

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

\* \* \* \* \*

VETERANS IN POLITICS  
INTERNATIONAL, INC.; AND STEVE W.  
SANSON,

Appellant,

vs.

MARSHAL S. WILICK; AND WILICK  
LAW GROUP,

Respondent.

SC NO: Electronically Filed  
Feb 07 2018 05:01 p.m.  
DC NO: Elizabeth A. Brown  
Clerk of Supreme Court

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**INDEX TO RESPONDENT'S APPENDIX  
VOLUME II**

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**DATE ORDER**

**Attorneys for Respondent:**

JENNIFER V. ABRAMS, ESQ.  
Attorney for Respondent  
Nevada Bar No. 7575  
THE ABRAMS AND MAYO LAW FIRM  
6252 South Rainbow Blvd., Ste. 100  
Las Vegas, Nevada 89118  
(702) 222-4021  
email: [JVAGroup@theabramslawfirm.com](mailto:JVAGroup@theabramslawfirm.com)

**Attorneys for Appellant:**

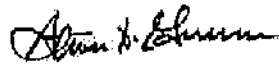
ANAT LEVY, ESQ.  
Attorney for Appellant  
Nevada Bar No. 12250  
5841 E. Charleston Blvd.,  
#230-421  
Las Vegas, Nevada 89142  
(310) 621-1199  
Email: [alevy96@aol.com](mailto:alevy96@aol.com)

**APPENDIX INDEX  
DATE ORDER**

<b>EXHIBIT</b>	<b>DOCUMENT</b>	<b>FILE STAMP DATE</b>	<b>VOLUME &amp; PAGES</b>
	<b>VOLUME I</b>		
1	Motion for Sanctions and Attorney's Fees	9/12/2016	I RA000001 – RA000020
2	Memorandum of Attorney's fees and Costs	01/31/2017	I RA000021 – RA000221
	<b>VOLUME II</b>		
3	Motion for Order to Show Cause	02/13/2017	II RA000222 - RA000243
4	Appendix of Exhibits to Plaintiff's Motion for an Order to Show Cause	02/13/2017	II RA000244 - RA000280
5	Opposition to Motion for Order to Show Cause Re: Contempt	03/06/2017	II RA000281 - RA000297
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8	Transcript Re: All Pending Motions; Monday, June 5, 2017	07/05/2017	III, part I RA000436 – RA000502

<b>EXHIBIT</b>	<b>DOCUMENT</b>	<b>FILE STAMP DATE</b>	<b>VOLUME &amp; PAGES</b>
9	Plaintiff's Omnibus Opposition to Defendants' Motion for Attorney's Fees and Costs	10/27/2017	III, part I RA000503 – RA000618
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11	Order of Recusal	9/5/2017	IV, part I RA000724 RA000734
12	Exhibits to Omnibus Opposition to Doug and Steve Sanson's Motions to Vacate – PART 1 (Continued in Volume IV, Part II)	10/4/2017	IV, part I RA000735 – RA000809
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13	Family Court Judge Accuses Agitator Steve Sanson of Intimidation by Rachael Crosby	9/9/2017	IV, part III RA000905 – RA000913

<b>EXHIBIT</b>	<b>DOCUMENT</b>	<b>FILE STAMP DATE</b>	<b>VOLUME &amp; PAGES</b>
14	Sanson's Latest Complaint, like Him, a Political Loser by Jane Ann Morrison	9/13/2017	IV, part III RA000914 – RA000921
15	Veterans In Politics International, Inc. Email regarding Michael Cherry's Appearance	1/6/2018	IV, part III RA000922 – RA000923
16	Letter to Judge Cherry: Re Veterans In Politics International radio appearance, scheduled for January 13, 2018	1/10/2018	IV, part III RA000924 – RA000955
17	Judges' Ties to Sanson Have Courts in Tight Spot by Jane Ann Morrison	1/20/2018	IV, part III RA000956 – RA000963
18	DiCiero, Mark (2018, January 26). Nevada Court Watchers [Facebook group]. Retrieved from <a href="https://www.facebook.com/groups/433293260115971/permalink/1322318161213472/">https://www.facebook.com/groups/433293260115971/permalink/1322318161213472/</a>	1/29/2018	IV, part III RA000964
19	Emails between Josh Gilmore, Esq., and Anat Levy re: joint appendix	6/12/17	IV, part III RA000965 – RA000966
	<b>VOLUME V</b>		
20	Transcript from the recusal hearing on August 30, 2017	9/19/17	V RA000967 – RA001009

  
CLERK OF THE COURT

**MOT**

Jennifer V. Abrams, Esq.  
Nevada State Bar Number: 7575  
Brandon K. Leavitt, Esq.  
Nevada State Bar Number: 11834  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Fax: (702) 248-9750  
Email: bklgroup@theabramslawfirm.com  
Attorneys for Plaintiff

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

BRANDON PAUL SAITER,	)	Case No.:	D-15-521372-D
	)		
Plaintiff,	)	Department:	L
	)		
vs.	)		
	)	Hearing date:	03/30/17
TINA MARIE SAITER,	)	Hearing time:	9:00 AM
	)		
Defendant.	)	ORAL ARGUMENT REQUESTED	

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

**MOTION FOR AN ORDER TO SHOW CAUSE**

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

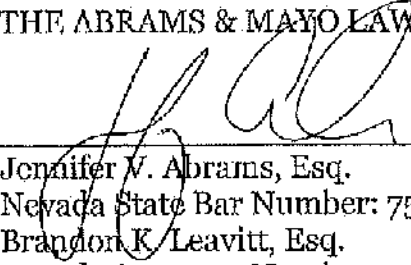
1 Cause, asking that this Court issue an Order to Show Cause against  
2 Defendant's counsel of record, LOUIS C. SCHNEIDER, ESQ., and  
3 STEVE W. SANSON, and ordering Defendant, TINA MARIE SAITER, to  
4 personally appear at the hearing on this matter.

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

9 DATED Monday, February 13, 2017.

10 Respectfully Submitted,

11 THE ABRAMS & MAYO LAW FIRM

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

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

PLEASE TAKE NOTICE that the foregoing Motion will be heard on  
March 30, 2017 at 9:00 AM, in

DATED Monday, February 13, 2017.

THE ABRAMS & MAYO LAW FIRM

Jennifer V. Abrams, Esq.  
Nevada State Bar Number: 7575  
Brandon K. Leavitt, Esq.  
Nevada State Bar Number: 11834  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Attorneys for Plaintiff

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

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

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

21       <sup>2</sup> See, for example, Exhibit 1.

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

15 ///

16 ///

17  
18 <sup>8</sup> Mr. Sanson also published the false assertion that Mr. Saiter lied on his  
Financial Disclosure Form.

19 <sup>4</sup> See Exhibit 2.

20 <sup>5</sup> See Exhibit 3.

21 <sup>6</sup> See Exhibit 4.

<sup>7</sup> See Exhibit 5.

<sup>8</sup> See Exhibit 6.

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

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

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

## 13 **II. LAW AND ARGUMENT**

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

17 NRS 22.010 states:

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

21 <sup>9</sup> Emphasis added. See Exhibit 7.

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

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

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

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

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

<sup>11</sup> *State of Iowa v. Lipcamon*, 438 N.W.2d 605 (Iowa 1992)

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

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

20 ///

21 <sup>12</sup> Emphasis added. See Exhibit 7.

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

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

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

18       <sup>13</sup> *In re Chantz*, 29 Nev. 110, 85 P. 352 (1907); *Halverson v. Hardeastle*, 123  
Nev. 245, 163 P.3d 428 (2007).

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

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

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

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

19 ///

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

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

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

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

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

19 <sup>16</sup> *Warner v. Second Judicial Dist. Court*, 111 Nev. 1379, 1382, 906 P.2d 707,  
20 709 (1995)(quoting *Marcisz v. Marcisz*, 65 Ill.2d 206, 312, 357 N.E.2d 477, 479  
(1976))

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



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

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

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

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

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

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

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

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

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

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

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

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

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

21 <sup>23</sup> *Lewis v. Lewis*, 132 Nev. \_\_\_, 373 P.3d 878 (2016)

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

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

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

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

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

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

21 <sup>26</sup> *Id.* at 1.

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

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

### 8 **III. CONCLUSION**

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

- 13 1. Find that Mr. Schneider and Mr. Sanson are individually in  
14 contempt of this Court's *Order Prohibiting Dissemination of*  
15 *Case Material*, entered on October 6, 2016;
- 16 2. Order sanctions against Mr. Schneider and Mr. Sanson, as  
17 follows:
  - 18 a. An order requiring the removal of the videos from the  
19 internet, including removal from the Russian website;
  - 20 b. \$500 in monetary sanctions for each violation of this  
21 Court's order; and

1 c. 12 hours incarceration<sup>27</sup> for each violation of this

2 Court's order;

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

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

5 DATED Monday, February 13, 2017.

6 Respectfully Submitted,

7 THE ABRAMS & MAYO LAW FIRM

8 

9 Jennifer V. Abrams, Esq.

10 Nevada State Bar Number: 7575

11 Brandon K. Leavitt, Esq.

12 Nevada State Bar Number: 11834

13 6252 South Rainbow Blvd., Suite 100

14 Las Vegas, Nevada 89118

15 Tel: (702) 222-4021

16 Attorneys for Plaintiff

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

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**AFFIDAVIT OF BRANDON PAUL SAITER**

STATE OF NEVADA     )  
                                      ) ss:  
COUNTY OF CLARK    )

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

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

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

3. On October 6, 2016, after Mr. Sanson disseminated videos on the internet of the September 29, 2016 hearing, this Court entered an *Order Prohibiting Dissemination of Case Material*. That order was personally served on Mr. Sanson on October 8, 2016 and the Declaration of Service was filed on October 14, 2016. Rather than abide by this Court's directive, Mr. Sanson and VIP1 continued to disseminate the Saiter case materials repeatedly.

4. After having been served with this Court's *Order Prohibiting Dissemination of Case Material*, a series of campaigns were launched by Mr. Sanson and VIP1 via email blast, YouTube, numerous Facebook pages, Twitter accounts, Google+ accounts, and on various blogs and

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

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

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

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

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

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



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

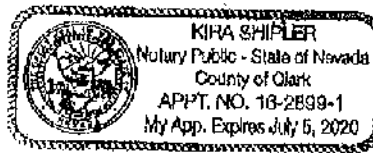
4  
5  
6 BRANDON PAUL SAPIER

State of Nevada County of Clark

7 SUBSCRIBED AND SWORN to before  
me this 10<sup>th</sup> day of February, 2017.

8 by Brandon Paul Saper

9 Kira Shieler  
NOTARY PUBLIC



MOFT

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

BRANDON PAUL SAITER

Plaintiff/Petitioner

v.

TINA MARIE SAITER

Defendant/Respondent

Case No. D-15-521372-D

Dept. 1

MOTION/OPPOSITION  
FEE INFORMATION SHEET

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

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

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

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

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

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

The total filing fee for the motion/opposition I am filing with this form is:

☐ \$0 ☒ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

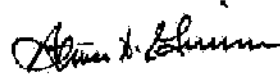
Party filing Motion/Opposition: Plaintiff/Petitioner

Date 02/13/2017

Signature of Party or Preparer: 

RA000243

905

  
CLERK OF THE COURT

1 **EXH**

2 Jennifer V. Abrams, Esq.  
3 Nevada State Bar Number: 7575  
4 Brandon K. Leavitt, Esq.  
5 Nevada State Bar Number: 11834  
6 THE ABRAMS & MAYO LAW FIRM  
7 6252 South Rainbow Blvd., Suite 100  
8 Las Vegas, Nevada 89118  
9 Tel: (702) 222-4021  
10 Fax: (702) 248-9750  
11 Email: bklgroup@theabramslawfirm.com  
12 Attorneys for Plaintiff

13 Eighth Judicial District Court  
14 Family Division  
15 Clark County, Nevada

16 BRANDON PAUL SAITER, ) Case No.: D-15-521372-D  
17 )  
18 Plaintiff, ) Department: I  
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14 **APPENDIX OF EXHIBITS TO PLAINTIFF'S**  
15 **MOTION FOR AN ORDER TO SHOW CAUSE**

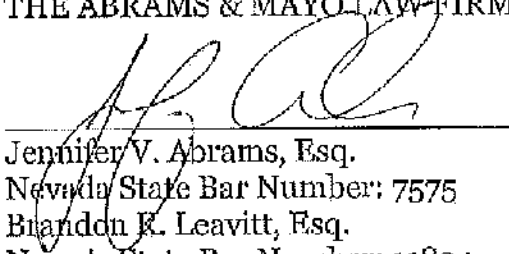
Exhibit	Description
1	Printout of Facebook post from Steve Sanson, dated 10-05-17
2	Emails from YouTube to Brandon Saiter, dated 01-15-17
3	Screenshot of videos upload by Mr. Sanson to vimeo
4	Email from vimeo to Brandon Saiter, dated 01-18-17

5	Printout of videos uploaded to 'mail.ru'
6	Interview of Mr. Sanson on Radio Tribune, dated 02-02-17 [DVD with video file attached]
7	Veterans In Politics email, dated 01-25-17

DATED Monday, February 13, 2017.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM

  
 Jennifer V. Abrams, Esq.  
 Nevada State Bar Number: 7575  
 Brandon R. Leavitt, Esq.  
 Nevada State Bar Number: 11834  
 6252 South Rainbow Blvd., Suite 100  
 Las Vegas, Nevada 89118  
 Tel: (702) 222-4021  
 Attorneys for Plaintiff

**EXHIBIT 1**

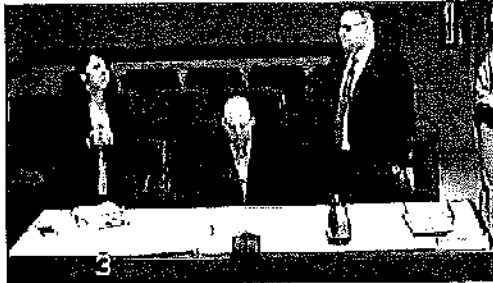
**EXHIBIT 1**

**EXHIBIT 1**



**Steve Sanson**

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



**Jennifer Abrams Las Vegas Divorce Attorney attacks Judge Jennifer Elliot in open court**

10/5/2016 1:53 AM (UTC -07:00)

01:12:05 / 956 views / 2 likes / 1 dislikes / 5 comments

5 indexed comments



**Steve Sanson** A behind the scenes look inside our courtroom

**No boundaries in our courtrooms!**

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

The above are examples of the court room over stepping boundaries. But what happens when a Divorce Attorney crosses the line with a Clark County District Court Judge Family Division?

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

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

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

Judge Jennifer Elliot:

I find that there is undue influence in the case.

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

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

Court is charged to making sure that justice is done.

Your client lied about his finances.

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

Your firm does this a lot and attack other lawyers.

I find it to be a pattern with your firm.

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

I am the Judge not you.

Jennifer Abrams:

Excuse me I was in the middle of a sentence.

Is there any relationship between you and Louis Schneider?

At what point should a judge sanction an attorney?

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

If there is an ethical problem or the law has been broken by an attorney the Judge is mandated by law to report it to the Nevada State Bar or a governing agency that could deal with the problem appropriately.

10/5/2016 9:48 AM (UTC -07:00)



campilobaxter Dang, I thought there was actually going to be an attack in there.

10/5/2016 12:17 PM (UTC -07:00)



One Stop Tech Shop Typical for nefe and abrams law firm

10/5/2016 3:52 PM (UTC -07:00)



SelectLasVegas This is crazy...If there is no money and they agree...Really? Insane, no

wonder there is a backlog.

10/7/2016 4:58 AM (UTC -07:00)



Pamela Lawson Good job Judge Elliot. Somebody should have been found in contempt!

10/7/2016 1:35 PM (UTC -07:00)



Steve Sanson

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



Jennifer Abrams Las Vegas Divorce Attorney attacks Judge Jennifer Elliot in open court

10/5/2016 1:53 AM (UTC -07:00)

01:12:05 / 956 views / 2 likes / 1 dislikes / 12 comments

11 Indexed comments



Steve Sanson A behind the scenes look inside our courtroom

No boundaries in our courtrooms!

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

The above are examples of the court room over stepping boundaries. But what happens when a Divorce Attorney crosses the line with a Clark County District Court Judge Family Division?

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10/7/2016 4:58 AM (UTC -07:00)



Pamela Lawson Good job Judge Elliot. Somebody should have been found in contempt!

10/7/2016 1:35 PM (UTC -07:00)



Chuck Jameson The title of this video is backwards. It's the judge who is attacking the attorney. But the attorney is not intimidated and stands up to the judge. You have to watch the entire video to see the truth. The judge has no idea what is going on in the case and then completely reverses herself at the end when she finally understands the facts.

10/8/2016 6:13 PM (UTC -07:00)



EvilLucian Abrams did an awesome job convincing the judge she was wrong! You need to watch the end where the judge takes back her accusations and admits Abrams was right!

10/8/2016 9:21 PM (UTC -07:00)



Steve Sanson District Court Judge Bullied by Family Attorney Jennifer Abrams

District Court

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

Clark County, Nevada

October 9, 2016

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

D-15-521372D.

We had recently posted a videotape of a hearing that took place on September 29, 2016 in the Salter case. The video exposed the disrespectful and obstructionist behavior of the husband's lawyer, Jennifer Abrams (see Nevada Attorney attacks a Clark County Family Court Judge in Open Court

<http://myemail.constantcontact.com/Nevada-Attorney-attacks-a-Clark-County-Family-Court-Judge-in-Open-Court.html?solid=1119987097423&aid=vvZH2h8224w>).

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

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

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

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

10/9/2016 10:50 PM (UTC -07:00)



Steve Sanson Rule 1. Nevada Rules for Sealing and Redacting Court Records; purpose, policy, and scope of rules.

1. Title. These rules may be known and cited as Nevada Rules for Sealing and Redacting Court Records, or abbreviated SROR.

2. Purpose. These rules provide a uniform procedure for the sealing and redacting of court records in civil actions.

3. Policy. All court records in civil actions are available to the public, except as otherwise provided in these rules or by statute.

4. Scope. These rules apply to all court records in civil actions, regardless of the physical form of the court record, the method of recording the court record, or the method of storage of the court record. These rules do not apply to the sealing or redacting of court records under specific statutes, such as NRS Chapter 33, NRS Chapter 179, juvenile cases pursuant to NRS Chapters 62 and 63, or domestic relations matters pursuant to NRS Chapters 122 (Marriage), 123 (Rights of Husband and Wife), 125 (Dissolution), 126 (Parentage), 127 (Adoption), 128 (Termination of Parental Rights), 129 (Minors' Disabilities), 130 (Child Support), 453 (Treatment and Rehabilitation of Addicts), 433, 433A (Admission to Mental Health Facilities/Sealing of Records), 433B (Provisions Relating to Children), 435 (Retarded Persons), and 436 (Community Programs for Mental Health) or to NRS Title 13 (Guardianships; Conservatorships; Trusts). These rules do not provide for the retention or destruction of court records or files.

[Added; effective January 1, 2008.]

10/10/2016 3:39 PM (UTC -07:00)



Steve Sanson District Court Judge Bullied by Family Attorney Jennifer Abrams

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

Clark County, Nevada  
October 9, 2016

Yesterday, Veterans In Politics International, Inc. (VIPI) was served with a copy of a Court Order sealing case materials in a family court case on which we have been reporting, Saiter v. Saiter, case no. D-15-521872D.

We had recently posted a videotape of a hearing that took place on September 29, 2016 in the Saiter case. The video exposed the disrespectful and obstructive behavior of the husband's lawyer, Jennifer Abrams (see Nevada Attorney attacks a Clark County Family Court Judge in Open Court <http://myemail.constantcontact.com/Nevada-Attorney-attacks-a-Clark-County-Family-Court-Judge-in-Open-Court.html?scid=1119987097423&aid=yvZHZh8224w>).

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

10/10/2016 5:16 PM (UTC -07:00)



Steve Sanson Jennifer Abrams was never a party to this case, until today October 10th, 2016. After we filed an article informing her that she wasn't. So the question is who asked for the case to be sealed?

10/10/2016 5:19 PM (UTC -07:00)

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

**David Schoen**

---

**From:** YouTube Support Team <youtube-disputes+P42GIS7UJZ5WEVNXFQ4CYDMURU@google.com>  
**Sent:** Sunday, January 15, 2017 11:34 PM  
**To:** pbsaiter@cox.net  
**Subject:** RE: Privacy Complaint Received

Hello,

We have removed the material in question for a privacy violation, pursuant to our Community Guidelines.

It may take some time for video search results and thumbnail images to disappear from the site. Typically, this should not take more than a couple of days. Please be assured that the content has been removed.

For more information regarding our Privacy Guidelines, please visit: [http://youtube.com/t/privacy\\_guidelines](http://youtube.com/t/privacy_guidelines).

Sincerely,  
The YouTube Team

**David Schoen**

---

**From:** YouTube Support Team <youtube-disputes+4AK6N5PSRBRNUYLEO2NLQPC3EU@google.com>  
**Sent:** Sunday, January 15, 2017 11:33 PM  
**To:** pbsaiter@cox.net  
**Subject:** RE: Privacy Complaint Received

Hello,

We have removed the material in question for a privacy violation, pursuant to our Community Guidelines.

It may take some time for video search results and thumbnail images to disappear from the site. Typically, this should not take more than a couple of days. Please be assured that the content has been removed.

For more information regarding our Privacy Guidelines, please visit: [http://youtube.com/t/privacy\\_guidelines](http://youtube.com/t/privacy_guidelines).

Sincerely,

The YouTube Team

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3





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**Steve Sanson** PHOTO

0 Videos · 0 Followers · 0 Likes

Steve Sanson's Biography Steve Sanson's strong commitment to his country and his community has been demonstrated through his leadership and service. [Read more](#)



**Lawyers acting badly in a Clark County Family Court**  
Steve Sanson · 11/11/11



**Nevada Attorney attacks a Clark County Family Court Judge &...**  
Steve Sanson · 11/11/11



EXHIBIT 4

EXHIBIT 4

EXHIBIT 4

**David Schoen**

---

**From:** Vimeo Support <support@vimeo.com>  
**Sent:** Wednesday, January 18, 2017 11:03 AM  
**To:** Brandon Salter  
**Subject:** [Vimeo Support] Re: Privacy Violation Report

*##- Please type your reply above this line -##*  
To ensure delivery, add [no-reply@vimeo.com](mailto:no-reply@vimeo.com) to your address book.



**Melissa B. (Vimeo Support)**

Jan 18, 2:03 PM EST

Hi there,

Thank you for bringing this to our attention. We have reviewed the videos in question and removed them as a violation of our Terms of Service.

With such a gigantic community and library, we truly appreciate the efforts of our community to bring inappropriate content to our attention. Thank you for helping us keep Vimeo awesome!

Sincerely,  
Melissa B.  
Trust and Safety Coordinator

---

**Brandon Salter**

Jan 18, 12:35 PM EST

// Contact Information

Name: Brandon Salter

Email Address: [pbsalter@cox.net](mailto:pbsalter@cox.net)  
Mailing Address: 831 Wintersweet rd  
Henderson, NV 89015  
Phone Number: 7022052604

// Privacy Complaint

Description: This complaint and the other complaint(s) are regarding my divorce. My ex-wife has requested it to be removed as well. The publisher will not, Hence him being sued. This video has ALL our personal and business information on. We also have 4 minor children that could come across this. Things on this video, that if were on paper would be a confidential court document. This case was also sealed and he was ordered by the court to remove it and has not.

That is not enough? Please advise

Details: district court Judge ordered to seal records and orders to remove the video. The entire video infringes on a court order and a family. Along with myself of course. My ex wife has requested to be removed as well. Can gladly provide court documents if between us,

URLs at Issue: <https://vimeo.com/199774775>, <https://vimeo.com/199773603>,  
<https://vimeo.com/199772985>

// User Information

User Name: Logged Out

User Email: Logged Out

User URL: Logged Out

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**EXHIBIT 5**

**EXHIBIT 5**

**EXHIBIT 5**

ВИДЕО@mail.ru

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Veterans In Politics

VIDEO 1

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Nevada Attorney attacks a  
Clark County Family Court

49:54 · 21.01.2017

## WEEK'S TOP



HD 01:27

Голосование

Add friend



HD 09:12

Алексей Воробьев -  
Я просто хочу



HD 01:41

Завораживающий  
танец дельфинов!



HD 02:21

Круговое  
путешествие из 3300



HD 04:54

"What Is Love" в  
винтажном стиле



HD 02:27

Восточный танец



HD 00:17

вдохновился стрит-  
артом



EXHIBIT 6

EXHIBIT 6

EXHIBIT 6



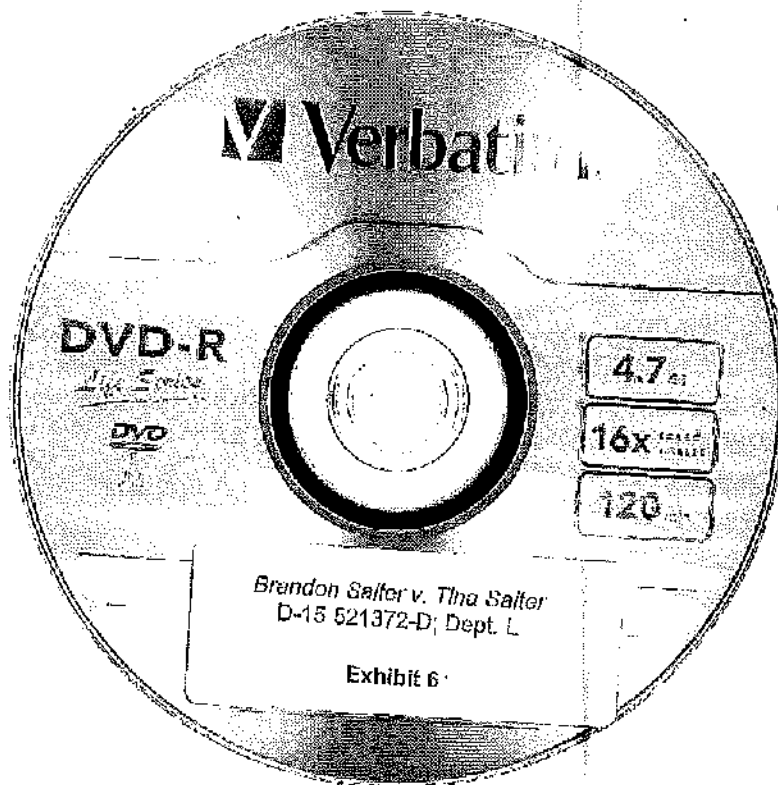


EXHIBIT 7

EXHIBIT 7

EXHIBIT 7

1/25/2017

Stavros S. Anthony & Michael Haines to Appear On the "Veterans In Politics" Video-Talk-Show

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VETERANS  
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## Stavros S. Anthony & Michael Haines to Appear On the "Veterans In Politics" Video- Talk-Show

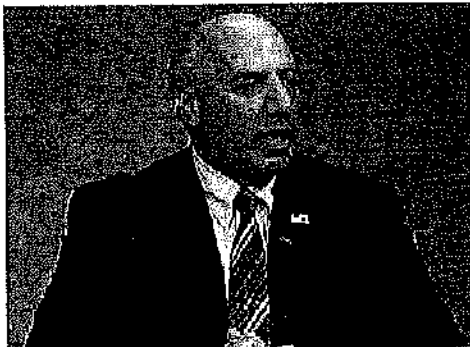
Las Vegas City  
Councilman &  
Former US Senate  
Candidate



FIND OUT MORE

"Veterans In Politics Talk Show" ( Anthony & Haines )

Call In to the show 702 685 8380



<http://myemail.constantcontact.com/Stavros-S-Anthony---Michael-Haines-to-Appear-On-the-Veterans-In-Politics-Video-Talk-Show-.html?eoid=111090700...> 1/13

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930

1/25/2017

Stavros S. Anthony & Michael Haines to Appear On the "Veterans In Politics" Video-Talk-Show

**Stavros S. Anthony Las Vegas  
City Councilman Ward 4**

Learn More About Stavros S.  
Anthony



**Michael Haines former US  
Senate Candidate**

Learn More About Michael Haines

**LAS VEGAS, NEVADA- - Veterans In Politics video Talk Show**  
proudly announces that **Stavros S. Anthony** Las Vegas City  
Councilman Ward 4 and **Michael Haines** former US Senate  
Candidate to appear on the "**Veterans In Politics**" internet video  
talk-show as a special guest on **Saturday - January 28, 2017**  
from **2-3pm PT**. Listen and watch LIVE on  
<http://www.wvdbtv.com/veterans-in-politics.html>.

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

<http://myemail.constantcontact.com/Stavros-S-Anthony---Michael-Haines-to-Appear-On-the-Veterans-In-Politics-Video-Talk-Show-.html?solid=411098700...> 2/13

1/26/2017

Stavros S. Anthony & Michael Helmes to Appear On the "Veterans In Politics" Video-Talk-Show

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 recognitions from countless non-profit organizations, Mayors and City Councils plus schools.

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

### 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:

Attorney Marshall Willick's letters against opposing party found defamatory per se in 2008; Willick settled before trial on issue privilege.

Richard Crane, formerly with Willick's firm, guilty of sexual misconduct involving a minor and suspended from the practice of law.

<http://myemail.constantcontact.com/Stavros-S.-Anthony---Michael-Helmes-to-Appear-On-the-Veterans-In-Politics-Video-Talk-Show-.html?so/d=1118893709...> 3/13



**Click onto link below:**

Richard Crane, formerly with Willick's firm, guilty of sexual misconduct involving a minor and suspended from the practice of law.

**Statement from Steve Sanson President of Veterans In Politics International, Inc.**



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 before the sealing and was taking down illegally, we have placed the videos on a multitude of channels. We will not be pushed around by people that think they are entitled or beyond approach.

**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

1/25/2017

Slavros S. Anthony & Michael Haines to Appear On the "Veterans In Politics" Video-Talk-Show

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.

I received this notice from Facebook, indicating that this law firm owns my articles and a video that I received from the courts under the Freedom of Information Act. That I am in violation of copy right infringement signed under penalty of perjury.

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 #: 307875170275756

Rights Owner: Jennifer Abrams / The Abrams & Mayo Law Firm

Email: jabrams@theabramslawfirm.com

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Stavros S. Anthony & Michael Haines to Appear On the "Veterans In Politics" Video-Talk-Show

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).

He Defended Us, Let's Defend Him!



[Click Here to Support Veterans In Politics International, Inc.](#)

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

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*\*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](#)

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RA000273

935



1/25/2017

Stavros S. Anthony & Michael Holmes to Appear On the "Veterans In Politics" Video-Talk-Show

*\*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>

Veterans In Politics video Talk Show proudly announces that **Janiece S. Marshall** former Las Vegas Justice of the Peace Department 3 and **Rick Workman** candidate for Mayor of Henderson Nevada



<http://myemail.constantcontact.com/Stavros-S.-Anthony--Michael-Holmes-to-Appear-On-the-Veterans-In-Politics-Video-Talk-Show-.html?aid=111998709...> 7/13

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936

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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...

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**JOIN US ON FRIDAY JANUARY 27TH FROM 7-11PM**  
**Hang in the Veterans In Politics Section by Ringside call**  
**702 283 8088 for tickets**

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**Sponsored by Veterans In Politics International, Inc.**



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**Heidi Hanusa**

Nevada License MA, LMFT

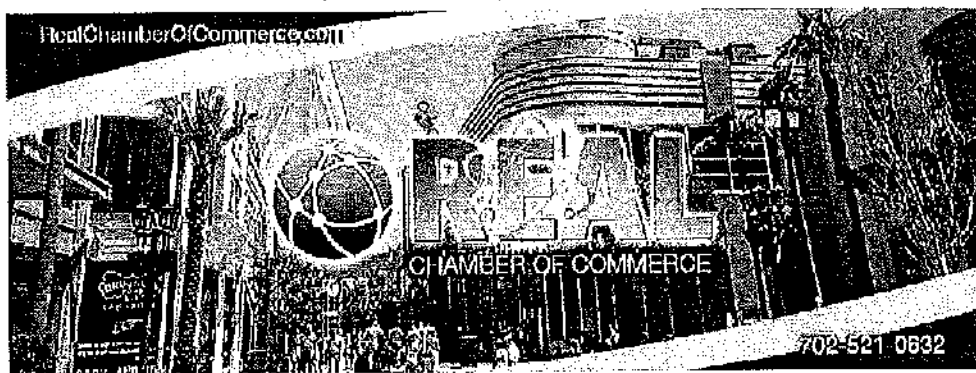
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702 370-4244 (cell)

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# REAL<sup>2</sup> ALKALIZED WATER

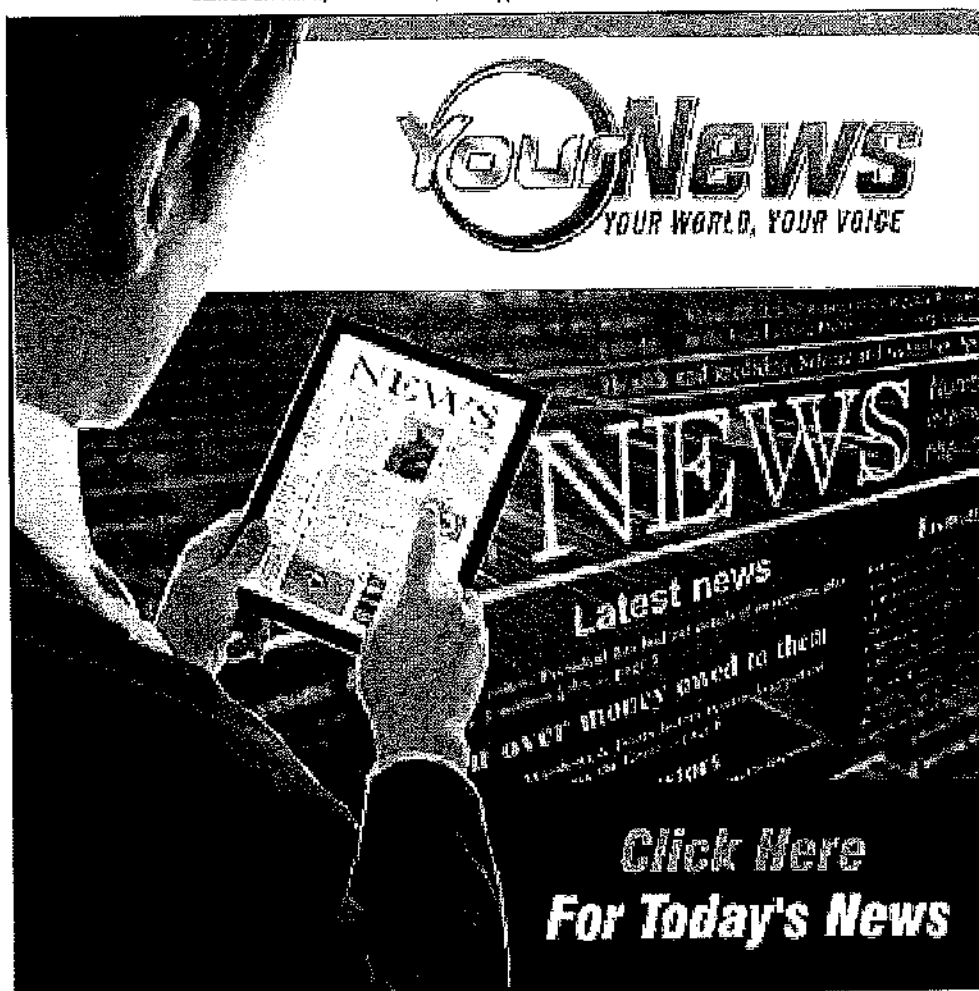
<http://myemail.constantcontact.com/Stavros-S.-Anthony--Michael-Haines-to-Appear-On-the-Veterans-In-Politics--Video-Talk-Show-.html?solid=111908709...> 11/13

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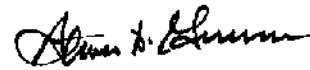
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Click the "Like" button.

  
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**OPP**

Margaret A. McLetchie, Esq. (State Bar No. 10931)  
MCLECHIE SHELL LLC  
701 East Bridger Ave., Suite 520  
Las Vegas, Nevada 89101  
Phone: (702) 728-5300; Fax: (702) 425-8220  
Email: maggie@nvlitigation.com

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-fax: (310) 734-1538  
E-mail: alevy96@aol.com

Attorneys for: NON-PARTY STEVE SANSON

**DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA**

BRANDON PAUL SAITER,	)	Case No: D-15-521372-D
	)	
Plaintiff,	)	Hearing Date: 3/30/2017
	)	Time: 9:00 a.m.
vs.	)	Dept.: L
	)	
TINA MARIE SAITER,	)	<b><u>SPECIAL APPEARANCE</u></b>
	)	
Defendant.	)	

**OPPOSITION TO MOTION FOR ORDER TO SHOW CAUSE RE: CONTEMPT**

Non-party Steve Sanson hereby specialy appears to oppose Petitioner Brandon Saiter's Motion for an Order to Show Cause against Sanson. The Opposition is based on the Court's lack of personal jurisdiction over Sanson and the Court's lack of subject matter jurisdiction to enforce an Order that is legally void. Void orders can be attacked in any proceeding in any court where the validity of the order comes into issue. Pennoy v. Neff, 95 U.S. 714, 24 L.Ed. 565 (1877); McDonald v. Mabey, 243 US 90, 61 L.Ed. 608 (1917); U.S. v. Holtzman, 762 F.2d 720 (9th Cir. 1985). Sanson hereby requests that the Court vacate the Order.

OPPOSITION TO MOTION FOR OSC RE: CONTEMPT



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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Non-party Steve Sanson hereby specialy appears to oppose Petitioner Brandon Paul Saiter's motion to issue an OSC re: contempt against Sanson for his purported violation of the Court's October 6, 2016 Order in this case (the "Order"). A copy of the Order is attached as Exhibit 3 to Sanson's Declaration ("Sanson Decl.") filed herewith.

This motion is but one part of the over the top, beyond the bounds of reason measures that Abrams is taking to eliminate from public view a court-produced video transcript that simply shows her arguing a client's case in court.

Abrams is apparently so mortified by her own behavior that she will at nothing to get the video out of public view. This includes now asking the Court to find Sanson, the President of Veterans in Politics International, Inc. ("VIPI")<sup>1</sup> which posted the video online, in criminal contempt. Abrams is actually asking the Court to throw Sanson in jail for 54 days, which she unabashedly implies is a good faith break from the 7 years, 4 months and 24 days she thinks he should otherwise receive.<sup>2</sup> Mtn., 17:19-21. All this, for Sanson purportedly violating a Stipulated Order issued in a case in which he is not a party. As shown below, the Court has no jurisdiction over him, and the Order is legally void because it was issued in violation of state and federal laws.

The harassment noted out by Abrams and her fiancé, Marshal Willick, towards Sanson, VIPI and others demonstrate that this motion has much to do with Abrams and little to do with her client. After disseminating the video, Abrams sent the Court an Email complaining that the

<sup>1</sup> VIPI is a non-profit that operates as a government watchdog. It lobbies government on behalf of veterans and works to expose public wrongdoing and corruption. Sanson Decl., ¶ 2. Its philosophy is to safeguard the principles of democracy that countless veterans have lost their lives to protect. VIPI is also for all intents and purposes a member of the media. It operates a weekly internet talk show that features public officials and others who discuss issues of public concern, it writes blogs and articles, administers Facebook pages on which it distributes information, and it sends email updates to its members and others with its latest news. *Id.*

<sup>2</sup> This in spite of the fact that NRS 22.100(2) caps imprisonment for contempt to 25 days.

1 video made her look bad. Sanson Decl., ¶ 4, Ex. 2. Indeed, Abrams even argues in this motion  
2 that the video should be taken down because "the information being disseminated with the video  
3 is *"intended to place [the undersigned] in a bad light."* Mtn., 11:3-5. Tellingly, despite all of the  
4 conclusory statements that Abrams makes about how upset her client is over the release of the  
5 courtroom video, she fails to provide any affidavit from her client in support of the motion.

6 Even the "take down" notices that Abrams claims her client sent to VIPI's online service  
7 providers were in fact sent by her and Willick. Sanson Decl., ¶11, Ex. 7. Interestingly, she  
8 refused to provide copies of these notices to Sanson's counsel and now fails to submit them as  
9 exhibits to her motion even though they are prominently discussed in the moving papers.

10 Abrams and Willick recently each filed separate lawsuits against Sanson and VIPI (and  
11 others) in District Court claiming a plethora of identical causes of action. (See, complaints in  
12 Abrams v. Schneider, case no. A-17-749318-C and Willick v. Sanson, case, attached as Exs. 4  
13 and 6 respectively to Sanson Decl.) Abrams' complaint is based on VIPI's distribution of the  
14 court video and its criticisms of Abrams' court practices. Willick's lawsuit is based on VIPI's  
15 criticism of his court practices. While the gravamen of their complaints is defamation, the  
16 complaints make fantastical claims of RICO violations (even though there are no factually  
17 supported RICO related crimes alleged), intentional and negligent infliction of emotional distress  
18 (even though this is improbable given that Abrams and Willick are hardened family law  
19 litigators), conspiracy of action (even though no inherently dangerous activity, e.g., drag-racing,  
20 is alleged as required for this cause of action), copyright infringement (even though state courts  
21 have no subject matter jurisdiction over federal copyright claims), etc.

22 But Abrams and Willick didn't stop there. They individually and together engaged in a  
23 campaign to shut VIPI down by getting its email service provider, Constant Contact, to suspend  
24 its account so it could no longer effectively communicate with its members. Sanson Decl., ¶11,  
25 Ex. 7. While VIPI has since switched to the Mail Chimp email distribution service, its  
26 viewership under this service has significantly dropped. Sanson Decl., ¶ 11. They are also using  
27 unfounded claims of privacy and/or copyright infringement (reportedly including claims of  
28 ownership the Court's video transcript) to take VIPI's postings off the internet.

1 Willick has also resorted to viciously disparaging Sanson and VIPI online, falsely  
2 claiming that VIPI is a "sham organization," is an "unethical scheme to extort concessions," is  
3 used to fund Sanson's personal expenses, fails to file tax returns, has a "sham" radio show and a  
4 fraudulent endorsement process. He calls Sanson a "hypocrite...but even worse," "repugnant,"  
5 "a sleazy extra out of Harper Valley PTA," "slimy beyond words," and a "two-bit unemployed  
6 hustler," who was "forced to flee California." He also accuses Sanson of "shaking down  
7 candidates for cash and conspiring with like-minded cronies." Sanson Decl., ¶¶ 8-9, Ex. 5.  
8 These statements are worse than those for which Willick and Abrams are suing VIPI and Sanson  
9 in their defamation actions.

10 While the above alone should give this Court pause, the reasons to deny the present  
11 motion are embedded in the *most basic* of legal and democratic principles:

12 1. Courts do not have jurisdiction over non-parties. Sanson is not a party to this  
13 action, has never been served with legal process in the case, and does not voluntarily submit to  
14 the jurisdiction of this Court. An OSC re: contempt against a non-party would be, among other  
15 things, a violation of Sanson's federal and state constitutional due process rights. Moreover, the  
16 Order was expressly issued and based on the "Stipulation of the Parties." Sanson was not  
17 involved with such stipulation and never agreed to be bound by it. It is axiomatic that  
18 stipulations cannot bind non-parties, and neither can orders thereon.

19 2. Courts do not have subject matter jurisdiction to enforce void or voidable orders.  
20 This Order is void because it violates federal and state constitutional free speech rights and was  
21 issued in violation of Nevada laws. Discussing and disseminating information about a court  
22 proceeding -- which is of course presumed public -- is a constitutionally-protected right that  
23 cannot be infringed absent a "compelling state interest." Such interest must be specifically  
24 identified and supported in the Order. Neither the Order nor Petitioner identifies such state  
25 interest. Further, any measures taken by the court to address such interest must be narrowly  
26 tailored. It is unlawful for the Court to simply seal the entire case, as the Order purports to do.  
27 Further, the Order is based on the Stipulation of the Parties and cannot bind non-parties such as  
28 Sanson who never agreed to the Stipulation. Accordingly, the Order is void and is therefore

1 beyond the subject matter jurisdiction of the Court to enforce. Instead, the Court has a legal  
2 obligation to vacate it, and Sanson hereby requests that it do so. Jordon v. Gilligan, 500 F.2d  
3 701, 710 (6th Cir., 1974) ("a court must vacate any judgment entered in excess of its  
4 jurisdiction.")

5 3. If this Court grants Petitioner's motion and issues an OSC re: Contempt, which it  
6 should not, then Sanson hereby moves to disqualify this judge, and demands that a different  
7 judge be assigned to hear such OSC. While contempt hearings in family law cases are typically  
8 heard by the judge who issued the underlying order, in this case, this judge has a vested interest  
9 in the outcome of such OSC and should be disqualified pursuant to Rule 2.11 of the Code of  
10 Judicial Conduct. VIPT's postings indicate that the video transcript that is the subject of the  
11 Order reflects negatively on the judge for failing to control her courtroom. This Judge, an  
12 elected official, would not be able to avoid the appearance of partiality should she preside over  
13 an OSC that would affect whether a video that may reflect poorly on her should be kept from  
14 public view.

15 Accordingly, the Court should deny Petitioner's motion in its entirety.

16 **II. THE COURT DOES NOT HAVE PERSONAL JURISDICTION OVER SANSON**

17 There can be no dispute that Sanson is not a party to this action. The Nevada Supreme  
18 Court has "consistently defined a party as someone who has been named a party in the record,  
19 and who, as such, is served with process and enters an appearance." Frank Settelmeier & Sons,  
20 Inc. v. Smith & Harmer, Ltd., 124 Nev. 1206, 1212, n.3, 197 P.3d 1051, 1055 (2008). Generally,  
21 a stranger to an action cannot appear in the action or make a motion in it (State ex rel. Garaventa  
22 Land & Livestock Co. v. Second Jud. Dist. Ct. 61 Nev. 350, 354, 128 P.2d 266, 268 (1942)), nor  
23 can a court adjudicate such non-party's rights without appropriate constitutional Due Process  
24 protections, including an opportunity to be heard. The United States Supreme Court has held  
25 that the validity of the Order may be affected by a failure to give constitutionally required due  
26 process notice and an opportunity to be heard. Barle v. McVeigh, 91 U.S. 503, 23 L.Ed. 398  
27 (1875). It should go without saying that no order may be rendered in violation of constitutional  
28 protections.

1 Here, the Order was issued after VIPI (acting through Sanson) disseminated the video,  
2 and after VIPI refused to voluntarily and unnecessarily relinquish its First Amendment rights.  
3 The Order, undoubtedly drafted by Abrams, purported to retroactively seal all the records in the  
4 case and to broadly apply even to non-parties who were never given an opportunity to be heard.  
5 This is of course not constitutionally permitted.

6 Moreover, the Order was expressly entered into by Stipulation of the Parties – again,  
7 Sanson was never a party and never stipulated to the form or contents of the Order. He cannot  
8 therefore be bound by it. Indeed, it is axiomatic that stipulations cannot bind unrelated third  
9 parties.

10 Petitioner's argument that Sanson should become subject to the Court's jurisdiction  
11 because he "interjected himself into this case by taking possession of and disseminating a closed  
12 hearing video for the purpose of impacting the outcome of the litigation in exchange for Mr.  
13 Schneider's payment to him" and "by reposting two hearing videos after being personally served  
14 with an order prohibiting their dissemination" is unfounded. First, no one submits to the  
15 jurisdiction of the court simply by obtaining a publicly available video transcript or  
16 disseminating it. If that were the law, news agencies and any citizen could be subject to the  
17 jurisdiction of every court, which is of course not the case. The allegation that the hearing was  
18 "closed" under Rule 5.02 is of no import since, as discussed in Section III.B herein, Rule 5.02  
19 does not operate to seal hearing transcripts. Moreover, it appears that there may have been no  
20 basis to close the hearing if it was in fact closed at the time. Further, reposting the hearings after  
21 being served with the Order is also of no import since the Court had and continues to have no  
22 jurisdiction over Sanson and cannot purport to bind him to an Order based on a stipulation of  
23 counsels in a case in which he is not involved. Indeed, Petitioner cites to no law to support this  
24 untenable position.

25 Since the Court lacks personal jurisdiction over Sanson, the motion for OSC re: contempt  
26 should be denied for this reason alone.

1     **III. THE COURT LACKS SUBJECT MATTER JURISDICTION AS THE ORDER IS**  
2     **VOID OR VOIDABLE AND CANNOT SERVE AS A BASIS FOR CONTEMPT.**

3         Even if the Court somehow had personal jurisdiction over Sanson, which it does not, it  
4     does not have subject matter jurisdiction to enforce the Order since the Order is void for failing  
5     to comply with applicable law. In a 1996 family law case, the Nevada Supreme Court held that  
6     an order that is void exceeds the subject matter jurisdiction of the court, and the court cannot  
7     enforce it:

8         In this state it is clearly the law that the violation of an order in excess of  
9     the jurisdiction of the issuing court cannot produce a valid judgment of  
10    contempt, and that the "jurisdiction" in question extends beyond mere  
11    subject matter or personal jurisdiction to that concept described by us in  
12    Abelleira v. District Court of Appeal [17 Cal. 2d 280, 109 P.2d 942, 948  
13    (1941)]: "Speaking generally, any acts which exceed the defined power of  
14    a court in any instance, whether that power be defined by constitutional  
15    provision, express statutory declaration, or rules developed by the courts  
16    and followed under the doctrine of stare decisis, are in excess of  
17    jurisdiction, [ . . . ]

18         Del Papa v. Steffen, 915 P.2d 245, 249 (1996), quoting, In re Berry, 68 Cal. 2d 137, 65 Cal.  
19    Rptr. 273, 280, 436 P.2d 273, 280 (1968) (some citations omitted). The court in Del Papa  
20    concluded:

21         Although the Whitehead panel had subject matter jurisdiction in the  
22    Whitehead case, it acted in excess of that jurisdiction under the First  
23    Amendment, NRS 1.090, and the ARJD in ordering that the proceedings  
24    in the Whitehead case before this court be kept confidential. Therefore,  
25    those orders were void, and their violation cannot produce a valid  
26    judgment of contempt.

27         Id.; See also, State Indus. Ins. System v. Sleeper, 100 Nev. 267, 269, 679 P.2d 1273, 1274  
28    (1984) ("a person may not be held in contempt of a void order"); Kalb v. Feuerstein, 308 U.S.  
29    433, 60 S.Ct. 343 (1940) (a void order does not create any binding obligation).

30         For the reasons stated below, the Order is void and cannot serve as the basis of a  
31    contempt order.

1           **A. COURT PROCEEDINGS ARE OPEN TO THE PUBLIC AS A MATTER OF**  
2 **CONSTITUTIONAL RIGHT, COMMON LAW, AND STRONG PUBLIC POLICY.**

3           In the family law case of Dcl Papa v. Steffen, 915 P.2d 245, 248 (1996), the Nevada  
4 Supreme Court recognized that the unwarranted sealing of court documents or procedures  
5 violates constitutional rights:

6           Court ordered confidentiality orders implicate First Amendment concerns.  
7 The First Amendment prohibits Congress from making any law "abridging  
8 the freedom of speech, or of the press; or the right of the people peaceably  
9 to assemble, and to petition the Government for a redress of grievances."  
10 U.S. Const. amend. 1. The Fourteenth Amendment makes this prohibition  
11 applicable to state actions as well. U.S. Const. amend. XIV, § 1. The First  
12 Amendment guarantees public access to places traditionally open to the  
13 public, such as criminal trials. Richmond Newspapers, Inc. v. Virginia,  
14 448 U.S. 555, 577, 580, 100 S. Ct. 2814, 2827, 2829, 65 L. Ed. 2d 973  
15 (1980). In Richmond, the Supreme Court noted that though the right to  
16 attend civil trials was not at issue before it, "historically both civil and  
criminal trials have been presumptively open." *Id.* at 580 n. 17, 100 S. Ct.  
at 2829 n. 17. **A state may deny this right of public access only if it  
shows that "the denial is necessitated by a compelling government  
interest, and is narrowly tailored to serve that interest."** Globe  
Newspaper Co. v. Superior Court, 457 U.S. 596, 607, 102 S. Ct. 2613,  
2620, 73 L. Ed. 2d 248 (1982).

17 (Emphasis added); See also, Civil Rights for Seniors. Nonprofit Corp. v. Admin. Office of the  
18 Courts, 313 P.3d 216, 129 Nev. Adv. Op. 80 (Nev. 2013) (acknowledging First Amendment  
19 rights of access in criminal and civil judicial proceedings).

20           Indeed, there is a strong legal presumption, dating to common law, that courtroom  
21 proceedings are open to the public. Stephens Media v. Eighth Judicial District Court, 125 Nev.  
22 849 (2009); Richmond Newspapers, Inc. v. Virginia, 448 U.S. 555, 564-69, 580, n. 17 (1980);  
23 Nixon v. Warner Communications, Inc., 435 U.S. 589, 597-98 (1978).

24           The United States Supreme Court recognized the importance of public access to both  
25 criminal and civil courts in Gannett Co., Inc. v. DePasquale, 443 U.S. 368, 386, n. 15 (1979):  
26 "For many centuries, both civil and criminal trials have traditionally been open to the public. As  
27 early as 1685, Sir John Hawles commented that open proceedings were necessary so 'that truth  
28 may be discovered in civil *as well as* criminal matters.'" (*Id.*; citation omitted; emphasis in

1 original.) The Court recognized that the salutary effect of public access is as important in civil  
2 cases as it is in criminal trials.

3 In fact, the issue of open proceedings is so important that in 2008 the Nevada Supreme  
4 Court convened a special task force to address the problem of attorneys and courts over-sealing  
5 court records and promulgated civil rules pertaining to this issue. NRS 1.090 also recognizes  
6 this important public policy and provides: "[t]he sitting of every court of justice shall be public  
7 except as otherwise provided by law."

8 Accordingly, the Court must allow the proceedings to be open and public unless it  
9 specifically and factually identifies a "compelling government interest" and then, can only  
10 impose narrowly tailored measures to protect such state interests.

11 Petitioner's unsupported argument that Sanson has no right to disseminate or critique the  
12 court video because it is, in her opinion, part of a "smear campaigns" (Mtn., 10:16) actually  
13 underscores the importance of free speech rights—and makes evident that silencing Sanson's  
14 criticism is Abrams' goal in this case and part of the campaign she and Willick have initiated  
15 against him. Even if Abrams doesn't like him or his criticism, Sanson has every right to  
16 comment on court proceedings. That is the very meaning of having a First Amendment right.  
17 Abrams' distaste for its contents and her opinions on whether the speech is justified are entirely  
18 irrelevant.

19 Lastly, Petitioner boldly argues that Sanson is not allowed to watch or disseminate a  
20 court video transcript because Sanson was allegedly paid to distribute it or paid to state VIPT's  
21 opinion. Not only is this baseless (Sanson Decl., ¶ 12), but the notion that constitutionally  
22 protected free speech rights are somehow extinguished if money is involved is illogical and  
23 untrue. If that were the law, then television stations that depend on revenue from sponsored  
24 commercials, or media that pay for celebrity stories would simply not have free speech rights.  
25 Not surprisingly, Petitioner cites to no authority for this argument.

26 **B. IT IS IMPERMISSIBLE TO SEAL ENTIRE CASES.**

27 Sealing entire cases is not permitted under Nevada law.  
28



1 NRS 125.110(1) requires the following court records to remain public regardless of any  
2 attempts to seal a case:

3 (a) In case the complaint is not answered by the defendant, the summons,  
4 with the affidavit or proof of service; the complaint with memorandum  
5 endorsed thereon that the default of the defendant in not answering was  
6 entered, and the judgment; and in case where service is made by  
7 publication, the affidavit for publication of summons and the order  
8 directing the publication of summons.

9 (b) In all other cases, the pleadings, the finding of the court, any order  
10 made on motion as provided in Nevada Rules of Civil Procedure, and the  
11 judgment.

12 Further, while NRS 125.110(2) permits the court to seal certain documents such as  
13 certain testimony or exhibits if they are shown to be "private," it is a manifest abuse of discretion  
14 for the Court to seal an entire case. In Johanson v. District Court, 182 P.3d 94 (2009), the  
15 Nevada Supreme Court stated:

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

29 Id. at 99 (emphasis added).

30 In violation of these requirements, the Stipulation and Order in this case is impermissibly  
31 stated in the broadest possible terms. The Stipulation portion states:

32 Counsel then stipulated to seal the case and to disallow any further release  
33 of case information and to demand that the current post of the September  
34 29, 2016 hearing video, or any other hearing video from this case be  
35 immediately removed from the Internet and to prohibit any portion of  
36 these proceedings from being disseminated or published and that any such  
37 publication or posting by anyone be immediately removed...

1  
2 Order, at 1:27 – 2:6; emphasis added. The Order portion likewise states:

3 ...IT IS HEREBY ORDERED that the current post of the September 29,  
4 2016 hearing video, and any and all other hearing video(s) from this case  
5 shall be immediately removed from the internet. All persons or entities  
6 shall be prohibited from publishing, displaying, showing or making public  
7 any portion of these case proceedings; nothing from the case at bar shall  
8 be disseminated or published and that any such publication or posting by  
9 anyone or any entity shall be immediately removed ...

10 Order at 2:12-19 (emphasis added). Such blanket prohibition on access to an entire case file is  
11 specifically disallowed under Nevada law, and thereby renders the Order void.

12 **C. THERE IS NO COMPELLING STATE INTEREST IN SEALING THE**  
13 **COURT VIDEO.**

14 The Order states that the video transcript of the September 29, 2016 hearing should be  
15 sealed because the hearing was closed pursuant to Eighth District Court Rule 5.02.

16 Yet, Rule 5.02(a) does not purport to justify the sealing of part of a hearing, let alone an  
17 entire hearing. Rule 5.02 simply provides that members of the public and others may be  
18 excluded from a hearing to the extent that private facts are revealed or discussed:

19 In any contested action for divorce, annulment, separate maintenance,  
20 breach of contract or partition based upon a meretricious relationship,  
21 custody of children or spousal support, the court must, upon demand of  
22 either party, direct that the trial or hearing(s) on any issue(s) of fact joined  
23 therein be private and upon such direction, all persons shall be excluded  
24 from the court or chambers wherein the action is heard, except officers of  
25 the court, the parties their witnesses while testifying, and counsel.

26 Here, there was no finding, nor could there be, that any particular issue discussed at the  
27 hearing pertained to any private fact about the parties or their children. While Petitioner makes  
28 conclusory allegations about Sanson having disseminated private information, Petitioner's  
motion is completely devoid of any specificity regarding what particular private information  
was disseminated. The information it does mention is not private:

(a) At page 4:18-19, Petitioner argues that "the Saiter family's private material" was  
disseminated. This conclusory statement fails without an identification of what specific  
private material is being referred to.

1 (b) At 5:1-2, Petitioner finds objectionable that Sanson disseminated "copies of this  
2 Court's orders, and named Brandon and Tina Saiter personally, listing their case number  
3 repeatedly." Yet, none of this information is private. In fact, it falls squarely within the  
4 purview of NRS 125.110(1) which expressly states that pleadings and all court orders must  
5 remain public; the litigants' names and their case numbers are necessarily part of those  
6 documents. So, as a matter of law, this information is not private.

7 (c) At 5:2-3 Petitioner states that Sanson "continues to comment on Mr. Saiter's  
8 income and business information." Again there is no specificity to this statement. Any mention  
9 of annual income or the type of business Mr. Saiter is in, is typically public record in divorce  
10 proceedings. All divorce and custody litigants are required under NRCP, Rule 16.2 to file  
11 detailed income and expense declarations that set out this information. Likewise, affidavits of  
12 financial condition must be filed when a party seeks fees in connection with a motion for  
13 support and other matters. NRCP, Rule 5.32. There is no explanation for why this case should  
14 be treated as more confidential than any other family law case.

15 (d) At 5:4 Petitioner states that Sanson somehow commented on "Ms. Saiter's  
16 emotional state," though again there is no specificity to this allegation and no claim that any  
17 medical records or other confidential medical fact was disclosed.

18 (e) Finally, Petitioner argues at 5:4-6 that the video contains "commentary by this  
19 Court on very sensitive, personal matters, -- which, frankly, have no place in the public forum."  
20 This too is conclusory and fails to identify the subject matter of any confidential information. If  
21 it refers to the Court's critical statements about Ms. Abrams firm's court practices, then  
22 commentary on that would be exactly the type of speech that would be of public concern and  
23 would be protected by the First Amendment -- speech about the actions and statements of an  
24 officer of the court and the actions and statements of an elected public official, made during the  
25 course of their respective service.

26 Again, there is nothing private, and certainly nothing about the litigants or their children,  
27 that was discussed in the courtroom and that would justify closure under EDRC Rule 5.02, let  
28 alone justify a "compelling state interest" to seal the otherwise public record.

1 Moreover, even if the court wanted to seal part of the hearing, the Order was required to  
2 expressly state which part was being sealed, identify the compelling state interest involved in  
3 that particular part of the hearing, and then seal only that portion of the record to protect that  
4 particular interest. It cannot simply state in conclusory terms, as the Order does, that the  
5 transcript is being sealed "in the best interests of the children."

6 **D. THE ORDER SHOULD BE VACATED.**

7 It is well established that orders that are void for failing to comply with applicable law  
8 should be vacated. Jordon v. Gilligan, 500 F.2d 701, 710 (6th Cir., 1974) ("a court must vacate  
9 any judgment entered in excess of its jurisdiction.")

10 This Court has broad discretion to and should set aside the Order for mistakes and errors,  
11 and can also do so pursuant to N.R.C.P. 59(e) and 60(b). Doing so is well within the Court's  
12 sound judgment, and would not be reversible absent an abuse of discretion. Union Petrochemical  
13 Corp. of Nevada v. Scott, 96 Nev. 337, 337, 609 P.2d 323, 323 (1980).

14 Indeed, this is the Court's opportunity to rectify the situation without having the parties  
15 incur additional fees and costs to appeal the enforcement of the stipulated Order against non-  
16 party Sanson.

17 **IV. IF THE COURT GRANTS THE MOTION FOR OSC, THEN SANSON HEREBY**  
18 **MOVES TO DISQUALIFY THE JUDGE FROM PRESIDING OVER THE OSC.**

19 Rule 2.11 of the Code of Judicial Conduct requires a judge to disqualify herself "in any  
20 proceeding in which the judge's impartiality might reasonably be questioned." Here, the article  
21 that VIPI issued with the video transcript was critical of the Judge as well as Abrams:

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

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

28 Sanson Decl., Ex. 4. By signing an order that purports to take the video off the internet and

1 cease its further distribution, the court was effectively seeking to stifle public criticism about  
2 herself, an elected official. As such, the Judge has a vested interest in the outcome of an OSC  
3 hearing and would be subject to having her impartiality reasonably questioned. Consequently,  
4 Sanson hereby demands that she be disqualified from presiding over an OSC hearing.<sup>3</sup>

5 **V. PETITIONER SHOULD BE ORDERED TO PAY SANSON'S**

6 **ATTORNEYS' FEES AND COSTS**

7 Petitioner's motion is baseless and his request for attorneys' fees and costs should be  
8 denied. Instead, it is Petitioner who should be ordered to pay Sanson's attorneys' fees for filing  
9 a motion that lacks legal support and appears to be yet another tool used by Abrams to harass  
10 and attempt to intimidate Sanson and VIPI into stifling their constitutionally protected speech.

11 Sanson's counsel will submit a memorandum of fees and costs should the court grant his  
12 request.

13 **VI. CONCLUSION**

14 For all of the reasons stated above, Defendants respectfully request that the Court:

- 15 a. Deny the Motion for OSC re: Contempt;  
16 b. Vacate the Order;  
17 c. Order Petitioner to pay Sanson's attorneys' fees and costs; and  
18 d. Order such further relief as the court may deem just and proper.

19 DATED: March 6, 2017

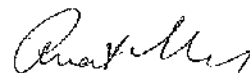
Margaret A. McLatchie, Esq. (Bar #10931)  
McLatchie Shell LLC  
701 East Bridger Ave., Suite 520  
Las Vegas, Nevada 89101  
Telephone: (702) 728-5300  
Fax: (702) 425-8220  
Email: maggie@nvlitigation.com

24 (signature block continued on next page)

25 <sup>3</sup> Petitioner's repeated argument that Sanson, a non-lawyer, at one point stated that only this  
26 Court can enforce its order is of no import. NRS §22.030, which applies to non-family law  
27 cases, even recognizes otherwise: "Except as otherwise provided in this subsection, if a  
28 contempt is not committed in the immediate view and presence of the court, the judge of the  
court in whose contempt the person is alleged to be shall not preside at the trial of the contempt  
over the objection of the person."

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Anat Levy, Esq. (Bar #12250)  
**Anat Levy & Associates, P.C.**  
5841 E. Charleston Blvd., #230-421  
Las Vegas, NV 89142  
Cell: (310) 621-1199  
E-fax: (310) 734-1538  
Email: alevy96@aol.com

By:   
Attorneys for: Non-party, 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 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 through the Court's wiznet E-service program:  
7

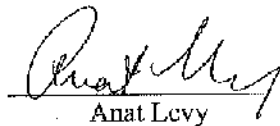
8 Jennifer Abrams, Esq.  
9 Brandon Leavitt, Esq.  
10 The Abrams & Mayo Law Firm  
11 6252 S. Rainbow Blvd., Ste. 100  
12 Las Vegas, NV 89118  
13 (702) 222-4021  
14 [JVAGroup@theabramslawfirm.com](mailto:JVAGroup@theabramslawfirm.com)  
15 [bklgroup@theabramslawfirm.com](mailto:bklgroup@theabramslawfirm.com)

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

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

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

22 Executed this 6th day of March 2017, in Las Vegas, NV

23   
24 Anat Levy

25  
26  
27  
28  

---

OPPOSITION TO MOTION FOR OSC RE: CONTEMPT

MOPI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

BRANDON PAUL SAITER

Plaintiff/Petitioner

v.

TINA MARIE SAITER

Defendant/Respondent

Case No. D-15-521372-D

Dept. L

**MOTION/OPPPOSITION  
FEE INFORMATION SHEET**

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

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

- ☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
- OR-
- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
- ☒ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
  - ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
  - ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on \_\_\_\_\_.
  - ☒ Other Excluded Motion (must specify) Party is seeking an OSC re: contempt against non-party. Non-party is contesting the jurisdiction of the court.

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

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☐ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
  - ☒ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57. The moving party would have paid the motion fee. Sanson is opposing.
- OR-
- ☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
- OR-
- ☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

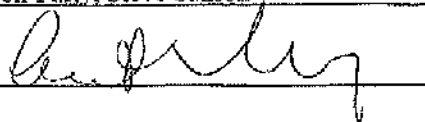
**Step 3. Add the filing fees from Step 1 and Step 2.**

The total filing fee for the motion/opposition I am filing with this form is:

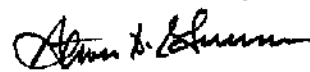
☒ \$0 ☐ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

Party filing Motion/Opposition: Non-Party, Steve Sanson Date March 6, 2017

Signature of Party or Preparer







CLERK OF THE COURT

1 OPP  
2 Margaret A. McLetchie, Esq. (NV Bar #10931)  
3 MCLETCHE SHELL LLC  
4 701 East Bridger Ave., Suite 520  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 728-5300  
7 Facsimile: (702) 425-8220  
8 Email: maggie@nvlitigation.com

9 Anat Levy, Esq. (NV Bar # 12250)  
10 ANAT LEVY & ASSOCIATES, P.C.  
11 5841 E. Charleston Blvd., #230-421  
12 Las Vegas, NV 89142  
13 Phone: (310) 621-1199  
14 E-mail: [alevy96@aol.com](mailto:alevy96@aol.com); Fax: (310) 734-1538

15 Attorneys for: NON-PARTY STEVE SANSON

16 **DISTRICT COURT**  
17 **FAMILY DIVISION**  
18 **CLARK COUNTY, NEVADA**

19 BRANDON PAUL SAITER,	)	Case No: D-15-521372-D
	)	
20 Plaintiff,	)	Hearing Date: 3/30/2017
	)	Time: 9:00 a.m.
21 vs.	)	Dept.: L
	)	
22 TINA MARIE SAITER,	)	<b><u>SPECIAL APPEARANCE</u></b>
	)	
23 Defendant.	)	

24 **DECLARATION OF STEVE SANSON IN OPPOSITION OF**  
25 **MOTION FOR ORDER TO SHOW CAUSE RE: CONTEMPT**

26 I, STEVE SANSON, hereby declare as follows:

27 1. I am not a party to the instant action and do not voluntarily submit to its  
28 jurisdiction. I am SPECIALLY APPEARING IN THIS CASE TO CONTEST THE  
JURISDICTION OF THE COURT. I make this declaration in support of my Opposition to  
Petitioner's Motion for an Order to Show Cause Re: Contempt. This declaration based on my

DECLARATION OF STEVE SANSON IN  
OPPOSITION TO MOTION FOR OSC RE: CONTEMPT

1 personal knowledge, except as to matters stated to be based on information and belief. I am  
2 competent to testify as to the truth of these statements if called upon to do so.

3 2. I am the President of defendant Veterans in Politics International, Inc. ("VIPI").  
4 VIPI is a non-profit corporation that advocates on behalf of veterans and that works to expose  
5 public corruption and wrongdoing. We routinely publish articles online on our VIPI website,  
6 various Facebook pages and through Constant Contact group emails. We also host an online  
7 weekly talk show which features public officials and others who discuss veterans, political,  
8 judicial and other issues of public concern.

9 3. In October 2016, acting in my capacity as President of VIPI, I posted the court  
10 video transcript of the September 29, 2016 hearing in the instant case. The video showed what I  
11 believed in good faith was Abrams being disrespectful of the Judge and the Judge failing to  
12 adequately control her courtroom. Attached hereto as Exhibit 1 is a true and correct copy of the  
13 article that I posted.

14 4. I thereafter received an email from the Court which attached an email from  
15 Jennifer Abrams stating that the video should be taken down in part because she thought it made  
16 her look bad. Since VIPI was within its rights to post a video of a court proceeding, I did not  
17 take it down. Attached as Exhibit 2 is a true and correct copy of the email from Abrams.

18 5. I was then personally served with a copy of the October 6, 2016 Court Order in  
19 this case. Attached hereto as Exhibit 3 is a true and correct copy of the Order.

20 6. The Order purported to seal all of the documents and proceedings in the case on a  
21 retroactive basis. While I did not agree that the records should be sealed or that there was a legal  
22 basis to take the video down, out of an abundance of caution, I took the video out of public view  
23 temporarily until I could get further legal advice. Once I learned that the Court had no  
24 jurisdiction over VIPI or me, and had no legal basis for sealing the records, I reposted the video  
25 online, along with an article reporting on what had taken place and analyzing the practice of  
26 sealing court documents. A true and correct copy of the article is attached hereto as Exhibit 4.  
27  
28

DECLARATION OF STEVE SANSON IN  
OPPOSITION TO MOTION FOR OSC RE: CONTEMPT

1           7.       Shortly after January 9, 2017, I was served with a complaint in which Abrams  
2 sued me, VIPI and each of its officers and directors, its former web administrator and her  
3 opposing counsel in this family law proceeding. She even sued a VIPI officer who lives in  
4 Missouri. None of those officers or directors had anything to do with the postings I made on  
5 behalf of VIPI, nor did they know about the posting in advance. In addition, Abrams sued  
6 Sanson Corp., an entity which has nothing to do with VIPI or its activities. Attached as Exhibit 5  
7 is a true and correct copy of the operative complaint in that case, without its exhibits.

8           8.       I thereafter learned of a letter that Abrams' fiancé, Marshal Willick, posted online  
9 and addressed to me, but never sent to me. A true and correct copy of the letter and the links to it  
10 on his website is attached as Exhibit 6.

11           9.       In the letter, among other things, Willick accuses VIPI of manipulating its  
12 candidate interview process, using VIPI's income for my personal expenses, not filing tax  
13 returns for VIPI, and using VIPI as an "unethical scheme to extort concessions in an ongoing  
14 case." He further accuses me of being a "hypocrite...but even worse," "a sleazy extra out of  
15 'Harper Valley PTA,'" states that I am the very definition of "hypocrite – not to mention slimy  
16 beyond words," calls me a "two-bit unemployed hustler," accuses me of "shaking down  
17 candidates for cash and conspiring with like-minded cronies" and says "you are repugnant." He  
18 also accuses VIPI's radio show of being a "fraud," claims that VIPI is a "sham organization,"  
19 and claims that I was "forced to flee California." None of those statements are true.

20           10.      On or about February 4, 2017 Willick sued VIPI, me, and all of the same VIPI  
21 officers and directors as Abrams sued, alleging the identical causes of action that Abrams alleged  
22 in her complaint. He claimed that VIPI's posts criticizing him were defamatory. Attached  
23 hereto as Exhibit 7 is a true and correct copy of the complaint.

24           11.      Starting on January 6, 2017 and continuing into February, I have received emails  
25 from VIPI's online service providers advising that Jennifer Abrams sent "take down" letters to  
26 them and that they were either taking materials off my site or shutting down my service until an  
27 investigation could be made. Attached as Exhibit 8 are true and correct copies of take down  
28

DECLARATION OF STEVE SANSON IN  
OPPOSITION TO MOTION FOR OSC RE: CONTEMPT

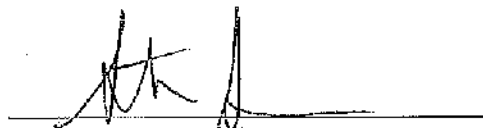
- 3

1 notices that I received from YouTube which took down the court transcript video of Abrams in  
2 the family court proceeding, Facebook which took down numerous of VIPI's posts on Abrams,  
3 Vimeo, and Constant Contact. Constant Contact has shut down VIPI's account so that VIPI  
4 could no longer send emails using that account to its followers and members. While VIPI has  
5 now switched to distributing its emails via Mail Chimp service, our readership has fallen  
6 significantly with this new service provider. I have spent considerable time and aggravation  
7 dealing with these take down notices that I believe are completely unwarranted and that are  
8 disrupting VIPI's operations.

9  
10 12. VIPI has never accepted payment from anyone in exchange for publishing articles  
11 or disseminating a particular news story to its members or the public. We are a non-profit  
12 organization of veterans who have risked their lives to preserve our democracy. We take pride in  
13 the work that we do to expose government-related wrongdoing and corruption.

14 I declare under penalty of perjury under the laws of the State of Nevada that the  
15 foregoing is true and correct to the best of my knowledge and belief.

16 Dated this 5 day of March, 2017 in Las Vegas, NV.

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Steve Sanson

DECLARATION OF STEVE SANSON IN SUPPORT OF  
OPPOSITION TO MOTION FOR OSC RE: CONTEMPT

# EXHIBIT 1

  Share:

Tweet

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

**A behind the scenes look inside our courtroom**

FIND OUT MORE



## **No boundaries in our courtrooms!**

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

The above are examples of the court room over stepping

boundaries. But what happens when a Divorce Attorney crosses the line with a Clark County District Court Judge Family Division?

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

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



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

**Judge Jennifer Elliot:**



I find that there is undue influence in the case.

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

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

Court is charged to making sure that justice is done.

Your client lied about his finances.

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

Your firm does this a lot and attack other lawyers.

I find it to be a pattern with your firm.

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

I am the Judge not you.

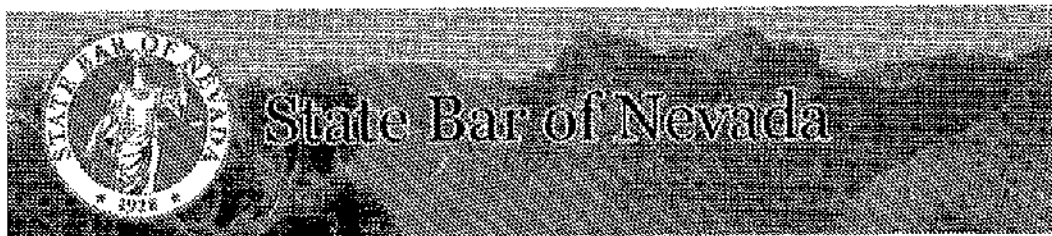


**Jennifer Abrams:**



Excuse me I was in the middle of a sentence.

Is there any relationship between you and Louis Schneider?



At what point should a judge sanction an attorney?

Is a judge too comfortable or intimidated by an attorney that

they give them leeway to basically run their own courtroom?

If there is an ethical problem or the law has been broken by an attorney the Judge is mandated by law to report it to the Nevada State Bar or a governing agency that could deal with the problem appropriately.

**Learn More about Nevada State Bar Ethics & Discipline**

#### **UPCOMING EVENTS**

[WEBSITE](#) [NEWS](#) [GOALS AND VALUES](#) [OFFICERS](#) [CONTACT US](#)



**Veterans In Politics International Inc.**

**702-283-8088**

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

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

**SIGN UP FOR EMAILS**

**Confirm that you like this.**

Click the "Like" button.

## EXHIBIT 2

From: Louis Schneider <lcslawllc@yahoo.com>  
To: Jennifer Abrams <jabrams@theabramslawfirm.com>; 'veteransinpoliti@cs.com' <veteransinpoliti@cs.com>; ElliottJ <ElliottJ@clarkcountycourts.us>  
Cc: vipipresident <vipipresident@cs.com>  
Subject: Re: Nevada Attorney attacks a Clark County Family Court Judge in Open Court  
Date: Tue, Oct 11, 2016 10:10 am

I am unsure why I am copied on these e-mails.  
I don't want anything to do with this.

Louis  
*Law Office of Louis C. Schneider*  
Nevada Bar No. 9683  
430 South Seventh Street  
Las Vegas, Nevada 89101  
Phone: 702-435-2121  
Fax: 702-431-3807

CONFIDENTIALITY WARNING: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this missive. If you have received this in error, please notify the sender immediately by reply e-mail and delete this message and its attachments from your computer system. We do not waive any attorney-client, work product or other privilege by sending this email or attachment.

From: Jennifer Abrams <jabrams@theabramslawfirm.com>  
To: "veteransinpoliti@cs.com" <veteransinpoliti@cs.com>; "ElliottJ@clarkcountycourts.us" <ElliottJ@clarkcountycourts.us>  
Cc: "lcslawllc@yahoo.com" <lcslawllc@yahoo.com>; "vipipresident@cs.com" <vipipresident@cs.com>  
Sent: Monday, October 10, 2016 7:03 PM  
Subject: RE: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

PERSONAL AND CONFIDENTIAL

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

Mr. Sanson,

Whoever provided you with the legal analysis below is mistaken. I am not providing you with legal advice here but the authority you cite deals with civil, not family law cases. The hearing was closed and such was announced at the very beginning. See EDCR 5.02, NRS 125.080, and NRS 125.110. I had the case sealed at my client's request because he does not want his children, their friends, or anyone in his circle of friends, family, or business associates to see his private divorce proceedings broadcast on the internet.

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

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

Sincerely,

Jennifer V. Abrams, Esq.  
Board Certified Family Law Specialist  
Fellow of the American Academy of Matrimonial Lawyers  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Fax: (702) 248-9750  
[www.TheAbramsLawFirm.com](http://www.TheAbramsLawFirm.com)

From: [veteransinpoliti@cs.com](mailto:veteransinpoliti@cs.com) [<mailto:veteransinpoliti@cs.com>]  
Sent: Monday, October 10, 2016 4:08 PM  
To: [ElliotJ@clarkcountycourts.us](mailto:ElliotJ@clarkcountycourts.us)  
Cc: Jennifer Abrams; [jcslawllc@yahoo.com](mailto:jcslawllc@yahoo.com); [viptpresident@cs.com](mailto:viptpresident@cs.com)  
Subject: Re: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Judge Elliot and all involved.

I have to admit this seal that was done on this case is the fastest I have ever seen family court or any court in this state move. Now, I know they have the capability to be fast.

I have talked to many lawyers and Judges, I even spoke to a Justice in DC just to make sure I had all my facts correct.

I must say that you can not seal a case just to seal a case, especially if one of the reasons its been done is to shield the attorney and not the litigants I am referring to Abrams email to you Judge, she said the following (Further, the information is inaccurate and intended to place me in a bad light). Is she protecting herself? Absolutely.

When we expose folks we do it under the umbrella of a journalist and we use the Freedom of information Act.

The case was sealed without a hearing and the video was requested, paid for and posted prior to the sealing. The order to seal the case can not be retroactive.

I have also taking the liberty to investigate the following, general rules on sealing: [http://www.leg.state.nv.us/courtrules/SCR\\_RGSROR.html](http://www.leg.state.nv.us/courtrules/SCR_RGSROR.html) (see particularly 3-1 and 4). The entire case cannot be sealed. RJ article: <http://www.reviewjournal.com/news/standards-sealing-civil-cases-tougher> from when current rules went in. Policy discussion in a criminal case, first couple of pages of [https://scholar.google.com/scholar\\_case?case=6580253056313342241&q=seal+court+record&hl=en&as\\_sdt=4,29](https://scholar.google.com/scholar_case?case=6580253056313342241&q=seal+court+record&hl=en&as_sdt=4,29) A unanimous NV opinion keeping records of a divorce open (involving a former judge) [https://scholar.google.com/scholar\\_case?case=3787817847563480381&q=seal+court+record&hl=en&as\\_sdt=4,29](https://scholar.google.com/scholar_case?case=3787817847563480381&q=seal+court+record&hl=en&as_sdt=4,29).

It looks like the Nevada State Supreme Court has strict rules on sealing cases as well.

We might have sent out the second article prematurely.. We have also received numerous attorneys pointing us in the direction of other cases Abram's have had her outburst and bullied other Judges and Attorneys. Is she going asked for those cases to be sealed as well?

In addition, we are going to ask for an opinion from the Nevada Judicial Discipline Commission and Nevada State Bar in regards to the sealing of this case.

Steve Sanson  
President Veterans In Politics International  
702 283 8088

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

From: Elliott, Jennifer <[ElliottJ@clarkcountycourts.us](mailto:ElliottJ@clarkcountycourts.us)>

To: veteransinpoliti <[veteransinpoliti@cs.com](mailto:veteransinpoliti@cs.com)>

Cc: jabrams <[jabrams@theabramslawfirm.com](mailto:jabrams@theabramslawfirm.com)>; lcslawllc <[lcslawllc@yahoo.com](mailto:lcslawllc@yahoo.com)>; vipipresident <[vipipresident@cs.com](mailto:vipipresident@cs.com)>

Sent: Thu, Oct 6, 2016 4:00 am

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

Hi Steve, thank you for your quick response. I need you to know that I was wrong regarding the finances as they had been disclosed at the outset of the case, from the first filing, albeit late. At the further hearing we had in this matter I put on the record that I believe that he did not hide anything on his financial disclosure form; it was a misunderstanding that was explained and the record was corrected. We thereafter worked out all the remaining financial matters in the Decree. The hearing that you have was the pinnacle of the conflict between counsel and unfortunately this was affecting the resolution of the case.

A case always goes much better when the attorneys are able to work well together and develop more trust from the beginning. The ability to build trust in this case went south from the gate and created a dynamic that was toxic to seeing and reaching the merits of the case. Thus pleadings filed were accusatory on both sides and a court only knows what comes before it through papers properly filed or reports that have been ordered.

At this juncture it is my belief that both sides felt all financial information had truly been revealed and that both adjusted their positions enough to achieve a solution that was acceptable to both parties.

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

Sent from my iPhone

On Oct 5, 2016, at 11:16 PM, "veteransinpoliti@cs.com" <[veteransinpoliti@cs.com](mailto:veteransinpoliti@cs.com)> wrote:

Hi Judge;

I respect you reaching out and asking us to take the video down. We have known you for a very long time, and I know that you understand once we start a course of action we do not raise our hands in defeat. However, with that said we have no intentions on making the litigants uncomfortable, but our job is the expose folks that have lost their way.. Maybe the attorney for the plaintiff should have put her client before her own ego and be respectful of the court, be respectful of her client, advise her client not to perjure himself, treat people with respect (her own co-council she told him to

sit down), the years we have been doing this we are tired of attorneys running a tax payers courtroom. They feel that they are entitled and they will walk over anybody to make a buck.

In combat we never give up and we will not start given up, because we exposed someone.

Steve Sanson  
President Veterans In Politics International  
[www.veteransinpolitics.org](http://www.veteransinpolitics.org)  
702 283 8088

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

From: Elliott, Jennifer <[ElliottJ@clarkcountycourts.us](mailto:ElliottJ@clarkcountycourts.us)>  
To: veteransinpoliti <[veteransinpoliti@cs.com](mailto:veteransinpoliti@cs.com)>; jabrams <[jabrams@theabramslawfirm.com](mailto:jabrams@theabramslawfirm.com)>  
Sent: Wed, Oct 5, 2016 6:02 pm  
Subject: Fwd: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Hi Steve,

I was made aware of this video today and would kindly request that VIP please take it down. Since this hearing the court and parties worked further on resolving the issues and the case was resolved. Leaving this video up can only serve to inflame and antagonize where the parties are trying to move on with terms that will help them restructure their lives in two different homes. We all hope for the best post-divorce atmosphere; the parties will be working together to co-parent their children and I would loath to think they or their friends would encounter this and have to feel the suffering of their parents or relive their own uncomfortable feelings of loss. I know you care about children and families as much as you do about politics and justice, and I appreciate your courtesy in this regard. Thank you for your anticipated cooperation, Judge Jennifer Elliott

Begin forwarded message:

From: Jennifer Abrams <[jabrams@theabramslawfirm.com](mailto:jabrams@theabramslawfirm.com)>  
Date: October 5, 2016 at 1:48:20 PM PDT  
To: "elliottj@clarkcountycourts.us" <[elliottj@clarkcountycourts.us](mailto:elliottj@clarkcountycourts.us)>  
Cc: Louis Schneider <[lsclawllc@yahoo.com](mailto:lsclawllc@yahoo.com)>  
Subject: Fwd: Nevada Attorney attacks a Clark County Family Court Judge in Open Court

**PERSONAL AND CONFIDENTIAL**

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

Judge Elliott,

The below was brought to my attention. These parties don't need a video or other information about their personal divorce posted on the internet. Further, the information is inaccurate and intended to place me in a bad light. I ask that you please demand that this post, video, etc. be immediately removed.

Mr. Schneider is copied on this email.

JVA

Begin forwarded message:

**From:** Marshal Willick <[marshal@willicklawgroup.com](mailto:marshal@willicklawgroup.com)>  
**Date:** October 5, 2016 at 11:02:11 AM PDT  
**To:** "Jennifer V. Abrams Esq. ([jabrams@theabramslawfirm.com](mailto:jabrams@theabramslawfirm.com))"  
<[jabrams@theabramslawfirm.com](mailto:jabrams@theabramslawfirm.com)>, "[yafasedek3@gmail.com](mailto:yafasedek3@gmail.com)"  
<[yafasedek3@gmail.com](mailto:yafasedek3@gmail.com)>  
**Subject:** FW: [Junk released by Allowed List] Nevada Attorney attacks a Clark County Family Court Judge in Open Court

Thought you ought to know about this as soon as I saw it.

Marshal S. Willick

---

**From:** Veterans In Politics International Inc. [<mailto:devildog1285@cs.com>]  
**Sent:** Wednesday, October 05, 2016 9:59 AM  
**To:** Marshal Willick  
**Subject:** [Junk released by Allowed List] Nevada Attorney attacks a Clark County Family Court Judge in Open Court

---

Having trouble viewing this email? [Click here www.veteransinpolitics.org](http://www.veteransinpolitics.org)

Hi, just a reminder that you're receiving this email because you have expressed an interest in Veterans In Politics International Inc.. Don't forget to add [devildog1285@cs.com](mailto:devildog1285@cs.com) to your address book so we'll be sure to land in your inbox!

You may [unsubscribe](#) if you no longer wish to receive our emails.

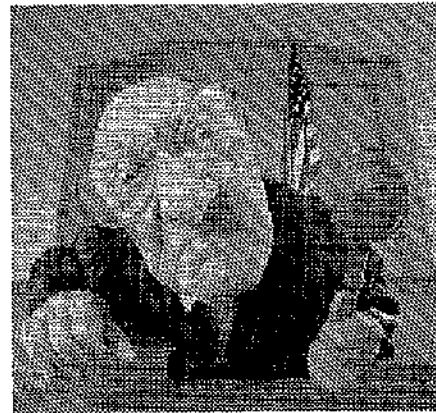


## Nevada Attorney attacks a Clark County Family Court Judge in Open Court



**A behind the scenes look  
inside our courtroom**

FIND OUT MORE



**No boundaries in our courtrooms!**

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

The above are examples of the court room over stepping boundaries. But what happens when a Divorce Attorney crosses the line with a Clark County District Court Judge Family Division?

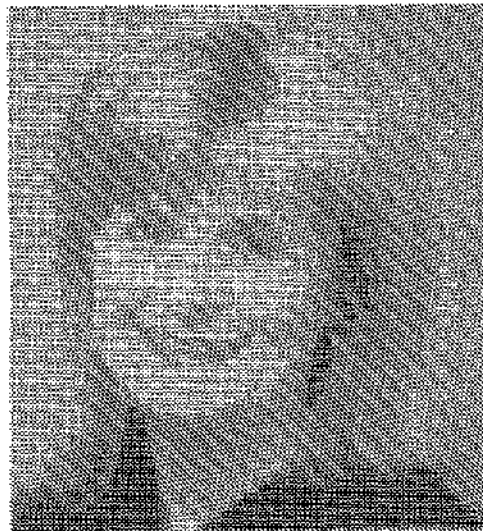
In a September 29, 2016 hearing in Clark County Family Court Department L Jennifer Abrams representing the plaintiff with co-council Brandon Leavitt and Louis Schneider representing the defendant. This case is about a 15 year marriage, plaintiff earns over 160,000 annually and defendant receives no alimony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

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



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

**Judge Jennifer Elliot:**



I find that there is undue influence in the case.

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

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

Court is charged to making sure that justice is done.

Your client lied about his finances.

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

Your firm does this a lot and attack other lawyers.

I find it to be a pattern with your firm.

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

I am the Judge not you.

**Jennifer Abrams:**



Excuse me I was in the middle of a sentence.

Is there any relationship between you and Louis Schneider?



At what point should a judge sanction an attorney?

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

If there is an ethical problem or the law has been broken by an attorney the Judge is mandated by law to report it to the Nevada State Bar or a governing agency that could deal with the problem appropriately.

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

**UPCOMING EVENTS**

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**Veterans In Politics International Inc.**

**702-283-8088**

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

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

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**SIGN UP FOR EMAILS**

Veterans In Politics International Inc., PO Box 28211, Las Vegas, NV 89126

[SafeUnsubscribe™](#) [marshal@williclawgroup.com](mailto:marshal@williclawgroup.com)

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[Not spam](#)

[Forget previous vote](#)

# EXHIBIT 3

  
CLERK OF THE COURT

**DISTRICT COURT  
FAMILY COURT DIVISION  
CLARK COUNTY, NEVADA**

BRANDON PAUL SAITER,

Plaintiff,

vs.

TINA MARIE SAITER,

Defendant.

CASE NO: D-15-521372-D  
DEPT NO: L

HEARING DATES: 9/29/16  
HEARING TIMES: 10:00 a.m.

**ORDER PROHIBITING  
DISSEMINATION OF CASE MATERIAL**

This matter having come before the Court for several pending matters on the 29<sup>th</sup> day of September at 10:00 a.m., Plaintiff Brandon Saiter represented by Jennifer Abrams, Esq. and Brandon Leavitt, Esq. and Defendant, Tina Marie Saiter represented by Louis Schneider, Esq., and the Court hearing preliminary matters, entertained and granted Ms. Abrams request for a closed hearing pursuant to EDCR 5.02, with the exception of permitting the parents of Defendant to remain pursuant to NRS 125.080 (2) (e).

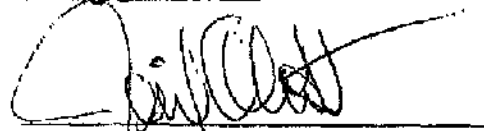
Thereafter, the videotape of this hearing was posted on youtube and a link to the video was emailed to multiple third parties not involved in the case on or about the 3<sup>rd</sup> day of October, 2016.

On October 5, 2016, the parties resolved all issues required for a Decree of Divorce. Counsel then stipulated to seal the case and to disallow any further release of

1 case information and to demand that the current post of the September 29, 2016  
2 hearing video, or any other hearing video from this case be immediately removed from  
3 the internet and to prohibit any portion of these proceedings from being disseminated  
4 or published and that any such publication or posting by anyone be immediately  
5 removed, as the September 29, 2016 hearing was a closed hearing. Additionally,  
6 counsels and the parties recognize that the case has been settled and that such an Order  
7 is in the best interest of the four (4) children in this case and is also authorized by NRS  
8 125.080, NRS 125.110, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 2(2)(a)  
9 and 3(4).  
10

11  
12 **PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS**  
13 **HEREBY ORDERED** that the current post of the September 29, 2016 hearing video,  
14 or any and all other hearing video(s) from this case shall be immediately removed from  
15 the internet. All persons or entities shall be prohibited from publishing, displaying,  
16 showing, or making public any portion of these case proceedings; nothing from the  
17 case at bar shall be disseminated or published and that any such publication or posting  
18 by anyone or any entity shall be immediately removed as the Court finds the stipulation  
19 of the parties and this Courts' Order to be in the best interest of the four (4) children in  
20 this case and to be fully supported by law (NRS 125.080, NRS 125.110, EDCR 5.02,  
21 and Supreme Court Rules, Part VII, Rule 2(2)(a) and 3(4)).  
22

23 DATED this 6<sup>th</sup> day of October 2016.

24  
25   
26 Jennifer Elliott, District Court Judge,  
27 Family Division, Dept. L  
28

JENNIFER L. ELLIOTT  
DISTRICT JUDGE  
FAMILY DIVISION, DEPT. L  
LAS VEGAS, NV 89101



## **EXHIBIT 4**

  Share:

Tweet

- 
- 
- 
- 



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

Clark County, Nevada  
November 6, 2016

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



[FIND OUT MORE](#)

**Its importance cannot be overstated!**

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

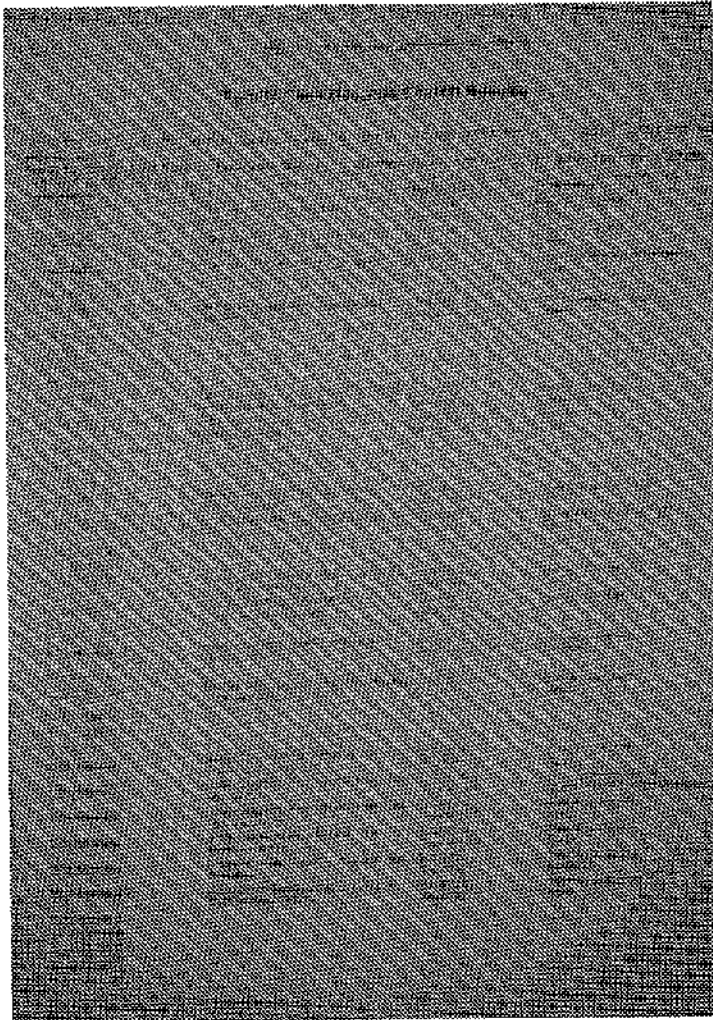
As former Nevada Supreme Court Justice Nancy Saitta wrote earlier this year regarding the Supreme Court's rules on sealing civil records, ***"the cornerstones of an effective, functioning judicial system are openness and transparency. Safeguarding these cornerstones requires public access not only to the judicial proceedings but also to judicial records and documents."***



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

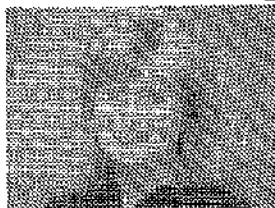


It also appears, however, that at least one of her cases, and perhaps more, may have been sealed to protect her own reputation, rather than to serve a compelling client privacy or safety interest.



### Learn More

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



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

In response to our article, Abrams sought and obtained a court order from Judge Elliott which does not name VIPI, but which purports to

apply to the entirety of the general population. VIPL, however, was served with the Order. The document orders all videos of Abrams' September 29, 2016 judicial browbeating to be taken off the internet.

**Click onto District Court Judge Bullied by Family Attorney Jennifer Abrams**

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

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



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

[Learn More](#)

Moreover, while the Court Order is broadly stated and purports to prohibit the public viewing or dissemination of "any portion of these

case proceedings," such blanket prohibition on public access to the entire case is specifically **disallowed by law.**

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

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

**Click onto Standards for sealing civil cases tougher**

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



This requirement applies even when a party in a family law case tries to seal a case under NRS 125.110, the statute on which Abrams seems to routinely rely. This statute provides that certain evidence in a divorce case, such as records, exhibits, and transcripts of particular testimony, may be deemed "private" and sealed upon request of one of the parties. However, the Court must justify why these records

have to be sealed, and cannot seal the entire case - complaints, pleadings and other documents must remain public.

In the 2009 case of Johansen v. District Court, the Nevada Supreme Court specifically held that broad unsupported orders sealing documents in divorce cases are subject to reversal given the important public policies involved.

**The Court stated:**

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

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

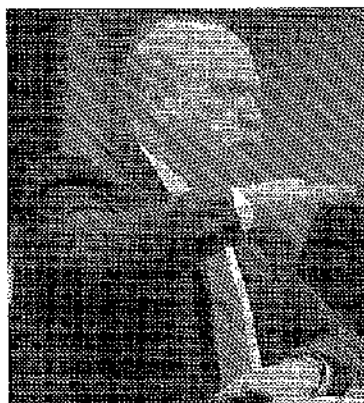
In the *Saiter* case, no notice was given to the general public for a hearing before the Order was issued, there was no opportunity for the public to be heard, no specific findings were made in the Order, and the Order was not drafted narrowly.

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

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

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

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



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





### **So, who is to blame here?**

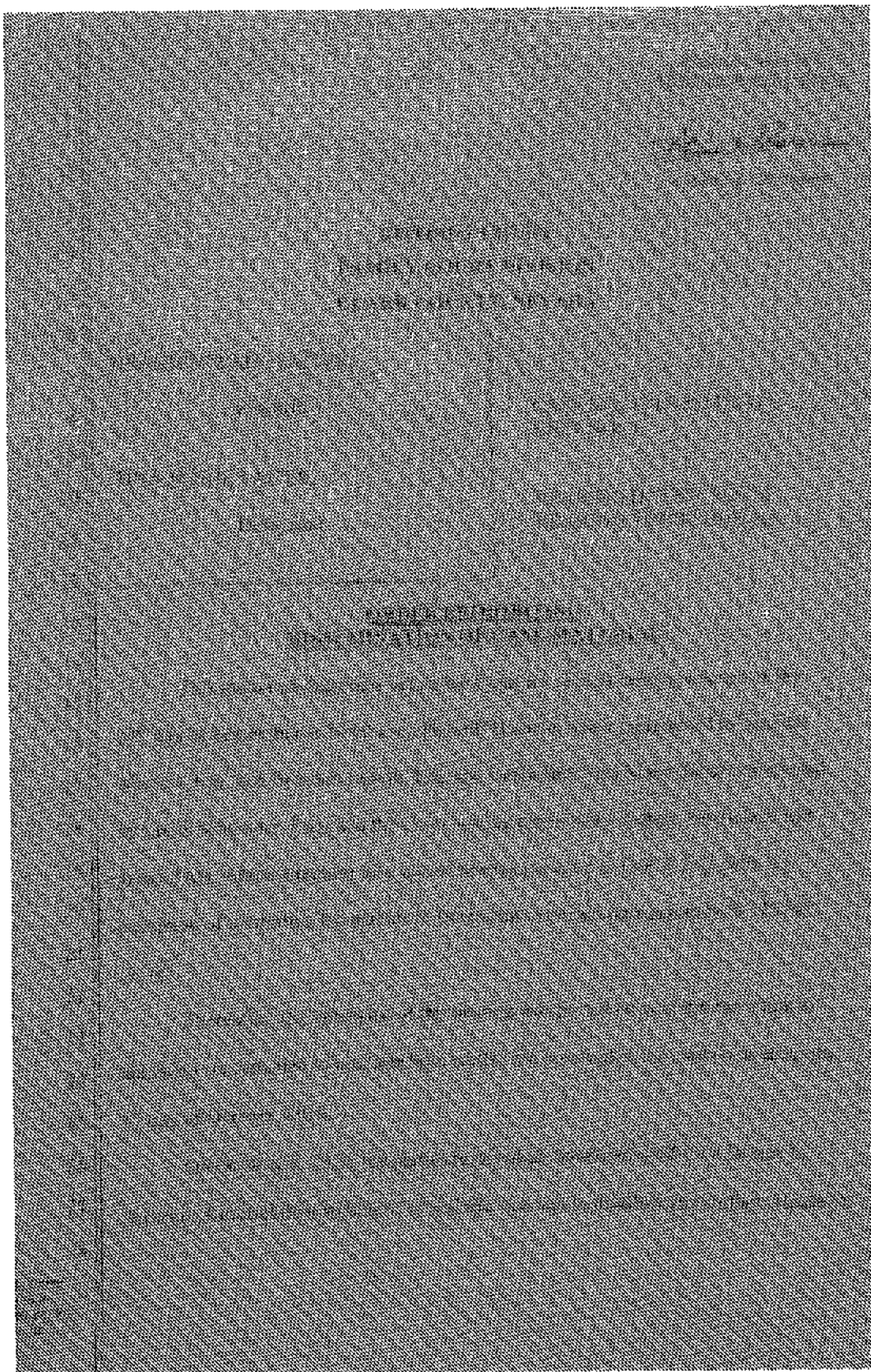
Of course Jennifer Abrams should be responsible and accountable for her own actions.

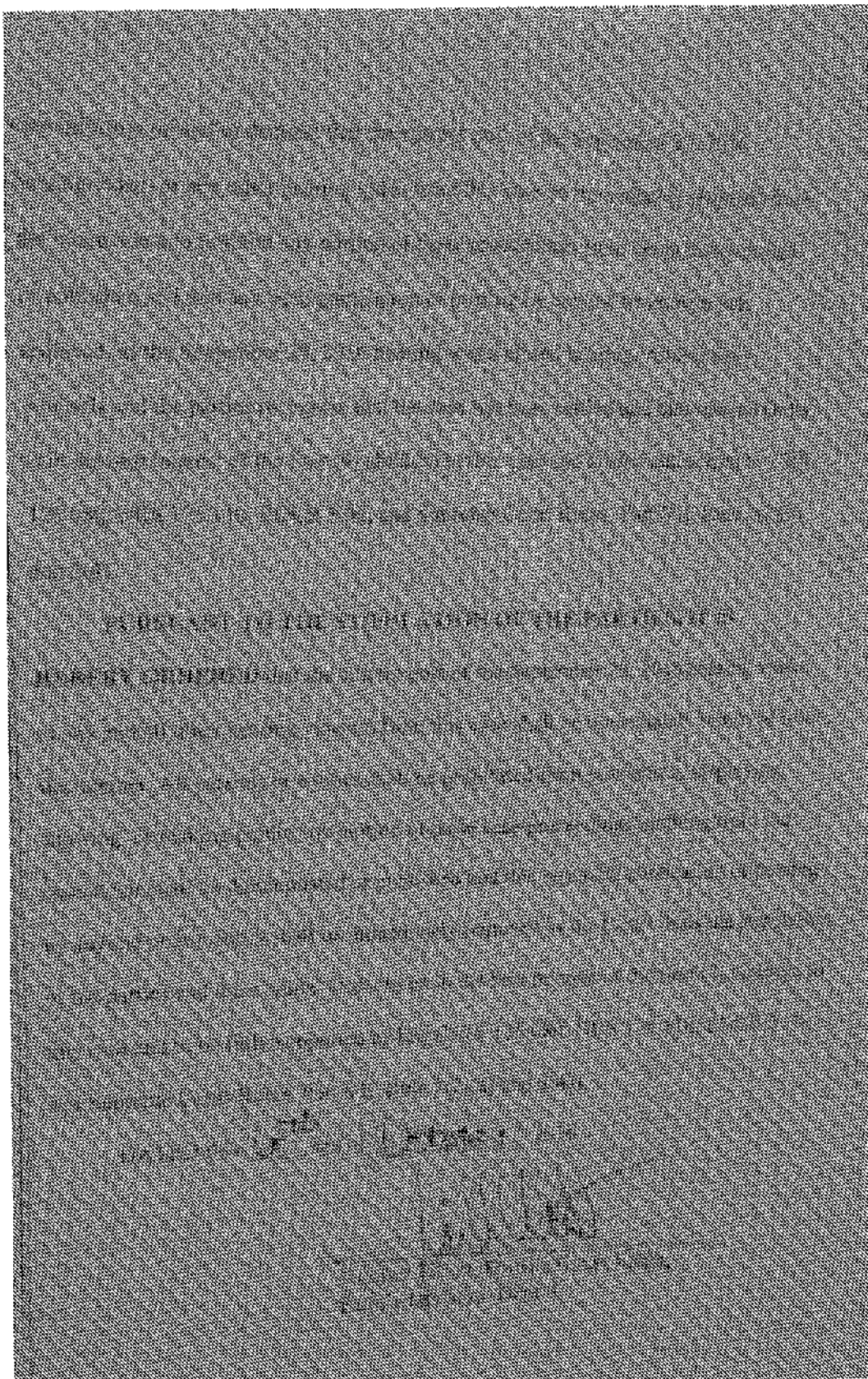
But, what judge allows a lawyer to bully her in court and then gets her to issue an overbroad, unsubstantiated order to seal and hide the lawyer's actions?

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

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

**[Learn More](#)**





[Learn More](#)

## UPCOMING EVENTS

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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)

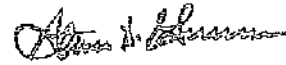
**SIGN UP FOR EMAILS**

**Confirm that you like this.**

Click the "Like" button.

# **EXHIBIT 5**

Electronically Filed  
01/09/2017 01:08:18 PM



CLERK OF THE COURT

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

6 DISTRICT COURT  
7 CLARK COUNTY, NEVADA

8 JENNIFER V. ABRAMS and THE ABRAMS )  
& MAYO LAW FIRM, )

Case No.: A-17-749318-C

9 Plaintiff, )

Department: I

10 vs. )

11 LOUIS C. SCHNEIDER; LAW OFFICES OF )

Hearing Date: N/A

12 LOUIS C. SCHNEIDER, LLC; STEVE W. )

Hearing Time: N/A

13 SANSON; HEIDI J. HANUSA; CHRISTINA )

14 ORTIZ; JOHNNY SPICER; DON )

WOOLBRIGHT; VETERANS IN POLITICS )

ACTION IN TORT

15 INTERNATIONAL, INC.; SANSON )

ARBITRATION EXEMPTION

CORPORATION; KAREN STEELMON; and )

16 DOES I THROUGH X, )

CLAIMED

Defendant. )

17 COMPLAINT FOR DAMAGES

18 I.

19 INTRODUCTION

20 I. Plaintiffs, Jennifer V. Abrams and The Abrams & Mayo Law Firm

21 ("Plaintiffs") bring this action for damages based upon, and to redress, Defendants

22 Intentional Defamation of the character of the Plaintiffs through libelous writings

23 and slander, for Intentional Infliction of Emotional Distress, Negligent Infliction of

24 Emotional Distress, False Light, Business Disparagement, Harassment, Concert of

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

6  
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 Jennifer V. Abrams, is a natural person and an attorney  
19 licensed to practice law in the State of Nevada. She practices exclusively in the field  
20 of Domestic Relations and is a peer-reviewed and certified Fellow of the American  
21 Academy of Matrimonial Lawyers, and a Certified Specialist in Family Law.

22 6. The Abrams & Mayo Law Firm is a dba of The Abrams Law Firm, LLC,  
23 a duly formed Limited Liability Company in the State of Nevada.

24 7. Upon information and belief, Louis C. Schneider is a natural person  
who is admitted to practice law in the State of Nevada and is the managing member  
of Law Offices of Louis C. Schneider, LLC.



1        8.     Upon information and belief, Law Offices of Louis C. Schneider, LLC is  
2 a duly formed Limited Liability Company located in Las Vegas, Nevada.

3        9.     Upon information and belief, Steve W. Sanson is a natural person, the  
4 President of Veterans In Politics International, Inc., and the Treasurer and Director  
5 of Sanson Corporation.

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

9        11.    Upon information and belief, Christina Ortiz is a natural person and  
10 the Director of Veterans In Politics International, Inc.

11       12.    Upon information and belief, Johnny Spicer is a natural person and  
12 Secretary of Veterans In Politics International, Inc.

13       13.    Upon information and belief, Don Woolbright is a natural person and  
14 Secretary of Veterans In Politics International, Inc.

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

21       15.    Upon information and belief, Sanson Corporation is a duly formed  
22 Domestic Corporation in the State of Nevada.

23       16.    Upon information and belief, Karen Steehmon is a natural person and  
24 is the Registrant of the Domain veteransinpolitics.org.



17. Upon information and belief, additional persons and entities have been working with the above named Defendants either individually or in concert and have been added as Doe Defendants in this action until they are personally identified.

18. Jennifer V. Abrams and The Abrams & Mayo Law Firm are informed and believe, and therefore allege, that each of the Defendants designated herein as Louis C. Schneider, Law Offices of Louis C. Schneider, LLC, Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson Corporation, Karen Steelman, and Does I through X inclusive, are in some way legally responsible and liable for the events referred to herein, and directly or proximately caused the damages alleged herein.

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

#### IV. FACTUAL ALLEGATIONS

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

///

21. Plaintiffs represent Brandon Saiter (hereinafter "Husband") in a divorce action pending in the Eighth Judicial District Court, County of Clark, Nevada, Family Division, Case Number D-15-521372-D (hereinafter "the 'D' Case"), Hon. Jennifer L. Elliott, Department L, presiding.

22. Defendants Louis C. Schneider and Law Offices of Louis C. Schneider, LLC (hereinafter collectively referred to as "Schneider") represent Tina Saiter (hereinafter "Wife") in the "D" Case.

23. On September 12, 2016, Plaintiffs, on behalf of Husband, filed a *Motion for Sanctions and Attorney's Fees* against Schneider in the "D" Case for Schneider's violations of both ethical and procedural rules. Schneider was served via electronic service the same day, September 12, 2016.

24. On September 15, 2016, Schneider sent the following email to Brandon Leavitt, Esq. at The Abrams & Mayo Law Firm, which states in relevant part:

I've had about all I can take.  
Withdraw your Motion and I'll withdraw from the case.  
Be advised -- Tina has asked me not to leave the case.  
I was getting ready to withdraw my motion to withdraw.  
If your firm does not withdraw that motion, I will oppose it and  
take additional action beyond the opposition.

[Emphasis added.]

25. Plaintiffs did not withdraw the *Motion for Sanctions and Attorney's Fees* against Schneider. Said *Motion for Sanctions and Attorney's Fees* was set for hearing on September 29, 2016.

26. Upon information and belief, Schneider engaged in one or more *ex parte* communications with Judge Elliott, either directly or through her staff, between September 25, 2016 and the September 29, 2016 hearing.

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

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

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

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

16               Can you please upload the video from yesterday's hearing?  
17               Thank you.  
18               :)

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

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

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

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

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

- 16 a. [steve.sanson.1](#)
- 17 b. [steve.sanson.3](#)
- 18 c. [veteransinpolitics](#)
- 19 d. [veteransinpoliticsinternational](#)
- 20 e. [cyc.on.nevada.politics](#)
- 21 f. [steve.w.sanson](#)
- 22 g. [Veterans-In-Politics-International-Endorsement-for-the-State-of-](#)  
23 [Nevada](#)

24 <sup>1</sup> A copy of the published "Attack" article is attached as Exhibit 1.

1 h. Veterans in Politics; groups/OperationNeverForget

2 i. Nevada-Veterans-In-Politics

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

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

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

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

12 c. Abrams is unethical;

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

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

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

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

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

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

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

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

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

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

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

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

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

19 46. On October 9, 2016, Defendants published or caused to be published  
20 on a website known as veteransinpolitics.org, a website purportedly owned and  
21 controlled by Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny  
22 Spicer, Don Woolbright, Veterans In Politics International, Inc., Sanson  
23 Corporation, Karen Steelmon, and Does 1 through X inclusive, an article entitled  
24 "BULLY District Court Judge Bullied by Family Attorney Jennifer Abrams"

(hereinafter "the 'BULLY' article") along with a copy of the Order Prohibiting Dissemination of Case Material,<sup>2</sup>

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

a. steve.sanson.1

b. steve.sanson.3

c. veteransinpolitics

d. veteransinpoliticsinternational

e. eye.on.nevada.politics

f. steve.w.sanson

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

Nevada

h. Veterans in Politics: groups/OperationNeverForget

i. Nevada-Veterans-In-Politics

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

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

<sup>2</sup> A copy of the published "Bully" article is attached as Exhibit 2.



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

24

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

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

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

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

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

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

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

24 <sup>4</sup> A copy of the published "Acting badly" article is attached as Exhibit 4.

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

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

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

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

24 <sup>a</sup> A copy of the published "Deceives" article is attached as Exhibit 5.

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

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

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

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

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

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

1 a. "VIDEO 1 The Abrams Law Firm 10 05 15,"

2 b. "VIDEO 2 The Abrams Law Firm Inspection part 1,"

3 c. "VIDEO 3 The Abrams Law Firm Practices p 2."

4 (hereinafter "the 'Inspection' videos").<sup>6</sup>

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

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

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

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

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

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

23 ///

24 <sup>6</sup> A printout of the published "Inspection" videos is attached as Exhibit 6.



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

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

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

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

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

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

24       ///

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

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

9           80. During the December 22, 2016 conversation with Mr. Schoen,  
10 Defendant Steve W. Sanson said that "Jennifer is in bed with Marshal Willick, that  
11 explains a lot about the kind of person she is," or words to that effect.<sup>7</sup>

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

82. The defamatory statements by Defendants have caused numerous negative comments to be directed against Plaintiffs.<sup>6</sup>

V.  
FIRST CLAIM FOR RELIEF  
(DEFAMATION)

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

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

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

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

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

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

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

9 87. The referenced defamatory statements were not privileged.

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

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

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

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

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

23 ///

24 ///

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

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

93. 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 Plaintiff's friends, co-workers, colleagues, clients, and an unknown number of persons that were subjected to the defamatory comments on the internet.

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

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

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

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

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

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

4 WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law  
5 Firm, demand judgment against named Defendants for actual, special,  
6 compensatory, and punitive damages in an amount deemed by this Court to be just  
7 and fair and appropriate, in an amount in excess of \$16,000.

VIII.  
FOURTH CLAIM FOR RELIEF  
(FALSE LIGHT)

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

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

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

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

24 |||

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

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

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

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

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

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

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

X.  
SIXTH CLAIM FOR RELIEF  
(HARASSMENT)

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

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

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

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

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

XI.  
SEVENTH CLAIM FOR RELIEF  
(CONCERT OF ACTION)

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

///

111. Defendants and/or Defendants' agents, representatives, and/or employees in concert with one another, based upon an explicit or tacit agreement, intentionally committed a tort against Plaintiffs.

112. Defendants' concert of action resulted in damages to Jennifer Abrams and The Abrams & Mayo Law Firm.

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

XII.  
EIGHTH CLAIM FOR RELIEF  
(CIVIL CONSPIRACY)

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

114. 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 and intended to harm Jennifer Abrams and The Abrams & Mayo Law Firm's pecuniary interests and financial well-being.

115. Defendants' civil conspiracy resulted in damages to Jennifer Abrams and The Abrams & Mayo Law Firm.

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



**XIII.**  
**NINTH CLAIM FOR RELIEF**  
**(RICO VIOLATIONS)**

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

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

118. Here, Defendants<sup>9</sup> have all either committed, conspired to commit, or have attempted to commit the following crime(s):

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

<sup>9</sup> The named Defendants--and others--constitute a criminal syndicate as defined in NRS 207.370.

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

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

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

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

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

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

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

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

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

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

24 <sup>10</sup> Nevada Veterans In Politics and Veterans In Politics operate numerous social media sites  
where the defamation continues.

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

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

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

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

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

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

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

24 ///

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

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

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

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

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

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

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

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

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

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

22

23

24

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

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 " 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

///

///

///

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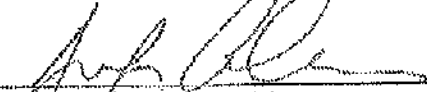
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6. For such other and further relief this Court may deem just and proper,

DATED this 9<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

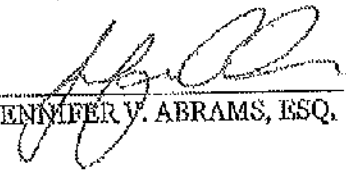
VERIFICATION

STATE OF NEVADA )  
COUNTY OF CLARK ) ss:


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

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

FURTHER, AFFIANT SAYETH NAUGHT.

  
JENNIFER V. ABRAMS, ESQ.

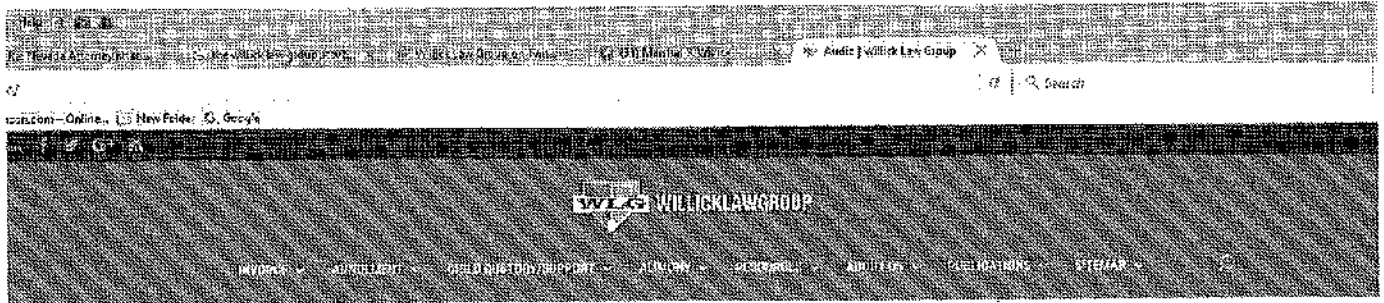
SUBSCRIBED and SWORN to before me  
this 9<sup>th</sup> day of January, 2017, by Jennifer V. Abrams, Esq.

  
NOTARY PUBLIC



# **EXHIBIT 6**

RA000373



## Audio



Transcript of Michael Willick Interview with Vera Sazon on Veterans in Politics Radio Show

Reynolds refers to Steve Carson after the interview show and after he posted a tweet claiming Michael Willick was a "hypocrite" in supporting veterans.

Reynolds refers to Steve Carson before the interview show.

Complaint for Damages Willick v. Sazon

Follow on Facebook Willick Law Group

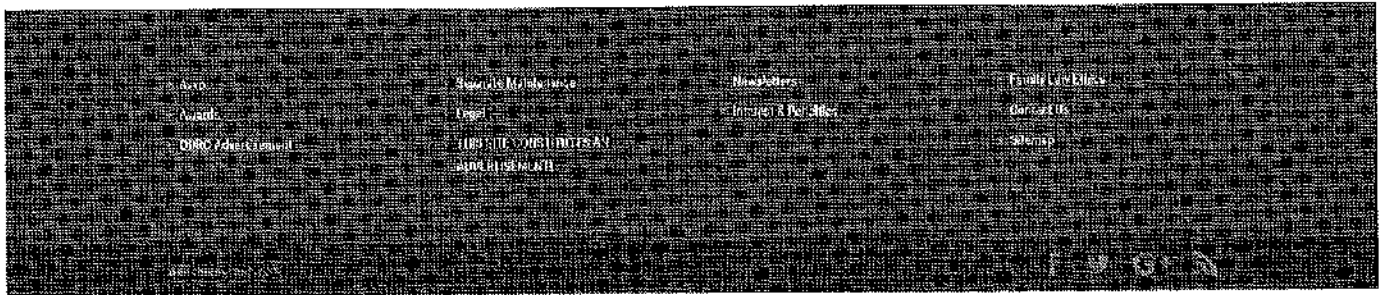
on Facebook



Archives

Archives

Select Month



RA000374

1142

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=aOZPBUn7Tro>). 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: 7576

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Boulevard, Suite 100

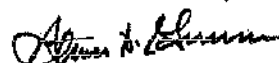
Las Vegas, Nevada 89118

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 Docs 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 1  
8 through X inclusive, are in some way legally responsible and liable for the events  
9 referred to herein, and directly or proximately caused the damages alleged herein.

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 1 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 veteransinpolitics.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 *Valle 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. Valle, 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 1 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.

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

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

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

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

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

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

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

///

1 WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group  
2 demand judgment against named Defendants for actual, special, compensatory, and  
3 punitive damages in an amount deemed by this Court to be just and fair and  
4 appropriate, in an amount in excess of \$15,000.

5  
6 **VII.**  
**THIRD CLAIM FOR RELIEF**  
**(NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS)**

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

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

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

16  
17 **VIII.**  
**FOURTH CLAIM FOR RELIEF**  
**(FALSE LIGHT)**

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

20 57. Defendants and/or Defendants' agents, representatives, and/or  
21 employees, either individually, or in concert with others, intentionally made and  
22 published false statements about Mr. Willick and the Willick Law Group.

23 58. The statements made by the Defendants against Mr. Willick were made  
24 with the specific intent to cause harm to Plaintiffs and their pecuniary interests.

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**  
12 **(BUSINESS DISPARAGEMENT)**

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

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

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

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

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



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  
10 **X.**  
**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 207.350(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 operates numerous social media sites  
where the defamation continues.

1           81. Defendants Steve W. Sanson, Heidi J. Hanusa, Christina Ortiz, Johnny  
2 Spider, 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 206.0832 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  
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 The statute goes on to define the theft as a person or entity that "Takes, destroys,  
17 conceals or disposes of property in which another person has a security interest, with  
18 intent to defraud that person." Here, as Abraham Lincoln famously pointed out 150  
19 years ago, time is a lawyer's stock in trade. Defendants—with malice—stole valuable  
20 time from Mr. Willick. Also, the theft of Mr. Willick's and Willick Law Group's "good  
21 will" by the making of false and defamatory comments and placing both Mr. Willick  
22 and Willick Law Group in a false light has diminished the value of the business.  
23 These are intangible thefts, but thefts nonetheless.

24 ///

1 88. Defendants' illegal conduct resulted in damages to Mr. Willick and the  
2 Willick Law Group.

3 WHEREFORE, Plaintiffs Marshal S. Willick and the Willick Law Group,  
4 pursuant to NRS 207.470, are entitled to treble damages as a result of Defendants'  
5 criminal conduct in the form of actual, special, compensatory, and punitive damages  
6 in amount deemed at the time of trial to be just, fair, and appropriate in an amount  
7 in excess of \$15,000.

8 **XIII.**  
9 **NINTH CLAIM FOR RELIEF**  
10 **(COPYRIGHT INFRINGEMENT)**

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

13 90. Defendants have infringed upon Plaintiffs' photographic works owned  
14 by Plaintiff, for which copyright registration is being sought, by posting the work on  
15 social media websites, including but not limited to, Facebook, Pinterest, Google+,  
16 Twitter, and LinkedIn, without consent, approval or license of Plaintiffs and by  
17 continuing to distribute and copy the commercial without compensation or credit to  
18 the Plaintiffs.

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

21 92. Defendants' infringement of Plaintiffs' photographic works has yielded  
22 Defendants profits in an amount not yet determined.

23 93. Defendants' infringement has been willful and deliberate and was done  
24 for the purpose of defaming Plaintiffs and making commercial use of and profit on  
Plaintiffs' material throughout the country and within this Judicial District.

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 Plaintiffs' 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.



1 d. The Court finds the Defendants' conduct was committed willfully.

2 e. Pursuant to 17 U.S.C. § 504(c)(2), Defendants be required to pay an  
3 award of increased statutory damages in a sum of not less than  
4 \$150,000 for willful infringement.

5 f. Pursuant to 17 U.S.C. § 505, Defendants be required to pay the  
6 Plaintiffs' full costs in this action and reasonable attorney's fees.

7 g. Defendants' conduct was willful or wanton and done in reckless  
8 disregard of Plaintiffs' rights thereby entitling Plaintiffs to recover  
9 punitive damages in an amount to be determined at trial.

10 **XIV.**  
11 **TENTH CLAIM FOR RELIEF**  
12 **(INJUNCTION)**

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

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

18 WHEREFORE, Plaintiffs request the following injunctive relief:

19 a. That all named Defendants and members of the listed organizations be  
20 enjoined from approaching within 1000 feet, of the person of Marshal  
21 S. Willick, his vehicle, his home, the Willick Law Group offices and all  
22 of its employees, and their places of residence and vehicles.

23 b. That all defamatory writings, video, postings, or any other documents  
24 or public display of the same, concerning Mr. Willick, the Willick Law

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

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

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

#### **XV. CONCLUSION**

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

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

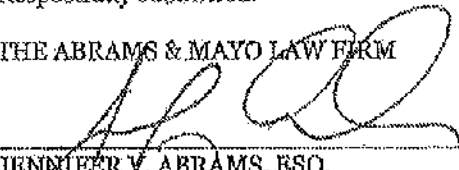
- a. General damages in an amount in excess of \$15,000 for each and every claim for relief;
- b. Compensatory damages in an amount in excess of \$15,000 for each and every claim for relief;

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

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

8 Respectfully submitted:

9 THE ABRAMS & MAYO LAW FIRM

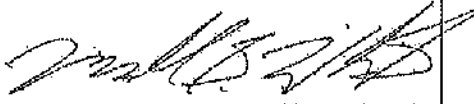
10  
11   
12 JENNIFER V. ABRAMS, ESQ.  
13 Nevada State Bar Number: 7575  
14 6252 South Rainbow Boulevard, Suite 100  
15 Las Vegas, Nevada 89118  
16 Phone: (702) 222-4021  
17 Email: JVAGroup@theabramslawfirm.com  
18 Attorney for Plaintiffs  
19  
20  
21  
22  
23  
24

1 VERIFICATION

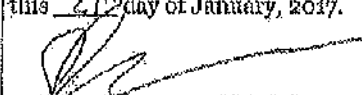
2 STATE OF NEVADA )  
3 COUNTY OF CLARK ) ss:

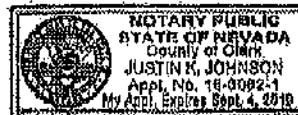
4 MARSHAL S. WILLOCK, ESQ., principal of WILLOCK LAW GROUP first being  
5 duly sworn, deposes and says:

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

11   
12  
13 MARSHAL S. WILLOCK, 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

3691 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  
main website: www.willicklawgroup.com  
QDRO website: 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  
main website www.willicklawgroup.com  
QDRO website: 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

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  
Phone: (970) 203-7345  
Fax: (781) 652-5130  
Web: 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://conla.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 Suite 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.co/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=zdMg5wI70Yg>

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 <a Levy95@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]  
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 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>[www.veteransinpolitics.org](http://www.veteransinpolitics.org) > > >-----Original Message----->From: Facebook >To: [vipipresident@cs.com](mailto:vipipresident@cs.com) >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>>Email : [vipipresident@cs.com](mailto:vipipresident@cs.com)>>>

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CERTIFICATE OF SERVICE

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

On the date indicated below, I caused to be served a true and correct copy of the document entitled SPECIAL APPEARANCE -- OPPOSITION TO MOTION FOR OSC RE: CONTEMPT on the below listed recipients by E-mailing a copy of the document to the below persons at their indicated addresses. Such Email is in lieu of service by U.S. Postal Service.

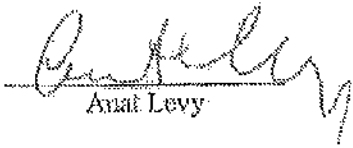
Jennifer Abrams, Esq.  
The Abrams & Mayo Law Firm  
6252 S. Rainbow Blvd., Ste. 100  
Las Vegas, NV 89118  
(702) 222-4021  
JYAGroup@theabramslawfirm.com

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

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

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

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

  
Anat Levy

DECLARATION OF STEVE SANSON IN SUPPORT OF  
OPPOSITION TO MOTION FOR OSC RE: CONTEMPT

-3-

*Steven L. Johnson*

CLERK OF THE COURT

1  
2 **ORDER**

3 **DISTRICT COURT**  
4 **FAMILY DIVISION**  
5 **CLARK COUNTY, NEVADA**

6 \*\*\*\*\*

7 Brandon Saiter,

8 Plaintiff,

9 vs.

10 Tina Saiter,

11 Defendant,

CASE NO.: D-15-521372-D

DEPT. NO.: L

Date of Hearing: 3-21-16

Time of Hearing: 10:00 a.m.

12 **ORDER WITHOUT HEARING**  
13 **PURSUANT TO EDCR 2.23**

14 The Court in review of Plaintiff's NRCP 60(A) Motion to Correct the  
15 Order After Hearing of September 29, 2016 filed February 2, 2017;  
16 Defendant's Opposition and Countermotion for Attorney's Fees and Costs  
17 filed February 14, 2017; Plaintiff's Reply and Opposition to Countermotion  
18 filed February 27, 2017; Plaintiff's Motion for an Order to Show Cause filed  
19 February 13, 2017; Steve Sanson's Opposition filed March 6, 2017; and  
20 Defendant's Opposition To Motion For Order To Show Cause Re: Contempt  
21 and Countermotion For Attorney's Fees filed March 7, 2017, hereby FINDS  
22 and ORDERS, pursuant to EDCR 2.23, that these matters are hereby decided  
23 without a hearing and vacates the hearings set for March 21, 2017 at 10:00  
24 a.m. and March 30, 2017 at 9:00 a.m.

25  
26  
27  
28  
☐ Other  
☐ Dismissed - Want of Prosecution  
☐ Involuntary (Statutory) Dismissal  
☐ Default Judgment  
☐ Transferred  
☐ Deposed After Trial Start  
☐ Judgment Reached by Trial  
☐ Settled/Withdrawn  
☒ Without Judicial Confirmation  
☐ With Judicial Confirmation  
☐ By ADR  
Non-Trial Dispositions:  
Trial Dispositions:

JENNIFER L. ELLIOTT  
DISTRICT JUDGE  
FAMILY DIVISION, DEPT. L  
LAS VEGAS, NV 89101

1  
2 **A. Relevant Factual Background**

3 1. The parties were divorced pursuant to the Decree of Divorce  
4 (hereinafter "Decree") filed December 28, 2016.

5  
6 2. Prior to the filing of the Decree, pursuant to emails between the  
7 parties' counsel on October 5, 2016, and copied on the Court on October 6,  
8 2016, the parties, through their counsel, stipulated to seal the case.

9  
10 3. Additionally, Plaintiff filed a Petition to Seal Records Pursuant to  
11 NRS 125.110(2), which was granted and an Order to Seal Records Pursuant  
12 to NRS 125.110(2) was filed on October 6, 2016. An Order Prohibiting  
13 Dissemination of Case Material was also filed on October 6, 2016.  
14

15 4. Subsequently, on January 11, 2017, Plaintiff filed his Motion to  
16 Enter the Order After Hearing of September 29, 2016.  
17

18 5. On January 20, 2017, the Order from the September 29, 2016  
19 hearing was prepared and filed by the Court because the parties' counsel  
20 could not agree on the precise language of the order.  
21

22 6. On February 2, 2017, Plaintiff filed his NRCP 60(a) Motion to  
23 Correct the Court's Order After Hearing of September 29, 2016.  
24

25 7. Defendant filed her Opposition and Countermotion for Attorney's  
26 Fees and Costs on February 14, 2017.  
27  
28

1  
2 8. Plaintiff filed his Reply to Defendant's Opposition to Plaintiff's  
3 NRCP 60(a) Motion and Opposition to Defendant's Countermotion for  
4 Attorney's Fees and Costs on February 27, 2017.  
5

6 9. On February 13, 2017, Plaintiff filed his Motion for an Order to  
7 Show Cause Against Defendant's Counsel of Record, Louis Schneider, Esq.  
8 (hereinafter "Schneider"), and a third party, Steve Sanson (hereinafter  
9 "Sanson").  
10

11 10. The Court takes judicial notice that Plaintiff's counsel of record,  
12 Jennifer Abrams, Esq. (hereinafter "Abrams") and her firm, the Abrams and  
13 Mayo Law Firm, has filed a civil suit against Schneider and Sanson, among  
14 others, in case A-17-749318-C alleging defamation, intentional infliction of  
15 emotional distress, negligent infliction of emotional distress, false light,  
16 business disparagement, harassment, concert of action, civil conspiracy,  
17 RICO violation, copyright infringement and injunction for acts that arose, in  
18 part, from the current case. This case is pending before Department 21.  
19  
20  
21

22 **B. Plaintiff's NRCP 60(a) Motion**

23 Plaintiff's NRCP 60(a) Motion seeks to amend the Order from the  
24 September 29, 2016 hearing, specifically requesting the following three (3)  
25 changes:  
26

27 (1) "Upon Plaintiff's request, the hearing is closed to the public."  
28

1  
2 (2) "In an email dated September 16, 2016, Tina [Defendant] made it  
3 clear that she no longer wanted to be represented by Mr. Schneider."

4 (3) Delete the "clerk's note" on page 3, lines 7 through 10 of the  
5 order.

6 The Court, after review of all available records, **ORDERS that**  
7 **Plaintiff's NRCP 60(a) Motion be granted in part and denied in part.**

8 As to the first request to close the hearing, Abrams, pursuant to EDCR 5.02  
9 (which was then in effect) sought to close the hearing (*see* video record at  
10 12:08:02).  
11

12  
13 **Rule 5.02. Hearings may be private.**

14 (a) In any contested action for divorce, annulment,  
15 separate maintenance, breach of contract or partition  
16 based upon a meretricious relationship, custody of  
17 children or spousal support, the court must, upon demand  
18 of either party, direct that the trial or hearing(s) on any  
19 issue(s) of fact joined therein be private and upon such  
20 direction, all persons shall be excluded from the court or  
21 chambers wherein the action is heard, except officers of  
22 the court, the parties, their witnesses while testifying, and  
23 counsel. . .  
24

25 At 12:08:04, the Court stated, "Sure." At 12:08:05, the Court Ordered  
26 "All those not a party, not representing a party would please exit the  
27 courtroom." Later in the hearing, Abrams states that her request to close the  
28 hearing is still pending (*see* video record at 12:13:06). However, the Court  
had already ruled on Abrams' request at the outset of this hearing, and the



1 Court, for good cause, had allowed Defendant's parents to remain as support  
2 for the Defendant who was struggling with whether she should continue to  
3 have legal representation. **Therefore, the Court GRANTS Plaintiff's**  
4 **request to add this language to the minutes and the Order: "Upon**  
5 **Plaintiff's request, the hearing is closed to the public."**  
6

7  
8 With regard to Plaintiff's second request as to Defendant's September  
9 16, 2016 email to Schneider, and Plaintiff's position regarding whether  
10 Defendant stated that she did not want to be represented by Schneider  
11 therein. The Court did comment that the September 16, 2016 email was the  
12 first time where it appeared that there was any settled purpose or clear intent  
13 by Defendant not to be represented by Schneider.  
14

15  
16 However, this did not also mean that the Court made a finding or  
17 believed that it was in the best interest of Defendant to be without assistance  
18 of counsel. The Court was concerned with issues such as, the difference in  
19 the economic knowledge/power balance between the parties, Defendant's  
20 mental and emotional competency to make the decisions on behalf of  
21 herself, issues pending such as the results of the forensic income report, and  
22 later in the hearing, the allegation that Plaintiff must pay for the community  
23 business from his post-tax personal income rather than through the business  
24 itself, leaving Plaintiff apparently unable to pay alimony to Defendant while  
25  
26  
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1  
2 grossing over \$20,000 a month, and the significant equity in the business  
3 that had not been accurately disclosed to Defendant, etc. Therefore, the  
4 Court was especially concerned that both parties continue to have the benefit  
5 of counsel pending the Court's ability to canvas and ensure the fairness of all  
6 of the settlement terms.  
7

8       The Court further FINDS that Schneider had his Motion to Withdraw  
9 pending before the Court at this same hearing, which he withdrew after the  
10 Court asked him to remain on the case to look into the financial aspects of  
11 the parties' agreement, including the need to pay \$5,000 monthly business  
12 debt payment from personal post-tax income and expenses that Plaintiff  
13 listed on his Financial Disclosure Form (hereinafter "FDF") filed April 4,  
14 2016.  
15

16  
17       With those concerns having been mentioned, the Court GRANTS  
18 Plaintiff's request to add to the order: "In an email dated September 16,  
19 2016, Tina [defendant] made it clear that she no longer wanted to be  
20 represented by Mr. Schneider."  
21

22  
23       As to the "Clerk's Note", those notes were specifically included at the  
24 Court's request following the hearing and constitutes a finding of the Court.  
25 Plaintiff's FDF, filed April 4, 2016, did not include the royalty payments  
26 which were paid through mid-2016; the royalty payment was also not  
27  
28

1 included in his December 14, 2015 FDF. Plaintiff's objection to the  
2 inclusion of the "Clerk's Note" is DENIED. Defendant's  
3 Countermotion for Attorney's Fees and Costs is DENIED.  
4

5 **C. Plaintiff's Motion for an Order to Show Cause**  
6

7 *1. Parties' Arguments*  
8

9 **a. Plaintiff's Allegations**

10 Plaintiff alleged that Sanson, even after being served with the  
11 Order Prohibiting Dissemination of Case Material, continued to post the  
12 video from the September 29, 2016 hearing on various websites and  
13 posted commentary that specifically referred to the parties' names and  
14 case number. As a result, he alleged the safety of the parties' children  
15 has been compromised and the parties' privacy had been invaded because  
16 neither party wanted their divorce case to be public. Plaintiff managed to  
17 take the video down from YouTube and Vimeo after making privacy  
18 complaints, but Sanson allegedly continued to post the video on a  
19 Russian website and despite further multiple requests, refused to take  
20 down the videos.  
21

22 Plaintiff argued that Sanson need not be inter-pled as a party  
23 because he interjected himself into the case by obtaining a copy of the  
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1 hearing video and posting it online in an attempt to influence the case,  
2 bringing him within the jurisdiction of the Court.  
3

4 Plaintiff further argued that Sanson's actions do not constitute free  
5 speech because the hearing was closed to the public and there is no  
6 legitimate purpose in invading the parties' privacy and risk of harm to the  
7 parties' children. Furthermore, Schneider was complicit in Sanson's  
8 actions because he acted in concert with Sanson to escalate the case and  
9 released the case material to him. Plaintiff argued that since the violation  
10 of the Order Prohibiting Dissemination of Case Material cannot be  
11 completely purged, Sanson and Schneider's conduct constitutes criminal  
12 contempt.  
13

14 **b. Sanson's Allegations**  
15

16 It is noted that Sanson made a special appearance to oppose  
17 Plaintiff's Motion for an Order to Show Cause.  
18

19 Sanson stated he is accused of violating an Order in a case to  
20 which he is not a party and had not been given notice or opportunity to be  
21 heard. He also notes the civil cases Abrams and her counsel, Marshal  
22 Willick (hereinafter "Willick") brought against Sanson and his  
23 organization, Veterans in Politics International (hereinafter "VPI"): case  
24 numbers A-17-749318-C and A-17-750171-C. Sanson argued that his  
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28

1 criticisms of Abrams and Willick's Court practices led to them filing  
2 suits against Sanson and VIPI. Sanson additionally noted Plaintiff's  
3 Motion for an Order to Show Cause failed to attach a supporting affidavit  
4 from Plaintiff and concluded the motion was filed to strengthen Abrams  
5 and her civil lawsuit against Sanson and VIPI and has nothing to do with  
6 Plaintiff.  
7

8  
9 Sanson noted that neither he nor VIPI were previously named as a  
10 party or served with process; furthermore, the Order Prohibiting  
11 Dissemination of Case Material was issued without a hearing or any due  
12 process protection for Sanson or VIPI.  
13  
14

15 The gravamen of Sanson's opposition is as follows: (1) this Court  
16 does not have jurisdiction over Sanson and (2) even if this Court has  
17 jurisdiction, the Court's Order Prohibiting Dissemination of Case  
18 Material is void as unconstitutionally overbroad, violating both federal  
19 and state law. Sanson argued that this Court lacks subject matter  
20 jurisdiction under *Del Papa v. Steffen*, 920 P.2d 489, 112 Nev. 369  
21 (1996). However, even if this Court has subject matter jurisdiction, he  
22 argues that there is a strong presumption for open courtroom  
23 proceedings. Furthermore, Sanson argued that he has the right to free  
24 speech to criticize Abrams' courtroom behavior and his posting of videos  
25  
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1 and making commentary regarding Abrams is a valid exercise of his right  
2 to free speech. Furthermore, even if the case was sealed, under *Johanson*  
3 v. *District Court*, 182 P.3d 94, 124 Nev. 245 (2008), sealing the entire  
4 case file without notice or opportunity to be heard constitutes abuse of  
5 discretion, especially if it fails to make findings of any clear and present  
6 danger or threat of serious and imminent harm to a protected interest and  
7 without examining alternative means to accomplish that purpose;  
8 furthermore, the Order Prohibiting Dissemination of Case Material was  
9 not narrowly drawn and failed to discuss whether any less restrictive  
10 alternatives were available. Since the Order Prohibiting Dissemination of  
11 Case Material cannot meet the *Johanson* test, Sanson argued that the  
12 Court's Order Prohibiting Dissemination of Case Material is  
13 impermissibly broad and thus, it should be vacated.  
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19 In addition, Sanson argued that if Plaintiff's Motion for an Order to  
20 Show Cause is granted, that this Court should be disqualified per Nevada  
21 Code of Judicial Conduct, Rule 2.11 because he alleged that this Court's  
22 impartiality may be questioned.  
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1  
2 **c. Defendant's Opposition**

3 Defendant's Opposition to Plaintiff's Motion for an Order to Show  
4 Cause alleged simply that said motion is aimed solely at bolstering  
5 Abrams' civil case against Schneider and Sanson.  
6

7 **2. Relevant Law**

8 Pursuant to NRS 125.110(2), once a party requests that a domestic  
9 case be sealed, the Court must seal the case. Other than pleadings,  
10 findings of the Court, Orders, and Judgments, all other records shall be  
11 sealed and shall not be open to inspection except to the parties or their  
12 attorneys, or when required as evidence in another action or proceeding  
13 (see below).  
14  
15

16 **NRS 125.110 What pleadings and papers open to**  
17 **public inspection; written request of party for sealing.**

18 1. In any action for divorce, the following papers and  
19 pleadings in the action shall be open to public inspection  
in the clerk's office:

20 (a) In case the complaint is not answered by the  
21 defendant, the summons, with the affidavit or proof  
22 of service; the complaint with memorandum endorsed  
23 thereon that the default of the defendant in not  
24 answering was entered, and the judgment; and in case  
where service is made by publication, the affidavit for  
publication of summons and the order directing the  
publication of summons.

25 (b) In all other cases, the pleadings, the finding of the  
26 court, any order made on motion as provided in  
Nevada Rules of Civil Procedure, and the judgment.

27 2. All other papers, records, proceedings and  
28 evidence, including exhibits and transcript of the

1  
2 testimony, shall, upon the written request of either  
3 party to the action, filed with the clerk, be sealed  
4 and shall not be open to inspection except to the  
5 parties or their attorneys, or when required as  
6 evidence in another action or proceeding.  
(Emphasis added.)

7 Under *Landreth v. Malik*, 251 P.3d 163, 127 Nev. 175 (2011), even  
8 if the matter at hand is outside the scope of a traditional Family Court  
9 matter, Family Court Judges do have subject matter jurisdiction over  
10 such matters and thus, *Landreth* overruled *Del Papa v. Steffan*.

11 The Court is mindful of the Nevada Supreme Court Rule VII, Rule  
12 (3)(4), which states that sealing is justified by identified compelling  
13 privacy or safety interests that outweigh the public interest in access to  
14 the Court record. However, under *Johanson*, the Nevada Supreme Court  
15 clarified the use of NRS 125.110 in sealing cases. In that case, the  
16 District Court entered an Order sealing the entire case file and sua sponte  
17 issued a gag order preventing all parties and attorneys from disclosing  
18 any documents or discussing any portion of the case.  
19

20 The *Johanson* Court adopted the following standard regarding gag  
21 Orders, or an Order that prevents participants from making extrajudicial  
22 statements about their own case: (1) a party must demonstrate a clear and  
23 present danger or a serious and imminent threat to a protected competing  
24 interest, (2) the order is narrowly drawn, and (3) less restrictive  
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1 alternatives are not available. In *Johanson*, respondent argued that the  
2 Court has inherent power to completely seal divorce cases beyond NRS  
3 125.110. However, the Nevada Supreme Court declined to adopt such  
4 broad standard and even assuming, in arguendo, that the Court indeed has  
5 such broad power, one must show the Court that sealing the entire case  
6 file is necessary to protect his, or another person's rights, or to otherwise  
7 administer justice. *Johanson*, 182 P.3d at 97-98, 124 Nev. at 250.  
8

9 Under NRS 22.010, disobedience or resistance to any lawful order  
10 issued by the court constitutes contempt. Furthermore, under  
11 *Cunningham v. District Court*, 102 Nev. 551, 559-60, 729 P.2d 1328,  
12 1333-34 (1986), the order must be "clear and unambiguous."  
13

14 Lastly, under new EDCR 5.301, (as with EDCR 5.03, in effect in  
15 2016), the parties and their counsel are prohibited from knowingly  
16 permitting others to (a) discuss the case with the minor children, (b)  
17 allow minor children to review the proceedings, pleadings or any records,  
18 or (c) leaving such materials in a place where it is likely or foreseeable  
19 that any minor child will access those materials.  
20

### 21 3. Discussion

22 The Order to Seal Records filed October 6, 2016 states the  
23 following: "all documents filed... in the above-entitled action exception  
24

1 for pleadings, findings of the Court, Orders made on motion... and any  
2 judgments, shall be and are hereby sealed." There is no dispute as to the  
3 validity of this Order. However, as Sanson alleged, there is a dispute  
4 over the validity of the Court's Order Prohibiting Dissemination of Case  
5 Material.  
6

7  
8 a. Does this Court have Subject Matter Jurisdiction over Sanson?  
9

10 Sanson, citing *Del Papa*, argued that this Court lacks subject  
11 matter jurisdiction over him. However, there is no discussion of how  
12 *Landreth*, which grants family courts subject matter jurisdiction over  
13 other matters, is distinguished. Accordingly, Sanson's argument facially  
14 fails in this regard. The Court FINDS that it has subject matter  
15 jurisdiction.  
16

17  
18 b. Even if this Court has Subject Matter Jurisdiction, is the Order  
19 Prohibiting Dissemination of Case Material Impermissibly Broad?

20 The Order Prohibiting Dissemination of Case Material states,  
21 pursuant to the stipulation of the parties, in the best interest of the  
22 children, and the fact that the parties have settled their case, all hearing  
23 videos shall be immediately removed from the internet and "all persons  
24 or entities shall be prohibited from publishing, displaying, showing, or  
25 making public any portion of these case proceedings." This Order clearly  
26 constitutes a gag order as to the parties as well as non-parties as  
27  
28

1  
2 contemplated in the *Johanson* case and hence, must be subject to the  
3 *Johanson* 3-part test.  
4

5 **1. Is there a Serious and Imminent Threat to a Protected**  
6 **Competing Interest?**

7 The first amendment right to free speech and the freedom of the  
8 press are obviously protected competing interests when weighed against  
9 divorcing parties' privacy interests and the best interest of their children  
10 in not being exposed to the case (*see* EDCR 5.301 and prior EDCR  
11 5.03).  
12

13 Plaintiff framed the issue as the parties and their children being  
14 dragged through the mud by unwanted exposure through the actions of  
15 Sanson and VIPI, allegedly acting in concert with Schneider. On the  
16 other hand, Sanson framed the issue as the exercise of his right to free  
17 speech in criticizing Abrams' courtroom behavior.  
18

19  
20 At the time the Court drafted the Order Prohibiting Dissemination  
21 of Case Material, it was very cognizant that there were four (4) minor  
22 children, ages 14, 12, 10 and 8 involved in the case and that their parents  
23 had settled this matter after over a year of great acrimony between the  
24 parties, as well as between their counsel. The Court believed it was  
25 certainly not in the best interest of the parties or the children to access  
26 YouTube, or hear from others who have accessed YouTube, or to see  
27  
28

1 their parents in Court during their divorce proceedings. This Court would  
2 not want the children, their friends or relatives to see their mother  
3 struggling with the divorce issues, struggling with whether or not to be  
4 represented, to see their maternal grandparents in the background, clearly  
5 worried about their daughter, who was very emotional and distraught  
6 during the hearing, to listen to financial and other matters being discussed  
7 in escalated tones, to hear accusations flying across the room, seeing their  
8 parents in conflict in the courtroom setting where children are not  
9 typically allowed to be present in divorce actions *for very good reasons*,  
10 to know their friends and relatives can access this same video material  
11 online at any time, etc. This material would clearly be disturbing  
12 emotionally and mentally to most any child who witnessed it.  
13  
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17

18 It was paramount in the Court's mind that the case simmers down  
19 and that the parties get down to co-parenting and focusing on bringing  
20 some peace to the restructuring they had done in two separate homes.  
21 There had been little peace to date; in the Court's view, continuing the  
22 case controversy based on any debate would not be in the best interest of  
23 the parties or their children. Thus, the Court FINDS that the best interest  
24 of the children would trump Sanson's and VIPI's free speech rights in  
25 this case.  
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## 2. Was the Order Narrowly Drawn?

The Court must find that the Order is facially overbroad as it is not narrowly drawn where it forbids ALL persons or entities to disseminate information obtained prior to the sealing without giving notice or opportunity to be heard on the issues. However, the Court finds that the Order to Seal Records filed October 6, 2016 forbids dissemination of videos of the hearing, which is covered as the official transcript under NRS 125.110(2):

“All other papers, records, proceedings and evidence, including exhibits and transcript of the testimony, shall, upon the written request of either party to the action, filed with the clerk, be sealed and shall not be open to inspection except to the parties or their attorneys, or when required as evidence in another action or proceeding.” (Emphasis added.)

## 3. Less Restrictive Alternatives Not Available?

The Court Ordered removal of the video from the September 29, 2016 hearing from the entire “internet” and there was no discussion by the Court of whether there were less restrictive means available (e.g. removing the parties’ names or case number from the case--which would be little help here where dealing with identification by video...). Plaintiff’s motion mentioned that the parties’ minor children have access to FaceBook and could have accessed the videos, and this

1  
2 Court is in agreement with that view. In this era, children are frequently  
3 online, especially watching videos on YouTube at age two (2) and older.

4 At this time, the Court FINDS that the only sure way it can  
5 conceive of that would have worked to assure the restriction of the video  
6 being shown only to interested adults, and not to children, would have  
7 been through advertised scheduled showings in a place where children  
8 are not allowed.  
9

10  
11 Again, the Court FINDS as the Order Prohibiting Dissemination of  
12 Case Material failed to give notices to any of the "All persons or  
13 entities," including Sanson, no one was given any means to challenge the  
14 validity of the order. Thus, any non-party, without prior notice, could  
15 have been dragged into court unconstitutionally, despite lack of any  
16 reasonable connection with the case.  
17

18  
19 Accordingly, the Court FINDS that the Order Prohibiting  
20 Dissemination of Case Material to be unconstitutionally overbroad  
21 and as such, the Court HEREBY ORDERS the Order Prohibiting  
22 Dissemination of Case Material shall be struck and vacated.  
23

24 Although the Court must find that the Order fails and cannot be  
25 enforced as written, nonetheless, this Court must always have the best  
26 interests of children in mind in all decision-making, and as such is  
27  
28

1 compelled to find that, after the Court made it clear what the concerns  
2 were, the Court does not find it was appropriate to continue to post the  
3 hearing video on the internet where the parties' minor children would  
4 have easy access to emotionally and mentally disturbing material,  
5 without attempting to reach an intended audience in a more responsible  
6 way. Notwithstanding, there is nothing this Court can do in this case to  
7 enforce this viewpoint.  
8

#### 9 10 11 **4. Disqualification of the Court**

12 Since the Court finds that the Order Prohibiting Dissemination of  
13 Case Material is overbroad and Orders that it be struck and vacated, it  
14 need not rule on Sanson's request that should this court grant Plaintiff's  
15 Motion for an Order to Show Cause, that the Court disqualify itself under  
16 Nevada Code of Judicial Conduct, Rule 2.11 because Sanson argued that  
17 he can reasonably infer that this Court is seeking to stifle criticism and  
18 thus, the Court's impartiality may be questioned.  
19

20 The Court would note that there is a great deal of case law under  
21 which his argument fails and Sanson fails to cite any rule of law in his  
22 support. Following his reasoning, if Sanson criticizes any or every  
23 Judge, each and every Judge who he criticized must recuse from hearing  
24 any case where Sanson involves himself. What then becomes of the  
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26  
27  
28

1 independence of the judiciary? Independent, except for Sanson?

2  
3 Independent, except for this or that reporter, or newspaper, or news  
4 station?

5  
6 **D. ORDER TO SHOW CAUSE**

7 **The Court FINDS and Orders that without a valid Order**  
8 **Prohibiting Dissemination of Case Material, that Plaintiff's Order to**  
9 **Show Cause cannot stand.**

10  
11 Although the Order to Seal Records (1) excludes any pleadings,  
12 findings, orders and judgments per NRS 125.110 requirements and under  
13 subsection (2) this includes the video as the "official transcript" in family  
14 court; this however, is not a fact that is widely known. The Court does not  
15 believe anyone working outside of the area of family court (or some inside  
16 for that matter) would be aware that the video is the official transcript of the  
17 hearing. Thus, the statute reads as if it is limited to documents only and does  
18 not give proper notice to anyone as to the prohibitory use of a hearing video  
19 as a hearing transcript.  
20  
21

22  
23 Additionally, at this juncture, the Plaintiff's Motion for an Order to  
24 Show Cause is unquestionably vague as to *how the parties were or even*  
25 *Plaintiff* (real party/parties in interest in this case) was harmed by the posting  
26  
27  
28



1 of the information on-line. Accordingly, the Court CANNOT FIND that  
2 either Schneider or Sanson violated the Order to Seal Records.

3  
4 The Court further FINDS that Plaintiff's Motions appear to be more  
5 about bolstering Abrams' civil action against Schneider and Sanson,  
6 especially since neither party has alleged specific harm. Proper venue to  
7 hear this matter appears to be Abrams' civil action against Schneider and  
8 Sanson, or the State Bar of Nevada, if appropriate.  
9

10  
11 Furthermore, it seems illogical that Plaintiff is seeking an order to  
12 compel Defendant to personally appear in this matter when his Motion for  
13 an Order to Show Cause is predominantly regarding allegations against  
14 Sanson. Plaintiff stated that both he and Defendant were mortified that case  
15 materials were being posted on-line. Plaintiff stated that he attempted to  
16 resolve the matter, but Sanson refused to remove the case  
17 materials. Schneider's alleged role in the matter was not made clear to the  
18 Court. In his Motion for an Order to Show Cause, Plaintiff made no claims  
19 against Defendant. **The Court declines to Order Defendant to personally**  
20 **appear.**  
21

22  
23  
24 **E. ATTORNEY'S FEES**

25  
26 Furthermore, **the Court ORDERS that all parties to bear their own**  
27 **fees and costs in this matter.**  
28

1  
2 The Court Orders that the Clerk shall remove the hearings from the  
3 Court's calendar set for March 21, 2017 at 10:00 a.m. and March 30, 2017 at  
4 9:00 a.m. and the case shall be CLOSED with the Notice of Entry of this  
5 Order, which shall be prepared by Department L. The Order and Notice of  
6 Entry of Order may be emailed and faxed to both counsel for the parties and  
7 counsel for Mr. Sanson, who shall be advised there shall be no appearances.  
8 Department L shall additionally mail the Order and Notice of Entry of Order  
9 to all counsel.  
10  
11

12 Dated this 24<sup>th</sup> day of March, 2017.

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15   
16 JENNIFER L. ELLIOTT  
17 DISTRICT COURT JUDGE  
18 FAMILY DIVISION, DEPT. L  
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JENNIFER L. ELLIOTT  
DISTRICT JUDGE  
FAMILY DIVISION, DEPT. L  
LAS VEGAS, NV 89101