview with Nash Glick, reporter for KUNR (NPR)... See More

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11:01 AM 1/20/2017

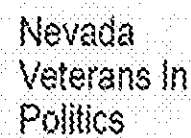






**City Code**  
Adopted: 2016 at 5:34 p.m.

8 CHRS

1246 PM  
1/10/80 H



**Figure 1**

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**Nevada Veterans In Politics**  
January 21 · 🌐

Mark Amodai & Debra March to appear on the Veterans in Politics video-talk show



**Mark Amodai & Debra March to appear on the Veterans in Politics video-talk show**

Mark Amodai & Debra March to appear on the Veterans in Politics video-talk show

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Exposing Corruption within our Law Enforcement

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**Nevada Veterans In Politics**  
January 21 · 🌐

Nevada Attorney attacks Clark county Family court Judge in Open Court Rule 5.02 only makes a hearing private, but does not prohibit anything else The Order that was served does not apply because it was based on "Stipulation of the Parties " WE are not a party in the case The fact the case was sealed after the fact is prospective not retrospective and cannot change what has already happened. Next, First Amendment and good faith participation in public processes are absolute! ... See more




Congratulations

**Albert Minton**  
February 14 at 4:58pm · 🌐

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[Live · Comment](#)

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**Terry Krejda**  
February 4 at 7:14pm · 🌐

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12:11 PM 1/10/2017

Steve Sanson shared a link.

January 13

Attorney Marshall Willick and his pal convicted of sexually coercion of a minor Richard Crane was found guilty of defaming a law student in a United States District Court Western District of Virginia signed by US District Judge Norman K. Moon

Friday, January 13, 2017 at 12:22am

Attorney Marshall Willick and his pal convicted of sexually coercion of a minor Richard Crane was found guilty of defaming a law student in a United States District Court Western

VETERANSINPOLITICS.ORG

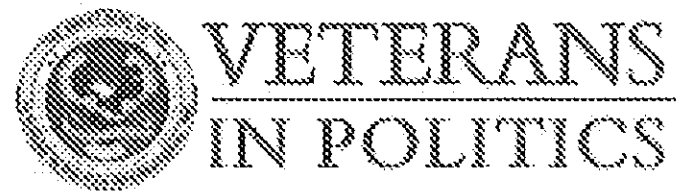
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## Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show

United States  
Congressman &  
Henderson City  
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**"Veterans In Politics Talk Show" (Amodei & March)**  
**Call Into the show 702 685 8380**



Mark Amodei US  
Congressman Representing  
District 2

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**Debra March Henderson City**  
**Councilwoman/Candidate for**  
**Henderson City Mayor**

[Read More about Debra March](#)

LAS VEGAS, NEVADA- - Veterans In Politics video Talk Show proudly announces that **Mark Amodei** US Congressman Representing District 2 and **Debra March** Henderson City Councilwoman/Candidate for Henderson City Mayor to appear on the "Veterans In Politics" internet video-talk-show as a special guest on **Saturday - January 21, 2017 from 2-3pm PT**. Listen and watch LIVE on Veterans In Politics Talk show now on World Wide Digital Broadcasting Corp.

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Listen to hosts **Steve Sanson, Jim Jonas** and co-host **Steven Sonnenburg and Christina Ortiz** plus special guests co-hosts live during the VIP Talk-Show on every Saturday from 1400-1500 (2:00pm-3:00pm PT) on World Wide Digital Broadcasting Corp.

[Learn More](#)

### Opinion Corner:

Attorney Marshall Willick and his pal convicted of sexually coercion of a minor, Richard Crane was found guilty of defaming a law student in a United States District Court Western District of Virginia signed by US District Judge Norman K. Moon.

[Meet Willick](#)





Meet Crane



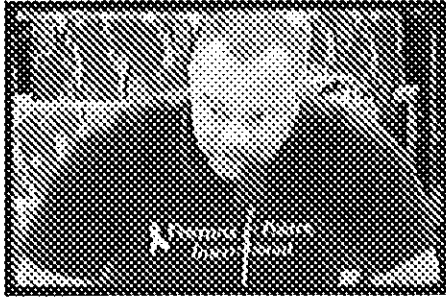
[Click here to Read the entire Court document](#)

Why isn't this attorney Sanctioned by the Nevada State Bar?



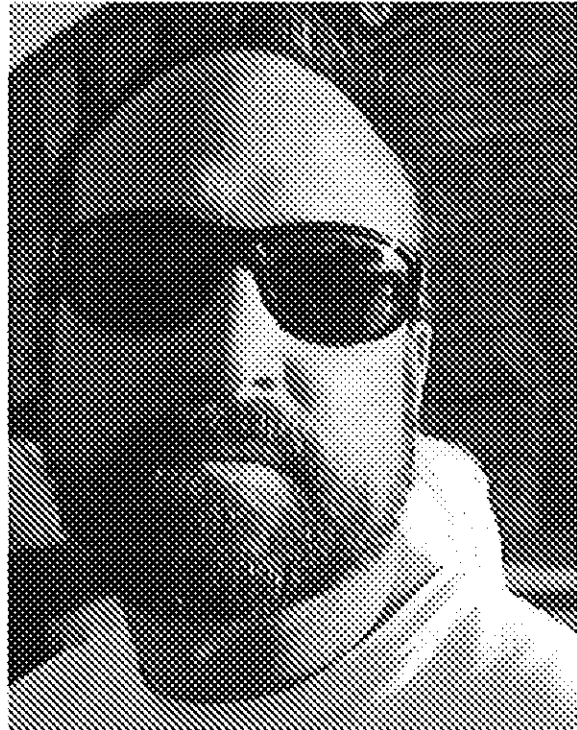
[Click here for more updates](#)

**Lawsuit accuses Las Vegas lawyer, veteran's group leader of defamation**



[Click here for the exclusive Face to Face interview on NewsMaxTV Las Vegas](#)

## Steven Sonnenburg new co-host for Veterans In Politics video talk show



Steven is a long time Nevada resident son of an Air Force Veteran and Family Court activist.

Sonnenburg will replace "Pirate" Mike Edwards. Thank you Mike Edwards for you dedication to the show.





Veterans In Politics International President Steve  
Sanson will fight for us!

Listen & Watch the Interview of Last Week's Show:

LIVE every Saturday from 2-3PM Pacific Time.

-  
-  
**Dr. Robin L. Titus** Nevada State Assembly District 38 and **Ron Q. Quilang** Owner of the Ron Q. Tax and Business Services a tax filing specialist and business Development Company



Please contribute to Veterans In Politics in an effort in helping us to continue our mission by Exposing Corruption, Champion Veterans Rights, and Educating the public on candidates running for elected office: go to [www.veteransinpolitics.org](http://www.veteransinpolitics.org) and click onto our PayPal Page or at our PO Box 28211/ Las Vegas, NV. 89126...

*\*If you would like to be a guest on our show please contact: email [veteransinpol@aol.com](mailto:veteransinpol@aol.com) or if you would like to place a commercial on anyone of our shows please dial 702 283 8088.*

*\*If you would like to visit any of our archived interviews go to our  
YouTube Channel.*

[Click here for our YouTube Channel](https://www.youtube.com/channel/UC1vBzrcEJOui3Cp5Bz-fT6Q) or  
<https://www.youtube.com/channel/UC1vBzrcEJOui3Cp5Bz-fT6Q>  
and [Click here for archived shows on Word Wide Digital  
Broadcasting Corp](#)

*\*If you would like to see who is coming on our show next go to our radio  
webpage. <http://www.wwdbtv.com/veterans-in-politics.html>*

**Learn More**

NONPROFIT  
**MIXER**  
JANUARY 18 • 6-8PM

ALL NONPROFIT ORGANIZATIONS ARE WELCOME TO ATTEND

NETWORK WITH OTHER ORGANIZATIONS IN THE VALLEY

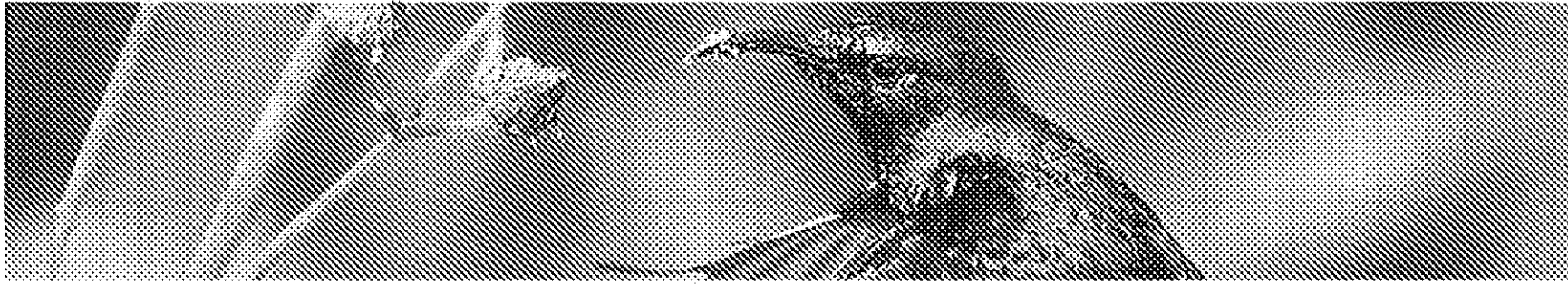
**KIT'S KITCHEN**

MIX IT UP AT KIT'S KITCHEN  
2021 W SUNSET RD, HENDERSON, NV 89014  
(702) 558-3366

The poster features a large white whisk graphic on a dark background. The whisk's head is at the top, and its handle extends downwards, ending in a semi-circular bowl. Inside the bowl is the logo for 'KIT'S KITCHEN', which depicts two stylized figures holding hands. The word 'KITCHEN' is written below the figures. The text 'NONPROFIT MIXER' is prominently displayed at the top, with 'JANUARY 18 • 6-8PM' below it. Two columns of text on either side of the whisk handle provide details about the event, and the location and contact information for Kit's Kitchen are at the bottom.

[Click here for More Information](#)

## Faith Ind and Family Counseling



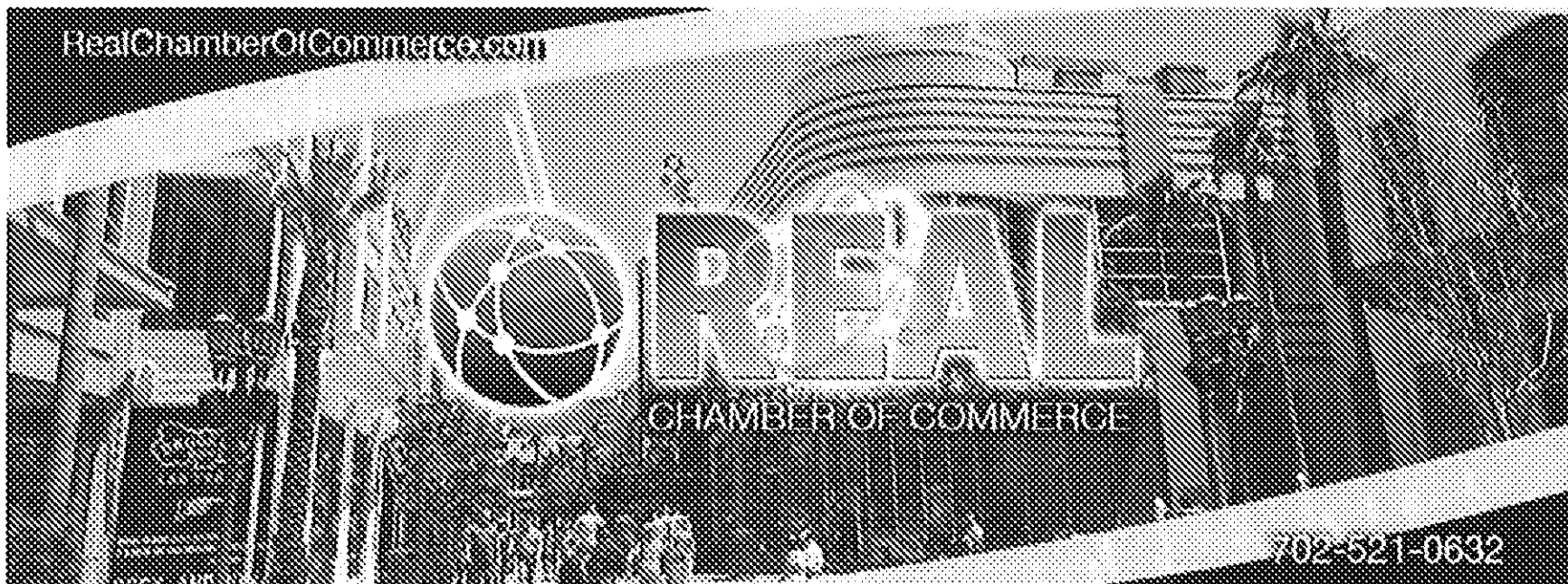
**Heidi Hanusa**

Nevada License MA, LMFT

At Lakeside Business Suites:  
2620 Regatta Drive Suite 102  
Las Vegas, NV 89128  
702 553-2398 (office)  
702 370-4244 (cell)

License Marriage & Family Therapist By appointment only

email: [HHanusa@cs.com](mailto:HHanusa@cs.com) • [www.faithindandfamilycounseling.com](http://www.faithindandfamilycounseling.com)







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702-263-8088  
devildog1285@cs.com  
[www.veteransinpolitics.org](http://www.veteransinpolitics.org)

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1/25/2017

Mark Amodei & Debra March to appear on the Veterans In Politics video-talk show

**Confirm that you like this.**

Click the "Like" button.

EXHIBIT 4

EXHIBIT 4

EXHIBIT 4





## Steve Sanson

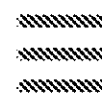
Coward. I served in combat defending this country where were you? Coward. I faced you on my radio show. The Coward is you, when you testified by satellite in attempts to crush and take veterans service connected disability benefits to use for alimony. Not once, but twice, in two legislative sessions. You should have came to Carson City, we where waiting for you. You are the COWARD! By the way don't forget my veteran friends potested at your office and you cowardly filed suit against them. Because you hide behind a keyboard. You are the biggest COWARD that has passed the bar.

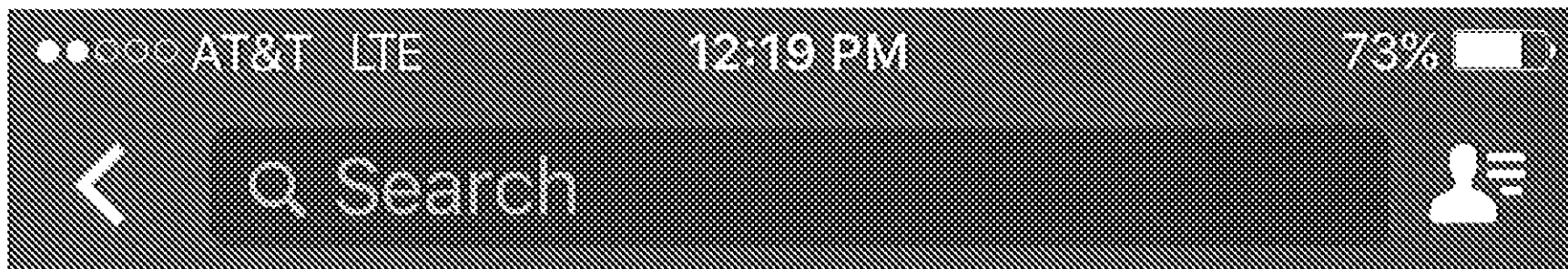


Write a comment...



Post





the biggest COWARD that has passed the bar.

3 hours ago · Like · Reply



**Willick Law Group**

Glad you brought it up. Your "friends" were eventually forced to write, sign, and post a public retraction and apology. It is posted on our web site (and, by court order, theirs). You should read it. You could save yourself a lot of time, money, and aggravation, by doing the same thing right now -- before you are forced to do so by a court.

3 hours ago · Like · Reply



**Steve Sanson**

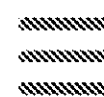
Willick I know you wrote the complaint against me. The

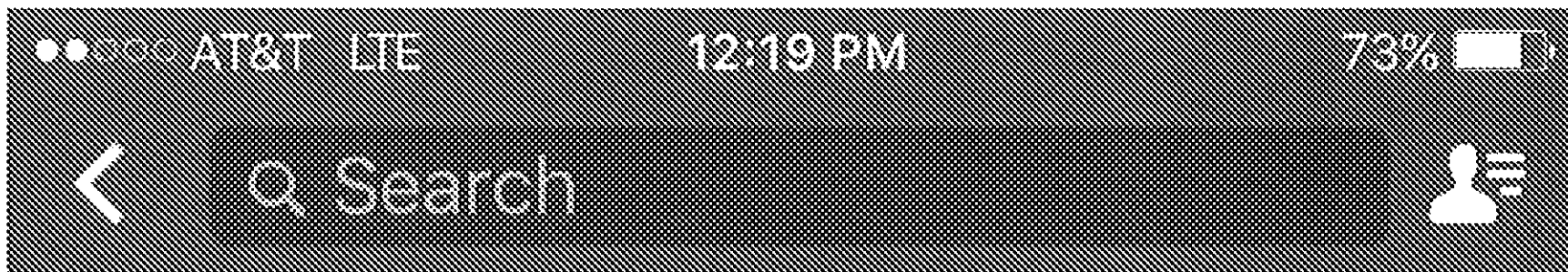


Write a comment...




Post





**Steve Sanson**

Willick I know you wrote the complaint against me. The year has just begun. Let's talk about why you hide behind a keyboard and why didn't you have the guts to serve our country in our Armed Forces. By the way I never apologize when it's the truth!

2 hours ago · Like ·  1 · Reply



**Steve Sanson**

You made some defamatory statements against me in an effort to delibratly discredit me without any shread of evidence. By the way you are the most honest guy in town. I think NOT! I beleive before this year is over, you are the one that will write an apology. Have fun lettina your ego get



Write a comment...




Post



EXHIBIT 5

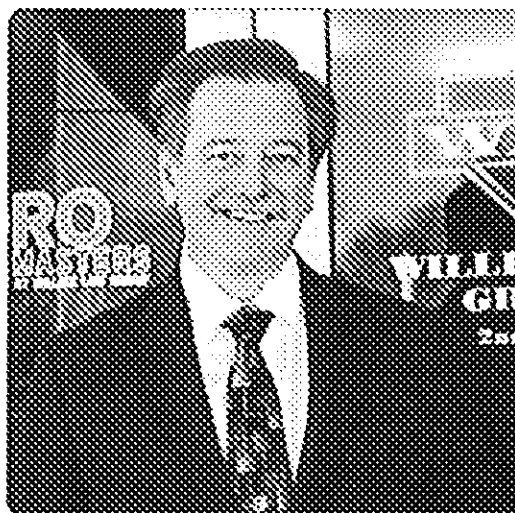
EXHIBIT 5

EXHIBIT 5

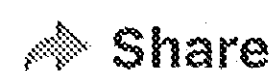

**Veterans In Politics International**January 13 at 12:00am · 

Attorney Marshall Willick and his pal convicted of sexually coercion of a minor Richard Crane was found guilty of defaming a law student in a United States District Court Western District of Virginia signed by US District Judge Norman K. Moon

<http://veteransinpolitics.org/2017/01/attorney-marshall-willick-pal-convicted-sexually-coercion-minor-richard-crane-found-guilty-defaming-law-student-united-states-district-court-western-district-virginia/>

**Attorney Marshall Willick and his pal convicted of sexually...**[veteransinpolitics.org](http://veteransinpolitics.org)[Learn More](#)

10 Comments 3 Shares

**Veterans In Politics International**January 12 at 12:45am · 

Lawsuit accuses Las Vegas lawyer, veterans group leader of defamation

<http://www.newsmaxtv.vegas/interview-with-steve-sanson/>



**19 people** reacted to this.

Done

**Lee Pudemonhuchin Gilford**

And this is how the defamation lawsuits begin. Nothing you shared indicates that Willick did anything but employ a nasty bastard.

You have intentionally indicated that he was convicted. I offer you a couple of choices to correct this, because as someone claiming to represent veterans, I would appreciate it at least being done in a legal way.

A) provide evidence that Willick was convicted.

B) change your caption

C) take this crap to your personal page.

You stand before political figures in this state, indicating that you represent veterans (me) here in Las Vegas. You therefore have an obligation to take our representation responsibly. Getting in to pissing wars and getting sued for libel does nothing but discredit the image of veterans, that some of us pride ourselves in maintaining

Like · Reply · More · Jan 13

**Veterans In Politics International**

Look Lee you are a Marine correct..

Everything we put out is... More

Lee Pudemo... replied · See all 9 replies



Write a comment...

Post

19 people reacted to this.

Done

You can't just make stuff up about people and post it; knowing it's wrong. That's the epitome of libel. So I'm asking you not to engage in criminal activities if you're publicly representing veterans.

There are plenty of other ways to measure Johnsons

Like · Reply · More · Jan 13

**Veterans In Politics International**

Look Lee you are a Marine correct..

Everything we put out is true.. If you don't believe that don't engage in our page. We been doing this for over a decade..

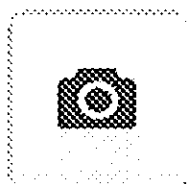
Maybe you should do your own reserach before you engage in another conversation with our group. Semper Fi

Like · Reply · More · Jan 13

**Lee Pudemonhuchin Gilford**

That's not how this works. That's not how any of this works. You are the media outlet of a state organization representing veterans. You are breaking the law.

Speeding to work every day and not getting caught, doesn't suddenly make it legal. Similarly, you saying something is true. when the evidence you present is



Write a comment...

Post

EXHIBIT 6

EXHIBIT 6

EXHIBIT 6





Steve Sanson

A quote from Mr. T from the A-Team; "When I was hungry nobody invited me over for dinner. Now, that I can afford to buy my own restaurant everybody wants to invite me over for dinner". So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation. Where are those people now when we need some assistance?

1/24/2017 1:00 PM (UTC -08:00)

0 comments.



Steve Sanson

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1/24/2017 1:17 PM (UTC -08:00)

2 comments.



Steve W. Sanson

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So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation. Where are those people now when we need some assistance?

1/24/2017 1:19 PM (UTC -08:00)

0 likes

0 comments.

3/7/2017

Charles McChesney & Victoria Adams to appear on the Veterans In Politics video-talk show

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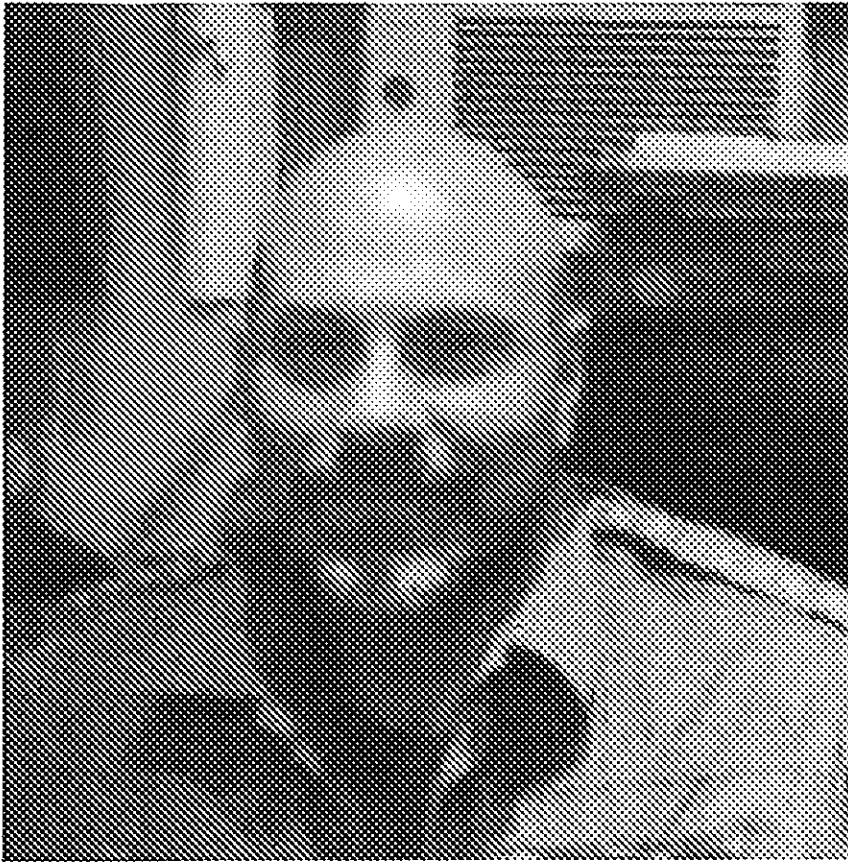
# Charles McChesney & Victoria Adams to appear on the Veterans In Politics video-talk show

Former Bail Agent & Spiritual  
Healer

FIND OUT MORE



**"Veterans In Politics Talk Show" (McChesney & Adams)**  
**Call Into the show 702 685 8380**



Charles McChesney former bail enforcer discussing how the Federal Bureau of Investigations over reach when deciding who to target

[Read More about Charles McChesney](#)



**Victoria Adams a Spiritual Healer**

[Read More about Victoria Adams](#)

LAS VEGAS, NEVADA- - Veterans In Politics video Talk Show proudly announces that **Charles McChesney** former bail enforcer discussing how the Federal Bureau of Investigations over reach when deciding who to target and **Victoria Adams** a Spiritual Healer to appear on the "Veterans In Politics" internet video-talk-show as a special guest on **Saturday - February 4, 2017 from 2-3pm PT**. Listen and watch LIVE on Veterans In Politics Talk show now on World Wide Digital Broadcasting Corp.

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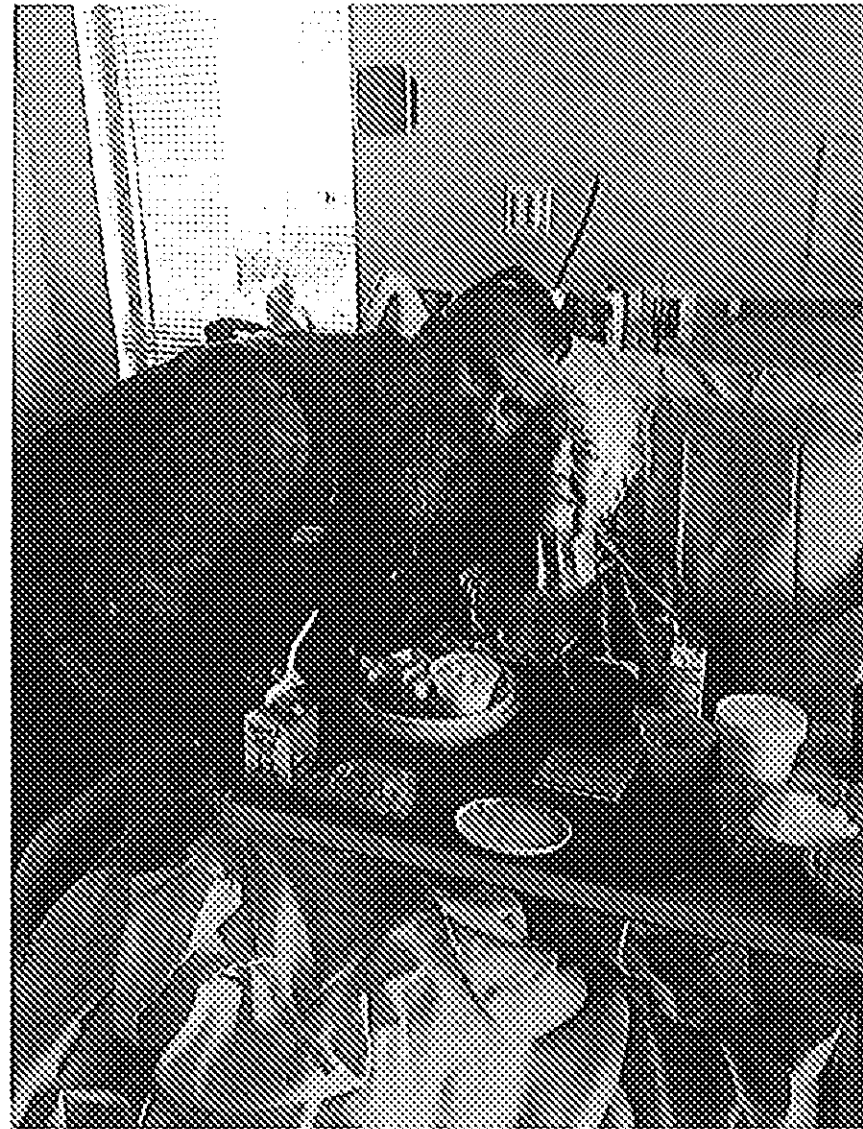
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[Learn More](#)

**WWII Veteran Irene Miller's Funeral**



Attention...bikers, Veterans and fellow patriots!!! Our beloved Irene Miller's last wish was to have a Veterans Funeral and Memorial with "100's of motorcycles"!!

Her ceremony will be Tues Jan 31st at 1400 at the Veterans Cemetery in Boulder City. Anyone... (Especially bikers) wanting to help fulfill her wish need to be at Railroad pass casino no later than 1300 on Tues the 31st. don't be late...I repeat Do Not Be Late!!! Plan accordingly. The Marine Riders will road guard as we escort our fallen Hero and WWII Vet to her final resting place. A celebration of her wonderful life will be held immediately after at

The Leatherneck Club, 4360 Spring Mt rd. It will be taco Tues...Taco bar will be free but donations will be appreciated. Let's give this beautiful American and Patriot the sendoff she deserves!!!

All are welcome to ride...When asked why she volunteered for WWII being a female her simple reply was..."because I'm an American". Please share and let's make this a day for all to remember and set an example of how we need to Honor our Veterans. Respectfully, Pirate Mike

[Learn More](#)

**He Defended Us, Let's Defend Him!**

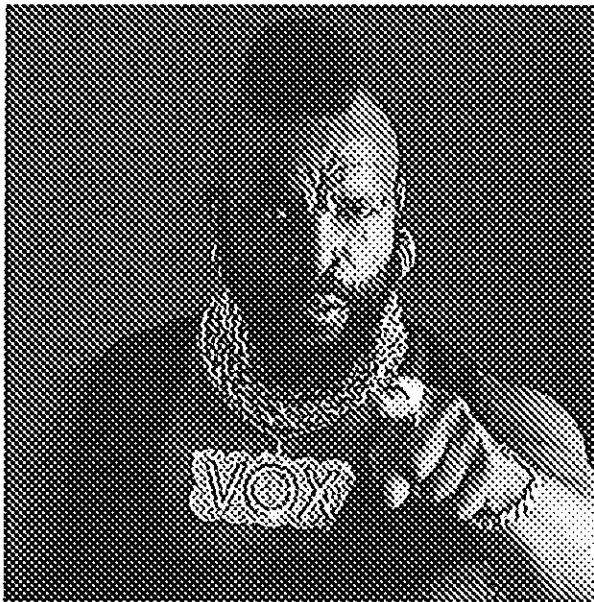




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### Opinion Corner:

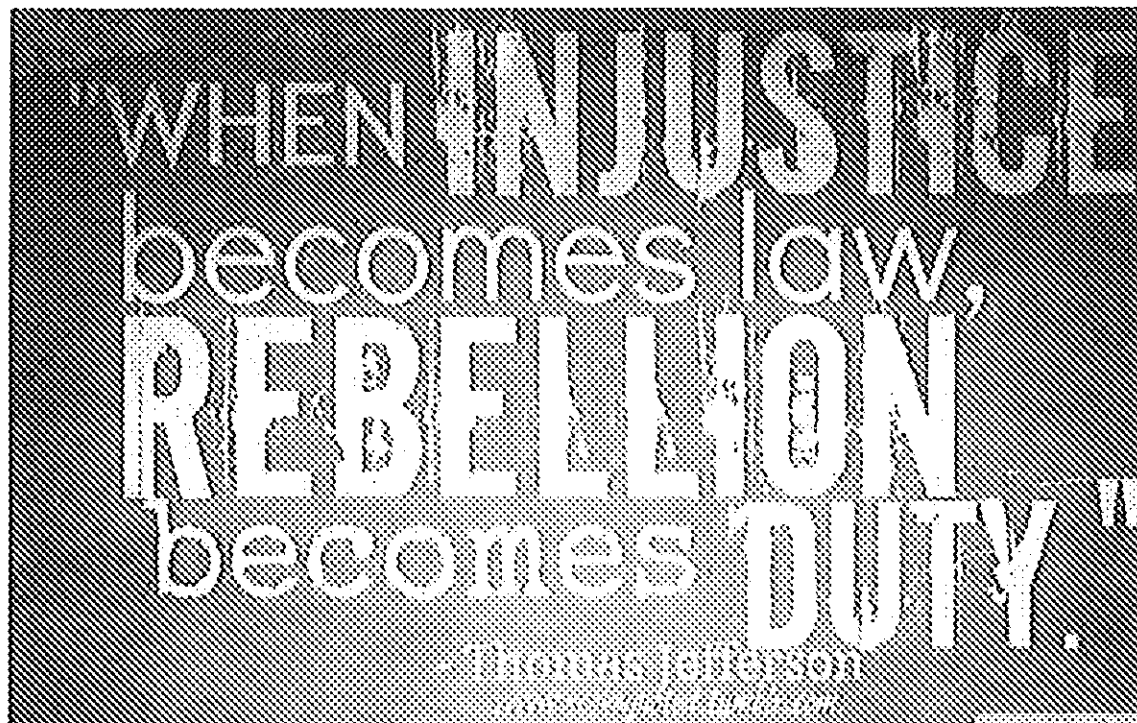
A quote from Mr. T from the A-Team; "When I was hungry nobody invited me over for dinner. Now, that I can afford to buy my own restaurant everybody wants to invite me over for dinner".



So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation.

Where are those people now when we need some assistance?





There needs to be an Over-site Committee that can help place the Family Court System into compliance with the law. There are too many personal bias, discretionary rulings and favoritism amongst attorneys and judges with this judicial branch.

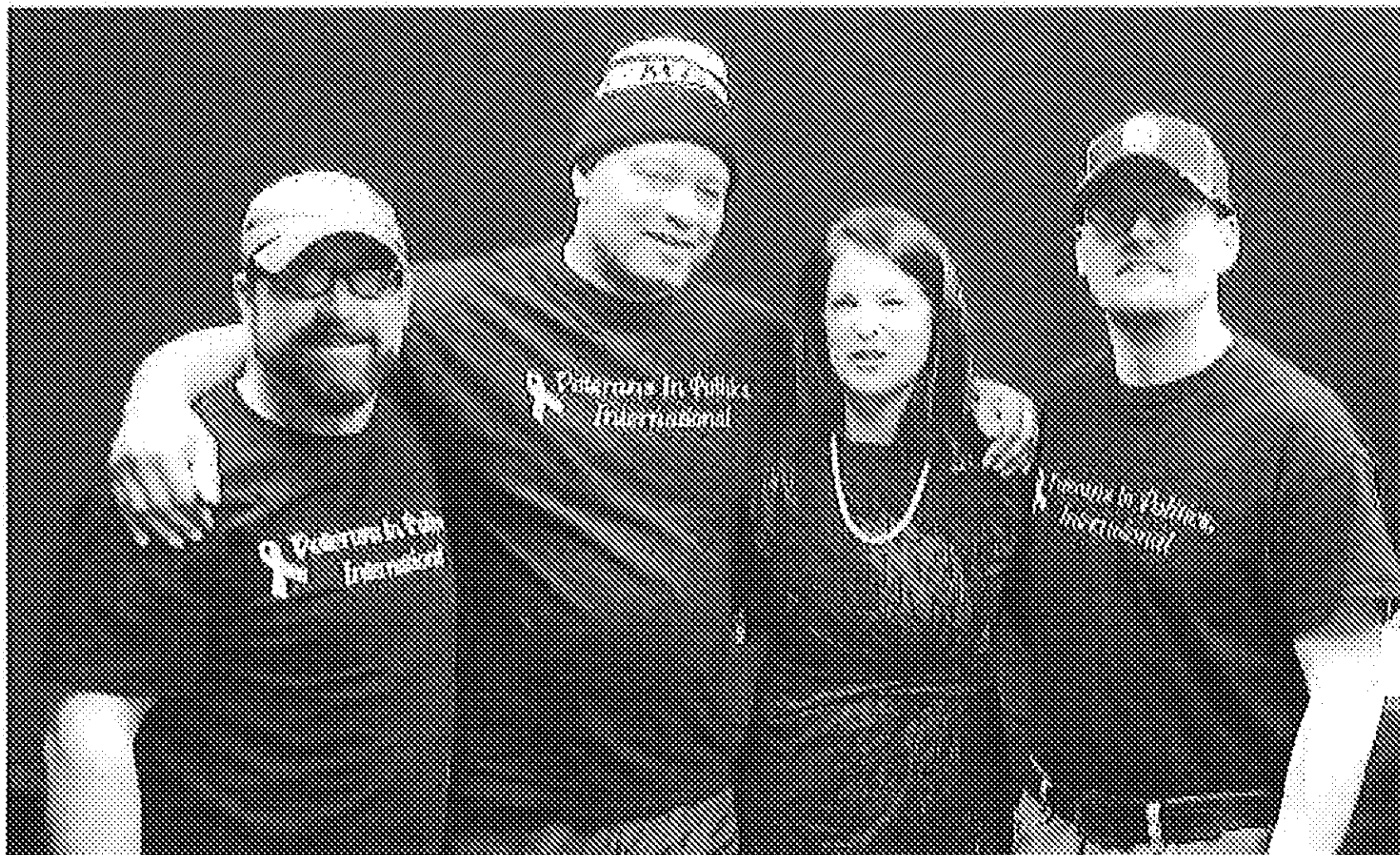
A system that was created to help families stay together has been designed to tear them apart and has created tremendous financial burden on the shoulders of struggling citizens that are stuck in a very emotional time of their lives.

[Learn More](#)

[Listen & Watch the Interview of Last Week's Show:](#)

[LIVE every Saturday from 2-3PM Pacific Time.](#)

Veterans In Politics video Talk Show proudly announces that **Mark Amodei** US Congressman Representing District 2 and **Debra March** Henderson City Councilwoman/Candidate for Henderson City Mayor



Please contribute to Veterans In Politics in an effort in helping us to continue our mission by Exposing Corruption, Champion Veterans Rights, and Educating the public on candidates running for elected

office: go to [www.veteransinpolitics.org](http://www.veteransinpolitics.org) and click onto our PayPal Page or at our PO Box 28211/ Las Vegas, NV. 89126...

*\*If you would like to be a guest on our show please contact: email*

*[veteransinpol@aol.com](mailto:veteransinpol@aol.com) or if you would like to place a commercial on anyone of our shows please dial 702 283 8088.*

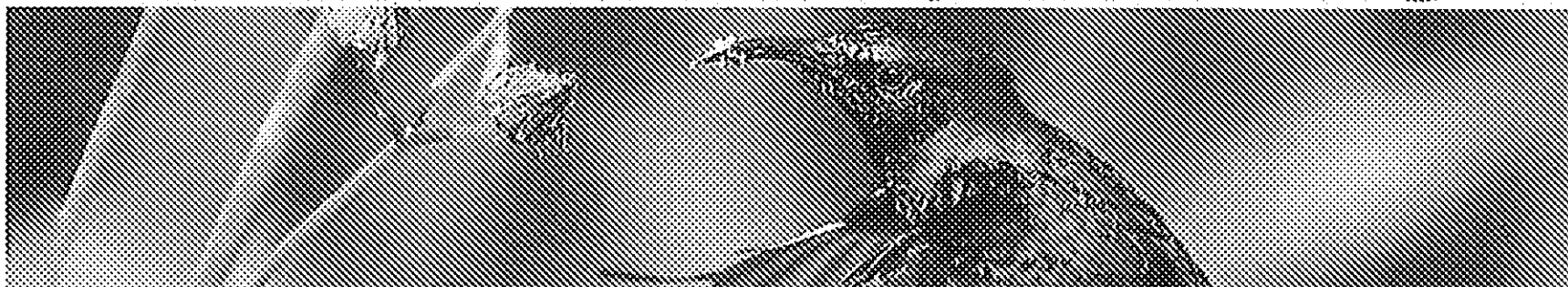
*\*If you would like to visit any of our archived interviews go to our YouTube Channel.*

**Click here for our YouTube Channel** or  
<https://www.youtube.com/channel/UC1vBzrcEJOui3Cp5Bz-ft6Q>  
and **Click here for archived shows on Word Wide Digital Broadcasting Corp**

*\*If you would like to see who is coming on our show next go to our radio webpage. <http://www.wwdbtv.com/veterans-in-politics.html>*

**Click here for recent archived shows**

## Faith Ind and Family Counseling



**Heidi Hanusa**  
Nevada License MA, LMFT

At Lakeside Business Suites:  
2620 Regatta Drive Suite 102  
Las Vegas, NV 89128  
702 553-2396 (office)  
702 370-4244 (cell)

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Veterans In Politics International Inc.

702-283-8088

[devildog1285@cs.com](mailto:devildog1285@cs.com)

[www.veteransinpolitics.org](http://www.veteransinpolitics.org)


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3/7/2017

Charles McChesney & Victoria Adams to appear on the Veterans In Politics video-talk show

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CLERK OF THE COURT

MSTR

Anat Levy, Esq. (State Bar No. 12550)

ANAT LEVY & ASSOCIATES, P.C.

5841 E. Charleston Blvd., #230-421

Las Vegas, NV 89142

Phone: (310) 621-1199

E-mail: [alevy96@aol.com](mailto:alevy96@aol.com); Fax: (310) 734-1538

Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND  
STEVE SANSON

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

MARSHALL S. WILICK and WILICK LAW ) CASE NO. A-17-750171-C  
GROUP, )

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. )

DEPT. NO.: 18

Hearing Date: 3/14/2017

Hearing Time: 9:00 a.m.

**MOTION TO STRIKE AND RESPONSE TO PLAINTIFFS' UNTIMELY**

**SUPPLEMENTAL BRIEF**

Defendants Veterans in Politics International, Inc. and Steve W. Sanson hereby respond and move, by and through their counsel of record Anat Levy of Anat Levy & Associates, P.C., to strike the Affidavit of Marshal Willick filed on March 13, 2017 in Opposition to Defendants' anti-SLAPP motion. The Affidavit actually constitutes an impermissible supplemental brief, is untimely, exceeds the allowable page limits, is subject to numerous evidentiary objections, and is unmeritorious.

This motion is made pursuant to NRCP 12(f), and is based on this motion, the notice of motion below, the accompanying Memorandum of Points and Authorities, the motions to strike

1 and filed concurrently herewith, the pleadings and court records, and any argument and  
2 evidence submitted at the time of hearing.

3  
4 DATED: February 24, 2017

5 By: 

6 Attorney for: VETERANS IN POLITICS  
7 INTERNATIONAL, INC. and STEVE W. SANSON  
8 Anat Levy, Esq.  
9 NV Bar No. 12250  
10 Anat Levy & Associates, P.C.  
11 5841 E. Charleston Blvd., #230-421  
12 Las Vegas, NV 89142  
13 Cell: (310) 621-1199  
14 [Alevy96@aol.com](mailto:Alevy96@aol.com)

15 **NOTICE OF MOTION**

16 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

17 PLEASE TAKE NOTICE that the undersigned counsel will appear at the Clark County  
18 Courthouse, Eighth Judicial District Court, Las Vegas, Nevada on the 14th day of March, 2017  
19 at 9:00 a.m. in Department XVIII, or as soon thereafter as counsel may be heard, to bring this  
20 MOTION TO STRIKE, on for hearing.

21 DATED: March 13, 2017

22 By: 

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



1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2  
3 NRCP 12(f) permits the Court to strike “any insufficient defense, or any redundant,  
4 immaterial, impertinent, or scandalous matter” from a pleading.

5 At 12:26 p.m., the day before this hearing, Plaintiff attorney Marshal Willick served a 14  
6 page legal brief, with 72 pages of exhibits, mistitled as a “Supplemental Declaration” in  
7 opposition to Defendants’ anti-SLAPP motion (the “Plaintiffs’ Supplemental Brief”)

8 Plaintiffs’ Supplemental Brief should be stricken or disregarded for the following  
9 reasons:

10 **1. THE SUPPLEMENTAL BRIEF IS UNTIMELY, CAUSES THE**  
11 **PLAINTIFFS’ OPPOSITION TO EXCEED THE COURT’S PAGE LIMITS, AND WAS**  
12 **FILED WITHOUT LEAVE OF COURT IN VIOLATION OF THE RULES OF CIVIL**  
13 **PROCEDURE.**

14 Plaintiffs’ opposition to Defendants’ anti-SLAPP motion was due at the latest on March  
15 8, 2017, assuming arguendo that Plaintiffs had the same time to oppose the anti-SLAPP motion  
16 as they would have had to oppose a motion for summary judgement, since both operate as an  
17 adjudication on the merits. In reality, however, their Opposition should have been filed before  
18 then, given that anti-SLAPP motions are set for hearing on shortened time. In any event,  
19 Plaintiffs E-filed and served a 20 page Opposition brief on March 8. Plaintiffs’ brief was  
20 replete with fanciful accusations of extortion, coercion and other crimes, but was unsupported  
21 by any admissible evidence.

22 On March 9, 2017 Defendants filed their Reply pointing to the lack of evidence and  
23 responding to the various unmeritorious arguments made in Plaintiffs’ Opposition. Given the  
24 timing of Plaintiffs’ Opposition, Defendants had only one day to prepare and file their Reply so  
25 that the Court could have it at least five days before this hearing pursuant to EDCR 2.20(h).  
26 Defendants filed their Reply in one day, on time, out of respect for the Court and its rules of  
27 procedure, so that it would not be subject to a motion to strike as untimely, and out of fairness  
28 to Plaintiffs to give them ample time to prepare for the hearing.

Without leave of Court, at 12:26pm today, less than 24 hours before this hearing, Plaintiffs filed a 14 page brief with 72 pages of purported exhibits. Although the brief is entitled “Affidavit of Marshal S. Willick In Support of Plaintiff’s Opposition to Anti-SLAPP Special Motion to Dismiss, etc.” it is actually a supplemental brief that is not permitted under the Nevada Rules of Civil Procedure without leave of court. The Supplemental Brief is comprised almost exclusively of legal argument, and recites few facts that may actually be within Plaintiff attorney Marshal Willick’s personal knowledge.

Moreover, the Supplemental Brief effectively causes Plaintiffs’ entire Objection to exceed the 30 page allowable page-limit -- 20 pages in the original Opposition, and another 14 pages in the Supplemental Brief for a total of 34 pages -- without the required leave of Court.

As such, Plaintiffs’ Supplemental Brief should be stricken or disregarded.

**2. THE “AFFIDAVIT” IS REplete WITH INADMISSIBLE STATEMENTS SUBJECT TO EVIDENTIARY OBJECTIONS.**

If the Court does not strike the Supplemental Brief, then Defendants make the following evidentiary objections to Plaintiffs’ purported Affidavit, and respectfully requests that the Court rule thereon:

PORTION OF AFFIDAVIT	GROUND FOR OBJECTION
Page 2, lines 7 and 8, strike “smear campaigns,” and “defamatory” email blasts	Conclusory fact on “smear campaign”; Legal Conclusion on “defamatory.”
Page 3, lines 5-7 “Apparently this is because the interview contained so much of Sanson’s foul-mouthed screaming that it reflected badly on him and his organization.”	Speculation; Lack of Foundation.
Page 3, lines 16-18: “they were paid by Louis Schneider, Esq. to launch a “smear campaign” against my fiancé, Jennifer V. Abrams, Esq. in an effort to coerce and intimidate her into withdrawing a sanctions motion she filed against Schneider in a divorce case that I have no part of.”	Speculation; Lack of Foundation; scandalous.
Page 3, lines 19-21: “After the VIPI Defendants disseminated a series of defamatory material against Ms. Abrams, it is my understanding that they ran a background check on Ms. Abrams to find information about her, and found nothing disparaging.”	Speculation; Lack of Foundation; Legal Conclusion with regard to “defamatory”.

1	Page 4, lines 9-12: “It is no coincidence that	Speculation; Lack of Foundation; Legal
2	this defamatory material was broadcast	Conclusion with regard to “defamatory
3	shortly after the VIPI defendants were paid by	material;” Irrelevant and Scandalous.
4	Louis Schneider to disseminate “smear	
5	campaigns” against my fiancé and	
6	immediately after they learned of the	
7	relationship between me and Ms. Abrams.”	
8	Page 4, lines 19-Page 5, line 2: “While the	Legal Argument; Lack of Foundation;
9	timing and focus of the ‘hypocrisy’ article	Speculation.
10	evidence the VIPI Defendants’ comments	
11	actual malice against me, the “sexually	
12	coercion” article and the VIPI Defendants’	
13	comments regarding that article heave no	
14	doubt that the purpose of the repeated	
15	publications was to try to find some way to	
16	injure me personally and professionally.”	
17	Page 8, lines 3-7: “Steve Sanson falsely states	Legal Argument; Speculation.
18	in his “Supplemental Declaration ... In other	
19	words, Steve Sanson has recently and directly	
20	lied to this Court, and is fully aware of that	
21	lie.”	
22	Page 9, line 11 – Page 10, line 16	Legal Argument.
23	Page 10, Footnote 8	Irrelevant; Legal Argument.
24	Page 11, line 3 – Page 12, line 17, and	Legal Argument.
25	footnotes 11, 12 and 13.	
26	Page 13, lines 1-6: “In short, I have been	Argument; Legal conclusions with regard to
27	made the target of a months-long campaign of	what constitutes “defamation,” “public
28	defamation having nothing to do with any	concern,” whether any speech at issue has to
29	issue of public concern, and having nothing to	do with legislation, whether Defendants are
30	do with any legislation, testimony, or anything	running a “criminal syndicate” or are engaged
31	else with which I am remotely connected.	in “extortion” and “defamed” Plaintiffs. Also
32	The Defendants are a criminal syndicate	irrelevant, lack of foundation and speculative
33	engaged in extortion against my fiancé, and	with regard to “criminal syndicate” and
34	defamation against me. It is inexcusable,	“extortion.”
35	unlawful and should be both stopped and	
36	punished accordingly.”	
37	<p><b>3. THE SUPPLEMENTAL BRIEF IS UNMERITORIOUS.</b></p> <p>In the event that the Court is willing to entertain the substance of Plaintiffs’ Supplemental Brief (which it should not), Defendants respond as follows to its main points:</p> <p>Plaintiffs’ Supplemental Brief centers on the January 12, 2017 VIPI post which inadvertently omitted two commas and read as follows – the brackets show where the intended commas should have been: “Attorney Marshall Willick[,] and his pal convicted of sexually</p>	

1 coercion of a minor, Richard Crane[,] was found guilty of defaming a law student in United  
2 States District Court Western District of Virginia signed by US District Judge Norman K.  
3 Moon.”

4 First, Defendants have rechecked each of the alleged postings itemized in Plaintiffs’  
5 Supplemental Brief which Plaintiffs claim show that the original ambiguous statement is still  
6 available for public viewing online. Upon Defendants’ further investigation, it appears that the  
7 original statement resides on VIPI’s Constant Contact account, which Plaintiffs shut down and  
8 to which Defendants have not had access since February 1, 2017. See notice from Constant  
9 Contact attached as Ex. 15, page 9 of Sanson’s Initial Decl., filed in support of anti-SLAPP  
10 motion. In January 2017 Plaintiffs had sent take down notices to Facebook, Vimeo and other of  
11 Defendants’ vendors having them take down specific posts pertaining to them, which those  
12 services did. See other take down notifications attached as Ex. 15 to Sanson’s Initial  
13 Declaration. As of February 1, 2017, Defendants were locked out of VIPI’s Constant Contact  
14 account and could not take any action on it. Had Plaintiffs simply provided their list to  
15 Defendants months ago and had they not caused the shutdown of Defendants’ account,  
16 Defendants would have been able to remove the original version of this January 12 statement  
17 from Constant Contact and it would no longer be viewable from any other site to which  
18 Constant Contact is linked. Indeed, if Plaintiffs withdraw their complaint to Constant Contact,  
19 Defendants would do this immediately upon the reactivation of VIPI’s account.

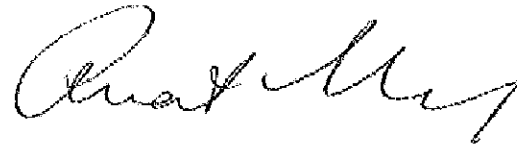
20 Moreover, NRS 41.338 provides that if a correction to a statement is made before a  
21 demand for correction is requested, then only special damages would be recoverable. NRS  
22 41.336. NRS 41.335 defines “special damages” as those relating to business, trade, profession  
23 or occupation. Here, Plaintiffs made no demand to take the post at issue down before filing  
24 their complaint on 1/27/2017, and Defendants weren’t served with the Complaint until February  
25 3 and 6, 2017 – days after being locked out of VIPI’s Constant Contact account. Moreover,  
26 Plaintiffs have made no factual allegations and provided no evidence whatsoever of any special  
27 damages.

28 Second, the Virginia Court’s finding that Plaintiff Willick committed Defamation per se

1 against his opponent, was based on Plaintiffs' claims to third parties that his opponent was  
2 guilty of kidnapping and other felonies. Moreover, Plaintiffs' statements in Virginia were made  
3 in written letters without including any source materials on which their statements were based.  
4 In the present case, Defendants at all times provided hyperlinks to the source materials,  
5 including the Virginia Judge's order in which he expressly found that Willick committed  
6 Defamation per se. Moreover, the Order is clearly civil in nature.

7 Third, while Plaintiffs claim that the Clarification of this statement was itself  
8 "defamatory," they continue to fail to explain how or why.

9  
10 DATED: March 13, 2017



11 By:

12 Attorney for: VETERANS IN POLITICS  
13 INTERNATIONAL, INC. and STEVE W.  
14 SANSON

15 Anat Levy, Esq.

16 NV Bar No. 12250

17 Anat Levy & Associates, P.C.

18 5841 E. Charleston Blvd., #230-421

19 Las Vegas, NV 89142

20 Cell: (310) 621-1199

21 [Alevy96@aol.com](mailto:Alevy96@aol.com)

1 **CERTIFICATE OF SERVICE**

2

3 I am over the age of 18 and am not a party to the within action.

4 On the date indicated below, I caused to be served a true and correct copy of the document

5 entitled **MOTION TO STRIKE (NRCP § 12(f))** on the below listed recipients by requesting

6 the court's wiznet website to E-file and E-serve such document to their respective email

7 addresses as indicated below.

8

9 Jennifer Abrams, Esq.  
10 The Abrams & Mayo Law Firm  
6252 S. Rainbow Blvd., Ste. 100  
11 Las Vegas, NV 89118  
(702) 222-4021  
12 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:**

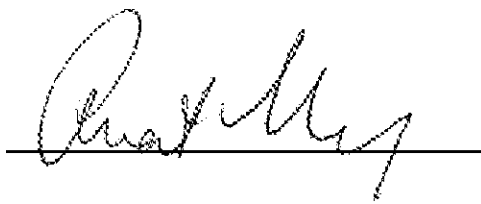
15 Maggie McLetchie, Esq.  
16 McLetchie Shell  
702 E. Bridger Ave., Ste. 520  
Las Vegas, NV 89101  
17 (702) 728-5300  
Maggie@nvlitigation.com

18

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 24th day of February 2017, in Las Vegas, NV

22 

23

24

25

26

27

28

  
CLERK OF THE COURT

1 **NOAC**  
DENNIS L. KENNEDY  
2 Nevada Bar No. 1462  
JOSHUA P. GILMORE  
3 Nevada Bar No. 11576  
**BAILEY❖KENNEDY**  
4 8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
5 Telephone: 702.562.8820  
Facsimile: 702.562.8821  
6 DKennedy@BaileyKennedy.com  
JGilmore@BaileyKennedy.com  
7

*Attorneys for Plaintiffs*  
8 Marshal S. Willick and Willick Law Group

9 DISTRICT COURT  
10 CLARK COUNTY, NEVADA  
11

12 MARSHAL S. WILLICK and WILLICK LAW  
13 GROUP,

14 Plaintiffs,

15 vs.

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

19 Defendants.  
20

Case No. A-17-750171-C  
Dept. No. XIX

21 **NOTICE OF ASSOCIATION OF COUNSEL**

22 PLEASE TAKE NOTICE that Dennis L. Kennedy and Joshua P. Gilmore of the law firm  
23 Bailey❖Kennedy are associating with Jennifer V. Abrams of The Abrams & Mayo Law Firm as  
24 counsel of record for the Plaintiffs, Marshal S. Willick and Willick Law Group.

25 ///

26 ///

27 ///

28 ///

Request is made that Dennis L. Kennedy and Joshua P. Gilmore of the law firm  
Bailey ♦ Kennedy be included on the service or mailing list for all pleadings, correspondence, and  
other papers filed or served in this matter.

DATED this 13<sup>th</sup> day of March, 2017.

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore  
DENNIS L. KENNEDY  
JOSHUA P. GILMORE

*Attorneys for Plaintiffs*  
Marshal S. Willick and Willick Law Group



**CERTIFICATE OF SERVICE**

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 13<sup>th</sup> day of March, 2017, service of the foregoing **NOTICE OF ASSOCIATION OF COUNSEL** was made by mandatory electronic service through the Eighth Judicial District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

ANAT LEVY  
**ANAT LEVY & ASSOCIATES, P.C.**  
5841 E. Charleston Boulevard, #230-421  
Las Vegas, NV 89142

Email: alevy96@aol.com  
*Attorneys for Defendants*  
**VETERANS IN POLITICS**  
**INTERNATIONAL, INC. and**  
**STEVE SANSON**

ALEX GHIBAUDO  
**G LAW**  
703 S. 8<sup>th</sup> Street  
Las Vegas, NV 89101

Email: alex@alexglaw.com  
*Attorneys for Defendants*  
**VETERANS IN POLITICS**  
**INTERNATIONAL, INC. and**  
**STEVE SANSON**

JENNIFER V. ABRAMS  
**THE ABRAMS & MAYO LAW FIRM**  
6252 South Rainbow Blvd., Ste. 100  
Las Vegas, NV 89118

Email:  
JVAGroup@theabramslawfirm.com  
*Attorneys for Defendants*  
**VETERANS IN POLITICS**  
**INTERNATIONAL, INC. and**  
**STEVE SANSON**

/s/ Susan Russo  
Employee of BAILEY ♦ KENNEDY

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Location : District Court Civil/Criminal [Help](#)

## REGISTER OF ACTIONS

CASE No. A-17-750171-C

Marshal Willick, Plaintiff(s) vs. Steve Sanson, Defendant(s)

§  
§  
§  
§  
§  
§

Case Type: **Intentional Misconduct**

Date Filed: **01/27/2017**

Location: **Department 18**

Cross-Reference Case Number: **A750171**

---

### PARTY INFORMATION

---

		Lead Attorneys
Defendant	Hanusa, Heidi J	
Defendant	Ortiz, Christina	
Defendant	Sanson Corporation	
Defendant	Sanson, Steve W	<b>Annat R. Levy, ESQ</b> <i>Retained</i> 310-621-1199(W)
Defendant	Spicer, Johnny	
Defendant	Steelmon, Karen	
Defendant	Veterans in Politics International Inc	<b>Annat R. Levy, ESQ</b> <i>Retained</i> 310-621-1199(W)
Defendant	Woolbright, Don	
Plaintiff	Willick Law Group	<b>Jennifer V. Abrams</b> <i>Retained</i> 702-222-4021(W)
Plaintiff	Willick, Marshal S	<b>Jennifer V. Abrams</b> <i>Retained</i> 702-222-4021(W)

---

### EVENTS & ORDERS OF THE COURT

---

03/14/2017 **All Pending Motions** (9:00 AM) (Judicial Officer Thompson, Charles)

#### Minutes

03/14/2017 9:00 AM

- Defendants' Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq. ... Plaintiffs' Opposition to Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs Arguments by counsel. Court stated its Findings the statute does not apply in this instance and ORDERED, Defendants' Anti-Slapp Special Motion to Dismiss is DENIED. FURTHER ORDERED, Plaintiffs' Countermotion for Attorney's Fees and Costs is DENIED. Ms. Levy requested stay of proceedings to pursue an appeal to Supreme Court. Objection by Mr. Gilmore who requested counsel file a written motion. Court not inclined to address the oral request noting there are still matters pending which may have merit. Mr. Gilmore to prepare the order within 10 days and

AA001602

distribute a filed copy to all parties involved in this matter.

[Parties Present](#)

[Return to Register of Actions](#)

AA001603

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](mailto:alevy96@aol.com);  
Fax: (310) 734-1538  
Attorney for: APPELLANTS, Veterans In Politics International, Inc.  
and Steve W. Sanson

Electronically Filed  
Aug 21 2017 03:00 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 VII OF IX**

Appeal from Eight Judicial District Court, Clark County

Senior Judge, Hon. Charles Thompson, Dept. 18

**APPELLANTS' APPENDIX**

**INDEX TO APPELLANTS' APPENDIX**

<b><u>DOCUMENT</u></b>	<b>DATE</b>	<b>VOL.</b>	<b>BATES NUMBERS</b>
<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

<b><u>DOCUMENT</u></b>	<b>DATE</b>	<b>VOL.</b>	<b>BATES NUMBERS</b>
<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
Declaration of Levy; Proposed Order Attached Thereto	3/26/2017	VIII	AA001674-AA001681
Declaration of Service of Complaint on Steve Sanson	2/4/2017 (service date)	I	AA000029
Declaration of Service of Complaint on Veterans in Politics International, Inc.	2/6/2017 (service date)	I	AA000030

<b><u>DOCUMENT</u></b>	<b>DATE</b>	<b>VOL.</b>	<b>BATES NUMBERS</b>
Declaration of Steve Sanson in Support of Anti-SLAPP Motion (with Exs.)	2/17/2017	I-II	AA000082- AA000350
Defendants' Ex Parte Motion to Shorten Time on Motion to Stay Proceedings Pending Appeal on Order Denying Defendants' Anti- SLAPP Motion		IX	AA001910- AA001920
Errata to 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	AA001477- AA001479
Exhibits to Opposition to Anti-SLAPP Motion to Dismiss Pursuant to NRS 41.650 et. seq., and Countermotion for Attorney's Fees and Costs	3/8/2017	VII	AA001446- AA001476
First Amended Complaint	4/3/2017	VIII	AA001692- AA001706
Minute Order of Hearing on Defendants' Anti-SLAPP Motion	3/14/2017	VII	AA001602- AA001603
Motion to Dismiss for Failure to State a Claim (NRCp §12(b)(5))	2/24/2017	V	AA000952- AA000983
Motion to Dismiss Ninth Cause of Action for Copyright Infringement for Lack of Subject Matter Jurisdiction (NRCp §12(b)(1))	2/24/2017	V	AA000947- AA000951

APPELLANTS' APPENDIX



<b><u>DOCUMENT</u></b>	<b>DATE</b>	<b>VOL.</b>	<b>BATES NUMBERS</b>
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

<b><u>DOCUMENT</u></b>	<b>DATE</b>	<b>VOL.</b>	<b>BATES NUMBERS</b>
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

<b><u>DOCUMENT</u></b>	<b>DATE</b>	<b>VOL.</b>	<b>BATES NUMBERS</b>
<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        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.<sup>11</sup>

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  
(INJUNCTION)

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

20 142. Defendants and/or Defendant's agents, representatives, and/or  
21 employees, either individually, or in concert with others are attempting to extort a  
22 result in the "D" case litigation by unlawful out-of-court means. The "D" case  
23

24 <sup>11</sup> 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 litigation is ongoing and an injunction is necessary to stop the extortion and  
2 continuation of harm and damage to Plaintiffs.

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

6 WHEREFORE, Plaintiffs request the following injunctive relief:

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

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

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

22 ///

23 ///

24 ///



XV.  
CONCLUSION

1. 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

///

///

///

///

///

DATED this 9<sup>th</sup> day of January, 2017.

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

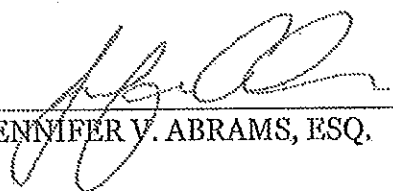
1 VERIFICATION

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

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

6 That her business is the Plaintiff in the above-entitled action; that she has  
7 read the above and foregoing **COMPLAINT FOR DAMAGES** and knows the  
8 contents thereof and that the same is true of her own knowledge, except as to those  
9 matters therein stated on information and belief, and as to those matters, she  
10 believes them to be true.

11 FURTHER, AFFIANT SAYETH NAUGHT.

12  
13   
JENNIFER V. ABRAMS, ESQ.

14  
15 SUBSCRIBED and SWORN to before me  
16 this 9<sup>th</sup> day of January, 2017, by Jennifer V. Abrams, Esq.

17   
18 NOTARY PUBLIC



# **EXHIBIT 6**

AA001381



- [DIVORCE](#) ▾
 [ANNULMENT](#) ▾
 [CHILD CUSTODY/SUPPORT](#) ▾
 [ALIMONY](#) ▾
 [RESOURCES](#) ▾
 [ABOUT US](#) ▾
 [PUBLICATIONS](#) ▾
 [SITEMAP](#) ▾



## Audio



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

Response letter to Steve Sanson after the interview above and after he posted a smear claiming Marshal Willick was a "hypocrite" in supporting veterans.

## Abrams v. Sanson Defamation Lawsuit

### Complaint for Damages Willick v. Sanson

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Law Group

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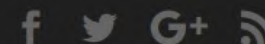
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## Archives

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**Willicklawgroup.com**



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 slamed 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 7**

1 **COMP**

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

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CLERK OF THE COURT

6  
7 DISTRICT COURT  
CLARK COUNTY, NEVADA

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

9 Plaintiff, )

10 vs. )

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

15 Defendant. )

Case No.: A-17-750171-C

Department: XIX

Hearing Date: N/A

Hearing Time: N/A

ACTION IN TORT

ARBITRATION EXEMPTION  
CLAIMED

16  
17 **COMPLAINT FOR DAMAGES**

18 **I.**  
**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        ///

1       15.     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       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 I  
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.

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

18  
19                                   **IV.**  
                                 **FACTUAL ALLEGATIONS**

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

22       19.     On or about November 14, 2015, Mr. Willick appeared by invitation on  
23 a radio show hosted by Mr. Sanson, in his capacity of President of Veterans in  
24 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.<sup>1</sup>

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           <sup>1</sup>    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").<sup>2</sup>

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           <sup>2</sup> 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.

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

30. On or about January 14, 2017, Defendants published or caused to be published on the Veterans in Politics International Facebook page, a Facebook page purportedly 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, a post containing eight (8) photographs (hereinafter "VIPI Facebook post").

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

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

32. On or about January 14, 2017, Defendants published or caused to be published on the Veterans in Politics Facebook page, a Facebook page purportedly 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").<sup>3</sup>

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 <sup>3</sup> 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.<sup>4</sup>

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 <sup>4</sup> 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.

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.<sup>5</sup>

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 <sup>5</sup> 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;

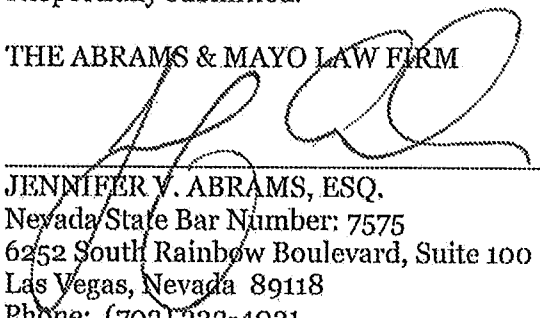
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- c. Punitive damages in an amount in excess of \$15,000 for each and every claim for relief;
- d. All attorney's fees and costs that have and/or may be incurred by Marshal S. Willick and the Willick Law Group in pursuing this action; and
- e. For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

DATED this 27<sup>th</sup> 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

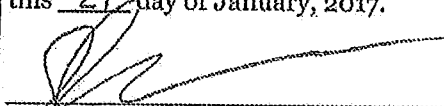
2 STATE OF NEVADA )  
3 ) ss:  
4 COUNTY OF CLARK )

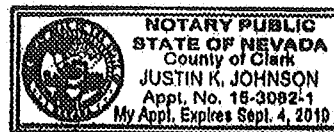
5 MARSHAL S. WILICK, ESQ., principal of WILICK LAW GROUP first being  
6 duly sworn, deposes and says:

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 27<sup>th</sup> day of January, 2017.

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



# **EXHIBIT 8**

## Anat Levy

---

**From:** Steve Sanson <vipipresident@cs.com>  
**Sent:** Tuesday, February 7, 2017 8:56 PM  
**To:** alevy96@aol.com  
**Cc:** devildog1285@cs.com  
**Subject:** Re: IP Counter Notification Form #386426505041326

### Constant Contact

Dear Mr. Sanson,

Due to a number of legal complaints that Constant Contact has received regarding your account, we must suspend services. We have received multiple allegations of copyright and trademark infringement which are a violation of our terms and conditions. Per our Terms and Conditions we reserve the right to terminate your services at any time, please see "section 8. Termination."

I've provided a copy of our terms and conditions here for your reference:

<https://www.constantcontact.com/legal/terms>

Please contact me with any questions.

Thank you,

--

Megen MacKenzie  
Legal Compliance Coordinator  
Constant Contact  
3675 Precision Dr,  
Loveland, CO 80538  
Email: mmackenzie@constantcontact.com  
Phone: (970) 203-7345  
Fax: (781) 652-5130  
Web: [www.constantcontact.com](http://www.constantcontact.com)

### Constant Contact

Hello Steve,

Our legal department generally does not forward on any legal documents we receive from attorneys because we do not want to get involved in legal disputes. However, I can send you the attorney's contact information and you can request they send you the documents.

Additionally, we also received a formal cease and desist letter on the account this week from Willick Law Group.

The attorneys who have contacted us are:

Carlos A. Morales, Esq.  
Willick Law Group

3591 E. Bonanza Road, Ste. 200  
Las Vegas, NV 89110-2101  
ph. 702/438-4100 x 128  
fax 702/438-5311  
e-mail: [Carlos@willicklawgroup.com](mailto:Carlos@willicklawgroup.com)  
main website: [www.willicklawgroup.com](http://www.willicklawgroup.com)  
QDRO website: [www.qdromasters.com](http://www.qdromasters.com)

Marshal S. Willick, Esq.  
3591 E. Bonanza Road, Ste. 200  
Las Vegas, NV 89110-2101  
Fellow, American Academy of Matrimonial Lawyers  
Fellow, International Academy of Family Lawyers  
Certified Specialist in Family Law, Nevada Board of Legal Specialization & NBTA  
ph. 702/438-4100 x 103  
fax 702/438-5311  
e-mail: [marshal@willicklawgroup.com](mailto:marshal@willicklawgroup.com)  
main website [www.willicklawgroup.com](http://www.willicklawgroup.com)  
QDRO website: [www.qdromasters.com](http://www.qdromasters.com)

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](http://www.TheAbramsLawFirm.com)

If you have any questions, please contact Patty Andrews, I believe you spoke with her this past week regarding this account. Her direct line is 781-482-7466.

Thank you,

Megen

--

Megen MacKenzie  
Legal Compliance Coordinator  
Constant Contact  
3675 Precision Dr,  
Loveland, CO 80538  
Email: [mmackenzie@constantcontact.com](mailto:mmackenzie@constantcontact.com)  
Phone: (970) 203-7345  
Fax: (781) 652-5130  
Web: [www.constantcontact.com](http://www.constantcontact.com)

**Facebook:**

Hello,

We've removed or disabled access to the following content that you posted on Facebook because we received a notice from a third party that the content infringes their copyright(s):

"Nevada Attorney attacks a Clark County Family Court Judge in Open Court"  
<http://conta.cc/2dKh34w>

If you believe that this content should not have been removed from Facebook, you can contact the complaining party



directly to resolve your issue:

Report #: 307875176275756  
Rights Owner: Jennifer Abrams / The Abrams & Mayo Law Firm  
Email: jabrams@theabramslawfirm.com  
Copyrighted Work: Other

If an agreement is reached to restore the reported content, please have the complaining party email us with their consent and include the report number.

Facebook complies with the notice and takedown procedures defined in section 512(c) of the Digital Millennium Copyright Act ("DMCA"). If you believe that this content was removed as a result of mistake or misidentification, you can submit a DMCA counter-notification by filling out our automated form at [http://www.facebook.com/legal/copyright.php?howto\\_appeal&parent\\_report\\_id=307875176275756](http://www.facebook.com/legal/copyright.php?howto_appeal&parent_report_id=307875176275756).

We strongly encourage you to review the content you have posted to Facebook to make sure that you have not posted any other infringing content, as it is our policy to terminate the accounts of repeat infringers when appropriate.

For more information about intellectual property, please visit our Help Center:

<https://www.facebook.com/help/370657876338359/>

Thanks,

The Facebook Team

**Facebook:**

Hi Steve,

The Facebook Team received a report from you. For reference, your complaint number is: #620138334841917.

Please note that this channel is only for reports of alleged infringements or violations of your legal rights, such as copyright or trademark. If you filed that type of report, no further action is necessary. However, if you contacted us through this channel about another matter, you might not receive a response.

If you're not confident that your issue concerns intellectual property rights, please consult the Intellectual Property section of our Help Center for additional information:

IP Help Center: [https://www.facebook.com/help/intellectual\\_property/](https://www.facebook.com/help/intellectual_property/)

Note that we routinely provide the contact information included in reports about alleged infringements/violations of legal rights, including email address, to the user that posted the content being reported.

For help with matters other than infringement/violation of your legal rights, the links below may be helpful:

- Hacked or phished accounts: <https://www.facebook.com/help/security>
- Fake/Impostor accounts (timelines): <https://www.facebook.com/help/174210519303259/>
- Abuse (including spam, hate speech and harassment): <https://www.facebook.com/help/263149623790594/>
- Pages (including admin issues): <https://www.facebook.com/help/pages/>
- Unauthorized photos or videos: <https://www.facebook.com/help/428478523862899>
- Login issues: <https://www.facebook.com/help/login>
- Help for users who have been disabled or blocked: <https://www.facebook.com/help/warnings>

If the links above do not contain the information you're looking for, you may want to search the Help Center for more assistance: <https://www.facebook.com/help/>

As a reminder, if your submission contains a report of alleged infringement/violation of your legal rights, no further action is necessary. We will look into your matter shortly.

Thanks for contacting Facebook,

The Facebook Team

-----  
Full Name : Steve Sanson  
Address : 2620 Regatta Drive Suit 102  
Las Vegas, Nv 89128  
Telephone : 7022838088  
Email : devildog1285@cs.com

**Facebook:**

Hello,

We've removed or disabled access to the following content that you posted on Facebook because we received a notice from a third party that the content infringes their copyright(s):

"Have you seen our latest news?"  
<http://conta.cc/2dXY3Qb>

If you believe that this content should not have been removed from Facebook, you can contact the complaining party directly to resolve your issue:

Report #: 307875176275756  
Rights Owner: Jennifer Abrams / The Abrams & Mayo Law Firm  
Email: [jabrams@theabramslawfirm.com](mailto:jabrams@theabramslawfirm.com)  
Copyrighted Work: Other

If an agreement is reached to restore the reported content, please have the complaining party email us with their consent and include the report number.

Facebook complies with the notice and takedown procedures defined in section 512(c) of the Digital Millennium Copyright Act ("DMCA"). If you believe that this content was removed as a result of mistake or misidentification, you can submit a DMCA counter-notification by filling out our automated form at [http://www.facebook.com/legal/copyright.php?howto\\_appeal&parent\\_report\\_id=307875176275756](http://www.facebook.com/legal/copyright.php?howto_appeal&parent_report_id=307875176275756).

We strongly encourage you to review the content you have posted to Facebook to make sure that you have not posted any other infringing content, as it is our policy to terminate the accounts of repeat infringers when appropriate.

For more information about intellectual property, please visit our Help Center:

<https://www.facebook.com/help/370657876338359/>

Thanks,

The Facebook Team

**Youtube:**

----- Original message -----

From: YouTube Support Team <youtube-disputes+P42GIS7UJZ5WEVNXFQ4CYDMURU@google.com>  
Date: 1/6/17 20:29 (GMT-08:00)  
To: stevewsanson1985@gmail.com  
Subject: Re: Case Subject

Dear Steve Sanson,

This is to notify you that we have received a privacy complaint from an individual regarding your content:

-----  
<https://www.youtube.com/watch?v=zdMg5wl70Yg>  
-----

We would like to give you an opportunity to remove or edit the private information within the content reported. You have 48 hours to take action on the complaint. If you remove the alleged violation from the site within the 48 hours, the complaint filed will then be closed. If the potential privacy violation remains on the site after 48 hours, the complaint will be reviewed by the YouTube Team and may be removed pursuant to our Privacy Guidelines.

Alleged violations commonly occur within the video content. YouTube offers a Custom Blurring tool, which allows you to blur anything in your video, including individuals or information. For more information on this blurring feature, visit the Creator Blog and Help Center. Alleged violations may also occur in the title, description or tags of your video.

YouTube offers metadata editing tools which you can access by going to My Videos and clicking the Edit button on the reported video. Making a video private is not an appropriate method of editing, as the status can be changed from private to public at any time. Because they can be turned off at any time, annotations are also not considered an acceptable solution.

We're committed to protecting our users and hope you understand the importance of respecting others' privacy. When uploading videos in the future, please remember not to post someone else's image or personal information without their consent. Personal information includes, but is not limited to, Social Security number, National Identification number, bank account number or contact information (e.g. home address, email address). For more information, please review our Privacy Guidelines.

Steve Sanson  
President Veterans In Politics International  
PO Box 28211  
Las Vegas, NV 89126  
702 283 8088  
[www.veteransinpolitics.org](http://www.veteransinpolitics.org)

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

From: Anat Levy <alevy96@aol.com>  
To: 'Steve Sanson' <vipipresident@cs.com>  
Sent: Tue, Feb 7, 2017 6:29 pm  
Subject: FW: IP Counter Notification Form #386426505041326

Steve, can you forward to me all of the original notifications from Facebook, Constant Contact, etc? I have the counter-notifications, but can't find the original notices that they sent you. I know you sent them to me, but can you resend them please?

---

**From:** [vipipresident@cs.com](mailto:vipipresident@cs.com) [<mailto:vipipresident@cs.com>]  
**Sent:** Tuesday, January 24, 2017 4:31 PM  
**To:** Anat Levy  
**Subject:** Fw: IP Counter Notification Form #386426505041326

Sent from my Verizon 4G LTE Smartphone

----- Original message-----

**From:** Facebook  
**Date:** Tue, Jan 24, 2017 16:17

To: [vipipresident@cs.com](mailto:vipipresident@cs.com);

Subject: IP Counter Notification Form #[386426505041326](#)

Hi, Thanks for contacting Facebook. We have received your Digital Millennium Copyright Act ("DMCA") counter-notification. Based on the information you've provided, we will restore or cease disabling access to the content at issue within 14 business days from now, unless we receive notice that the reporting party has filed an action seeking a court order to restrain you from engaging in infringing activity on Facebook related to that [content](#). Thanks, Daryl Intellectual Property Operations

On Mon Jan 23, 2017 00:15:08, Steve Sanson wrote: >To answer your question; I wrote all the articles that we posted, the original versions came from my Constant Contact page. You can verify this with Constant Contact and its also on our website at [www.VeteransInPolitics.org](http://www.VeteransInPolitics.org). >As far as the videos are concerned: Rule 5.02 only makes a hearing private, but does not prohibit anything else. The Order that was served does not apply because it was based on "Stipulation of the Parties." WE are not a party to the case. The fact the case was sealed after the fact is prospective not retrospective and cannot change what has already happened. Next, First Amendment and good faith participation in public processes are absolutely immune from suit. Then there is the lawsuit itself - it violates NRS Chapter 1 which requires all actions involving the same parties in Family Court be heard by the same judge - meaning there is no subject matter jurisdiction in the District Court. This further supported by the fact it involves an order by Judge Elliot who is the only one who can enforce that order or issue sanctions - but again - that order only pertains to the parties that engaged in the stipulation. I see a counter for First Amendment retaliation and violation of immunity and then removal to US District Court on federal question involving violation of rights.>Please let me know.. We are going to file a State Bar Complaint against this attorney for lying to FaceBook under penalty of perjury.> >Steve Sanson>President Veterans In Politics International>PO Box 28211>Las Vegas, NV 89126>[702 283 8088](tel:7022838088)>[www.veteransinpolitics.org](http://www.veteransinpolitics.org) > > >-----Original Message----->From: Facebook >To: vipipresident >Sent: Sun, Jan 22, 2017 10:32 pm>Subject: IP Counter Notification Form #[386426505041326](#)>Hi,>Thanks for contacting Facebook. In order to process your counter-notification, we need more information from you. Please provide us with:>- an explanation of why you believe the content should be restored. >We won't be able to process your counter-notification without this information. Please note that all information you provide may be sent to the original reporter.>Thanks,>Daryl>Intellectual Property Operations>>On Fri Jan 20, 2017 22:41:34, Steve Sanson wrote:>>Full Name : Steve Sanson>>Address : PO Box 28211>>Las Vegas, Nv 89126>>Telephone : [7022838088](tel:7022838088)>>Email : [vipipresident@cs.com](mailto:vipipresident@cs.com)>>>

1 **CERTIFICATE OF SERVICE**

2  
3 I am over the age of 18 and am not a party to the within action.

4 On the date indicated below, I caused to be served a true and correct copy of the document  
5 entitled **SPECIAL APPEARANCE -- OPPOSITION TO MOTION FOR OSC RE:**

6 **CONTEMPT** on the below listed recipients by E-mailing a copy of the document to the below  
7 persons at their indicated addresses. Such Email is in lieu of service by U.S. Postal Service.  
8

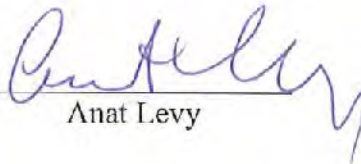
9 Jennifer Abrams, Esq.  
10 The Abrams & Mayo Law Firm  
6252 S. Rainbow Blvd., Ste. 100  
11 Las Vegas, NV 89118  
(702) 222-4021  
12 JVAGroup@theabramslawfirm.com  
13

Louis Schneider, Esq.  
Law Offices of Louis C. Schneider, LLC  
430 S. Seventh Street., Las Vegas, NV 89101  
(702) 435-2121  
[lcslaw@yahoo.com](mailto:lcslaw@yahoo.com)

14 Maggie McLetchie, Esq.  
McLetchie Shell  
15 702 E. Bridger Ave., Ste. 520  
16 Las Vegas, NV 89101  
(702) 728-5300  
17 Maggie@nvlitigation.com  
18

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 6th day of March, 2017, in Las Vegas, NV

22  
23   
24 Anat Levy  
25  
26  
27  
28

**OPPC**

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. WILLICK and WILLICK LAW )	Case No.: A-17-750171-C
GROUP, )	
Plaintiff, )	Department: XIX
vs. )	
STEVE W. SANSON; HEIDI J. HANUSA; )	Hearing date: March 14, 2017
CHRISTINA ORTIZ; JOHNNY SPICER; )	
DON WOOLBRIGHT; VETERANS IN )	Hearing time: 9:00 a.m.
POLITICS INTERNATIONAL, INC.; )	
SANSON CORPORATION; KAREN )	
STEELMON; and DOES I THROUGH X, )	
Defendant. )	

**OPPOSITION TO  
ANTI-SLAPP SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.650  
et. seq.;  
AND  
COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS**

**COME NOW** the Plaintiffs, MARSHAL S. WILLICK and WILLICK LAW GROUP, by and through their attorney of record, Jennifer V. Abrams, Esq., of The Abrams & Mayo Law Firm, and hereby submit their *Opposition* to Defendants STEVE W. SANSON and VETERANS IN POLITICS INTERNATIONAL, INC.'s *Anti-*

1 *SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and*  
2 *Countermotion for Attorney's Fees and Costs.*

3 This *Opposition and Countermotion* is made and based upon the attached  
4 Points and Authorities, the Affidavit attached hereto, all papers and pleadings on file  
5 herein, and any oral argument adduced at the hearing of this matter.

6 DATED Tuesday, March 07, 2017.

7 Respectfully submitted:

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Jennifer V. Abrams, Esq.

10 JENNIFER V. ABRAMS, ESQ.

11 Nevada State Bar Number: 7575

6252 South Rainbow Boulevard, Suite 100

12 Las Vegas, Nevada 89118

Phone: (702) 222-4021

Email: JVAGroup@theabramslawfirm.com

13 Attorney for Plaintiffs

14  
15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 **I. INTRODUCTION AND BACKGROUND**

17 Steve Sanson and Veterans In Politics International, Inc. ("the VIPI  
18 Defendants") operate an extortion racket. The racket appears to be controlled by  
19 Sanson and run through an organization purporting to be a 501(c)(3) "non-profit  
20 corporation"<sup>1</sup> which disseminates mass defamatory email blasts, maintains a website  
21 to house defamatory material, and re-publishes and posts defamatory material to  
22

23 <sup>1</sup> It appears that the VIPI and other Defendants engage in substantial violations of the laws  
24 pertaining to such entities by failing to submit all required filings (such as tax returns), failing to use a  
substantial portion of the funds for a specific public purpose, allowing a single member to exercise  
undue control, and violating the provisions of the Charitable Solicitation Act, amongst other  
violations.

1 numerous Facebook, Twitter, YouTube, Google Plus, and other social media  
2 accounts.

3 Despite their façade of “exposing corruption,” the real purpose of the bogus  
4 organization **is** corruption – **they make money by launching defamatory**  
5 **“smear campaigns.”** Such campaigns have been launched against judicial and  
6 political candidates and in this case, against private citizens. The VIPI defendants  
7 also solicit complaints from angry and often misguided persons without much, **if**  
8 **any**, inquiry as to the truth or accuracy of the allegations made. To be clear, the VIPI  
9 defendants do **not** strive to actually “expose corruption” as they falsely allege. For  
10 example, the undersigned was not able to find **any** postings or emails by the VIPI  
11 Defendants ‘exposing’ any **actual** corruption in the judiciary (e.g., former Judge  
12 Steven Jones), in the school district (e.g., Kevin Childs), or otherwise, likely because  
13 there was no money in it for them to do so.

14 And the VIPI Defendants **openly admit** that they engage in such activity - in  
15 at least three January 24, 2017 Facebook posts seeking contributions in violation of  
16 Nevada’s Charitable Solicitation Act, the VIPI Defendants admitted that “when  
17 people need[ ] someone to get dirty so they can stay nameless, we do it without  
18 hesitation.”<sup>2</sup>

19 The lawsuits of which they complain<sup>3</sup> resulted directly from such illicit  
20 activities by the VIPI Defendants. In or around September 2016, the VIPI  
21 Defendants were hired by Louis Schneider, Esq. to intimidate witnesses and a family  
22 court judge with threatened “smear campaigns” in an effort to alter the outcome of a  
23 pending sanctions motion filed against Schneider in a divorce case.

---

24 <sup>2</sup> See Exhibit 1.

<sup>3</sup> Abrams v. Schneider, et. al., and Willick v. Sanson, et. al.



1 In the underlying divorce case, Willick's fiancée, Jennifer Abrams, filed a  
2 sanctions motion against Schneider personally for his numerous and substantial  
3 violations of the Rules of Professional Conduct, amongst other things. Immediately  
4 after being served with the sanctions motion, Schneider wrote in an email: "If your  
5 firm does not withdraw that motion [referring to the sanctions motion filed against  
6 Schneider], I will oppose it and take additional action beyond the  
7 opposition." [Emphasis added].

8 Abrams did not withdraw the sanctions motion against Schneider.<sup>4</sup> As  
9 threatened, Schneider took "action beyond the opposition" by hiring<sup>5</sup> the VIPI and  
10 other Defendants to launch a series of false, misleading, and defamatory "smear  
11 campaigns" against Abrams. Those unlawful activities led to the filing of the *Abrams*  
12 *v. Schneider, et al.* lawsuit (Case Number A-17-749318-C).

13 Years earlier -- on **February 11, 2015**, Assembly Bill 140 was introduced.  
14 Marshal Willick testified against portions of the bill and Steve Sanson testified in  
15 favor of the bill. It was ultimately passed in a significantly altered form on or about  
16 **May 17, 2015** and **was signed by the Governor on or about May 25, 2015.**  
17 The legislative session ended days later.

18 Approximately **six months** later, Attorney Willick appeared on the VIPI  
19 radio show to discuss AB 140. The VIPI Defendants did not post any articles or  
20 material other than the interview itself which, very shortly thereafter, was no longer  
21  
22

---

23 <sup>4</sup> The outcome of that motion and the request for attorney fees has been briefed and is still  
pending decision of the Hon. Jennifer Elliott.

24 <sup>5</sup> In an internet radio interview with "NewsMax/Battlefield Nevada," Steve Sanson admitted  
receiving payment from Louis Schneider, and then claimed it was for "advertising."

1 accessible from their website.<sup>6</sup> For approximately eighteen months after the  
2 Governor signed AB 140 into law, there was nothing (other than the interview which  
3 was deleted) disseminated by the VIPI defendants on the issue. No further  
4 legislation or other issue was or is pending.

5 On December 25, 2016, ***over a year and a half after*** AB 140 had any  
6 significance to the public or was given any attention by the VIPI defendants, the VIPI  
7 defendants posted the “hypocrisy” article defaming Plaintiffs by calling Marshal  
8 Willick a “hypocrite” who “screw[s veterans] for profit and power.” “Coincidentally,”  
9 this defamatory material was disseminated shortly after the VIPI defendants were  
10 paid by Louis Schneider to disseminate “smear campaigns” against Willick’s fiancée,  
11 and almost immediately after the VIPI defendants learned of the relationship  
12 between Willick and Abrams. Those unlawful activities, and others, led to the filing  
13 of ***this*** lawsuit, *Willick v. Sanson, et al.*<sup>7</sup>

14 While the timing and focus of the “hypocrisy” article evidences the VIPI  
15 Defendants’ actual malice against Plaintiffs, the “sexually coercion” article and the  
16 VIPI Defendants’ comments regarding that article leave no doubt that the purpose of  
17 the publications were to unlawfully defame Plaintiffs. After the VIPI Defendants  
18 falsely alleged that Marshal Willick and his pal were “convicted of sexually (sic)  
19 coercion of a minor child” and falsely alleged that Marshal Willick was found “guilty”  
20  
21  
22

---

23 <sup>6</sup> Apparently this is because the “interview” contains a great deal of Sanson’s foul-mouthed  
screaming, which did not make the organization look good.

24 <sup>7</sup> Contrary to the assertions in the Motion, there have been many more than five defamatory  
statements made by the VIPI Defendants against Plaintiffs, including a one-hour radio show on  
February 25, 2017 dedicated to defaming Plaintiffs. To this day, the “smear campaign” continues.

1 of defaming a law student,<sup>8</sup> a comment was posted by Lee Pudemonhuchin Gilford,  
2 who wrote, in relevant part:

3 And this is how the defamation lawsuits begin. Nothing you shared  
4 indicates that Willick did anything but employ a nasty bastard. You  
5 have intentionally indicated that he was convicted.<sup>9</sup> I offer you a couple  
of choices to correct this, because as someone claiming to represent  
veterans, I would appreciate it at least done in a legal way.

6 A) provide evidence that Willick was convicted.

7 B) change your caption

8 C) take this crap to your personal page.

9 You stand before political figures in this state, indicating that you  
represent veterans (me) here in Las Vegas. You therefore have an  
obligation to take our representation responsibly. Getting in to pissing  
wars<sup>10</sup> and getting sued for libel does nothing but discredit the image of  
veterans, that some of us pride ourselves in maintaining

10 The VIPI defendants response was nothing short of extreme and outrageous.

11 The VIPI Defendants responded:

12 Look Lee you are a Marine correct.. Everything we put out is true.. If  
13 you don't believe that don't engage in our page. We been doing this for  
over a decade.. Maybe you should do your own reserach (sic) before  
you engage in another conversation with our group. Semper Fi<sup>11</sup>

14  
15 The blatantly false representation that "[e]verything we put out is true" and  
16 "[m]aybe you should do your own reserach (sic)," **implies that there is proof**  
17 **that Marshal Willick was convicted of sexual coercion of a minor child**  
18 **and implies that there is proof that Willick was found "guilty"** (implying  
19 criminal conduct) of defamation. These statements are not true, they are not  
20 substantially true, and they are not even remotely true. They are not "opinions," as  
21 they blatantly assert false facts. These knowingly false and malicious statements

---

22 <sup>8</sup> Somewhat ironically, the same posting by Defendants includes an opinion by a West Virginia  
judge that using the word "guilty" necessarily implies conviction of a crime and therefore is  
defamatory *per se*. Having posted that opinion, Defendants cannot claim to be ignorant of it.

23 <sup>9</sup> Mr. Gilford is describing "actual malice."

24 <sup>10</sup> Mr. Gilford is describing personal animus and the lack of any perceived "public interest."

<sup>11</sup> See Exhibit 2.

1 were not made within any legal proceedings and are therefore not privileged. These  
2 are blatantly false, malicious, and highly defamatory false statements of fact are **not**  
3 protected speech.<sup>12</sup> They are defamation *per se*. None of that is “hyperbole” – they  
4 are outright lies.<sup>13</sup>

5 And the VIPI Defendants admit that the posting was defamatory but seek  
6 cover for their actions by the posting of a “correction.” First, the “correction” is itself  
7 defamatory but worse, the VIPI Defendants re-posted the original admittedly  
8 defamatory article **after** the posting of the “correction” **and** each posting of the  
9 admittedly defamatory version of the article is still viewable online. In other words,  
10 the “correction” did not replace the admittedly defamatory posts – they remain  
11 visible independent of any “correction.”

12 As expressed in the old adage “my right to swing my fist ends where your nose  
13 begins,” the VIPI Defendants’ right to “free speech” ended when they published  
14 blatantly false, misleading, and defamatory material against the Plaintiffs in this  
15 action.<sup>14</sup>

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17  
18 <sup>12</sup> Similar malicious disregard for the truth by the VIPI Defendants is evident in the Abrams v.  
19 Schneider, et. al. matter wherein the VIPI Defendants falsely alleged, repeatedly, that Abrams’ client  
20 “lied about his finances.” This false statement of fact (amongst many others) were made by the VIPI  
21 Defendants repeatedly even though VIPI posted the video of Judge Elliott admitting that she was  
mistaken and that Abrams’ client was forthright in his financial disclosure and even though Judge  
Elliott sent an email to the VIPI Defendants directly notifying them that she was mistaken and that  
Abrams’ client correctly reported his income. The VIPI Defendants cannot claim that they didn’t  
receive Judge Elliott’s email as they responded to it yet, they continued to post the same false and  
defamatory factual allegation repeatedly.

22 <sup>13</sup> Contrary to the assertions made (at 15), the half-hearted “clarification” was not blasted out by  
multiple “paid placements” to the many tens of thousands of viewers that the original false claims  
were sent, making it a worthless exercise.

23 <sup>14</sup> The VIPI Defendants claim that Plaintiffs’ sent “take down notices” to YouTube and other  
24 social media websites in an effort to “stifle speech.” For example, it was the litigant in the underlying  
divorce case who requested removal of his private divorce proceedings from YouTube and Vimeo.  
Because those postings by the VIPI Defendants violated both YouTube and Vimeo’s policies, they were  
removed. The closing of the

## II. NEVADA’S ANTI-SLAPP STATUTES

“A SLAPP [strategic lawsuit against public participation] lawsuit is characterized as a meritless suit filed primarily to chill the defendant’s exercise of First Amendment Rights.”<sup>15</sup> The hallmark of a SLAPP lawsuit is that it is filed to obtain a financial advantage over one’s adversary by increasing litigation costs until the adversary’s case is weakened or abandoned.”<sup>16</sup> To protect citizens’ rights to make good faith communications in petitioning the government, the Legislature passed Nevada’s Anti-SLAPP statutes, following the California model.<sup>17</sup> The statutes protect “Good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern,” while leaving the door open for legitimate defamation claims. In other words, while Nevada’s Anti-SLAPP statute protects First Amendment freedom of speech; it does **not** protect defamatory speech.<sup>18</sup>

## III. SPECIAL MOTION TO DISMISS STANDARD

In Nevada, the district courts treat an Anti-SLAPP motion as a motion for summary judgment. The Nevada Supreme Court has set forth the requirements for summary judgment in Nevada:

Summary judgment is proper if the pleadings and all other evidence on file demonstrate that no genuine issue of material fact exists and the moving party is entitled to judgment as a matter of law. When deciding a summary judgment motion, all evidence and any reasonable inferences derived therefrom must be viewed in a light most favorable to the nonmoving party.

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<sup>15</sup> *John v. Douglas Cnty. Sch. Dist.*, 125 Nev. 746, 752, 219 P.3d 1276, 1280 (2009) (internal quotations omitted).

<sup>16</sup> *Id.* In this case, ironically, Plaintiffs are facing a flurry of motions from at least five teams of lawyers hired by the VIPI Defendants to increase costs and expenses to the maximum extent possible.

<sup>17</sup> NRS 41.635 et seq.

<sup>18</sup> *Id.*

1 General allegations and conclusory statements do not create genuine issues of  
fact.<sup>1920</sup>

2 In *Briggs v. Eden Council for Hope & Opportunity*,<sup>21</sup> the court held that to  
3 survive a challenge under the anti-SLAPP statute, a Plaintiff was only required to  
4 show **minimal merit** as to a claim, not to definitely prove it.<sup>22</sup>

5 The moving party seeking to dismiss a Plaintiff's complaint for defamation  
6 must establish "by a preponderance of the evidence, that the claim is based upon a  
7 good faith communication in furtherance of the right to petition or the right to free  
8 speech in direct connection with an issue of public concern."<sup>23</sup>

9 Each of those terms is defined as well. A "good faith communication" is a  
10 communication made to a governmental agency or made in direct connection with  
11 an "issue of public interest" in a place open to the public or in a public forum "which  
12 is truthful or is made without knowledge of its falsehood."<sup>24</sup>

13 If the moving party is successful in satisfying its burden, the burden then  
14 shifts to the Plaintiff to demonstrate "with prima facie evidence a probability of  
15 prevailing on the claim" in the underlying lawsuit.<sup>25</sup>

16 Recent Nevada case law has discussed "good faith communication" and "issue  
17 of public interest." In *Lawrence v. Krahne*, the issue revolved around "statements  
18

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19 <sup>19</sup> *Lawrence v. Krahne*, 2015 Nev. App. Unpub. LEXIS 452, \*1-2, 2015 WL 5545555 (Nev. Ct.  
App. Sept. 16, 2015) (citing *Wood v. Safeway, Inc.*, 121 Nev. 724, 729, 121 P.3d 1026, 1029 (2005))  
(internal quotations omitted).

20 <sup>20</sup> Notably, in *Panicaro v. Crowley*, the Court of Appeals of Nevada held that "Crowley's first  
21 amended complaint does not establish a genuine issue of material fact [...] because it utterly lacks  
specificity." Specifically addressing Crowley's defamation claim, the court stated "Crowley failed to  
point to any defamatory statements or even to whom they were directed.

22 <sup>21</sup> 19 Cal 4th 1106 (1999).

23 <sup>22</sup> *Id.* at 1122-23.

24 <sup>23</sup> NRS 41.660(3)(a).

25 <sup>24</sup> NRS 41.637.

<sup>25</sup> NRS 41.660(3)(b)

1 made by medical personnel to law enforcement officers.<sup>26</sup> The Court upheld the  
2 district court’s decision that “the respondents met their initial burden because their  
3 statements to the police were made in good faith and meant to procure governmental  
4 action ***in the form of an investigation*** of Lawrence’s threats.”<sup>27</sup>

5 In *Shapiro v. Welt*, the Supreme Court of Nevada adopted “guiding principles  
6 for what distinguishes a public interest from a private one”<sup>28</sup> from a California case,  
7 *Piping Rock Partners, Inc. v. Davis Lerner Assocs.*:

- 8
- 9 (1) “public interest” does not equate with mere curiosity;
  - 10 (2) a matter of public interest should be something of concern to a substantial  
11 number of people; a matter of concern to a speaker and a relatively small  
12 specific audience is not a matter of public interest;
  - 13 (3) there should be some degree of closeness between the challenged  
14 statements and the asserted public interest—the assertion of a broad and  
15 amorphous public interest is not sufficient;
  - 16 (4) the focus of the speaker’s conduct should be the public interest rather than  
17 a mere effort to gather ammunition for another round of private controversy;  
18 and
  - 19 (5) a person cannot turn otherwise private information into a matter of public  
20 interest simply by communicating it to a large number of people.

21 The *Shapiro* Court further stated that “If a court determines the issue is of public  
22 interest, it must next determine whether the communication was made in a place  
23 open to the public or in a public forum. Finally, no communication falls within the  
24 purview of NRS 41.660 unless it is truthful or is made without knowledge of its  
25 falsehood.”<sup>29</sup>

26 / / /

27 / / /

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28 <sup>26</sup> *Lawrence*, 2015 Nev. App. Unpub. LEXIS 452 at 3.

29 <sup>27</sup> *Id.* (emphasis added).

30 <sup>28</sup> *Shapiro v. Welt*, Nos. 67363, 67596, 2017 Nev. LEXIS 1, at \*9 (Feb. 2, 2017)

31 <sup>29</sup> *Id.* at 10. (quoting NRS 41.637(4), NRS 41.637, and NRS 41.660 internal quotations omitted).

1                   **DEFENDANTS FAIL TO MEET THEIR INITIAL BURDEN**

2                   Preliminarily, VIPI Defendants must not be allowed to confuse this Court.  
3                   The definition of “good faith” is provided in detail *supra* and can be found in NRS  
4                   41.637. The definition of “good faith” **is not** what the VIPI Defendants pretend it to  
5                   be -- whether their defamatory claims “were either true or substantially true and  
6                   therefore protected [...], or they constituted non-actionable opinion that is not  
7                   subject to a truthfulness evaluation [...], or they were privileged [or hyperlinked.]”<sup>30</sup>  
8                   VIPI Defendants are attempting to “create authority” which, even if the Court  
9                   entertained the effort, would still result in their *Motion* being denied and this case  
10                  moving forward to the trier of fact.

11                  VIPI Defendants confuse the very specific SLAPP standard with a Motion to  
12                  Dismiss pursuant to 12(b)(5). For multiple pages, VIPI Defendants go on at length  
13                  regarding “non-actionable opinions,”<sup>31</sup> “using hyperlinks to link to underlying source  
14                  materials,”<sup>32</sup> and asserting that statements made by Defendants were “true,  
15                  substantially true or constituted non-actionable opinion.”<sup>33</sup> Those sections of VIPI  
16                  Defendants’ *Motion* provide little help to this Court in the context of an anti-SLAPP  
17                  analysis.<sup>34</sup>

18                  The result of this anti-SLAPP motion **should** be simple. VIPI Defendants  
19                  have utterly failed to meet their initial burden of showing that their defamatory

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20                  <sup>30</sup> See *Motion* at 11, lines 4-7.

21                  <sup>31</sup> See *Motion* at 11.

22                  <sup>32</sup> See *Motion* at 12.

22                  <sup>33</sup> See *Motion* at 13.

23                  <sup>34</sup> The only bit of usefulness in the VIPI *Motion* is when, at the tail end of the analysis, the Court  
24                  decides whether the communication was made in a place open to the public or in a public forum and  
                    that communication is either truthful or is made without knowledge of its falsehood. There can be no  
                    legitimate question that the communications were made in a place open to the public and were  
                    knowingly false when made.



1 speech is “based upon a good faith communication in furtherance of the right to  
2 petition or the right to free speech in direct connection with an issue of public  
3 concern.” Moreover, even if they **could** meet that burden, the *Motion* would fail  
4 because their defamatory speech was untruthful and made with knowledge of its  
5 falsehood.

6 As detailed below, VIPI Defendants cannot show that their defamatory speech  
7 is an attempt to petition the government to act, **or** that their defamatory speech is  
8 **directly connected** with an issue of **public concern**.

9 **IV. THE DEFAMATORY SPEECH IS NOT AN ATTEMPT TO**  
10 **PETITION THE GOVERNMENT TO ACT**

11 VIPI Defendants fail to allege that their defamatory speech is an attempt to  
12 petition the government to act. This Court should note this fact and find that the  
13 VIPI Defendants have waived any such claim. Even if the Court does not make this  
14 finding, the VIPI Defendants cannot provide any proof that the defamatory speech  
15 ever petitioned any governmental agency to act in any way. The purpose was solely  
16 to malign and injure Plaintiffs.

17 **V. THE DEFAMATORY SPEECH HAS NOTHING TO DO WITH ANY**  
18 **“ISSUE OF PUBLIC CONCERN”**

19 The entire premise of the VIPI Defendants’ *Anti-SLAPP Motion to Dismiss*  
20 *Pursuant to NRS 41.650 et. seq.* boils down to the false premise that **anything and**  
21 **everything** Plaintiffs do is “a matter of public concern” because they practice law  
22 and thus are “public figures.” There are no facts in VIPI Defendants’ *Motion*, this  
23 case, or any controlling authority, which lend any credence to that false premise.

1       Actually, it is well established that in Nevada, being a private practice  
2 attorney, representing a client in a private case, is not a “public figure” in any way.<sup>35</sup>  
3 The Nevada Supreme Court has held that that professional accomplishments such as  
4 having an “accomplished career,” having a “national reputation” for skill and caring,  
5 going to a great school, having a prestigious fellowship, publishing numerous articles  
6 and abstracts, contributing to chapters in books and textbooks, belonging to  
7 specialized professional groups, and even being “the subject of newspaper articles”  
8 does **not** make a private practitioner a “limited-purpose public figure” for purposes  
9 of defamation law.<sup>36</sup>

10       At page 18 of the *Motion*, VIPI Defendants allege that the “December 25, 2016  
11 statement pertained to the 2015 interview that Willick gave to VIPI [...] about then-  
12 pending legislation.” VIPI Defendants are not only confused about what the  
13 defamatory speech is, they are also confused (again) of the SLAPP standard, and are  
14 temporally challenged -- nothing was “pending” at the end of 2016. Nothing had  
15 been “pending” for over eighteen months.

16       The defamatory post on December 25, 2016, is clearly specified in the  
17 *Complaint*.<sup>37</sup> The defamatory speech is: “This is the type of hypocrisy we have in our  
18 community. People that claim to be for veterans but yet they screw us for profit and  
19 power.” While “veteran’s issues” is a matter of public concern, the focus of this  
20 defamatory speech is Marshal Willick and Defendants’ concerted effort to harm his  
21 reputation.

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23       <sup>35</sup> See *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974).

24       <sup>36</sup> See *Bongiovi v. Sullivan*, 122 Nev. 556, 138 P.3d 433 (2006).

<sup>37</sup> See *Complaint* at 5, 9-21.

1       **No** reasonable person could read the above statement in the context provided  
2 in the *Complaint* – along with the other email-blasts and internet postings – and  
3 conclude that the speech is directed at “veteran’s issues.” VIPI Defendants efforts in  
4 disseminating this, and their many other email-blasts and internet postings are a  
5 “mere effort to gather ammunition for another round of private controversy.”<sup>38</sup> And  
6 the Nevada Supreme Court has made it crystal clear that such is **not** a legitimate  
7 “public interest.”

8       At page 19, the VIPI Defendants again mis-state what the defamatory  
9 language **is**: “The January 12, 2017 statement, about a federal judge in Virginia  
10 finding that Willick committed defamation per se against a law student who was  
11 opposing his client in a divorce case [...] likewise was of public concern.”

12       Respectfully, there is absolutely **no** authority that could allow this Court to  
13 find that a dispute between two **private** individuals in a decade-old private Virginia  
14 lawsuit is a matter of public concern, no matter how badly the VIPI Defendants wish  
15 to pretend that Plaintiff Willick was a public figure.<sup>39</sup>

16       VIPI Defendants persist in that misleading and confusing argument for every  
17 instance of defamatory speech clearly laid out in the *Complaint*. This Court should  
18 note their attempts to confuse and the false premise under which the pending  
19

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20       <sup>38</sup> *Shapiro*, Nos. 67363, 67596, 2017 Nev. LEXIS 1, at \*9. Many of Defendants’ postings  
21 included a promised \$10,000 “bounty” for anyone who could come up with additional defamatory  
22 material to be used against Willick; **nothing** in the case law would excuse such a blatant call for  
23 defamatory material.

24       <sup>39</sup> While it is a distraction, the Court could note that the factual assertions in the motion are  
largely false – Defendants allege repeatedly (e.g., at 3, 9, and 19) that Willick “lost” the *Holyoak*  
appeal – actually, the other side was the appellant, because Willick won the case at the trial court  
level, and the other side lost the appeal as well. It should also be noted that the VIPI Defendants don’t  
appear to disseminate information about the outcome of other attorneys’ cases or even other cases  
dealing with PERS, such as the recent Nevada Supreme Court Decision in *Henson v. Henson*. The  
VIPI Defendants specifically targeted Plaintiffs for any defamatory allegations they could concoct.

1 *Motion* was brought, and deny this frivolous and vexatious *Motion* for VIPI  
2 Defendants' failure to satisfy their initial burden under NRS 41.660(3)(a).

3 **VI. PLAINTIFFS MAKE A *PRIMA FACIE* SHOWING OF A**  
4 **PROBABILITY OF PREVAILING ON THEIR CLAIMS**

5 This issue need not even be ***reached*** -- Defendants did not and cannot meet  
6 their burden on the first prong of the test so the analysis would not proceed to the  
7 second prong where Plaintiffs have any burden to present evidence. However,  
8 assuming *arguendo* that the Defendants ***had*** met their burden, there can be no  
9 serious question that Plaintiffs have shown "with prima facie evidence a probability  
10 of prevailing on the claim."

11 **a. DEFAMATION**

12 The Nevada Supreme Court has been pretty clear:

13 a statement is not defamatory if it is an exaggeration or generalization that  
14 could be interpreted by a reasonable person as "mere rhetorical hyperbole."  
15 Nor is a statement defamatory if it is absolutely true, or substantially true. **A**  
16 ***statement is, however, defamatory if it "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."***

17 In determining whether a statement is actionable for the purposes of a  
18 defamation suit, the court must ask "whether a reasonable person would be  
likely to understand the remark as an expression of the source's opinion or as  
a statement of existing fact."<sup>40</sup>

19 VIPI Defendants' false claims that Willick has committed crimes against  
20 children, has been found "guilty" of anything, or is "unethical," cannot pass the  
21 "straight face test" under that standard. Even if it could, the Nevada Supreme Court  
22 has specified that "[w]hether a statement is defamatory is generally a question of  
23  
24

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<sup>40</sup> *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 715, 57 P.3d 82, 88 (2002).

1 law; however, where a statement is susceptible of different constructions, one of  
2 which is defamatory, resolution of the ambiguity is a question of fact for the jury.”

3 VIPI Defendants are attempting to prevent Plaintiffs from presenting this case  
4 to a finder of fact, because they know they cannot survive an examination of their  
5 behavior. As Judge Abbi Silver explained, dissenting in *Panicaro v. Crowley*: “The  
6 purpose of the [anti-SLAPP] statute is to deter frivolous lawsuits, not to prevent one  
7 party from presenting their case to a jury.

8 Next, VIPI Defendants make the absurd claim that merely because “each of  
9 the statements at issue contained hyperlinks to source materials, whether to the  
10 **VIPI radio show, Court Orders, newspaper articles or other documents**”  
11 this somehow “undermines a defamation claim.”<sup>41</sup> Stated differently, VIPI  
12 Defendants’ position is that they can post and disseminate **anything** about  
13 **anyone** so long as there is a hyperlink to **their own radio show**. As the Nevada  
14 Supreme Court expressed it, the assertion “must be rejected on the ground of  
15 inherent absurdity.”<sup>42</sup>

16 VIPI Defendants next false premise is that they are either “news media” or  
17 “reporting newsworthy events in judicial proceedings.” They are, and are doing,  
18 neither – they are running an extortion ring.

19 **None** of the Defendants in this matter are “news media.” The Nevada  
20 Supreme Court has defined “news media”:

21 The news media acts as an agent of the people to inform the public what  
22 transpires in the courtroom and to ensure the fairness of the proceedings. In  
23 exchange for this absolute privilege, comes the requirement and responsibility

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24 <sup>41</sup> See *Motion* at 23.

<sup>42</sup> *Mosley v. Figliuzzi*, 113 Nev. 51, 930 P.2d 1110 (1997).

1 that the report be **fair, accurate, and impartial**. Opinions must be left to  
2 the editorial pages or editorial segments of television broadcasts.<sup>43</sup>

3 The Defendants in this matter, through their words and actions, have demonstrated  
4 that they have zero interest in being, or appearing, “fair,” “accurate,” **or** “impartial.”

5 Instead, the Defendants in this matter have engaged in a very deliberate,  
6 malicious, ongoing campaign to defame the Plaintiffs to many thousands of people  
7 and intentionally injure their personal and business interests to the maximum extent  
8 possible using copyrighted material and conspiring with others to do so for the illicit  
9 purpose of corrupting ongoing court proceedings. To label these individuals as  
10 “news media” and provide them with immunity would be an act of Orwellian  
11 doublespeak.

12 **Nothing** that the Defendants have done could rationally be described as  
13 “reporting.” As detailed in the *Complaint* and this *Opposition*, Defendants are  
14 attacking Plaintiffs because they were paid to do so and they are attempting to extort  
15 and injure Willick’s fiancée.

16 Operation of a defamation campaign in service of an extortion ring gets no  
17 cover from the expression by the court in *Sahara, supra*, that “[a] **fair and**  
18 **impartial** account of the proceedings in a court of justice is, as a general rule, a  
19 justifiable publication.”<sup>44</sup> The Defendants in this matter did not make a “justifiable  
20 publication.”

21 The Defendants in this matter are not fair or impartial “reporters” of **any**  
22 kind; there simply is no excuse for the deliberately false months-long republication  
23 of the defamatory “Attorney Marshall [sic] and his pal convicted of sexually [sic]

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24 <sup>43</sup> *Sahara Gaming Corp. v. Culinary Workers Union Local 226*, 115 Nev. 212, 215, 984 P.2d  
164, 166 (1999).

<sup>44</sup> *Id.* at 215, quoting *Thompson v. Powning*, 15 Nev. 195, 203 (1880).

1 coercion [sic] of a minor.” This is a portion of the “headline” from the “Virginia  
2 post.” This Court cannot find that the Defendants *fairly and impartially*  
3 reported the proceedings of a court of justice.<sup>45</sup>

4 Defendants’ reference (at 5) to the *Beery* case is notable, primarily because  
5 that case, about two years ago, involving “friends” of Sanson, ended precisely as this  
6 case should end – in the public posting of a formal retraction and apology at all  
7 places where the defamatory material had been posted, including a promise to never  
8 again post such defamatory material.<sup>46</sup>

9 **b. EMOTIONAL DISTRESS, FALSE LIGHT, BUSINESS**  
10 **DISPARAGEMENT AND CONSPIRACY**

11 VIPI Defendants assert that “since the speech at issue is protected, each of  
12 these causes of action [emotional distress, false light, business disparagement, and  
13 conspiracy] must necessarily fail.” They are wrong. Contrary to what VIPI  
14 Defendants wish to be true, their defamatory speech is **not** protected, **is** actionable,  
15 and the Plaintiffs have easily met their burden of showing a *prima facie* case of  
16 defamation.

17 VIPI Defendants rely on *Maduiké v. Agency Rent-A-Car* in support of their  
18 assertion that “the complaint alleges no facts to support a claim of emotional  
19 distress.” *Maduiké* involved a family who was injured in a rental car crash  
20 subsequent to the rental car company refusing to change out an allegedly defective

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21  
22 <sup>45</sup> This false premise that the Defendants are “news media” or “reporting judicial proceedings”  
so blatantly ignores controlling authority, that *sua sponte* imposition of NRCP 11 sanctions would be  
23 appropriate.

24 <sup>46</sup> It is a minor point, but the claim that that there was a “non-monetary settlement” is not  
entirely accurate – some defendants in that action have multi-million dollar judgments entered  
against them; the ring-leaders of that defamation scheme were impecunious, so the public retraction  
and apology was the only significant recompense to be obtained.

1 vehicle. The facts of *Maduik* are a world away from those present here. At trial, the  
2 Maduikes presented evidence that:

3 1) Agency rented to the Maduik a three-year-old car with over 53,000 miles  
4 of service and only \$349.00 in repairs expended; 2) Agency rented the car to  
5 them without inspecting its safety equipment after a rental of over a month to  
6 another customer; 3) Agency rented the car to them despite a “readily  
7 apparent” brake or tire problem; 4) after the Maduik had been directed to  
8 return to Las Vegas and after the brakes had failed, causing the rear-end  
9 accident, Agency refused to take any measures to repair or prevent further  
10 driving of the car. Peter Maduik testified that the Las Vegas Agency  
11 employee who refused to replace the rental car stated, “There is nothing I can  
12 do, man. There is nothing I can do, man.” According to testimony, the  
13 employee then ignored Peter.

14 Here, the actions and conduct of the Defendants in this matter go far beyond rental  
15 of an inadequately inspected vehicle or an employee making an arguably rude  
16 statement. We have provided evidence of a very deliberate, malicious, ongoing  
17 campaign to defame the Plaintiffs to many thousands of people and to injure their  
18 personal and business interests to the maximum extent possible using copyrighted  
19 material and conspiring with others to do so for the illicit purpose of corrupting  
20 ongoing court proceedings, all of which is laid out in detail in the *Complaint*.

21 In *Branda v. Sanford* the Nevada Supreme Court opined that severe  
22 emotional distress could manifest as “hysterical and nervous . . . nightmares, great  
23 nervousness and bodily illness and injury.”<sup>47</sup> Notably, the *Branda* Court held that:

24 ***marginally adequate notice*** was given respondent of the basis of the  
claim for relief. A cause of action for intentional infliction of emotional  
distress was pled and prima facie proof ***given at trial. The jury was***  
***entitled to determine***, considering prevailing circumstances,  
contemporary attitudes and Cheryl’s own susceptibility, whether the conduct  
in question constituted extreme outrage.

Could a judge or jury ultimately find after trial that the actions of Defendants here  
have not been “outrageous enough” or that the impact on Plaintiffs was not “bad

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<sup>47</sup> *Branda v. Sanford*, 97 Nev. 643, 648, 637 P.2d 1223, 1227 (1981).



1 enough”? Sure – but that evidence has not yet been developed in discovery or  
2 presented at trial, and the discussion of what some jury might find based on evidence  
3 that has not even been discovered or presented is, at best, speculative.

4 The Plaintiffs in this matter have pled and demonstrated a *prima facie*  
5 showing of the probability of prevailing on all the claims which the VIPI Defendants  
6 allege “must fail.” This Court should deny the anti-SLAPP motion accordingly.

### 7 **c. RICO**

8 In Nevada, “for a plaintiff to recover under Nevada RICO, three conditions  
9 must be met: (1) the plaintiff’s injury must flow from the defendant’s violation of a  
10 predicate Nevada RICO act; (2) the injury must be proximately caused by the  
11 defendant’s violation of the predicate act; and (3) the plaintiff must not have  
12 participated in the commission of the predicate act.”

13 Here, VIPI Defendants admit that Plaintiffs have pled at least one crime  
14 under the RICO umbrella. This alone should be substantial evidence for a *prima*  
15 *facie* showing that the Plaintiffs will prevail on their claims.

## 16 **VII. COUNTERMOTION FOR ATTORNEY’S FEES AND COSTS**

17 VIPI Defendants’ *Motion* is both frivolous **and** vexatious. This anti-SLAPP  
18 *Motion* is merely a tactic being used by all the Defendants in this matter to  
19 overburden this Court’s limited resources, hinder and prevent discovery – and thus  
20 this case – from progressing, and increase the costs of litigation.<sup>48</sup>

21 Pursuant to NRS 41.670(2):

22 If the court denies a special motion to dismiss filed pursuant to NRS 41.660  
23 and finds that the motion was **frivolous or vexatious**, the court **shall**  
24 award to the prevailing party reasonable costs and attorney’s fees incurred in  
responding to the motion.” (emphasis added).

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<sup>48</sup> See NRS 18.010.

1 Moreover, NRS 41.670(3)(a)-(b) provides:

2 In addition to reasonable costs and attorney's fees awarded pursuant to  
3 subsection 2, the court may award:

4 (a) An amount of up to \$10,000; and

(b) Any such additional relief as the court deems proper to punish and  
5 deter the filing of frivolous or vexatious motions.

6 Here, this Court should make a finding that VIPI Defendants' *Motion* is frivolous and  
7 vexatious. Furthermore, and in light of the number of Defendants in this action, the  
8 multiple announcements from the remaining Defendants of intent to file and  
9 continue filing anti-SLAPP motions, this Court should award an additional \$10,000  
10 in attorney's fees and any further amount the Court "deems proper to ***punish and***  
11 ***deter*** the filing of frivolous or vexatious motions."

## 12 VIII. CONCLUSION

13 Based upon the foregoing, Plaintiffs respectfully request this Honorable  
14 Court deny Defendants STEVE W. SANSON and VETERANS IN POLITICS  
15 INTERNATIONAL, INC.'s motion in its entirety, and grant Plaintiffs'  
16 counter-motion for an award of attorney's fees and costs.

17 DATED Tuesday, March 07, 2017.

18 Respectfully submitted:

19 THE ABRAMS & MAYO LAW FIRM

20 /s/ Jennifer V. Abrams, Esq.

JENNIFER V. ABRAMS, ESQ.

21 Nevada State Bar Number: 7575

22 6252 South Rainbow Boulevard, Suite 100

Las Vegas, Nevada 89118

23 Phone: (702) 222-4021

Email: JVAGroup@theabramslawfirm.com

24 Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney’s Fees and Costs* was filed electronically with the Eighth Judicial District Court in the above-entitled matter on Tuesday, March 07, 2017. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Anat Levy, Esq.  
Alex Ghoubadi, Esq.  
Attorneys for Defendants

/s/ David J. Schoen, IV, ACP  
An Employee of The Abrams & Mayo Law Firm

**Details of filing:** *Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Counter-motion for Attorney's Fees and Costs*

**Filed in Case Number:** A-17-750171-C

**E-File ID:** 9155969

**Lead File Size:** 162620 bytes

**Date Filed:** 2017-03-07 23:59:02.0

**Case Title:** A-17-750171-C

**Case Name:** Marshal Willick, Plaintiff(s) vs. Steve Sanson, Defendant(s)

**Filing Title:** Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Counter-motion for Attorney's Fees and Costs

**Filing Type:** EFS

**Filer's Name:** Jennifer V. Abrams

**Filer's Email:** sworpell@theabramslawfirm.com

**Account Name:** Jennifer V. Abrams

**Filing Code:** OPPC

**Amount:** \$ 3.50

**Court Fee:** \$ 0.00

**Card Fee:** \$ 0.00

**Payment:** Filing still processing. Payment not yet captured.

**Comments:**

**Courtesy Copies:**

**Firm Name:** The Abrams Law Firm, LLC

**Your File Number:**

**Status:** Pending - (P)

**Date Accepted:**

**Review Comments:**

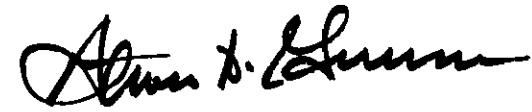
**Reviewer:**

**File Stamped Copy:**

**Documents:** Cover Document:  
Lead Document: OPP Anti-SLAPP - Willick.pdf 162620 bytes

**Data Reference ID:**

**Credit Card System Response:** AT0CF5E72EA5  
**Response:** Reference:



CLERK OF THE COURT

**EXH**  
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. WILLICK and WILLICK LAW )	Case No.: A-17-750171-C
GROUP, )	
Plaintiff, )	Department: XVIII
vs. )	
STEVE W. SANSON; HEIDI J. HANUSA; )	Hearing date: March 14, 2017
CHRISTINA ORTIZ; JOHNNY SPICER; )	
DON WOOLBRIGHT; VETERANS IN )	Hearing time: 9:00 a.m.
POLITICS INTERNATIONAL, INC.; )	
SANSON CORPORATION; KAREN )	
STEELMON; and DOES I THROUGH X, )	
Defendant. )	

**EXHIBITS TO OPPOSITION TO  
ANTI-SLAPP SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.650  
et. seq.;  
AND  
COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS**

**COME NOW** the Plaintiffs, MARSHAL S. WILLICK and WILLICK LAW GROUP, by and through their attorney of record, Jennifer V. Abrams, Esq., of The Abrams & Mayo Law Firm, and hereby files the following exhibits to their *Opposition* to Defendants STEVE W. SANSON and VETERANS IN POLITICS

1 INTERNATIONAL, INC.'s *Anti-SLAPP Special Motion to Dismiss Pursuant to NRS*  
2 *41.650 et. seq.; and Countermotion for Attorney's Fees and Costs:*

3 EXHIBIT 1: Veterans In Politics International email message for the  
4 February 4, 2017 radio show and the "A-Team" quote on page 5;  
5 Screenshot of Facebook post from "Steve Sanson," dated  
6 January 24, 2017 at 1:00 p.m.; Screenshot of Facebook post  
7 from "Steve Sanson," dated January 24, 2017 at 1:17 p.m.;  
8 Screenshot of Facebook post from "Steve W. Sanson," dated  
9 January 24, 2017 at 1:19 p.m.

10 EXHIBIT 2: Screenshot of Veterans In Politics International Facebook post,  
11 dated January 13, 2017 at 12:00 a.m.

12 EXHIBIT 3: Screenshots of various Facebook pages controlled by the VIPI  
13 defendants showing the original defamatory article re-posted  
14 after the "correction" article.

15 DATED Wednesday, March 08, 2017.

16 Respectfully submitted:

17 THE ABRAMS & MAYO LAW FIRM

18 /s/ Jennifer V. Abrams, Esq.

19 JENNIFER V. ABRAMS, ESQ.

20 Nevada State Bar Number: 7575

6252 South Rainbow Boulevard, Suite 100

21 Las Vegas, Nevada 89118

Phone: (702) 222-4021

Email: JVAGroup@theabramslawfirm.com

22 Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Exhibits to Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney’s Fees and Costs* was filed electronically with the Eighth Judicial District Court in the above-entitled matter on Wednesday, March 08, 2017. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Anat Levy, Esq.  
Alex Ghoubadi, Esq.  
Attorneys for Defendants

/s/ David J. Schoen, IV, ACP  
An Employee of The Abrams & Mayo Law Firm



EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

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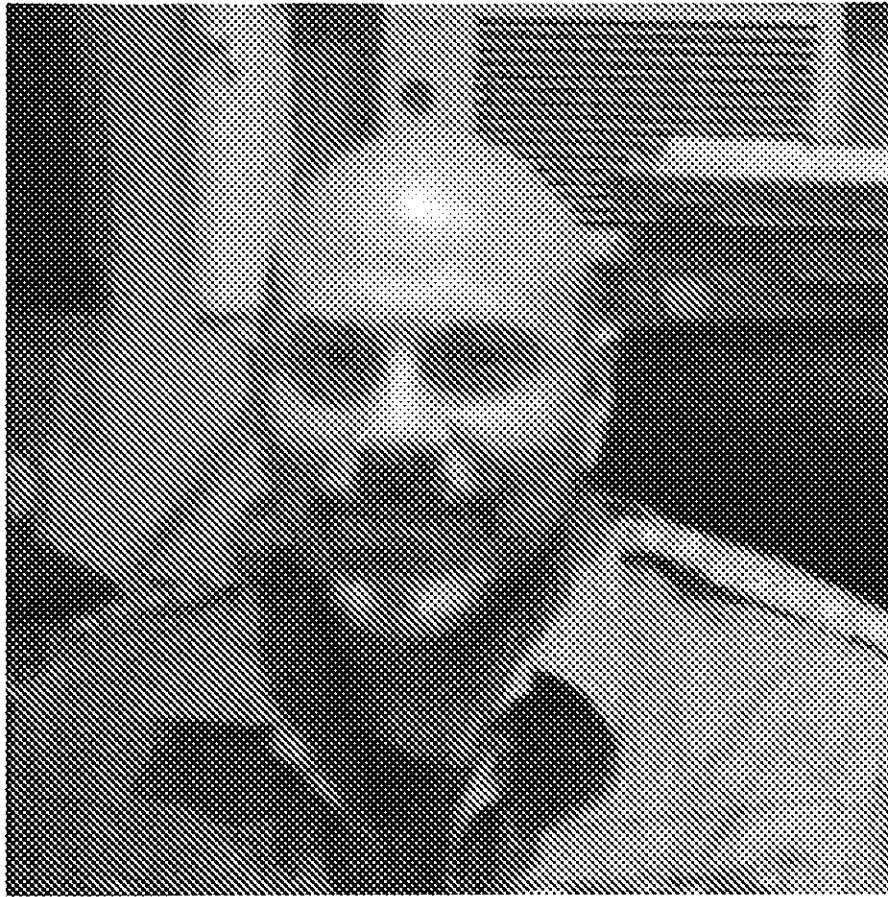
# Charles McChesney & Victoria Adams to appear on the Veterans In Politics video-talk show

Former Bail Agent & Spiritual Healer

FIND OUT MORE



**"Veterans In Politics Talk Show" (McChesney & Adams)**  
**Call Into the show 702 685 8380**



Charles McChesney former bail enforcer discussing how the Federal Bureau of Investigations over reach when deciding who to target

[Read More about Charles McChesney](#)



**Victoria Adams a Spiritual Healer**

[Read More about Victoria Adams](#)

LAS VEGAS, NEVADA- - Veterans In Politics video Talk Show proudly announces that **Charles McChesney** former bail enforcer discussing how the Federal Bureau of Investigations over reach when deciding who to target and **Victoria Adams** a Spiritual Healer to appear on the "Veterans In Politics" internet video-talk-show as a special guest on **Saturday - February 4, 2017 from 2-3pm PT**. Listen and watch LIVE on Veterans In Politics Talk show now on World Wide Digital Broadcasting Corp.

For more than a decade the non-partisan "Veterans In Politics Talk-Show" (VIP Talk-Show) has informed listeners about national veteran and political issues.

Past guests include active duty and veterans from all branches, authors, business owners, organization heads and political candidates and incumbents representing all parties from federal, state and local government branches.

The listening audience spans nationally and reaches a demographic of every gender, age and socioeconomic background. The VIP Talk-Show has become a trusted source of information and excerpts from past episodes have been quoted and published in reports of media and investigations of government agencies. Achievements include awards and special recognition's from countless non-profit organizations, Mayors and City Councils plus schools.

Listen to hosts **Steve Sanson, Jim Jonas and co-host Steven Sonnenburg** plus special guests co-hosts live during the VIP Talk-Show on every Saturday from 1400-1500 (2:00pm-3:00pm PT) on World Wide Digital Broadcasting Corp.

[Learn More](#)

**WWII Veteran Irene Miller's Funeral**



Attention...bikers, Veterans and fellow patriots!!! Our beloved Irene Miller's last wish was to have a Veterans Funeral and Memorial with "100's of motorcycles"!!

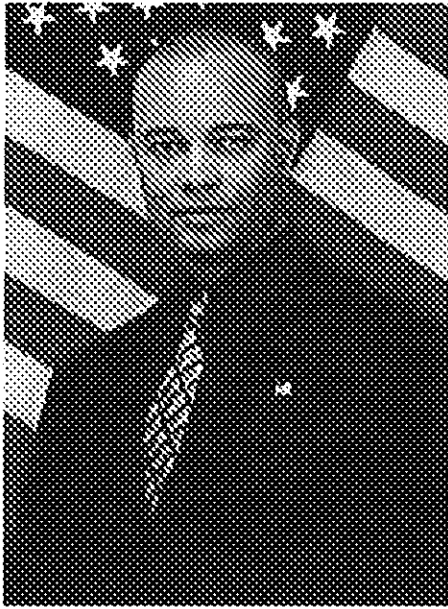
Her ceremony will be Tues Jan 31st at 1400 at the Veterans Cemetery in Boulder City. Anyone... (Especially bikers) wanting to help fulfill her wish need to be at Railroad pass casino no later than 1300 on Tues the 31st. don't be late...I repeat Do Not Be Late!!! Plan accordingly. The Marine Riders will road guard as we escort our fallen Hero and WWII Vet to her final resting place. A celebration of her wonderful life will be held immediately after at

The Leatherneck Club, 4360 Spring Mt rd. It will be taco Tues...Taco bar will be free but donations will be appreciated. Let's give this beautiful American and Patriot the sendoff she deserves!!!

All are welcome to ride...When asked why she volunteered for WWII being a female her simple reply was..."because I'm an American". Please share and let's make this a day for all to remember and set an example of how we need to Honor our Veterans. Respectfully, Pirate Mike

[Learn More](#)

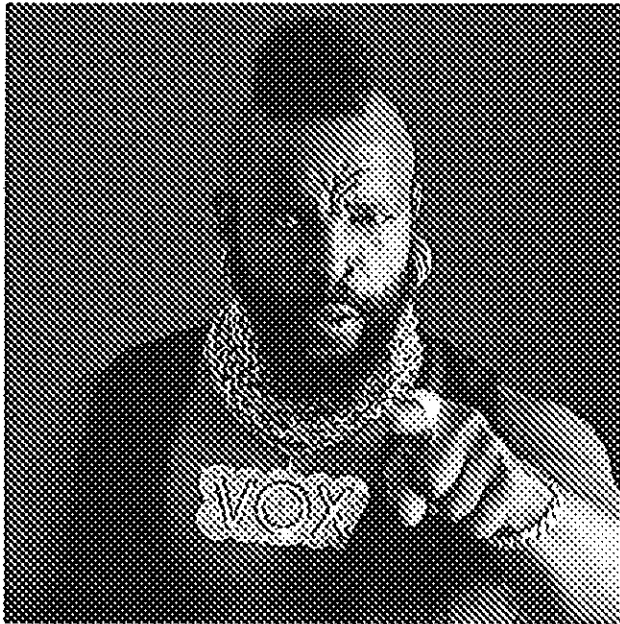
**He Defended Us, Let's Defend Him!**



[Click Here for more information](#)

## Opinion Corner:

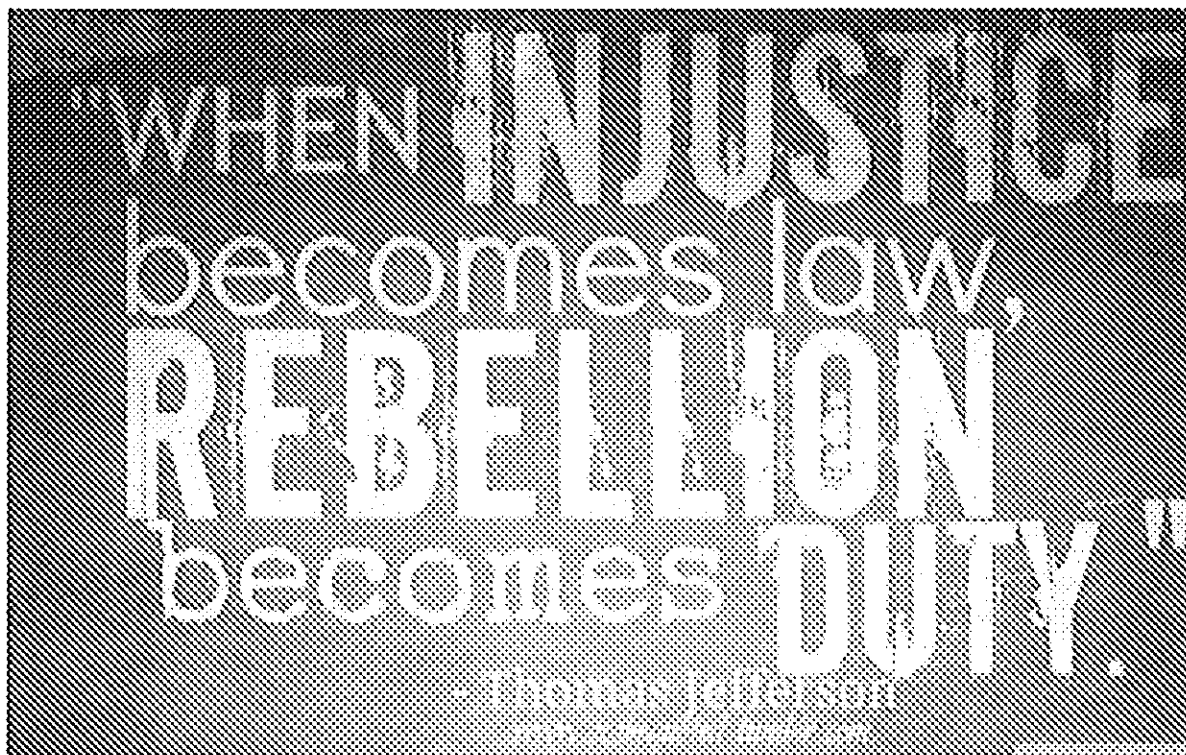
A quote from Mr. T from the A-Team; "When I was hungry nobody invited me over for dinner. Now, that I can afford to buy my own restaurant everybody wants to invite me over for dinner".



So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation.

Where are those people now when we need some assistance?





There needs to be an Over-site Committee that can help place the Family Court System into compliance with the law. There are too many personal bias, discretionary rulings and favoritism amongst attorneys and judges with this judicial branch.

A system that was created to help families stay together has been designed to tear them apart and has created tremendous financial burden on the shoulders of struggling citizens that are stuck in a very emotional time of their lives.

[Learn More](#)

[Listen & Watch the Interview of Last Week's Show:](#)

[LIVE every Saturday from 2-3PM Pacific Time.](#)

Veterans In Politics video Talk Show proudly announces that **Mark Amodei** US Congressman Representing District 2 and **Debra March** Henderson City Councilwoman/Candidate for Henderson City Mayor



Please contribute to Veterans In Politics in an effort in helping us to continue our mission by Exposing Corruption, Champion Veterans Rights, and Educating the public on candidates running for elected



office: go to [www.veteransinpolitics.org](http://www.veteransinpolitics.org) and click onto our PayPal Page or at our PO Box 28211/ Las Vegas, NV. 89126...

*\*If you would like to be a guest on our show please contact: email*

*[veteransinpol@aol.com](mailto:veteransinpol@aol.com) or if you would like to place a commercial on anyone of our shows please dial 702 283 8088.*

*\*If you would like to visit any of our archived interviews go to our YouTube Channel.*

**Click here for our YouTube Channel or**

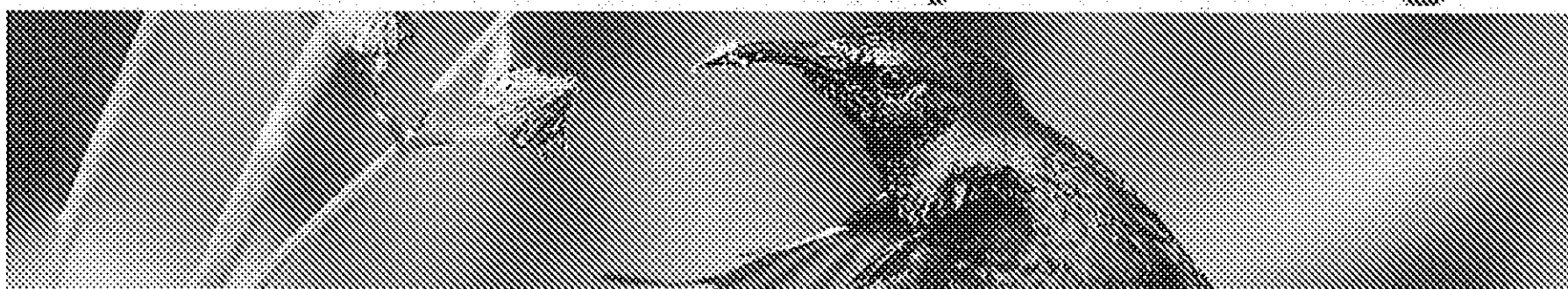
**<https://www.youtube.com/channel/UC1vBzrcEJOui3Cp5Bz-ft6Q>**

**and Click here for archived shows on Word Wide Digital Broadcasting Corp**

*\*If you would like to see who is coming on our show next go to our radio webpage. <http://www.wwdbtv.com/veterans-in-politics.html>*

**Click here for recent archived shows**

## **Faith Ind and Family Counseling**



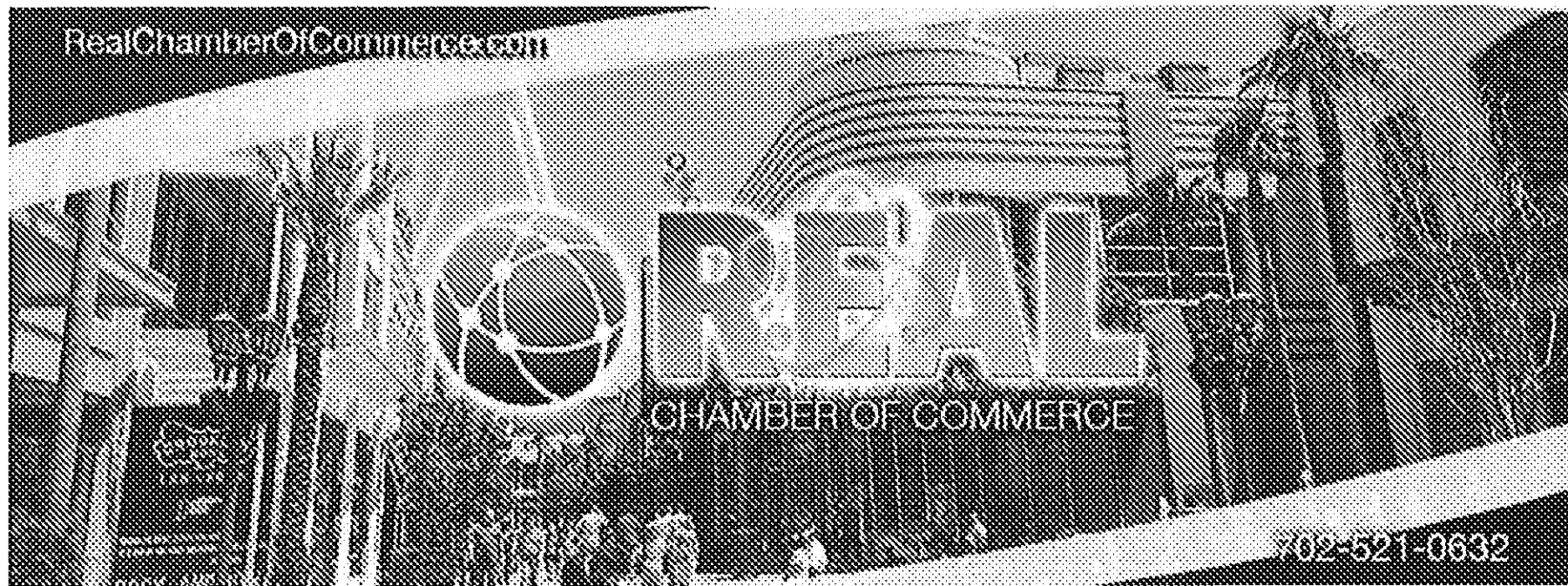
**Heidi Hanusa**

Nevada License MA, LMFT

At Lakeside Business Suites:  
2620 Regatta Drive Suite 102  
Las Vegas, NV 89128  
702 553-2386 (office)  
702 370-4244 (cell)

License Marriage & Family Therapist By appointment only

email: [HeidiHanusa@aol.com](mailto:HeidiHanusa@aol.com) • [www.faithindandfamilycounseling.com](http://www.faithindandfamilycounseling.com)



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Veterans In Politics International Inc.

702-283-8088

[devildog1285@cs.com](mailto:devildog1285@cs.com)

[www.veteransinpolitics.org](http://www.veteransinpolitics.org)

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Click the "Like" button.

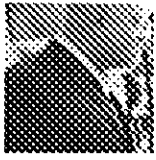


Steve Sanson

A quote from Mr. T from the A-Team; "When I was hungry nobody invited me over for dinner. Now, that I can afford to buy my own restaurant everybody wants to invite me over for dinner". So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation. Where are those people now when we need some assistance?

1/24/2017 1:00 PM (UTC -08:00)

0 comments.



Steve Sanson

A quote from Mr. T from the A-Team, "When I was hungry nobody invited me over for dinner. Now, that I can afford to buy my own restaurant everybody wants to invite me over for dinner". So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation. Where are those people now when we need some assistance?

1/24/2017 1:17 PM (UTC -08:00)

2 comments.



Steve W. Sanson

A quote from Mr. T from the A-Team: "When I was hungry nobody invited me over for dinner. Now, that I can afford to buy my own restaurant everybody wants to invite me over for dinner".

So the same goes here when people needed someone to get dirty so they can stay nameless, we do it without hesitation. Where are those people now when we need some assistance?

1/24/2017 1:19 PM (UTC -08:00)

0 likes


0 comments.

EXHIBIT 2

EXHIBIT 2

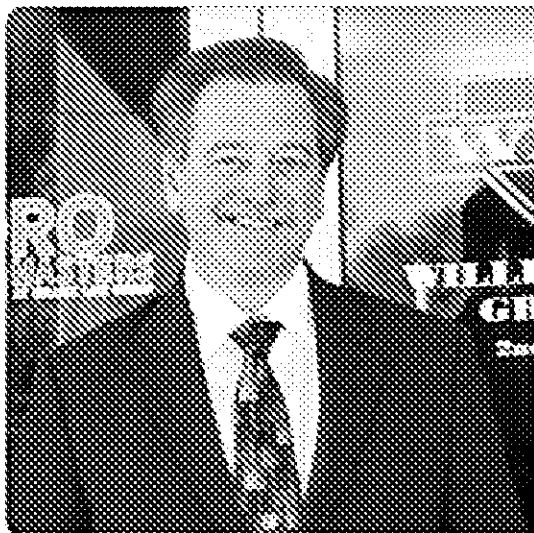
EXHIBIT 2



**Veterans In Politics International**January 13 at 12:00am · 

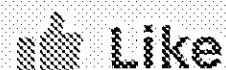
Attorney Marshall Willick and his pal convicted of sexually coercion of a minor Richard Crane was found guilty of defaming a law student in a United States District Court Western District of Virginia signed by US District Judge Norman K. Moon

<http://veteransinpolitics.org/2017/01/attorney-marshall-willick-pal-convicted-sexually-coercion-minor-richard-crane-found-guilty-defaming-law-student-united-states-district-court-western-district-virginia/>

**Attorney Marshall Willick and his pal convicted of sexually...**[veteransinpolitics.org](http://veteransinpolitics.org)[Learn More](#)

19

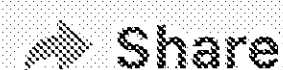
10 Comments 3 Shares




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**Veterans In Politics International**January 12 at 12:45am · 

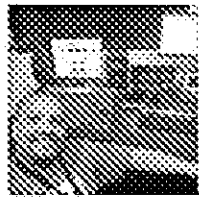
Lawsuit accuses Las Vegas lawyer, veterans group leader of defamation

<http://www.newsmaxtv.vegas/interview-with-steve-sanson/>



**19 people** reacted to this.

Done

**Lee Pudemonhuchin Gilford**

And this is how the defamation lawsuits begin. Nothing you shared indicates that Willick did anything but employ a nasty bastard.

You have intentionally indicated that he was convicted. I offer you a couple of choices to correct this, because as someone claiming to represent veterans, I would appreciate it at least being done in a legal way.

A) provide evidence that Willick was convicted.

B) change your caption

C) take this crap to your personal page.

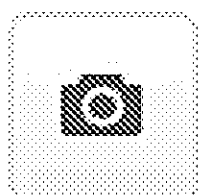
You stand before political figures in this state, indicating that you represent veterans (me) here in Las Vegas. You therefore have an obligation to take our representation responsibly. Getting in to pissing wars and getting sued for libel does nothing but discredit the image of veterans, that some of us pride ourselves in maintaining

Like · Reply · More · Jan 13

**Veterans In Politics International**

Look Lee you are a Marine correct.. Everything we put out is... More

Lee Pudemo... replied · See all 9 replies



Write a comment...

Post



19 people reacted to this.

Done

You can't just make stuff up about people and post it; knowing it's wrong. That's the epitome of libel. So I'm asking you not to engage in criminal activities if you're publicly representing veterans. There are plenty of other ways to measure Johnsons

Like · Reply · More · Jan 13



**Veterans In Politics International**

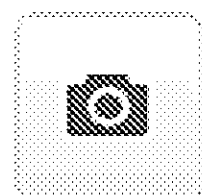
Look Lee you are a Marine correct.. Everything we put out is true.. If you don't believe that don't engage in our page. We been doing this for over a decade.. Maybe you should do your own reserach before you engage in another conversation with our group. Semper Fi

Like · Reply · More · Jan 13



**Lee Pudemonhuchin Gilford**

That's not how this works. That's not how any of this works. You are the media outlet of a state organization representing veterans. You are breaking the law. Speeding to work every day and not getting caught, doesn't suddenly make it legal. Similarly, you saying something is true. when the evidence vou present is



Write a comment...

Post

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

# Veteransin Politics

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**CLARIFICATION:**  
 Attorney Marshall Willick's letters against opposing party found defamatory per se in 2008; Willick settled before trial on issue privilege.  
 Click onto link below:  
[http://lesconsentcontact.com.../BpacH0z-en2b-423e-9efb...](#)  
 Richard Crane, formerly with Willick's firm, guilty of sexual misconduct involving a minor and suspended from the practice of law.  
 Click onto link below:  
[http://lesconsentcontact.com.../J0dCf09tS-36G5-4se6-9f73...](#)

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3

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Mark Wachter  
*Lawyer at Marshal Willick PC*  
 1st, MIA - a Poem by Christopher Tossley

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Like · Comment

Alan Perri  
*Counselor at Law at FLSA Inc.*  
 1st SHARE THIS TO EVERY MILITARY PERSON YOU KNOW & his recommendation! ...  
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**Veterans in Politics**

January 14 · 4

Mark Amodei & Debra March to appear on the Veterans in Politics video-talk show

**Mark Amodei & Debra March to appear on the Veterans in Politics video-talk show**

Mark Amodei & Debra March to appear on the Veterans in Politics video-talk show

WIKIPEDIA: DRUGS/NEUROPHARMACOLOGY

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**Veterans in Politics**

January 10 · 4

Nevada Attorney attacks Clark county Family court Judge in Open Court

<https://www.youtube.com/watch?v=200451263>

**Nevada Attorney Attacks Clark County Family Court Judge in Open Court**

No boundaries in our courtroom in Clark County Nevada, we have noticed...

10/27/2014 [Learn More](#)

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**Mark Wachter**  
November 14, 2014 at 11:01am · 4  
at MIA: A Poem by Christopher Tawley

Like Comment

**Alan Penn**  
October 20, 2014 at 10:51am · 4  
at SHAPE THIS TO EVERY MILITARY PERSON YOU KNOW if the reenlistment...

Like Comment

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**Nevada Preps** · Like

**Sun Media Productions** · Like

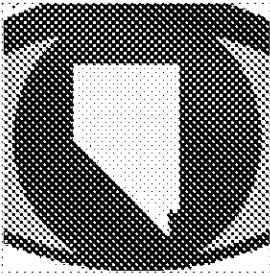
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## Eye on Nevada Politics



**Eye On Nevada Politics**  
government news


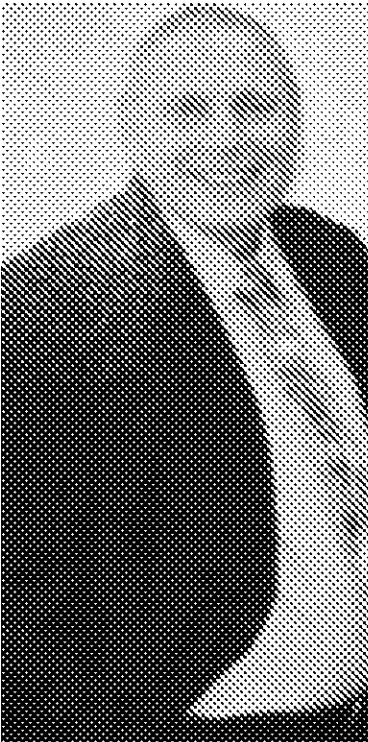
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**Eye On Nevada Politics** added 2 new photos.  
January 18 · 🌐


**CLARIFICATION:**  
Attorney Marshall Willick's letters against opposing party found defamatory per se in 2008; Willick settled before trial on issue privilege.  
Click onto link below:  
<http://files.constantcontact.com/.../00001102-0020-4340-0070-...>  
Richard Crane, formerly with Willick's firm, guilty of sexual misconduct involving a minor and suspended from the practice of law.  
Click onto link below:  
<http://files.constantcontact.com/.../00001102-0020-4340-0070-...>

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**Minor Posts**




**Tom T. Larr**  
December 12, 2016 at 10:00am · 🌐  
We citizens of this state really need to look into passing Family co...Continue Reading

Like Comment



**Chip Evans**  
October 20, 2016 at 10:10am · 🌐  
Listen to my latest interview with Noah Glick, reporter for KUNR (NPR)... See More


Like Comment




**First-Handway**  
August 5, 2016 at 10:41am · 🌐  
Realty778

Like Comment


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MusiciansBand  
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**Nevada Senate Republic...**  
Political Organization  
16 Likes



**Veterans Reporter News**  
Magazine  
16 Likes

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The screenshot displays a mobile application interface with a dark background and white text. At the top, there is a navigation bar with a 'Home' button and a 'Message' button. Below the navigation bar, a post by 'John Carr' is visible, dated 'December 12, 2018 at 10:00 AM'. The post text reads: 'We citizens of this state really need to look into passing Family co...Curious Reading'. Below the text is a 'Like' button. Further down, another post by 'Chip Evans' is shown, dated 'December 12, 2018 at 10:00 AM'. The post text reads: 'Listen to my latest interview with Noah Click, reporter for KUNR (NPR)...See More'. Below this text is a 'Like' button. At the bottom of the screen, there is a 'People Also Like' section featuring a post by 'Erin McElroy' dated 'August 11, 2018 at 12:00 PM'. The post text reads: 'The Notes of Choice'. Below this text is a 'Like' button. The bottom of the screen shows a 'Chat' button and a 'Share' button.



## Nevada Veterans In Politics

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**Nevada Veterans in Politics added 2 new photos January 18 · 0**

**CLARIFICATION:**  
Attorney Marshall Willick's letters against opposing party found defamatory per se in 2005. Willick settled before trial on issue privilege.  
Click onto link below:  
[http://thes.constantcontact.com/~t88acv1b3-cd2b-434e-a9fb-](#)  
Richard Crane, formerly with Willick's firm, guilty of sexual misconduct involving a minor and suspended from the practice of law.  
Click onto link below:  
[http://thes.constantcontact.com/~t88cfa2cc-3508-48ef-87f3-](#)




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## Nevada Attorney Attacks Clark County Family Court Judge in Open Court

**Abstract**

## Veterans In Politics International



### Veterans In Politics International

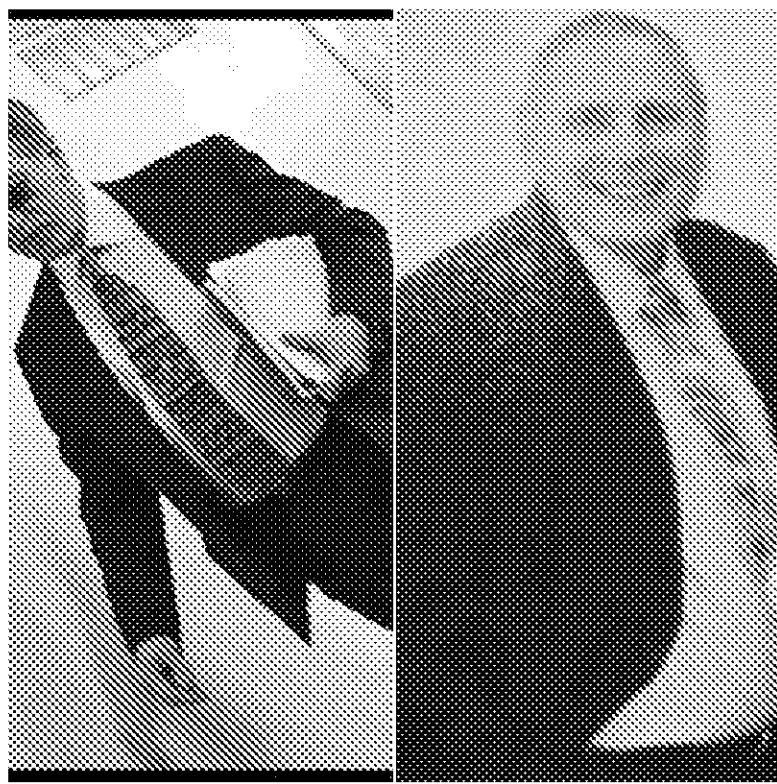
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
Veterans in Politics International added 3 new photos.  
January 16, 18

CLARIFICATION:  
Attorney Marshall Willick's letters against opposing party found defamatory per se in 2008, Willick settled before trial on issue privilege.  
Click onto link below:  
<http://files.constantcontact.com/1806a11a2-0d2b-4b4e-a38b-...>  
Richard Crane, formerly with Willick's firm, guilty of sexual misconduct involving a minor and suspended from the practice of law.  
Click onto link below:  
<http://files.constantcontact.com/1806a11a2-0d2b-4b4e-a38b-...>




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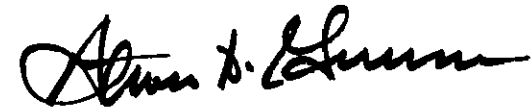
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**ERR**

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. WILLICK and WILLICK LAW )	Case No.: A-17-750171-C
GROUP, )	
Plaintiff, )	Department: XVIII
vs. )	
STEVE W. SANSON; HEIDI J. HANUSA; )	Hearing date: March 14, 2017
CHRISTINA ORTIZ; JOHNNY SPICER; )	
DON WOOLBRIGHT; VETERANS IN )	Hearing time: 9:00 a.m.
POLITICS INTERNATIONAL, INC.; )	
SANSON CORPORATION; KAREN )	
STEELMON; and DOES I THROUGH X, )	
Defendant. )	

**ERRATA TO OPPOSITION TO  
ANTI-SLAPP SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.650  
et. seq.;  
AND  
COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS**

**COME NOW** the Plaintiffs, MARSHAL S. WILLICK and WILLICK LAW GROUP, by and through their attorney of record, Jennifer V. Abrams, Esq., of The Abrams & Mayo Law Firm, and hereby files the following errata to their *Opposition* to Defendants STEVE W. SANSON and VETERANS IN POLITICS INTERNATIONAL, INC.'s *Anti-SLAPP Special Motion to Dismiss Pursuant to NRS*

1 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs, to correct the  
2 following:

- 3 1. Footnote 13 on page 7 should be deleted;
- 4 2. There should be a reference to Exhibit 3 at the end of the sentence on  
5 page 7, line 9; and
- 6 3. The last four words in footnote 14 on page 7 ("*The closing of the*")  
7 should be deleted.

8 DATED Wednesday, March 08, 2017.

9 Respectfully submitted:

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Jennifer V. Abrams, Esq.

12 JENNIFER V. ABRAMS, ESQ.

13 Nevada State Bar Number: 7575

6252 South Rainbow Boulevard, Suite 100

14 Las Vegas, Nevada 89118

Phone: (702) 222-4021

Email: JVAGroup@theabramslawfirm.com

15 Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Errata to Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney’s Fees and Costs* was filed electronically with the Eighth Judicial District Court in the above-entitled matter on Wednesday, March 08, 2017. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Anat Levy, Esq.  
Alex Ghoubadi, Esq.  
Attorneys for Defendants

/s/ David J. Schoen, IV, ACP  
An Employee of The Abrams & Mayo Law Firm



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Anat Levy, Esq. (State Bar No. 12550)

ANAT LEVY & ASSOCIATES, P.C.

5841 E. Charleston Blvd., #230-421

Las Vegas, NV 89142

Phone: (310) 621-1199

E-mail: [alevy96@aol.com](mailto:alevy96@aol.com); Fax: (310) 734-1538

Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND  
STEVE SANSON

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

MARSHALL S. WILICK and WILICK LAW  
GROUP,

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.

CASE NO. A-17-750171-C

DEPT. NO.: XVIII (18)

Hearing Date: 3/14/2017

Time: 9:00 a.m.

[Filed concurrently with  
Supplemental Declaration of Steve  
Sanson in Support of Defendants'  
anti-SLAPP Motion.]

**REPLY IN SUPPORT OF DEFENDANTS' ANTI-SLAPP**

**SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.650 et. seq.**

Defendants Veterans In Politics International, Inc. ("VIPI") and Steve Sanson hereby  
submit this Reply in support of their anti-SLAPP motion pursuant to 41.650 et. seq.



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1 Schneider, Esq. to intimidate witnesses and a family court judge with threatened ‘smear  
2 campaigns’” (Opp 3:14-18), that “VIPI and other Defendants” were hired “to launch a series of  
3 false, misleading, and defamatory ‘smear campaigns’ against Abrams” (the lawyer in this case)  
4 (Mtn., 4:8-11), and that Defendants tried to “alter the outcome of a pending sanctions motion” in  
5 an unrelated family law case (Mtn., 21-22).

6 The only purported “evidence” proffered in support of these claims is not evidence at all.  
7 It is instead a short, three paragraph declaration by Plaintiff that can be summed up as: “I have  
8 read the preceding filing, and I have personal knowledge of the facts contained therein, unless  
9 stated otherwise.” (Willick Decl., ¶ 2.) Willick is unqualified to attest to, and fails to establish,  
10 any of these “facts.”

11 Indeed it is the Opposition itself that reads like a “smear campaign” of Defendants. It  
12 would be improper for the Court to consider any of the factual allegations in the Opposition  
13 without proper evidentiary support.

### 14 **III. VIPI AND SANSON -- NEVADA HEROS.**

15 Given the grossly inaccurate allegations in the Opposition, a recitation of who VIPI and  
16 Sanson are will provide some necessary background and shed light on how baseless this case and  
17 its allegations are. Each of the below facts are supported by Sanson’s attached Supplementary  
18 Declaration, (“Sanson Supp. Decl.”) paragraphs 2 through 10:

19 Defendant Steve Sanson is a decorated U.S. veteran who served his country in the Marine  
20 Corp. for six years including in active, often brutal, duty in Desert Shield and Desert Storm; he  
21 also served an additional six years as an active reservist with the U.S. Army. He has paid a high  
22 personal price for his service and is 100% combat related disabled. While Sanson has not,  
23 contrary to Plaintiff’s allegation, been diagnosed with PTSD, he has seen the best and the worst  
24 in people under extreme circumstances, including as a former chaplain for the Veterans of  
25 Foreign Wars and the Marine Corps League.

26 In 2005, Sanson became the President of VIPI, a non-profit, non-partisan corporation.<sup>2</sup>  
27 Sanson made it his “mission” to ensure that VIPI advocates on behalf of Veterans and roots out  
28

---

<sup>2</sup> Contrary to Plaintiff’s allegation, VIPI is not a charitable 501(c)(3) organization, but rather, a

1 corruption wherever it hides in the dark crevices of government. VIPI's philosophy is that  
2 veterans did not die overseas, get maimed and put their lives on the line to preserve our  
3 democracy, just to have it corroded by our own corrupt public servants.

4 In furtherance of VIPI's mission, Sanson routinely testifies before the Nevada State  
5 Legislature, participates in Town Hall meetings, County Commission meetings, Planning  
6 Commission meetings, City Council meetings, Judicial Selection Committee meetings and other  
7 government meetings. He is often called upon to give the invocation at public meetings.

8 VIPI and Sanson have received numerous commendations and awards from local, state  
9 and federal officials and bodies. Among them are certificates of recognition and/or appreciation  
10 from the Las Vegas City Council, the North Las Vegas City Council, the Henderson City  
11 Council, former U.S. Representative for Nevada, Jon Porter, former U.S. Representative for  
12 Nevada, Shelley Berkeley, and former U.S. Senator for Nevada, John Ensign. Sanson was also  
13 the third veteran named "Veteran of the Month" by Governor Brian Sandoval, Governor Gibbons  
14 appointed Sanson to the Southern Nevada Veterans Cemetery Advisory Board, and Sanson was  
15 named one of Nevada's Distinguished Men in the 2016 Distinguished Men and Women  
16 Magazine.

17 VIPI's accomplishments are significant as well. Under Sanson's leadership, VIPI was  
18 instrumental in, among other things, creating Veterans' Court in Nevada. It got laws passed  
19 preventing veteran disability pay from being used in calculating spousal support. It got the  
20 passage of DMV veteran identification stickers to be put on Nevada drivers' licenses so that  
21 police who stop veterans can de-escalate potential violence. It got veteran de-escalation classes  
22 to become mandatory in police academy training, and worked to get a USO lounge at McCarran  
23 Airport for service personnel to use between flights.

24 VIPI also puts out a blog and writes articles, and hosts a weekly internet radio show,  
25 hosted by Sanson and other members of VIPI, in which they interview government officials and  
26

27 501(c)(4) organization which can and does lobby government, endorse public officials and  
28 educates the public through various media outlets, including Facebook, Twitter, Emails, internet  
talk shows, and traditional media. Also contrary to Plaintiff's unsupported accusation, VIPI is  
not in violation of any charitable organization laws.

1 election candidates to educate the public about pressing issues. Guests have included almost  
2 every public official in Nevada. Sanson's organization also developed a candidate endorsement  
3 process where distinguished guests from the community moderate and interview judicial and  
4 political candidates and vote on who to endorse based on their qualifications and moral fortitude  
5 to refuse corruption. To ensure the independence of the panel, Sanson disqualifies himself from  
6 voting and does not provide any questions to any panel members or to candidates either directly  
7 or indirectly.

8 Sanson and VIPI have developed such a strong local following that Nevada  
9 whistleblowers now routinely seek out VIPI to expose wrongdoing. Over the years, VIPI has  
10 exposed numerous corrupt politicians, political and judicial candidates and others, including  
11 most recently, Judge Rena Hughes who is now being investigated by the Judicial Disciplinary  
12 Commission for the actions that VIPI exposed. Plaintiff's claim that VIPI never exposed anyone  
13 because it purportedly didn't comment on former Judge Steve Jones and present Education  
14 Trustee Kevin Childs' alleged wrongdoing is simply wrong. Both Jones and Childs appeared on  
15 VIPI's radio show, both were the subject of articles disseminated by VIPI, Sanson on behalf of  
16 VIPI attended parts of former Judge Jones' trial and sent a letter to the federal judge in the case  
17 regarding Jones' sentencing. And, Sanson on behalf of VIPI spent over seven hours in a recent  
18 Trustee meeting to try to speak publicly regarding the Kevin Childs controversy.

19 Also, contrary to Plaintiff's allegations, Sanson does all this for free, often at his own  
20 personal expense. Why? As he puts it, "if you turn a blind eye or a deaf ear to corruption, you  
21 are just as guilty of the wrongdoing as the perpetrators." VIPI has never taken payment in  
22 exchange for writing or exposing any story and he does not draw a salary from VIPI. And,  
23 contrary to Plaintiff's allegations, VIPI has never been hired by Louis Schneider or anyone else  
24 to issue a "smear campaign" against Abrams or Plaintiff. Sanson Supp. Decl., ¶ 10.

25 **IV. ANTI-SLAPP STATUTES DO NOT REQUIRE SPEECH TO BE IN**  
26 **FURTHERANCE OF A RIGHT TO PETITION THE GOVERNMENT.**

27 Plaintiff erroneously argues that Defendants' speech is not subject to this anti-SLAPP  
28 motion because it was not made in connection with petitioning a government entity to act. (Opp.

1 12:9-16.) This is a misreading of the statute. As even the Opposition sets out, just two  
2 paragraphs above its own argument (at 12:1-4), Nevada's anti-SLAPP statutes provide for  
3 dismissal of claims based either on a communication in furtherance of the right to petition, or  
4 one based on "the right to free speech in direct connection with an issue of public concern."  
5 NRS 41.650. The speech at issue falls within the latter prong because, as detailed below, the  
6 functioning of family court and our legal system are matters of public concern.

7 **V. DEFENDANTS' SPEECH INVOLVED MATTERS OF PUBLIC CONERN.**

8 Plaintiff erroneously argues that none of Defendants' speech involved a matter of public  
9 concern.

10 In the seminal U.S. Supreme Court case of Snyder v. Phelps, 131 S.Ct. 1207, 179 L. Ed.  
11 2d 172 (2011), members of a church picketed the funeral of a Marine veteran in Maryland who  
12 had died in battle in Iraq. The picket signs stated "God Hates the USA/Thank God for 9/11,"  
13 "America is Doomed," "Don't Pray for the USA," "Thank God for IEDs," "Thank God for Dead  
14 Soldiers," "Pope in Hell," "Priests Rape Boys," "God Hates Fags," "You're Going to Hell," and  
15 "God Hates You." The picketing made the news and the father of the fallen Marine subsequently  
16 sued the church members for defamation, publicity given to private life, intentional infliction of  
17 emotional distress, intrusion upon seclusion, and civil conspiracy.

18 In that case, the United States Supreme Court defined what constitutes a matter of "public  
19 concern." It explained that the First Amendment reflects "a profound national commitment to  
20 the principle that debate on public issues should be uninhibited, robust, and wide-open." (citing,  
21 New York Times Co. v. Sullivan, 376 U. S. 254, 270 (1964).) That is because "speech  
22 concerning public affairs is more than self-expression; it is the essence of self-government." Id.,  
23 citing, Garrison v. Louisiana, 379 U. S. 64, 74-75 (1964). Accordingly, "speech on public issues  
24 occupies the highest rung of the hierarchy of First Amendment values, and is entitled to special  
25 protection." Connick v. Myers, 461 U. S. 138, 145 (1983) (internal quotation marks omitted).

26 The Court defined speech of public concern as follows: "[s]peech deals with matters of  
27 public concern when it can 'be fairly considered as relating to any matter of political, social, or  
28 other concern to the community,' . . . or when it 'is a subject of legitimate news.'" Emphasis

1 added; citations omitted. The Court also made clear that “[a] statement's arguably ‘inappropriate  
2 or controversial character... is irrelevant to the question of whether it deals with a matter of  
3 public concern’” (citing, Rankin v. McPherson, 483 U. S. 378, 387. Pp. 5-7). In that case, the  
4 Court found that the content of the defendants’ signs “plainly relates to broad issues of interest to  
5 society at large, rather than matters of ‘purely private concern’.” (Id., at 8.) The court further  
6 explained:

7 While these messages may fall short of refined social or political commentary, the  
8 issues they highlight—the political and moral conduct of the United States and its  
9 citizens, the fate of our Nation, homosexuality in the military, and scandals  
10 involving the Catholic clergy—are matters of public import. The signs certainly  
11 convey Westboro's position on those issues, in a manner designed, unlike the  
private speech in *Dun & Bradstreet*, to reach as broad a public audience as  
possible.

12 (Id.)

13 Each of the statements at issue in this case, fits within the Snyder definition of a matter of  
14 public concern:

15 1. The December 25, 2016 statement on the VIPI website stating “[t]his is the type  
16 of hypocrisy we have in our community. People that claim to be for veterans but yet the screw  
17 us for profit and power.” This statement pertained to and hyperlinked to the 2015 radio  
18 interview that Plaintiff gave to VIPI regarding then-pending legislation about Veterans disability  
19 pay. Since it pertained to a political issue – a state law – and particularly since Plaintiff had  
20 voluntarily injected himself into the legislative debate on that issue by writing to and testifying  
21 before the Nevada legislature (See Sanson Initial Decl., Exs. 8, 9), and Plaintiff appeared on the  
22 VIPI radio show to discuss his viewpoints on the legislation precisely because it was of public  
concern (Sanson Initial Decl., ¶ 14a, Ex. 4, p.4), this statement is of “public concern.”

23 Plaintiff’s argument that the statement is not of public concern now because it pertains to  
24 a 2015 legislation and a 2015 interview is not legally supported. Likewise, Plaintiff’s argument  
25 that the matter cannot be of public concern because it pertains to Plaintiffs’ view on the  
26 legislation rather than the legislation itself is wrong. As stated in Snyder, “even if a few of the  
27 signs—such as ‘You're Going to Hell’ and ‘God Hates You’—were viewed as containing  
28 messages related to Matthew Snyder or the Snyders specifically, that would not change the fact

1 that the overall thrust and dominant theme of Westboro's demonstration spoke to broader public  
2 issues.” (Snyder, supra, at p.8) Similarly, the mere fact that Willick’s views on the legislation  
3 are discussed does not change the political nature of the speech.

4         2.         The January 12, 2017 statement, about a federal judge in Virginia finding that  
5 Willick committed defamation per se against a law student who was opposing his client in a  
6 divorce case, and Willick’s colleague, Richard Crane, being suspended from the practice of law  
7 for committing sexual coercion on a minor, likewise was of public concern. It concerned a  
8 matter of social and general interest. Indeed, Crane’s suspension was reported on in Review  
9 Journal articles, and Willick being found guilty of defamation per se of an opponent when  
10 Willick touts himself as the leading divorce lawyer in the state, is at a minimum of social and  
11 general interest and therefore falls within the definition of the Snyder court.

12         3.         The January 14, 2017 post also refers to the conviction and suspension of Richard  
13 Crane and the fact that Richard Crane appeared to be continuing to work at Willick’s offices  
14 despite his suspension. The post was accompanied by links to relevant documents showing such  
15 employment. Again, given Willick’s notoriety, the nature of the Willick Law Group’s practice  
16 being in family law, the fact that Crane’s conviction and suspension was reported in newspapers,  
17 this statement was of “public concern” at a minimum because it would be of social or general  
18 interest under Snyder.

19         4.         The two January 14, 2017 Facebook posts pertaining to Willick’s work on the  
20 Holyoak case, how he lost his bid to overturn Supreme Court precedent and how he sought  
21 \$100,000 for his work on the case is likewise of public concern. It concerned a notorious public  
22 figure in the area of divorce law in Nevada and it involved a Supreme Court case in which  
23 Willick sought to overturn existing Supreme Court precedent. It therefore necessarily involved  
24 an issue of political and social concern – overturning existing law that would have broad social  
25 ramifications, and the amount of money that the self-proclaimed leading family law lawyer in  
26 Nevada charges for his work as petitioned in publicly filed documents.

1  
2 **VI. PLAINTIFFS HAVE FAILED TO MAKE A PRIMA FACIE CASE OF A**  
3 **PROBABILITY OF PREVAILING ON THEIR CLAIMS.**  
4

5 **A. DEFENDANTS FAILED TO SHOW A PRIMA FACIE CASE OF DEFAMATION.**

6 First, Plaintiffs misapply Pegasus v. Reno Newspapers, Inc., 118 Nev. 706, 715, 57 P.3d  
7 82, 88 (2202), to argue that each of Defendants' statements are defamatory as a matter of law  
8 because they "would tend to lower the subject in the estimation of the community, excite  
9 derogatory opinions about the subject, and hold the subject up to contempt." (Opp: 15: 14-16.)  
10 Plaintiffs simply ignore that the speech must first be a "statement of fact" and not opinion, must  
11 be "false," must not be privileged, and must be made with malice, where as here, the Plaintiff is a  
12 public figure. The analysis of whether the statement lowers the esteem of its subject is only  
13 relevant once the other elements are established.

14 Second, Plaintiffs' reliance on Bongiovi v. Sullivan, 138 P.3d 433, 122 Nev. 556 (Nev.,  
15 2006) for the proposition that Plaintiffs are not public figures is misplaced. In Bongiovi, the  
16 plaintiff was a plastic surgeon, who although well accomplished, had not voluntarily thrust  
17 himself into any public debate. As explained by the Court:

18 [D]octors have been held to be limited-purpose public figures for a  
19 particular issue when they have voluntarily come to the forefront of a  
20 national or local debate concerning that medical issue or have  
21 "affirmatively step[ped] outside of their private realms of practice to  
22 attract public attention." Coming to the forefront of a debate has included  
23 behavior such as: writing letters to politicians and hiring a private lobbyist  
24 and public relations agent, authoring articles in national magazines and  
25 appearing on national television shows, testifying before an FDA panel,  
26 and 'writing [letters] to newspapers, professional journals and  
27 organizations, fellow physicians, and government officials' regarding an  
28 issue.

25 In contrast, a small minority of courts has held that doctors are limited-  
26 purpose public figures regardless of whether they have come to the  
27 forefront of a debate or a particular issue because the qualifications of  
28 doctors are matters of vital importance to the public, or because the  
doctors have advertised in the yellow pages and received clientele from  
throughout the United States because of their expertise.



1  
2 Consistent with the majority of courts, we conclude that a doctor is not a  
3 limited-purpose public figure unless that doctor voluntarily comes to the  
4 forefront of a national or local debate concerning medical issues or has  
5 "affirmatively step[ped] outside of [his] private realm[ ] of practice to  
6 attract public attention."35 We conclude that Sullivan's professional  
7 achievements are insufficient to render him a limited-purpose public  
8 figure.

9 (Emphasis added.)

10 Here, Plaintiffs have definitively thrust themselves into public debate and have “stepped  
11 outside of their private realm of practice to attract public attention.” Plaintiff Willick touts his  
12 firm as “the premiere Family Law firm in Nevada.” He voluntarily thrusts himself in the public  
13 eye by submitting written and oral testimony to the Nevada legislature on proposed legislation  
14 (Sanson Initial Decl., Exs. 8 and 9 ) has written dozens of articles on family law issues (see  
15 resume, attached as Ex. 8 to Levy Decl. filed with moving papers), has served as an expert  
16 witness in dozens of cases (Id.), has written 3 books on family law matters (Levy Decl., Ex. 9),  
17 is extensively quoted in the Las Vegas Review Journal and other publications (Levy Decl., Ex.  
18 10), has received local and national awards (Levy Decl., Ex. 8) and makes public appearances in  
19 traditional and social media to promote his work and firm. He also appears in an internet video  
20 advertisement for the Legal Aid Center in which he indirectly also promotes his firm and his  
21 stature in the community. His firm also has a large public billboard directly across the street  
22 from family court (Levy Decl., Ex. 12). It cannot seriously be doubted that Willick and his firm  
23 are “public figures” for purposes of defamation law, not just because of their career  
24 achievements, but also because of their voluntary injection into matters of public discourse.

25 Third, as public figures, Plaintiffs must prove by clear and convincing evidence that any  
26 purportedly defamatory statement was “made with ‘actual malice’ – that is, with knowledge that  
27 it was false or with reckless disregard of whether it was false or not.” New York Times Co. v.  
28 Sullivan, 376 U.S. 254 (1964). Notwithstanding all of Plaintiffs’ hyperbole and unsubstantiated  
claims of extortion, there is simply no admissible evidence of such malice (or extortion).

Plaintiffs seize on Defendants’ inadvertent failure to include 2 commas in its January 12,  
2017 statement as proof of Defendants malice, purportedly with regard to all the statements. As

1 fully explained in Defendants’ opening brief, the January 12, 2017 statement was supposed to  
2 read as follows: Attorney Marshall [sic] Willick, and his pal convicted of sexually coercion of a  
3 minor Richard Crane, was found guilty of defaming a law student in United States District Court  
4 Western District...” (Sanson Initial Decl., ¶4b.) Plaintiffs’ unexplained claims aside, that is a  
5 true statement. Sanson did not notice the comma error at the time of publication and was  
6 unaware of the statement’s ambiguity at the time that he communicated with Lee Gilford that the  
7 statement was true and to do his own research. (*Id.*).

8 Yet, Plaintiffs’ pointing to the exchange between Sanson and someone he doesn’t know  
9 named Lee Pudemonhucin Gilford as an indication of malice, actually shows something much  
10 different -- that the use of hyperlinks in VIPI’s speech had its intended effect of permitting  
11 readers to access the supporting documents and make up their own minds. Gilford apparently  
12 did just that when he remarked in Plaintiffs’ Exhibit 2 that “[n]othing you shared indicates that  
13 Willick did anything but employ a nasty bastard” and “you saying something is true, when the  
14 evidence you present is...” (remainder of Plaintiff’s exhibit 2 was cut off). This falls directly  
15 into the “speech based on disclosed facts” that Courts protect when hyperlinks to source  
16 materials are provided. See, *Jankovic v. Inter’l Crisis Grp.*, 429 F.Supp.2d 165, 177 n.8 (DDC  
17 2006) “what little confusion the sentence could possibly cause is easily dispelled by any reader  
18 willing to perform minimal research); *Adelson v. Harris*, 973 F.Supp.2d 471, 485 (SD NY 2013)  
19 (applying Nevada law “[p]rotecting defendant who hyperlink to their sources is good public  
20 policy, as it fosters the facile dissemination of knowledge on the Internet”); *Franklin v. Dynamic*  
21 *Details, Inc.*, 116 Cal.App.4<sup>th</sup> 375, 379, 10 Cal.Rptr.3d 429 (2004) (no defamation where the  
22 emails at issue disclosed the facts upon which the opinions were based by directing the reader to  
23 the FCC website via hyperlink.) The exchange shows that readers did not believe that Willick  
24 was convicted of child sexual coercion.

25 Also, contrary to the allegations in the Opposition (at 7:5-11), VIPI in fact did take down  
26 the original January 12, 2017 statement, and did in fact distribute the corrected statement via all  
27 the same channels as it did the original statement. (Sanson Supp. Decl., ¶ 11.) Plaintiffs claim  
28 that their Exhibit 3 shows that the original post is still available online after it was clarified on

1 January 18, 2017, but although the pages of Exhibit 3 are very fuzzy, they do not appear to  
2 corroborate this. In any event, if there are any remaining original version postings on a website  
3 that VIPI can control, then VIPI will take it down. To the best of VIPI's knowledge, the original  
4 version of the statement is not available to the public on a VIPI controlled internet page. Sanson  
5 Supp. Decl., ¶ 11.)

6 Fourth, Plaintiffs' unsupported argument that Defendants statements do not fall within  
7 the Fair Reporting Privilege because VIPI is not a "news media" (Opp., at 16:8-17:2) is  
8 irrelevant. The Fair Reporting Privilege applies to the general public as well as to news media.  
9 Sahara Gaming Corp. v. Culinary Workers Union Local 226, 115 Nev. 212, 984 P.2d 164, 166  
10 (1999) (the special privilege of absolute immunity from defamation is "given to the news media  
11 and the general public to report newsworthy events ..."; emphasis added.) Ironically, Plaintiffs  
12 are silent about Gilford's opinion in their own Exhibit 2 in which he states that VIPI "are the  
13 media outlet of a state organization representing veterans." Apparently, they value Gilford's  
14 opinions when Plaintiffs erroneously think he supports their claims but not when they think he  
15 does not.

16 Further, Plaintiffs' argument that the reporting privilege would not apply in this case  
17 because VIPI's reporting is purportedly not "fair" or "impartial" (Opp., 18:2), actually  
18 underscores the very protections of our Free Speech rights -- especially from the opinions of  
19 those about whom the speech is made! Indeed, one can look to mainstream media for examples  
20 of how reporting can be skewed and yet still qualify for First Amendment protections. For  
21 example, there are those who believe that Fox News is not "fair and balanced" despite its claims  
22 to be so, and that MSNBC news is "far left" despite its claim to be "telling it like it is."  
23 Regardless of such opinions, those stations, as do Defendants, have a constitutional right to free  
24 speech and to report and comment on stories and news even though it may be through the prisms  
25 of their respective viewpoints and opinions.<sup>3</sup>

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27 <sup>3</sup> Although not relevant, Plaintiffs' statement (oddly placed in this section of their Opposition),  
28 that veterans they sued in 2012 for criticizing them paid a multi-million dollar judgment is false.  
Plaintiff somehow obtained a \$10 million default judgment against one of the out of state,  
unrepresented, veteran defendants without any justification whatsoever in the order or in the

1 As stated in Texas v. Johnson, 491 U. S. 397, 414 (1989)., "if there is a bedrock principle  
2 underlying the First Amendment, it is that the government may not prohibit the expression of an  
3 idea simply because society finds the idea itself offensive or disagreeable." Indeed, "the point of  
4 all speech protection... is to shield just those choices of content that in someone's eyes are  
5 misguided, or even hurtful." Hurley v. Irish-American Gay, Lesbian and Bisexual Group of  
6 Boston, Inc., 515 U. S. 557, 574 (1995).

7 Accordingly, Plaintiffs have proffered no evidence they are likely to prevail on a cause of  
8 action for defamation.

9 **B. PLAINTIFFS CANNOT PREVAIL ON THEIR CLAIMS FOR**  
10 **EMOTIONAL DISTRESS, FALSE LIGHT, BUSINESS DISPARAGEMENT AND**  
11 **CONSPIRACY.**

12 Plaintiffs appear to claim in a conclusory fashion that even if Defendants' speech was  
13 found to be protected, it would not render Defendants immune from claims of emotional distress,  
14 false light, business disparagement and conspiracy. (Opp., 18:9-20:3.) Again, this is false.

15 1. Emotional Distress.

16 The Snyder court recognized that "[t]he Free Speech Clause of the First Amendment can  
17 serve as a defense in state tort suits, including suits for intentional infliction of emotional  
18 distress" (citing, Hustler Magazine, Inc. v. Falwell, 485 U. S. 46, 50-51). In the Snyder case, the  
19 father of the fallen marine at whose funeral the defendants picketed described the severity of his  
20 emotional injuries: "He testified that he is unable to separate the thought of his dead son from his  
21 thoughts of Westboro's picketing, and that he often becomes tearful, angry, and physically ill  
22 when he thinks about it. ... Expert witnesses testified that Snyder's emotional anguish had  
23 resulted in severe depression and had exacerbated preexisting health conditions." *Id.*, at 12-13.  
24 Yet, the Supreme Court held:

25 The jury here was instructed that it could hold Westboro liable for  
26 intentional infliction of emotional distress based on a finding that  
27 Westboro's picketing was "outrageous." "Outrageousness," however, is a

28 motion for default, as to the basis for such a large award. Further, Plaintiffs' unsubstantiated  
allegation that these defendants were "friends" of Sanson is also false. Sanson does not know  
them and has never met them. Sanson Supp. Decl., ¶ 12.