



District Court *Judge Bullied* by Family Attorney Jennifer Abrams



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



Clark County, Nevada

October 9, 2016

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

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

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



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

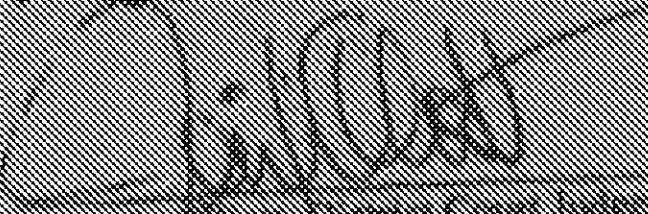
While we disagree that there is anything private in the video, we are abiding by it out of respect for the Court. The Order states that it is being issued "in the best interest of the four (4) children in the case," however, the focus of the video is the misbehavior of Abrams, not the children. Abrams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

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

case information and is demanded that the current post of the September 29, 2016 hearing video, or any other hearing video from this case be immediately removed from the internet and to prohibit any portion of these proceedings from being disseminated or published and that any such publication or posting by anyone be immediately removed, as the September 29, 2016 hearing was a closed hearing. Additionally, counsel and the parties recognize that the case has been settled and that such an Order is in the best interest of the four (4) children in this case and is also authorized by NRS 125.080, NRS 125.110, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 32(a) and 3(4).

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the current post of the September 29, 2016 hearing video, or any and all other hearing video(s) from this case shall be immediately removed from the internet. All persons or entities shall be prohibited from publishing, displaying, showing, or making public any portion of these case proceedings; nothing from the case at bar shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed as the Court finds the stipulation of the parties and this Court's Order to be in the best interest of the four (4) children in this case and to be fully supported by law (NRS 125.080, NRS 125.110, EDCR 5.02, and Supreme Court Rules, Part VII, Rule 32(a) and 3(4)).

DATED this 1st day of October, 2016.


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

[Read: Nevada Attorney attacks a Clark County Family Court Judge in Open Court](#)

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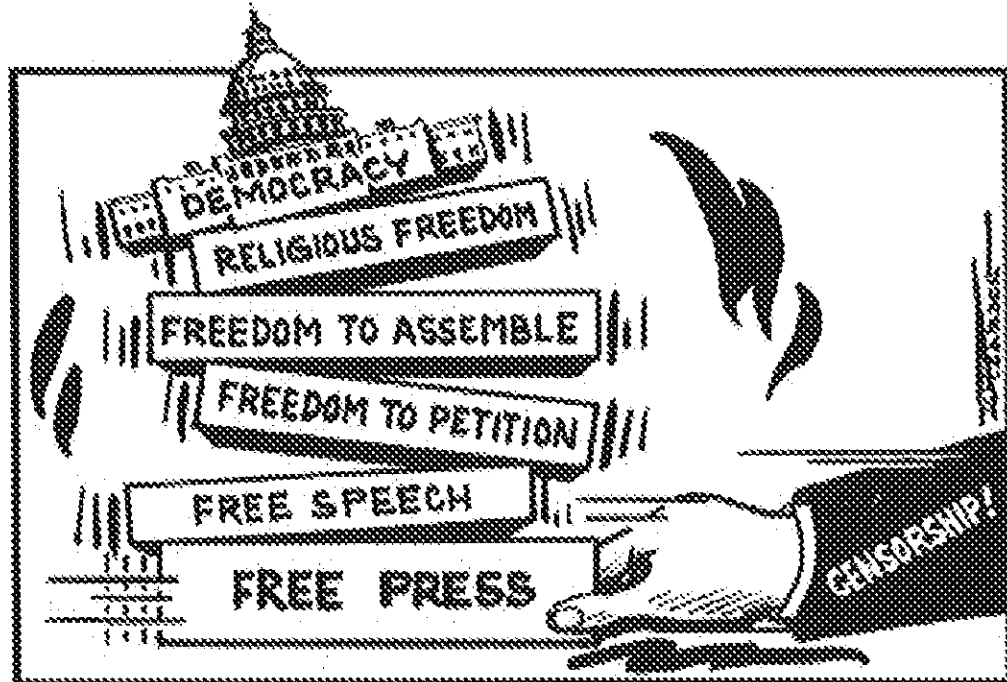
VETERANS
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Law Frowns on Nevada Attorney Jennifer Abrams' "Seal-Happy" Practices

Clark County, Nevada
November 6, 2016

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

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Its importance cannot be overstated!

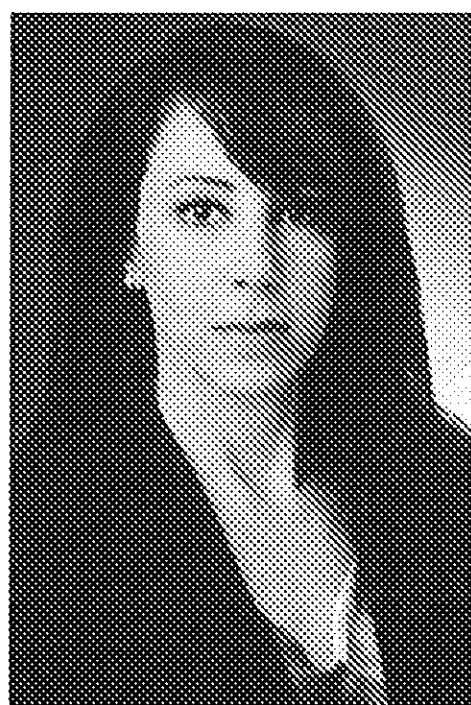
State and federal courts, including Nevada's Supreme Court, recognize that public access to court proceedings serves vital public policy interests, including, serving as a check on corruption, educating the public about the judicial process, promoting informed discussion of government affairs, and enhancing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

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

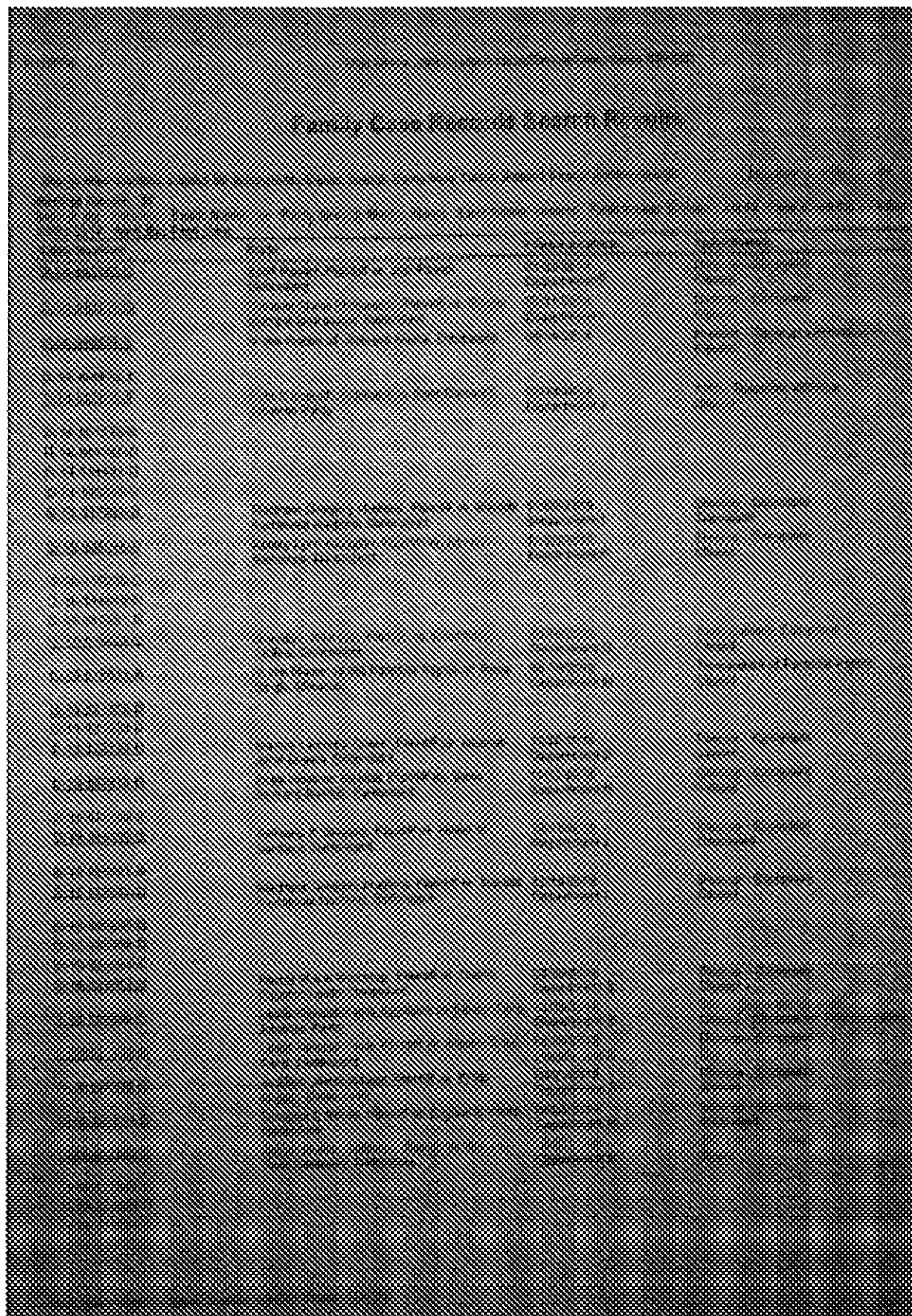
"the cornerstones of an effective, functioning judicial system are openness and transparency. Safeguarding these cornerstones requires public access not only to the judicial proceedings but also to judicial records and documents."



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

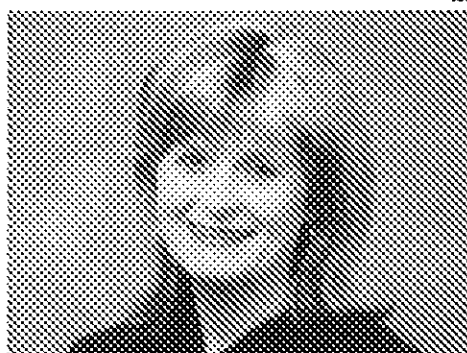


It also appears, however, that at least one of her cases, and perhaps more, may have been sealed to protect her own reputation, rather than to serve a compelling client privacy or safety interest.



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



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

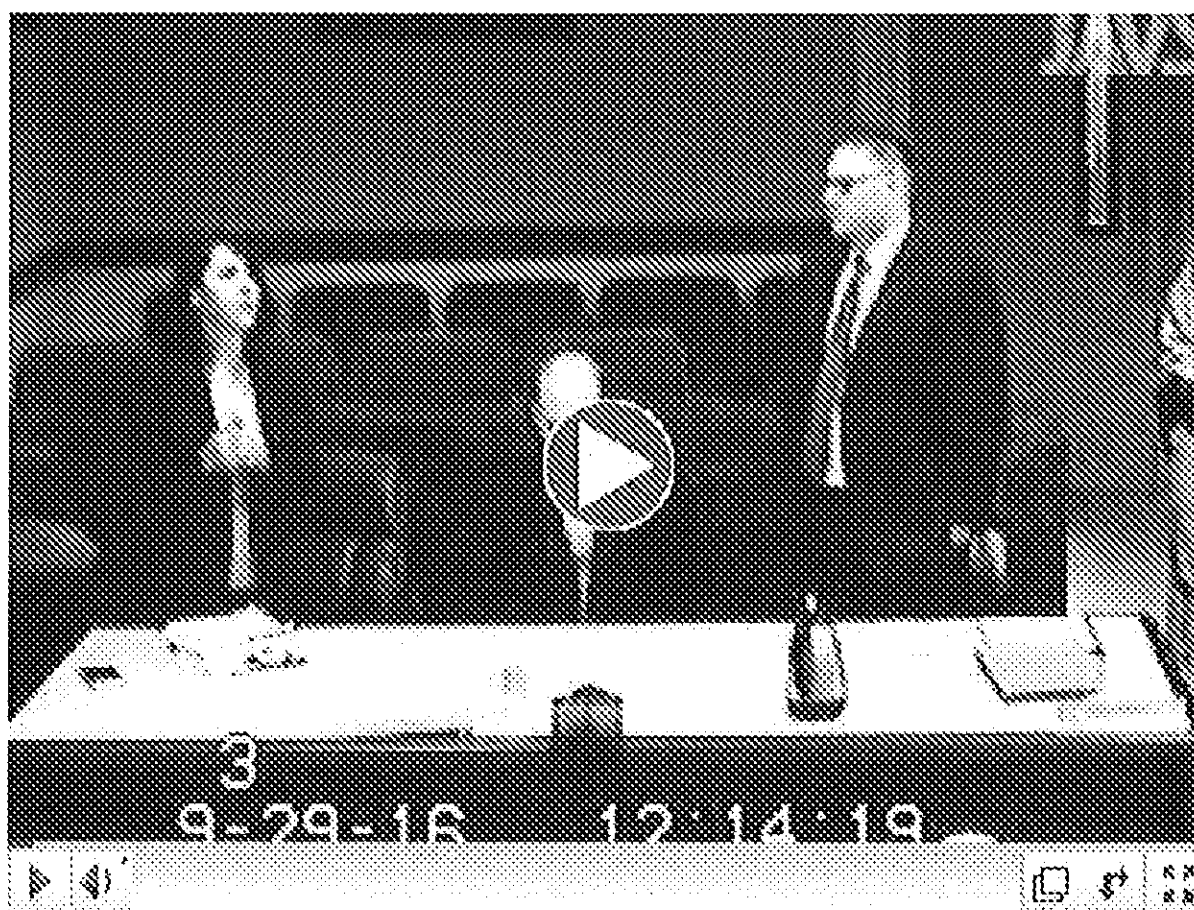
In response to our article, Abrams sought and obtained a court order from Judge Elliott which does not name VIPI, but which purports to apply to the entirety of the general population. VIPI, however, was

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

[Click onto District Court Judge Bullied by Family Attorney Jennifer Abrams](#)

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

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



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

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

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

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

[Click onto Standards for sealing civil cases tougher](#)

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



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

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

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

The Court stated:

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

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

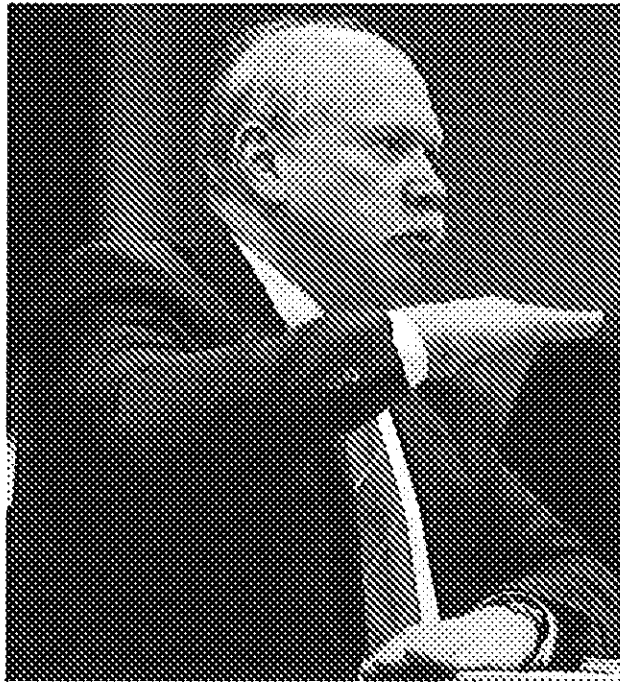
In the *Saiter* case, no notice was given to the general public for a hearing before the Order was issued, there was no opportunity for the public to be heard, no specific findings were made in the Order, and the Order was not drafted narrowly.

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

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

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

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



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



So, who is to blame here?


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

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

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

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

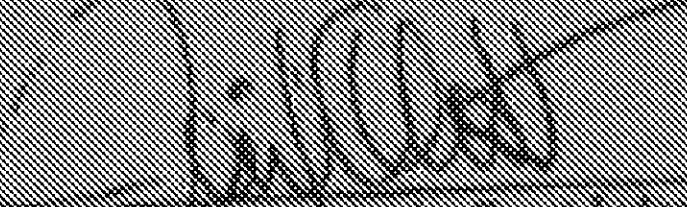
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<p>  JENNIFER ABRAMS CLERK OF THE COURT </p>	
<p> DISTRICT COURT FAMILY COURT DIVISION CLARK COUNTY, NEVADA </p>	
<p> BRANIM PALM SAITER, Plaintiff, </p>	<p> CASE NO. D-15-0017-D DEPT NO. 1 </p>
<p> vs. TINA MARIE SAITER, Defendant. </p>	<p> HEARING DATES: 9/15/16 HEARING TIMES: 10:00 a.m. </p>
<p> <u>ORDER PROHIBITING DISSEMINATION OF CASE MATERIAL</u> </p>	
<p> This matter having come before the Court for several pending matters on the 24th day of September at 10:00 a.m., Plaintiff Branim Saiter represented by Jennifer Abrams, Esq. and Shannon Leavelle Esq. and Defendant Tina Marie Saiter represented by Louis Schneider, Esq., and the Court hearing preliminary matters, entertained and granted Mr. Abrams request for a closed hearing pursuant to NRS 3.017, with the exception of permitting the parents of Defendant to remain pursuant to NRS 125.005 (3)(d). </p>	
<p> Thereafter, the videotape of this hearing was posted on youtube and a link to the video was emailed to multiple third parties not involved in the case on or about the 3rd day of October, 2016. </p>	
<p> On October 3, 2016, the parties received all orders required for a hearing of summary. Counsel then attempted to seal the case and to disallow any further release of </p>	

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

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DATED this 1st day of October, 2016.


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

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EXHIBIT 4

Lawyers acting badly in a Clark County Family Court

Steve Sanson

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Published on Oct 9, 2016

District Court Judge Bullied by Family Attorney Jennifer Abrams

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

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and a public message.

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

Judge Elliott gave child custody to pedophile

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

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5



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News

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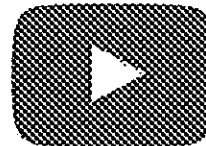
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Deplorable actions by Family Court Judge Rena Hughes against a minor chil...



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

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



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Home

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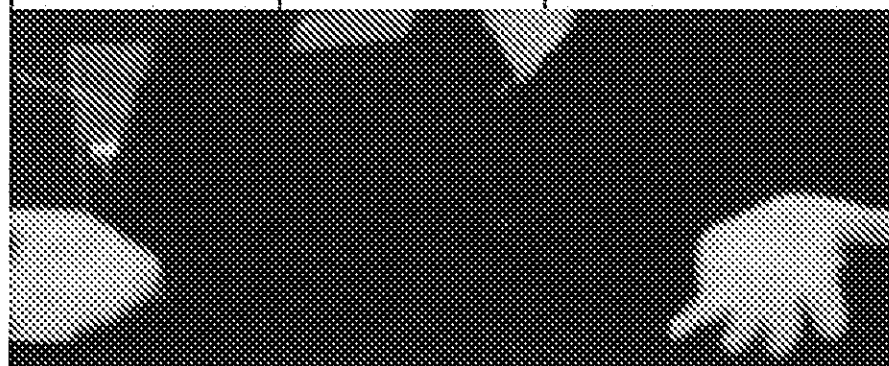
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Clark County Nevada; in a recent article "Deplorable actions by Family Court Judge Rena Hughes against a minor child".

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

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

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

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

Click onto video:

Part 3 threatened the minor child with Child Haven

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

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

Child Haven Website:



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Home

News

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Officers

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See other related Videos:

Part 1 on the Record

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

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

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

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

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

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

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

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

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



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

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

Questions and Recommendations

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

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

Does this Family Court Judge have children of her own?

Should this Judge be reprimanded for this?

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

State of Nevada Commission on Judicial Discipline:

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

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

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

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

November 17, 2016

1



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VIDEO 1 The Abrams Law Firm LLC

https://www.youtube.com/watch?v=Zoxu2l6Oefe

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The Abrams Law Firm LLC

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Steve Sanson

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Published on Dec 21, 2016

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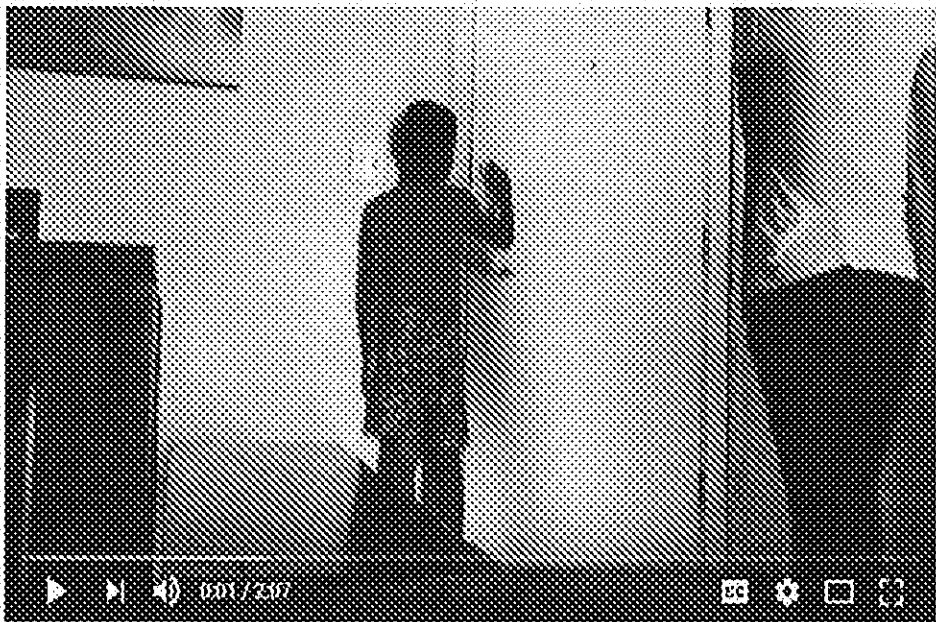
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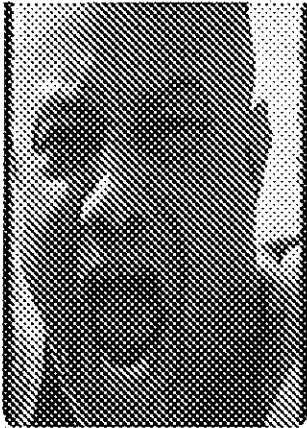
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Veterans In Politics

@VIPSteveSanson

Steve Sanson strong commitment to his country and his community has been demonstrated through his leadership and service in the United States Marine Corps.


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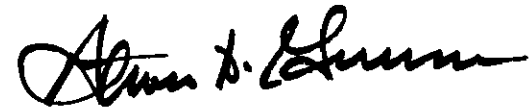
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Nevada Bar No. 13225
POTTER LAW OFFICES
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Attorneys for Schneider Defendants

DISTRICT COURT
CLARK COUNTY, NEVADA

JENNIFER V. ABRAMS and,
THE ABRAMS and MAYO
LAW FIRM,

Plaintiff,

v.

LOUIS SCHNEIDER; LAW OFFICES
OF LOUIS SCHNEIDER, LLC; 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;

Defendants

Case No.: A-17-749318-C

Dept. No.: I

**DEFENDANT LOUIS SCHNEIDER'S
AND LAW OFFICES OF LOUIS
SCHNEIDER'S MOTION TO
DISMISS PLAINTIFFS'
COMPLAINT PURSUANT TO
NRCF 12(b)(5)**

COMES NOW, the Defendant, LOUIS SCHNEIDER, the Law Offices of Louis C.
Schneider by and through their attorneys, CAL J. POTTER, III, ESQ. and C. J. POTTER, IV,
ESQ. of POTTER LAW OFFICES, and moves this Honorable Court pursuant to NCRP
12(b)(5) to dismiss the complaint for Damages.

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1 This Motion is made and based upon the pleadings and papers on file herein, as well as
2 the Points and Authorities attached hereto, and the arguments of Counsel at the time of the
3 hearing of this motion.

4 DATED this 30th day of January, 2017

5 POTTER LAW OFFICES

6 By /s/ Cal J. Potter, III, Esq.
7 CAL J. POTTER, III, ESQ.
8 Nevada Bar No. 1988
9 C. J. POTTER, IV, ESQ.
10 Nevada Bar No. 13225
11 1125 Shadow Lane
12 Las Vegas, NV 89102
13 *Attorneys for Schneider Defendants*

11 **NOTICE OF MOTION**

12 TO: Jennifer V. Abrams; and The Abrams and Mayo Law Firm; and,

13 TO: Marshall Willick, Esq., their attorney;

14 YOU AND EACH OF YOU, will please take notice that the undersigned will bring the
15 foregoing Motion for hearing before the above-entitled Court on the 8th day of March,
16 2017, at the hour of 9:30am, or as soon thereafter as counsel can be heard, in Department
17 I of the Eighth Judicial District Court, 200 Lewis Avenue, Las Vegas, Nevada 89101.

18 DATED this 30th day of January, 2017

19 POTTER LAW OFFICES

20 By /s/ Cal J. Potter, III, Esq.
21 CAL J. POTTER, III, ESQ.
22 Nevada Bar No. 1988
23 C. J. POTTER, IV, ESQ.
24 Nevada Bar No. 13225
25 1125 Shadow Lane
26 Las Vegas, NV 89102
27 *Attorneys for Schneider Defendants*
28

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **INTRODUCTION**

4 Plaintiffs' Complaint for damages is filed in retaliation of Mr. Schneider's efforts to
5 sanction Attorney Brandon Leavitt's *ex parte* communications with Mr. Schneider's client in a
6 divorce proceeding where Mr. Schneider specifically declined to give Mr. Leavitt permission to
7 talk with his client on the eve of a divorce trial. Nonetheless, Brandon Leavitt met with the
8 represented party for approximately four hours concerning the subject of representation.

9 **II.**

10 **STATEMENT OF THE CASE**

11 Jennifer Abrams, Esq, is a duly licensed attorney in the State, who claims to practice
12 exclusively in the field of Domestic Relations, yet has e-filed a tort action in the State District
13 Court of Clark County, Nevada. The complaint for damages asserts claims for reliefs as
14 follows.: 1. Defamation; 2. IIED; 3. NIED; 4. False Light; 5. Business Disparagement; 6.
15 Harassment; 7. Concert of Action; 8. Civil Conspiracy; 9. Rico Violations; 10. Injunctive
16 Relief.

17 Dismissal of Plaintiffs' claims is appropriate because Plaintiffs' Complaint lacks factual
18 specificity concerning the moving Defendants. Rather the Complaint merely contains legal
19 conclusions and threadbare recitals of the elements of the causes of action.

20 Specifically, the entirety of the *factual* allegations against the moving Defendants
21 consist of the following:

22 "Defendants Louis C. Schneider and Law Offices of Louis C. Schneider, LLC represent
23 Tina Sailer hereinafter in the "D" Case." (Plaintiff's Complaint, ¶ 22).

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

26 I've had about all I can take.
27 Withdraw your Motion and I'll withdraw from the case.
28 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

1 take additional action beyond the opposition.” (Plaintiff’s
2 Complaint, ¶ 24).

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

5 Can you please upload the video from yesterday's hearing?
6 Thank you.
7 :)” (Plaintiff’s Complaint, ¶ 30).

8 “Upon information and belief, Schneider provided a copy of the September 29, 2016
9 "closed hearing" to Defendants Steve W. Sanson and Veterans In Politics International, Inc.
10 (Plaintiff’s Complaint, ¶ 31).

11 “During a break at another court hearing in the "D" case on October 5, 2016
12 (immediately after the dissemination of the "Attack" article via email), Defendant Schneider
13 said to Brandon K. Leavitt, Esq., of The Abrams & Mayo Law Firm, that a withdrawal of the
14 Motion for Sanctions and Attorney Fees would "make this all go away," or words to that
15 effect.” (Plaintiff’s Complaint, ¶ 38).

16 Plaintiffs Complaint contains no other *facts* concerning the moving Schneider
17 Defendants.

18 **III.**

19 **ARGUMENT**

20 **A. STANDARD OF REVIEW**

21 Pursuant to NRCP 12(b)(5), all or part of a pleading may be dismissed for failure to
22 state a claim upon which relief can be granted. Bemus v. Estate of Bemus, 114 Nev. 1021, 967
23 P.2d 437 1998). When deciding a motion to dismiss under NRCP 12(b)(5), a court must treat
24 all factual allegations as true and draw all reasonable inferences in favor of the nonmoving
25 party. Buzz Stew LLC v. City of North Las Vegas, 124 Nev. 224, 181 P.3d 670, 672 (Nev.
26 2008). Nevertheless, a claim should be dismissed "if it appears beyond a doubt that [plaintiff]
27 could prove no set of facts, which if true, would entitle [plaintiff] to relief." Id. It is axiomatic
28 that an allegation consisting of conclusory verbiage, i.e., merely naming a legal element of a
claim, is insufficient to survive a motion to dismiss. Buzz Stew, 181 P.3d at 672; *accord* Bell

1 Atlantic Corp. v. Twombly, 550 U.S. 544, 561-562, 127 S.Ct. 1955, 1968-1969 (2007).

2 In 2007 and again in 2009 the United States Supreme Court issued two formative
3 decisions that instructed and clarified pleading standards and requirements: Bell Atlantic Corp.
4 v. Twombly, 550 U.S. 544 (2007) and Ashcroft v. Iqbal, 556 U.S. 662 (2009). Twombly was
5 notable for several holdings including the termination of the “no set of facts” language set forth
6 in Conley v. Gibson, 355 U.S. 41 (1957) that proscribed a dismissal for failure to state a claim
7 unless it appeared that “no set of facts” could be set forth to support the claim. Conley, 355
8 U.S. at 45–46.

9 Iqbal meanwhile proscribed such phrasing as “the-defendant-unlawfully-harmed-me
10 accusation.” Iqbal, 556 U.S. at 678. This comment is significant for purposes of this Motion
11 because such conclusory accusations are precisely what the Plaintiffs in this action have alleged
12 against the moving Defendant.

13 “To survive a motion to dismiss, a complaint must contain sufficient factual matter,
14 accepted as true, to ‘state a claim to relief that is plausible on its face.’ A claim only has facial
15 plausibility when the plaintiff pleads factual content that allows the court to draw the
16 reasonable inference that the defendant is liable for the misconduct alleged.” Iqbal, 556 U.S.
17 662, 678 (2009). The Court further explained in Twombly and Iqbal that conclusory statements
18 that merely recite the elements of a claim are insufficient for the purpose of a rule 12 motion.
19 Iqbal, 556 U.S. at 678 (“Threadbare recitals of the elements of a cause of action, supported by
20 mere conclusory statements, do not suffice.”); Twombly, 550 U.S. at 555 (“a plaintiff’s
21 obligation to provide the ‘grounds’ of his ‘entitle[ment] to relief’ requires more than labels and
22 conclusions, and a formulaic recitation of the elements of a cause of action will not do . . .”).

23 **B. PLAINTIFFS’ CIVIL RICO CLAIMS MUST BE DISMISSED BECAUSE THEY LACK FACTUAL**
24 **SPECIFICITY**

25 The Nevada Supreme Court determined that civil racketeering claims must be pled
26 with specificity. Hale v. Burkhardt, 104 Nev. 632, 637-38, 764 P.2d 866, 869-70 (1988). The
27 specificity required is that called for in a criminal indictment or information. Id. at 638, 764
28 P.2d at 869. “A civil RICO pleading must, in that portion of the pleading which describes the

1 criminal acts that the defendant is charged to have committed, contain a sufficiently 'plain,
2 concise and definite' statement of the essential facts such that it would provide a person of
3 ordinary understanding with notice of the charges." Id. at 638, 764 P.2d at 869-70. This means
4 the complaint should provide information as to "when, where [and] how" the underlying
5 criminal acts occurred. Id. at 637, 764 P.2d at 869.

6 The elements of a civil RICO claim are: 1. Defendant violated a predicate racketeering
7 act; 2. Plaintiff suffered injury in his business or property by reason of defendant's violation of
8 the predicate racketeering act; 3. Defendant's violation proximately caused plaintiff's injury; 4.
9 Plaintiff did not participate in the racketeering violation; 5. Therefore, under NRS 207.470,
10 plaintiff is entitled to damages from defendant for three times actual damages sustained. NRS
11 207.470, NRS 207.400; Allum v. Valley Bank of Nevada, 109 Nev. 280, 849 P.2d 297 (1993).

12 In this case, the entirety of Plaintiffs' allegations concerning the alleged civil RICO lack
13 factual specificity and are merely comprised of legal conclusions and rote recitation of
14 elements. (*See*, Plaintiffs' Complaint pp. 28-34). For example, Plaintiffs allege: "Defendants
15 used threats, intimidation, and deception with the intent to cause or induce Plaintiff and
16 Plaintiff's client to withhold testimony against Schneider in the "D" case." (Plaintiff's
17 Complaint at ¶ 25). Such conclusory language exemplifies the remainder of Plaintiffs RICO
18 claims, such as a seriatim list of alleged crimes, devoid of any facts, that Defendants allegedly
19 committed. These allegations fail to set forth the "when, where and how" the underlying
20 criminal acts occurred. Moreover, the allegations are exactly the type of
21 "the-defendant-unlawfully-harmed-me" allegation proscribed by *Twombly* and *Iqbal*.
22 Accordingly, the Plaintiffs' Complaint fails to set forth factual specificity that the Nevada
23 Supreme Court requires for a Civil RICO claim. Therefore, Plaintiffs' civil Rico claims should
24 be dismissed.

25 ...

26 ...

27 ...

28 ...

**C. REPUBLICATION OF, AND REPORTING CONCERNING, A JUDICIAL PROCEEDING
CANNOT CONSTITUTE DEFAMATION AS A MATTER OF LAW (A CLOSED HEARING IS
NOT A SEALED HEARING)**

In Nevada, the elements of a cause of action for defamation are: 1. Defendant made a false and defamatory statement concerning plaintiff; 2. An unprivileged publication of this statement was made to a third person; 3. Defendant was at least negligent in making the statement; and 4. Plaintiff sustained actual or presumed damages as a result of the statement. Pegasus v. Reno Newspapers, Inc., 118 Nev. 706, 57 P.3d 82 (2002).

Communications uttered or published in the course of judicial proceedings are absolutely privileged. Fink v. Oshins, 118 Nev. 428, 49 P.3d 640 (2002). This privilege precludes liability even where the defamatory statements are published with knowledge of their falsity and personal ill will toward the plaintiff. Id. The defamatory communication need not be strictly relevant to any issue involved in the proposed or pending litigation, it only need be in some way pertinent to the subject of controversy. Id. Further, the privilege applies not only to communications made during actual judicial proceedings, but also to communications preliminary to a proposed judicial proceeding. Id. Courts should apply the absolute privilege liberally, resolving any doubt in favor of its relevancy or pertinency. Id.

Additionally, republication of a judicial proceeding constitutes an absolute privilege even when the statements are false or malicious and are republished with the intent to harm another. Sahara Gaming Corp. v. Culinary Workers Union Local 226, 115 Nev. 212, 984 P.2d 164(1999). Reporting of judicial proceedings is privileged and nonactionable. Lubin v. Kunin, 117 Nev. 107, 17 P.3d 422 (2001).

The policy underlying the absolute privilege accorded to communications uttered or published in the course of judicial proceedings is that, in certain situations, the public interest in having people speak freely outweighs the risk that individuals will occasionally abuse the privilege by making false and malicious statements. Circus Circus Hotel, Inc. v. Witherspoon, 99 Nev. 56, 657 P.2d 101 (1983).

For example, a trust attorney's allegedly defamatory statement to a family trustee that an

1 independent trustee was concealing trust assets was covered by absolute privilege applicable to
2 judicial proceedings. Fink, 118 Nev. 428 (2002).

3 Finally, defamation is a publication of a false statement of fact. Statements of opinion
4 cannot be defamatory because there is no such thing as a false idea. However pernicious an
5 opinion may seem, we depend for its correction not on the conscience of judges and juries but
6 on the competition of other ideas. The Court has held that statements of opinion as opposed to
7 statements of fact are not actionable. Pegasus v. Reno Newspapers, Inc., 118 Nev. 706, 57 P.3d
8 82 (2002).

9 In this case, the only factual statements attributed to the moving Defendants are
10 privileged communications related to judicial proceedings. Specifically, the September 15,
11 2016, email to Brandon Leavitt, Esq, the September 30, 2016, email to Kim Gurule at Video
12 Transcription Services; and the October 5, 2016, statement made to Brandon Leavitt, each are
13 privileged statements because each alleged statement is pertinent to the subject of controversy,
14 and made during the course of a pending judicial action. Moreover, providing a video of a
15 judicial proceeding cannot constitute Defamation because republication of a judicial
16 proceeding likewise enjoys an absolute privilege. Consequently, this Court should apply the
17 absolute privilege liberally, resolving any doubt in favor of its relevancy or pertinency and
18 dismiss Plaintiffs' Defamation claims with prejudice.

19 **D. PLAINTIFFS FAIL TO ALLEGE A PLAUSIBLE CLAIM FOR IIED**

20 The elements of a cause of action for Intentional Infliction of Emotional Distress
21 ("IIED") are: 1. Defendant's conduct was extreme or outrageous with either the intention of, or
22 reckless disregard for causing emotional distress to plaintiff; and 2. Plaintiff suffered severe or
23 extreme emotional distress as the actual or proximate result of defendant's conduct. Dillard
24 Dep't Stores, Inc. v. Beckwith, 115 Nev. 372, 989 P.2d 882 (1999).

25 Extreme and outrageous conduct is that which is outside all possible bounds of decency
26 and is regarded as utterly intolerable in a civilized community; persons must necessarily be
27 expected and required to be hardened to occasional acts that are definitely inconsiderate and
28 unkind. Maduike v. Agency Rent-A-Car, 114 Nev. 1, 953 P.2d 24 (1998).

1 A Plaintiff's deposition testimony that he was depressed for some time was not enough
2 to show severe or extreme emotional distress; plaintiff failed to seek any medical or psychiatric
3 assistance for the depression and presented no objectively verifiable indicia of the severity of
4 his emotional distress. Miller v. Jones, 114 Nev. 1291, 970 P.2d 571 (1998).

5 In this case, Plaintiffs Complaint fails to set forth any facts which tend to demonstrate
6 the Plaintiffs suffered emotional distress. Rather the Complaint merely contains a rote
7 recitation of the elements of the claim devoid of any facts. These threadbare recitals of
8 elements do not enjoy a presumption of truth and are insufficient to demonstrate a plausible
9 cause of action. Likewise, the Complaint does not set forth any fact demonstrating that the
10 moving Defendants alleged acts of sending a few emails transcends all possible bounds of
11 decency or is regarded as utterly intolerable in a civilized community. Consequently, Plaintiffs
12 Complaint should be dismissed because it fails to set forth facts which tend to demonstrate
13 plausible claims for relief.

14 **E. PLAINTIFFS FAIL TO ALLEGE A PLAUSIBLE CLAIM FOR NIED**

15 The elements of a cause of action for Negligent Infliction of Emotional Distress
16 ("NIED") are: 1. Defendant owed a duty of care to Plaintiff; 2. Defendant breached that duty; 3.
17 the breach was the legal cause of plaintiff's injuries; and, 4. Plaintiff suffered serious emotional
18 distress. Olivero v. Lowe, 116 Nev. 395, 995 P.2d 1023 (2000).

19 Like Plaintiffs' IIED claim, the NIED claim fails to which tend to demonstrate the
20 Plaintiffs suffered emotional distress. Furthermore, the claim does not even set forth any duty
21 owed by the Defendant or any alleged breach. The entire cause of action merely contains three
22 paragraphs, one of which incorporates the rest of the Complaints conclusory allegations by
23 reference, one that alleged damages "in excess of \$15,000" and the third a vague statement
24 devoid of any facts that alleges: "[t]o whatever extent the infliction of emotional distress
25 asserted in the preceding cause of action was not deliberate, it was a result of the reckless and
26 wanton actions of the Defendants, either individually, or in concert with others." On its face,
27 the allegations contains no particularized facts whatsoever and fails to state a plausible claim

28 . . .

for relief, let alone the elements of the cause of action. Accordingly, Plaintiffs' claim should be dismissed.

F. PLAINTIFFS FAIL TO ALLEGE A PLAUSIBLE CLAIM FOR FALSE LIGHT

The elements of a cause of action for False Light are: 1. Defendant gave publicity to a matter concerning plaintiff that placed plaintiff before the public in a false light; 2. The false light under which plaintiff was placed would be highly offensive to a reasonable person; and 3. Defendant had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which plaintiff was placed. PETA v. Bobby Berosini, Ltd., 111 Nev. 615, 895 P.2d 1269 (1995).

Once again Plaintiff's claim fails to set forth any fact that enjoys the assumption of truth at the pleading stage. Plaintiffs' threadbare legal conclusion and not sufficient to state a claim for relief and Plaintiffs' claim should be dismissed.

G. PLAINTIFFS FAIL TO ALLEGE A PLAUSIBLE CLAIM FOR BUSINESS DISPARAGEMENT

To succeed in a claim for business disparagement, the plaintiff must prove: (1) a false and disparaging statement, (2) the unprivileged publication by the defendant, (3) malice, and (4) special damages. *Id.* Clark County Sch. Dist. v. Virtual Educ. Software, Inc., 125 Nev. 374, 386 (Nev. 2009). Nev.R.Civ.P 9(g) requires that special damages be plead with specificity.

Here, Plaintiffs fail to plead the alleged special damages with specificity. On the contrary, Plaintiffs merely state that they "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." On its fact the statement lacks specificity. Likewise, there are no facts, whatsoever, demonstrating that the moving Defendants acted with malice. Consequently, Plaintiffs' claim should be dismissed.

H. PLAINTIFFS FAIL TO ALLEGE A PLAUSIBLE CLAIM FOR CONCERT OF ACTION

The elements of a cause of action for Concert of Actions are: 1. Defendant acted with another, or Defendants acted together, to commit a tort while acting in concert or pursuant to a common design. Dow Chemical Co. v. Mahlum, 114 Nev. 1468, 970 P.2d 98 (1998). An

1 agreement alone is not sufficient, however, because it is essential that the conduct of each
2 tortfeasor be in itself tortious. Id.

3 In order to be jointly and severally liable under NRS 41.141(5)(d)'s concert of action
4 exception, the defendants must have agreed to engage in conduct that is inherently dangerous
5 or poses a substantial risk of harm to others. Thus, this requirement is met when the defendants
6 agree to engage in an inherently dangerous activity, with a known risk of harm, that could lead
7 to the commission of a tort. Mere joint negligence, or an agreement to act jointly, does not
8 suffice; such a construction of NRS 41.141(5)(d) would render meaningless the general rule of
9 several liability. GES, Inc. v. Corbitt, 117 Nev. 265, 21 P.3d 11 (2001).

10 As analyzed above, the moving Defendants' alleged statements enjoy an absolute
11 privilege. Therefore, the moving Defendants alleged conduct is not tortious as a matter of law.
12 Furthermore, there are no alleged facts which tend to demonstrate the Defendants engaged in
13 any activity which is inherently dangerous or poses a substantial risk of harm to others.
14 Consequently, this Court should dismiss Plaintiffs' conclusory claims.

15 **I. PLAINTIFFS FAIL TO ALLEGE A PLAUSIBLE CLAIM FOR CIVIL CONSPIRACY**

16 The elements of a cause of action for Civil Conspiracy are: 1. Defendants, by acting in
17 concert, intended to accomplish an unlawful objective for the purpose of harming plaintiff; and
18 2. Plaintiff sustained damage resulting from defendants' act or acts. Consol. Generator-Nevada,
19 Inc. v. Cummins Engine Co., 114 Nev. 1304, 971 P.2d 1251 (1999).

20 A claim for civil conspiracy should identify a combination between two or more
21 persons and should name the alleged parties to the conspiracy. In addition, the claim should
22 identify the required "unlawful objective." Morris v. Bank of Am. Nevada, 110 Nev, 1274, 886
23 P.2d 454 (1994).

24 As analyzed above, Plaintiffs' Complaint fails to set forth the "when, where and how"
25 of any alleged conspiracy. Likewise, the Complaint fails to set forth facts illustrating any
26 unlawful objective. Rather the Plaintiffs complain of vague
27 "the-defendant-unlawfully-harmed-me" allegations that fail to state a plausible claim for relief.
28 Accordingly, this Court should dismiss Plaintiffs' claim.

1 **J. HARASSMENT AND INJUNCTIVE RELIEF ARE NOT CAUSES OF ACTION AND SHOULD BE**
2 **DISMISSED**

3 Harassment is not a cause of action. Similarly, an injunction is an equitable remedy, not
4 a cause of action. Lippis v. Peters, 112 Nev. 1008, 1009 (Nev. 1996). Accordingly, the Court
5 should dismiss these two claims that do not constitute causes of action.

6 **IV.**
7 **CONCLUSION**

8 The Schneider Defendants respectfully request that this Court dismiss Plaintiffs claims
9 which are merely supported by a series of conclusory and implausible allegations that
10 do not put the moving Defendants on notice of specific instances of misconduct.

11 In addition, the Schneider Defendants reserve the right to file a pleading pursuant to an
12 anti-SLAPP suit pursuant to NRS 41.660.

13 DATED this 30th day of January, 2017

14 POTTER LAW OFFICES

15 By /s/ Cal J. Potter, III, Esq.
16 CAL J. POTTER, III, ESQ.
17 Nevada Bar No. 1988
18 C. J. POTTER, IV, ESQ.
19 Nevada Bar No. 13225
1125 Shadow Lane
20 Las Vegas, NV 89102
21 *Attorneys for Schneider Defendants*
22
23
24
25
26
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1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that pursuant to EDCR 8.05, Administrative Order 14-2, and
3 NEFCR 9 on the 30th day of January, 2017, I did serve at Las Vegas, Nevada a true and correct
4 copy of **THE SCHNEIDER DEFENDANTS' MOTION TO DISMISS** on all parties to this
5 action by:

- 6 ☐ Facsimile
7 ☐ U.S. Mail
8 ☐ Hand Delivery
9 ☒ Electronic Filing

10 Addressed to:

11 Jennifer Abrams, Esq.
12 THE ABRAMS & MAYO LAW FIRM
13 6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
JVAGroup@theabramslawfirm.com

14 Marshal Willick, Esq.
15 WILLICK LAW GROUP
16 3591 E. Bonanza rd. #200
Las Vegas, NV 89110
marshal@willicklawgroup.com

17 Maggie McLetchie
18 MCLECHIE SHELL
19 701 E. Bridger #520
Las Vegas, NV 89101
maggie@nvlitigation

20
21 /s/ Tanya Bain
An employee of POTTER LAW OFFICES

8

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

DECLARATION OF SERVICE Electronically Filed
02/08/2017 04:11:28 PM

**JENNIFER V. ABRAMS and THE ABRAMS & MAYO
LAW FIRM,**


Case No :A-17-749318
CLERK OF THE COURT

Plaintiff/Petitioner,
vs.
LOUIS C. SCHNEIDER; et al.,

Case No. : A-17-749318-C

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK ss.:

AMENDED COMPLAINT FOR DAMAGES Received by NOW! Services, Inc. on 02/06/2017 with instructions to serve **LOUIS C. SCHNEIDER c/o Cal J. Potter, III** at **Potter Law Offices, 1125 Shadow Lane, Las Vegas, NV89102.**

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

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

On **02/06/2017** at **11:54 AM**, I served the within **AMENDED COMPLAINT FOR DAMAGES** on **LOUIS C. SCHNEIDER c/o Cal J. Potter, III** at **Potter Law Offices, 1125 Shadow Lane, Las Vegas, NV89102** in the manner indicated below:

SUITABLE AGE: By delivering thereat a true copy of each to **Kristy Hulse, Authorized Employee at Potter Law Office** authorized to accept service on behalf of **LOUIS C. SCHNEIDER c/o Cal J. Potter, III**, a person of suitable age and discretion. Said premises is **LOUIS C. SCHNEIDER c/o Cal J. Potter, III's** usual place of business within the state.

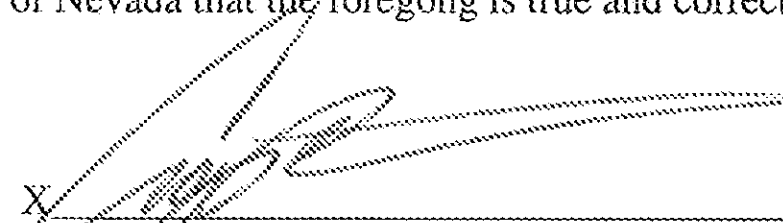
A description of the Recipient, or other person served on behalf of the Recipient is as follows:

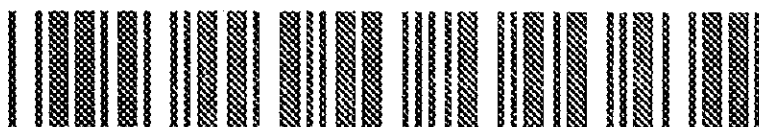
Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Brown	40's	5'5"	135
Other Features:					

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

Executed this 6 of Feb, 2017.

No Notary is required per NRS 53.045.

X 
Craig Burton
License#: 1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV89102
(702) 669-7378
Atty File#:



15322

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Electronically Filed
DECLARATION OF SERVICE 02/08/2017 03:51:08 PM

**JENNIFER V. ABRAMS and THE ABRAMS & MAYO
LAW FIRM,**


Case No :A-17-749318
CLERK OF THE COURT

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK ss.:

AMENDED COMPLAINT FOR DAMAGES Received by NOW! Services, Inc. on 02/06/2017 with instructions to serve **STEVE W. SANSON c/o Margaret McLetchie, Esq.** at **McLetchie Shell, LLC, 701 E. Bridger Ave., Ste. 520, Las Vegas, NV89101.**

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

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

On 02/06/2017 at 12:18 PM, I served the within **AMENDED COMPLAINT FOR DAMAGES** on **STEVE W. SANSON c/o Margaret McLetchie, Esq.** at **McLetchie Shell, LLC, 701 E. Bridger Ave., Ste. 520, Las Vegas, NV89101** in the manner indicated below:

SUITABLE AGE: By delivering thereat a true copy of each to **Pharan Burchfield, Authorized Employee at McLetchie Shell Law Office** authorized to accept service on behalf of **STEVE W. SANSON c/o Margaret McLetchie, Esq.**, a person of suitable age and discretion. Said premises is **STEVE W. SANSON c/o Margaret McLetchie, Esq.**'s usual place of business within the state.

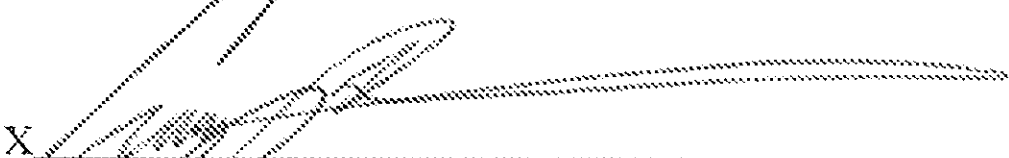
A description of the Recipient, or other person served on behalf of the Recipient is as follows:

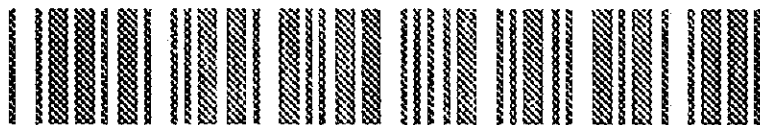
Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Brown	35	5'7"	130
Other Features:					

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

Executed this 6 of Feb, 2017.

No Notary is required per NRS 53.045.

X 
Craig Burton
License#: 1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV89102
(702) 669-7378
Atty File#:



15324

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

DECLARATION OF SERVICE Electronically Filed
02/08/2017 03:52:20 PM


Case No :A-17-749318
CLERK OF THE COURT

**JENNIFER V. ABRAMS and THE ABRAMS & MAYO
LAW FIRM,**

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK ss.:

AMENDED COMPLAINT FOR DAMAGES Received by NOW! Services, Inc. on 02/06/2017 with instructions to serve **VETERANS IN POLITICS INTERNATIONAL, INC. c/o Margaret McLetchie, Esq. at McLetchie Shell, LLC, 701 E. Bridger Ave., Ste. 520, Las Vegas, NV89101.**

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

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

On 02/06/2017 at 12:18 PM, I served the within **AMENDED COMPLAINT FOR DAMAGES** on **VETERANS IN POLITICS INTERNATIONAL, INC. c/o Margaret McLetchie, Esq. at McLetchie Shell, LLC, 701 E. Bridger Ave., Ste. 520, Las Vegas, NV89101** in the manner indicated below:

SUITABLE AGE: By delivering thereat a true copy of each to **Pharan Burchfield, Authorized Employee at McLetchie Shell Law Office** authorized to accept service on behalf of **VETERANS IN POLITICS INTERNATIONAL, INC. c/o Margaret McLetchie, Esq.**, a person of suitable age and discretion. Said premises is **VETERANS IN POLITICS INTERNATIONAL, INC. c/o Margaret McLetchie, Esq.**'s usual place of business within the state.

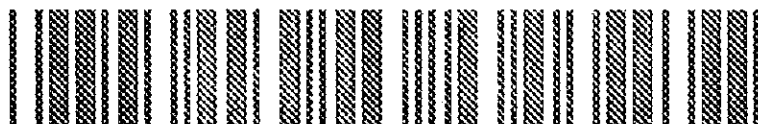
A description of the Recipient, or other person served on behalf of the Recipient is as follows:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Brown	35	5'7"	130
Other Features:					

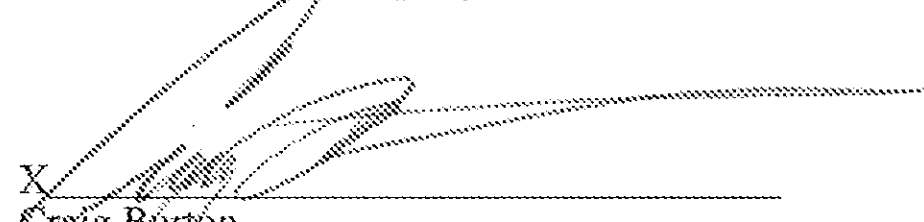
I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 6 of Feb, 2017

No Notary is required per NRS 53.045.



15327

X 
Craig Burton
License#: 1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV89102
(702) 669-7378
Atty File#:

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

DECLARATION OF SERVICE Electronically Filed
02/08/2017 03:55:08 PM

**JENNIFER V. ABRAMS and THE ABRAMS & MAYO
LAW FIRM,**

Alvin D. Shuman
Case No :A-17-749318

CLERK OF THE COURT

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK ss.:

AMENDED COMPLAINT FOR DAMAGES Received by NOW! Services, Inc. on 02/06/2017 with instructions to serve **LAW OFFICES OF LOUIS C. SCHNEIDER, LLC c/o Cal J. Potter, III** at **Potter Law Offices, 1125 Shadow Lane, Las Vegas, NV89102.**

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

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

On **02/06/2017** at **11:54 AM**, I served the within **AMENDED COMPLAINT FOR DAMAGES** on **LAW OFFICES OF LOUIS C. SCHNEIDER, LLC c/o Cal J. Potter, III** at **Potter Law Offices, 1125 Shadow Lane, Las Vegas, NV89102** in the manner indicated below:

SUITABLE AGE: By delivering thereat a true copy of each to **Kristy Hulse, Authorized Employee at Potter Law Office** authorized to accept service on behalf of **LAW OFFICES OF LOUIS C. SCHNEIDER, LLC c/o Cal J. Potter, III**, a person of suitable age and discretion. Said premises is **LAW OFFICES OF LOUIS C. SCHNEIDER, LLC c/o Cal J. Potter, III's** usual place of business within the state.

A description of the Recipient, or other person served on behalf of the Recipient is as follows:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Brown	40's	5'5"	135
Other Features:					

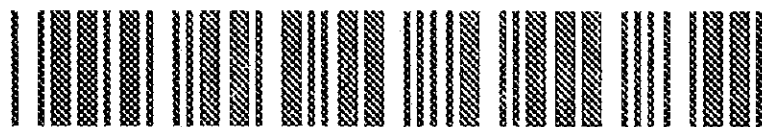
I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 6 of Feb, 2017

No Notary is required per NRS 53.045.

X

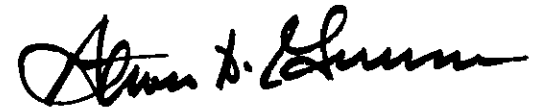
Craig Burton
Craig Burton
License# 1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV89102
(702) 669-7378
Atty File#:



15323

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CLERK OF THE COURT

OPPS
WILLICK LAW GROUP
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Las Vegas, NV 89110-2101
Phone (702) 438-4100; Fax (702) 438-5311
email@willicklawgroup.com
Attorney for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

JENNIFER V. ABRAMS AND THE
ABRAMS AND MAYO LAW FIRM,
Plaintiff,

VS.

LOUIS 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 STEELMON; and
DOES I THROUGH X,
Defendant.

CASE NO: A-17-749318-C
DEPT. NO: I

DATE OF HEARING: 3/8/17
TIME OF HEARING: 9:30 a.m.

**OPPOSITION TO
“DEFENDANT LOUIS SCHNEIDER’S AND LAW OFFICES OF
LOUIS SCHNEIDER’S MOTION TO DISMISS COMPLAINT
PURSUANT TO NRCP 12(B)(5)”
AND
COUNTERMOTION FOR ATTORNEY’S FEES**

I. INTRODUCTION

Defendants Louis Schneider and the Law Offices of Louis C. Schneider, LLC
 (“Schneider Defendants”) attempt to color the opinion of this Court with false
 assertions from their very first sentence:

1 Plaintiff's Complaint for damages is filed in retaliation of Mr.
2 Schneider's efforts to sanction Attorney Brandon Leavitt's ex parte
3 communications with Mr. Schneider's client in a divorce proceeding
where Mr. Schneider specifically declined to give Mr. Leavitt
permission to talk with his client on the eve of a divorce trial.¹

4 Every part of that assertion is false; a brief recantation of the background behind this
5 false assertion is necessary.

6 Plaintiffs represent Brandon Saiter ("Husband") in a divorce case against Tina
7 Saiter ("Wife").² Plaintiffs discovered that Mr. Schneider was actively attempting to
8 prevent settlement of the case – despite the mutual intentions of the parties – while
9 pressuring Wife to engage in an unprofessional and personal relationship with him.
10 Mr. Schneider also fabricated allegations against Husband in order to procure fee
11 awards because Mr. Schneider essentially took the divorce case on contingency in
12 violation of NRPC 1.5(d)(1).

13 Wife was so displeased with Mr. Schneider's conduct and representation – and
14 told him so – that Mr. Schneider eventually filed a Motion to Withdraw on July 20,
15 2016. Mr. Schneider's affidavit explains that he and his client had "a complete
16 breakdown of the attorney/client relationship" and that "as a result, it has become
17 impossible to continue to represent her in this matter."

18 Approximately one month later, while the Motion to Withdraw was still
19 pending, Wife was still eager to engage in settlement discussions but felt limited
20 because Mr. Schneider was still her formal attorney of record. Wife asked Mr.
21 Schneider to authorize her to speak with Brandon Leavitt, Esq. directly.³ Mr.
22 Schneider *did* so in an email to Wife dated September 15, 2016, at 3:21 p.m., which
23
24

25
26 ¹ Motion at 4, lines 4-8.

27 ² Case No. D-15-521372-D.

28 ³ Mr. Leavitt is an associate attorney at The Abrams & Mayo Law Firm.

1 Wife then forwarded to Husband.⁴ The same day, Wife wrote to Mr. Schneider: “I
2 have finally decided to stop all this..I no longer need your representation.”⁵

3 That brings us back to the false opening sentence of the pending motion. The
4 entirety of Mr. Schneider’s “efforts to sanction Attorney Brandon Leavitt’s *ex parte*
5 communications with Mr. Schneider’s client” occurred during a single hearing before
6 Judge Jennifer Elliott in which the judge stated on the record:

7 But it sounds like, the last thing that I saw was on Exhibit 8, was a
8 September 16th 10:30 a.m. transmission to him saying ‘Hi Louis I have
9 finally decided to stop all of this, I no longer need your representation.
10 Thank you. Tina Saiter’ and Mr. Schneider responded at 11:03 a.m. ‘I
11 understand Tina, be careful and good luck. Louis.’ So I felt that that was
12 pretty clear, that you were saying I’m ready to do this on my own.

13 Judge Elliott did **not** find any misconduct as a result of a meeting between Wife and
14 Mr. Leavitt. Furthermore, Judge Elliott **did not even consider** issuing any sanctions
15 against Mr. Leavitt or The Abrams & Mayo Law Firm.⁶ The premised basis of the
16 motion before this Court is false.

17 If there is **anything** to be taken from that false assertion, it is that the Schneider
18 Defendants lack credibility and will say anything to avoid responsibility for **their**
19 actions:

- 20 1. “Mr. Schneider’s efforts to sanction Attorney Leavitt” were of no
21 significance in the proceedings and had nothing to do with the
22 filing of this lawsuit **four months** later.
- 23 2. Mr. Leavitt did not have “*ex parte* communications with Mr.
24 Schneider’s client.” As indicated by Judge Elliott, Mr.

25 ⁴ See Exhibit 1.

26 ⁵ See email from Tina Saiter to Louis Schneider dated September 16, 2016, at 10:39 am,
27 attached as Exhibit 2.

28 ⁶ A Motion for Sanctions filed by Plaintiffs on behalf of Husband against Mr. Schneider was
pending during this period for his numerous violations of both procedural and ethical rules
throughout the case. Those issues have been briefed and it is expected that Judge Elliott will issue
a decision on Husband’s request for an award of attorney fees and sanctions.

1 Schneider's Motion to Withdraw was pending and Wife made it
2 clear to Mr. Schneider in her September 16, 2016, email that she
3 no longer wanted Mr. Schneider to represent her.

- 4 3. Mr. Schneider did not "specifically decline" to give permission
5 for Wife and Mr. Leavitt to communicate directly – the email
6 permitting such communication is attached hereto as Exhibit 1.
7

8 **II. OPPOSITION TO MOTION TO DISMISS**

9 The Schneider Defendants' *Motion to Dismiss* is further premised on the false
10 assertion that the *Amended Complaint for Damages* only contains paragraphs 22, 24,
11 30, 31, and 38. They ignore and fail to acknowledge the remaining ***one-hundred and***
12 ***forty-five paragraphs*** of the *Amended Complaint for Damages* which, when read in
13 conjunction with paragraphs 22, 24, 30, 31, and 38, greatly ***surpass*** the requirements
14 for a complaint in this "notice pleading" State.

15 In brief, the Schneider Defendants threatened and intimidated witnesses in an
16 attempt to subvert ongoing judicial proceedings by use of out-of-court actions against
17 counsel and others. The Schneider Defendants then conspired with the other
18 Defendants in this action and acted in concert with them to perpetrate the defamation,
19 intentional infliction of emotional distress, negligent infliction of emotional distress,
20 false light, business disparagement, harassment, concert of action, civil conspiracy,
21 RICO violations, and copyright infringement complained of in the *Amended*
22 *Complaint for Damages*.

23 The specifics, including dates, specific acts, quotes from emails, defamatory
24 statements, locations where the defamatory statements were posted and disseminated,
25 etc., are all spelled out in the *Amended Complaint for Damages*.

26 The case law cited in the *Motion to Dismiss* does not support the relief
27 requested. In *Ashcroft v. Iqbal*, the United States Supreme Court explained its
28 decision in *Twombly* concerning the sufficiency of a complaint:

1 Our decision in *Twombly* illustrates the two-pronged approach. There,
2 we considered the sufficiency of a complaint alleging that incumbent
3 telecommunications providers had entered an agreement not to compete
4 and to forestall competitive entry, in violation of the Sherman Act, 15
5 U.S.C. §1. Recognizing that §1 enjoins only anticompetitive conduct
6 “effected by a contract, combination, or conspiracy,” *Copperweld Corp.*
7 *v. Independence Tube Corp.*, 467 U.S. 752, 775, 104 S. Ct. 2731, 81 L.
8 Ed. 2d 628 (1984), the plaintiffs in *Twombly* flatly pleaded that the
9 defendants “ha[d] entered into a contract, combination or conspiracy to
10 prevent competitive entry . . . and ha[d] agreed not to compete with one
11 another.” 550 U.S., at 551, 127 S. Ct. 1955, 167 L. Ed. 2d 929 (internal
12 quotation marks omitted). The complaint also alleged that the
13 defendants’ “parallel course of conduct . . . to prevent competition” and
14 inflate prices was indicative of the unlawful agreement alleged. *Ibid.*
15 (internal quotation marks omitted).

16 The Court held the plaintiffs’ complaint deficient under Rule 8. In
17 doing so it first noted that the plaintiffs’ assertion of an unlawful
18 agreement was a “legal conclusion” and, as such, was not entitled to
19 the assumption of truth. *Id.*, at 555, 127 S. Ct. 1955, 167 L. Ed. 2d 929.
20 **Had the Court simply credited the allegation of a conspiracy, the**
21 **plaintiffs would have stated a claim for relief and been entitled to**
22 **proceed perforce.** The Court next addressed the “nub” of the plaintiffs’
23 complaint--the well-pleaded, nonconclusory factual allegation of
24 parallel behavior--to determine whether it gave rise to a “plausible
25 suggestion of conspiracy.” *Id.*, at 565-566, 127 S. Ct. 1955, 167 L. Ed.
26 2d 929. Acknowledging that parallel conduct was consistent with an
27 unlawful agreement, the Court nevertheless concluded that it did not
28 plausibly suggest an illicit accord because it was not only compatible
with, but indeed was more likely explained by, lawful, unchoreographed
free-market behavior. *Id.*, at 567, 127 S. Ct. 1955, 167 L. Ed. 2d 929.
Because the well-pleaded fact of parallel conduct, accepted as true, did
not plausibly suggest an unlawful agreement, the Court held the
plaintiffs’ complaint must be dismissed. *Id.*, at 570, 127 S. Ct. 1955,
167 L. Ed. 2d 929.⁷

[Emphasis added.]

Here, Plaintiffs did allege a conspiracy between the Schnieder Defendants and
the other named Defendants in this action. Further, the factual allegations set forth
in the *Amended Complaint for Damages* spell out the wrongful conduct in detail:

1. Mr. Schneider’s written threat that: “If your firm does not withdraw that
motion, I will oppose it *and take additional action beyond the*
opposition.” [Emphasis added]. Complaint ¶24.

⁷ *Ashcroft v. Iqbal*, 556 U.S. 662, 679, 129 S. Ct. 1937, 1950 (2009).

2. Mr. Schneider was the only person who requested a copy of the hearing video. Complaint ¶30.
3. Mr. Schneider conspired with the other Defendants to affect the outcome of the pending “D” Case by defaming, inflicting emotional distress upon, placing in a false light, disparaging the business of, and harassing Plaintiffs etc. Complaint ¶32.
4. Steve Sanson admittedly received a copy of the hearing video from Louis Schneider. Complaint ¶74.
5. No less than six “smear campaigns” were launched by Defendants, individually and in concert, against Plaintiff’s. Complaint ¶’s 33-69.
6. Mr. Schneider said to Brandon Leavitt, Esq., that a withdrawal of the Motion for Sanctions would “make this all go away” or words to that effect. Complaint ¶38.
7. Defendants published an advertisement two days after the first “smear campaign” was disseminated stating “Law Offices of Louis Schneider” and “Friends of Veterans In Politics.” Complaint ¶43.

Unlike the facts involved in *Twombly*, the facts alleged here are simply not *compatible* with lawful behavior. If proven – and the proof of each alleged act should be straightforward – the complaint sets out causes of action that are compensable under law and as to which injunctive relief is appropriate.

In *Iqbal*, a Pakistani Muslim detainee designated as a person “of high interest” to the September 11 investigation sued numerous federal officials including the former Attorney General of the United States and the Director of the Federal Bureau of Investigation.

The High Court found that although *Iqbal*’s complaint alleged discrete wrongs – for instance, beatings – by lower level Government actors which could be the basis for some inference of wrongful intent on petitioners’ part, the respondent’s pleadings did not suffice to state a claim. The Court reasoned that unlike in *Twombly*, where

1 the doctrine of *respondeat superior* could bind the corporate defendant, the
2 petitioners in *Iqbal* could not be held liable unless they themselves acted on account
3 of a constitutionally protected characteristic and *Iqbal*'s complaint did not contain any
4 factual allegation sufficient to plausibly suggest petitioners' discriminatory state of
5 mind.

6 Here, the Schneider Defendants' actions and inactions are explained in
7 significant detail over 39 pages, 150 numbered paragraphs, and 6 Exhibits. The
8 factual allegations exceed the "notice pleading" requirements, and they state claims
9 that are far more than "plausible."⁸ If established, and we believe the proof is more
10 than adequate to do so, liability is clear, leaving only the question of the amount of
11 damages.

12 13 **A. Plaintiffs' RICO Claims Have Merit**

14 In *Hale v. Burkhardt*,⁹ Plaintiff alleged RICO claims against defendants which
15 failed for failure to allege the necessary predicate acts:

- 16 1. Scheme A - In a claim of false pretenses, Plaintiff failed to allege
17 any specific false representations upon which he may have relied
18 and that might have caused him to be defrauded.
- 19 2. Scheme B - In an unspecified claim with no citation to any law,
20 Plaintiffs failed to connect Defendant's alleged breach of contract
21

22 ⁸ Nevada is a notice-pleading jurisdiction; the courts are directed to construe liberally
23 pleadings to place into issue matters that are fairly noticed to an adverse party. *Nevada State Bank*
v. Jamison Family Partnership, 106 Nev. 792, 801, 801 P.2d 1377, 1383 (1990).

24 To plead a claim for relief in Nevada, a party must include (1) a statement of the claim, and
25 (2) a demand (or prayer) for relief. NRCP 8(a). With respect to the first requirement, the complaint
26 must "set forth sufficient facts to demonstrate the necessary elements of a claim for relief so that the
27 defending party has adequate notice of the nature of the claim and relief sought." *Western States*
Constr. v. Michoff, 108 Nev. 931, 936, 840 P.2d 1220, 1223 (1992).
Nevada Civil Practice Manual, Section 5.02.

28 ⁹ *Hale v. Burkhardt*, 104 Nev. 632, 640, 764 P.2d 866, 871 (1988)

1 to any false representations or wrongdoing, failed to reveal the
2 identity of the parties to whom false representations were made
3 or who was actually defrauded, much less how much ill-gotten
4 gain resulted from the supposed deception.¹⁰

5 3. Scheme C - The alleged criminal transactions were presented to
6 the Court simply by saying “Burkhardt is a defendant in an action
7 in St. Louis, Missouri regarding fraud in the sale of securities,
8 mail fraud, and wire fraud” and that a copy of the RICO section
9 of the complaint is attached “for the Court’s review to establish
10 that Defendant JOE E. BURKHARDT has engaged in a pattern
11 of racketeering activity to obtain possession of money or property
12 valued at \$100.00 or more by means of false pretenses on
13 numerous occasions.” A 75-page criminal complaint was
14 attached with no indication whatsoever as to which factual
15 allegations were applicable.¹¹

16 The Court held that “while several of the schemes appear to suggest some of
17 the elements of cognizable racketeering-related crimes, none is sufficiently coherent
18 or complete as to enable this court to determine the specific crimes Burkhardt is
19 charged with having committed.”

20 In contrast, in *this* case, Plaintiffs detail the wrongful actions and inactions of
21 the Schneider Defendants, the specific dates of those actions and inactions, the
22 actions of the Schneider Defendants’ cohorts, and the specific elements of the
23 enumerated crimes committed by them, throughout the 39-page *Amended Complaint*
24 *for Damages*.

26
27 ¹⁰ *Id.* at 641.

28 ¹¹ *Id.*

1 Ironically, the Schneider Defendants do *exactly* what they complain about in
2 their filing – they merely make a “blanket” allegation that Plaintiffs’ *Amended*
3 *Complaint for Damages* “lacks specificity.” Conveniently missing from their *Motion*
4 are what facts are supposedly “missing,” that prevents them from notice of the
5 “when,” where,” or how” of the complaint against them.

6
7 **B. The Defamatory Statements Were Not Privileged**

8 In the very recent Nevada Supreme Court decision of *Shapiro v. Welt*, the
9 Court explained:

10 In order for the privilege to apply to defamatory statements made in the
11 context of a judicial proceeding, “(1) a judicial proceeding must be
12 contemplated in good faith and under serious consideration, and (2) the
13 communication must be related to the litigation.” *Id.* (internal quotation
14 marks omitted). However, a “[party’s] statements to someone who is not
15 directly involved with the actual or anticipated judicial proceeding will
16 be covered by the absolute privilege only if the recipient of the
17 communication is significantly interested in the proceeding.” *Fink v.*
18 *Oshins*, 118 Nev. 428, 436, 49 P.3d 640, 645-46 (2002) (internal
19 quotation marks omitted).

20 For a statement to fall within the scope of the absolute litigation
21 privilege it must be made to a recipient who has a significant interest in
22 the outcome of the litigation or who has a role in the litigation. *Id.* at
23 436, 49 P.3d at 645-46; see also *Jacobs*, 130 Nev., Adv. Op. 44, 325
24 P.3d at 1287. In order to determine whether a person who is not directly
25 involved in the judicial proceeding may still be “significantly interested
26 in the proceeding,” the district court must review “the recipient’s legal
27 relationship to the litigation, not their interest as an observer.”¹²

28 In *Jacobs v. Adelson*, the Nevada Supreme Court held that the statements made
to the media regarding ongoing or contemplated litigation are *not* subject to absolute
privilege.¹³

The Schneider Defendants’ assertion that “[s]tatements of opinion cannot be
defamatory because there is no such thing as a false idea” is equally incorrect. The

¹² *Shapiro v. Welt*, 133 Nev. ___, ___ P.3d ___ (Adv. Op. 6, Feb. 2, 2017).

¹³ “Extension of the absolute privilege to cover statements to the media, when the media are
not a party to the lawsuit or inextricably intertwined with the lawsuit, would not further the policy
underlying the absolute privilege.” *Jacobs v. Adelson*, 325 P.3d 1282, 1287 (Nev. 2014).

1 *Piping Rock Partners* decision, adopted by the Nevada Supreme Court in *Shapiro*,
2 held that:

3 Although statements of opinion are not per se actionable, an opinion
4 loses its constitutional protection and becomes actionable when it is
5 “based on implied, undisclosed facts” and “the speaker has no factual
6 basis for the opinion.” *Ruiz v. Harbor View Community Association*,
134 Cal. App. 4th 1456, 1471, 37 Cal. Rptr. 3d 133 (2005). That is,
expressions of opinion do not enjoy blanket constitutional protection.¹⁴

7 Lastly, the Schneider Defendants’ assertion that “a closed hearing is not a
8 sealed hearing” is irrelevant to the issue of “public interest.” A “closed hearing” is
9 a hearing that is “not open to the public” (former EDCR 5.02) and therefore cannot
10 be a “matter of public concern.”

11 **C. The Remaining Causes of Actions Have Merit and Survive the**
12 **Defendants’ Meritless Challenge¹⁵**

13 The Schneider Defendants’ assertions relating to each of these causes of action
14 is predicated upon the false assertion that the *Amended Complaint for Damages* only
15 consists of paragraphs 22, 24, 30, 31, and 38. As stated above, when read in
16 conjunction with the other *one-hundred and forty-five numbered paragraphs*,
17 sufficient facts have been alleged as to each and every cause of action.

18 As for the allegation that specific damages have not been set forth for
19 Intentional Infliction of Emotional Distress and Business Disparagement, notice of
20 the fact of the damages has been pled. The extent of damages will be in issue after
21 liability is established.

24
25 ¹⁴ *Piping Rock Partners, Inc. v. David Lerner Assocs.*, 946 F. Supp. 2d 957, 972 (N.D. Cal.
26 2013).

27 ¹⁵ Namely, Intentional Infliction of Emotional Distress, Negligent Infliction of Emotional
28 Distress, False Light, Business Disparagement, Concert of Action, Civil Conspiracy, Harassment,
and Injunctive Relief.

1 Lastly, to the extent that Injunctive Relief is not a separate cause of action, it
2 is requested relief in the existing causes of action, and must be pled and proved to be
3 granted.

4 5 **III. ATTORNEY'S FEES**

6 There is justification for an award of attorney's fees under EDCR 7.60, which
7 sanctions obviously frivolous, unnecessary, or vexatious litigation:

8 (b) The court may, after notice and an opportunity to be
9 heard, impose upon an attorney or a party any and all
10 sanctions which may, under the facts of the case, be
reasonable, including the imposition of fines, costs or
attorney's fees when an attorney or a party without just
cause:

11 (1) Presents to the court a motion or opposition to a
12 motion which is obviously frivolous, unnecessary or
unwarranted.

13 (3) So multiplies the proceedings in a case as to increase
14 the costs unreasonably and vexatiously.

15 Additionally, NRS 18.010, dealing with awards of attorney's fees, states that
16 fees may be awarded:

17 (b) Without regard to the recovery sought, when the court
18 finds that the claim, counterclaim, cross-claim or
19 third-party complaint or defense of the opposing party was
brought or maintained without reasonable ground or to
harass the prevailing party. The court shall liberally
construe the provisions of this paragraph in favor of
awarding attorney's fees in all appropriate situations. *It is
20 the intent of the Legislature that the court award
attorney's fees pursuant to this paragraph and impose
21 sanctions pursuant to Rule 11 of the Nevada Rules of
Civil Procedure in all appropriate situations to punish for
22 and deter frivolous and vexatious claims and defense
because such claims and defenses overburden limited
23 judicial resources, hinder the timely resolution of
meritorious claims and increase the costs of engaging in
24 business and providing professional services to the
public.*

25 [Emphasis added.]

26 The Schneider Defendants' *Motion to Dismiss* relies on multiple false
27 assertions of facts, based in part on a "pick your poison" reading of Plaintiffs'
28

1 *Amended Complaint for Damages*, and misinterpretation of controlling case law. The
2 Schneider Defendants in this matter should be jointly and severally liable for 100%
3 of Plaintiffs' fees and costs in defending their *Opposition* before the Court.

4 The Supreme Court has re-adopted "well-known basic elements," which in
5 addition to hourly time schedules kept by an attorney, are to be considered in
6 determining the reasonable value of an attorney's services, and qualities, commonly
7 referred to as the Brunzell factors:¹⁶

- 8 1. The Qualities of the Advocate: his ability, his training, education,
experience, professional standing and skill.
- 9 2. The Character of the Work to Be Done: its difficulty, its
intricacy, its importance, time and skill required, the
10 responsibility imposed and the prominence and character of the
parties where they affect the importance of the litigation.
- 11 3. The Work Actually Performed by the Lawyer: the skill, time and
attention given to the work.
- 12 4. The Result: whether the attorney was successful and what
benefits were derived.

13 Each of these factors should be given consideration, and no one element should
14 predominate or be given undue weight.¹⁷ Additional guidance is provided by
15 reviewing the "attorney's fees" cases most often cited in Family Law.¹⁸

16 The Brunzell factors require counsel to rather immodestly make a
17 representation as to the "qualities of the advocate," the character and difficulty of the
18 work performed, and the work actually performed by the attorney.

19 First, respectfully, we suggest that the undersigned is A/V rated, a peer-
20 reviewed and certified (and re-certified) Fellow of the American Academy of
21

22
23
24 ¹⁶ *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

25 ¹⁷ *Miller v. Wilfong*, 121 Nev. 119, P.3d 727 (2005).

26 ¹⁸ Discretionary Awards: Awards of fees are neither automatic nor compulsory, but within
27 the sound discretion of the Court, and evidence must support the request. *Fletcher v. Fletcher*, 89
28 Nev. 540, 516 P.2d 103 (1973), *Levy v. Levy*, 96 Nev. 902, 620 P.2d 860 (1980), *Hybarger v.*
Hybarger, 103 Nev. 255, 737 P.2d 889 (1987).

1 Matrimonial Lawyers, and a Certified Specialist in Family Law¹⁹ who has been in
2 practice nearly 40 years. Mr. Willick, the attorney primarily responsible for drafting
3 this *Opposition*, is the principal of the WILLICK LAW GROUP.

4 As to the “character and quality of the work performed,” we ask the Court to
5 find our work in this matter to have been adequate, both factually and legally; we
6 have diligently reviewed the applicable law, explored the relevant facts, and believe
7 that we have properly applied one to the other.

8 The fees charged by paralegal staff are reasonable, and compensable, as well.
9 The tasks performed by staff in this case were precisely those that were “some of the
10 work that the attorney would have to do anyway [performed] at substantially less cost
11 per hour.”²⁰ As the Nevada Supreme Court reasoned, “the use of paralegals and other
12 nonattorney staff reduces litigation costs, so long as they are billed at a lower rate,”
13 so ‘reasonable attorney’s fees’ . . . includes charges for persons such as paralegals and
14 law clerks.”

15 The work actually performed will be detailed in a *Memorandum of Fees and*
16 *Costs*, at the Court’s request (redacted as to confidential information), consistent with
17 the requirements under *Love*.²¹

18 *****

19 *****

20 *****

21 *****

23 ¹⁹ Per direct enactment of the Board of Governors of the Nevada State Bar, and independently
24 by the National Board of Trial Advocacy. Mr. Willick was privileged (and tasked) by the Bar to
25 write the examination that other would-be Nevada Family Law Specialists must pass to attain that
status.

26 ²⁰ *LVMPD v. Yeghiazarian*, 129 Nev. ___, ___ P.3d ___ (Adv. Opn. No. 81, Nov. 7, 2013)
27 citing to *Missouri v. Jenkins*, 491 U.S. 274 (1989).

28 ²¹ *Love v. Love*, 114 Nev. 572, 959 P.2d 523 (1998).

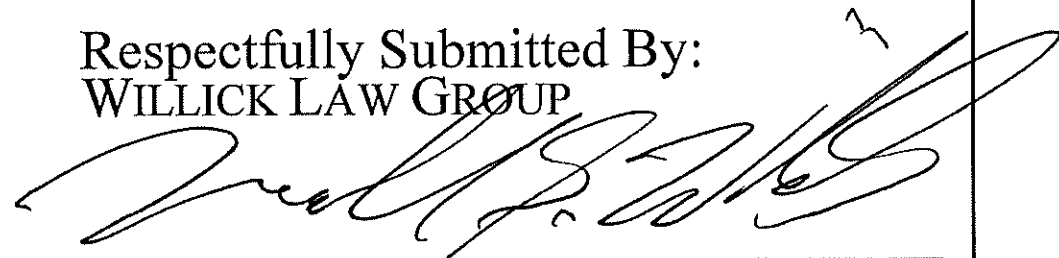
1 **IV. CONCLUSION**

2 Based on the above, Plaintiffs respectfully requests the Court issue the
3 following orders:

- 4 1. Deny Schneider Defendants' *Motion to Dismiss* in its entirety.
5 2. Grant Plaintiffs attorney's fees in the minimum amount of \$5,000.
6

7 **DATED** this 14 day of February, 2017.

8 Respectfully Submitted By:
9 WILICK LAW GROUP



10 MARSHAL S. WILICK, ESQ.
11 Nevada Bar No. 2515
12 3591 E. Bonanza, Suite 200
13 Las Vegas, Nevada 89110-2101
14 (702) 438-4100 Fax (702) 438-5311
15 Attorney for *Plaintiffs*

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DECLARATION OF JENNIFER V. ABRAMS, ESQ.

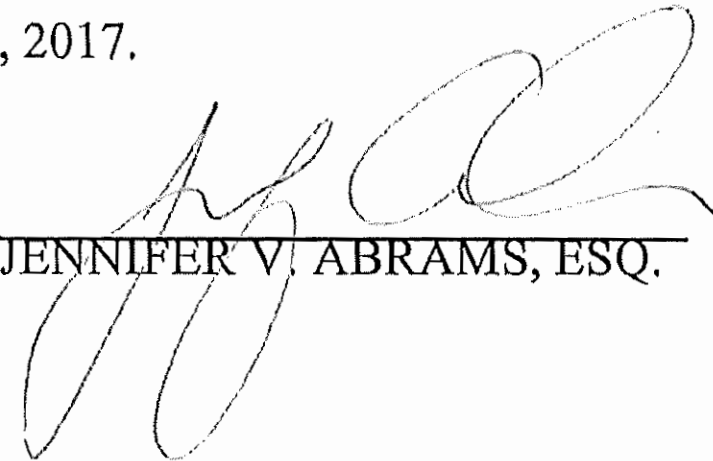
1. I, Jennifer V. Abrams, Esq., declare that I am competent to testify to the facts contained in the preceding filing.

2. I have read the preceding filing, and I have personal knowledge of the facts contained therein, unless stated otherwise. Further, the factual averments contained therein are true and correct to the best of my knowledge, except those matters based on information and belief, and as to those matters, I believe them to be true.

3. The factual averments contained in the preceding filing are incorporated herein as if set forth in full.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and correct.

EXECUTED this 11th day of February, 2017.


JENNIFER V. ABRAMS, ESQ.

\\wlgserver\company\wp16\ABRAMS,JENNINDRAFTS\00167340.WPD\cam

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILLICK LAW GROUP and that on this 14th day of February, 2017, I caused the above and foregoing document, to be served as follows:

- ☒ Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court's electronic filing system.
- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and by email.
- ☐ pursuant to EDCR 7.26, to be sent via facsimile, by duly executed consent for service by electronic means.
- ☐ by hand delivery with signed Receipt of Copy.

To the attorney and/or litigant listed below at the address, email address, and/or facsimile number indicated below:

Maggie McLetchie, Esq.
MCLECHIE SHELL LLC
701 E Bridger Avenue, #520,
Las Vegas, Nevada 89101
Attorney for *Steve W. Sanson* and
VETERANS IN POLITICS INTERNATIONAL, INC.

Alex Ghibaudo, Esq.
GLAW
320 E Charleston Blvd., Suite 105
Las Vegas, Nevada 89104
Attorney for Louis C. Schneider,
LAW OFFICES OF LOUIS C. SCHNEIDER, LLC and
Christina Ortiz

Heidi J. Hanusa
2620 Regatta Drive, Suite 102
Las Vegas, Nevada 89128


Heidi J. Hanusa
8908 Big Bear Pines Ave
Las Vegas, Nevada 89143

Johnny Spicer
3589 East Gowan Road
Las Vegas, Nevada 89115

1 Don Woolbright
2 4230 Saint Linus Ln.
3 Saint Ann, Missouri 63074

4 Sanson Corporation
5 Reg. Agent:c/o Clark McCourt
6 7371 Prairie Falcon Road, Ste. 120
7 Las Vegas, Nevada 89128

8 Karen Steelmon
9 2174 East Russell Road
10 Las Vegas, Nevada 89119

11 
12 An Employee of the WILLICK LAW GROUP

13 \\wlgserver\company\wp16\ABRAMS,JENNIDRAFTS\00167340.WPD\cam
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EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

Julie Schoen

Subject:

FW: Re:

From: Tina Saiter [<mailto:cleaningmama30@aol.com>]

Sent: Friday, September 16, 2016 10:03 AM

To: Brandon Saiter <bsaiter@harmonicinnerprizes.com>; Brandon Saiter <pbsaiter@cox.net>

Subject: Fwd: Re:

Tina Saiter

Begin forwarded message:

From: Louis Schneider <lcslawllc@yahoo.com>

Date: September 15, 2016 at 3:21:18 PM PDT

To: Tina Saiter <cleaningmama30@aol.com>

Subject: Re:

Reply-To: Louis Schneider <lcslawllc@yahoo.com>

It is your choice if you want to speak with Brandon without my presence. I don't advise it, but you can if you want to.

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

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From: Louis Schneider <lcslawllc@yahoo.com>

To: Tina Saiter <cleaningmama30@aol.com>

Sent: Thursday, September 15, 2016 2:07 PM

Subject: Re:

I just received an invoice from Anthem Forensics requesting an additional \$2,000.00. I strongly believe that Brandon is concerned about the outcome of the forensic accounting.

Again, I strongly suggest that you wait to settle this case until after we review the forensic accounting.

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

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From: Louis Schneider <lcsllawllc@yahoo.com>
To: Tina Saiter <cleaningmama30@aol.com>
Sent: Thursday, September 15, 2016 1:21 PM
Subject: Fw:

Please respond to this e-mail and confirm that you received it.

Thank you.

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

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----- Forwarded Message -----

From: Louis Schneider <lcsllawllc@yahoo.com>
To: Tina Saiter <cleaningmama30@aol.com>
Sent: Thursday, September 15, 2016 10:58 AM
Subject:

I don't think it's a good idea, but if that's what you want to do, I'm not going to stop you. I think that negotiating without seeing the forensic accounting and without an attorney present, is a mistake.

I'm suspicious as to why this is being rushed, especially on the eve of the forensic accounting being complete.

You have made it clear that this is what you want to do, and there is nothing I can do to stop you.

I think this is a really bad idea to do this without an attorney.

I think you should wait until the forensic accounting is complete.

I am highly suspect as to why you are being pressured right now.

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

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Spam

Phish/Fraud

Not spam

Forget previous vote

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

To: Tina Saiter >

Re:

Today at 11:03 AM

I understand Tina be careful and good luck
Louis

From: Tina Saiter <cleaningmama30@aol.com>

To: Louis Schneider <lcsllawllc@yahoo.com>;
lcsllaw@yahoo.com

Sent: Friday, September 16, 2016 10:39 AM

Subject:

Hi Louis

I have finally decided to stop all this..I no longer
need your representation.

Thank you,

Tina Saiter

[Read: Nevada Attorney attacks a Clark County Family Court Judge in Open Court](#)

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Veterans In Politics International Inc.

762-283-8088

devildog1285@cs.com

www.veteransinpolitics.org

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EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

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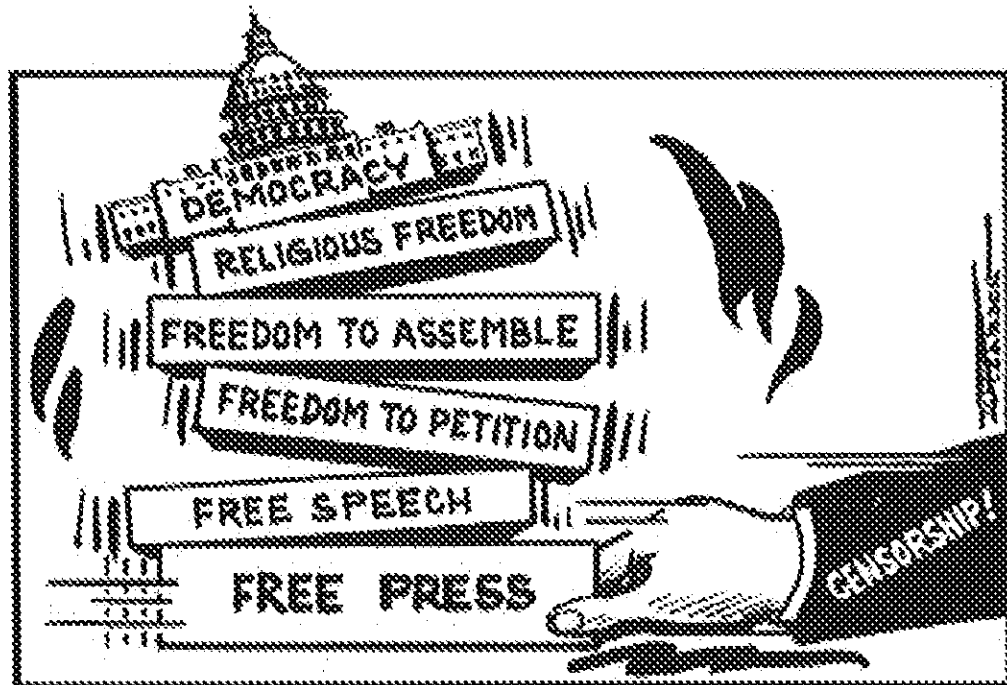
VETERANS
IN POLITICS

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

Clark County, Nevada
November 6, 2016

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

[FIND OUT MORE](#)



Its importance cannot be overstated!

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

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

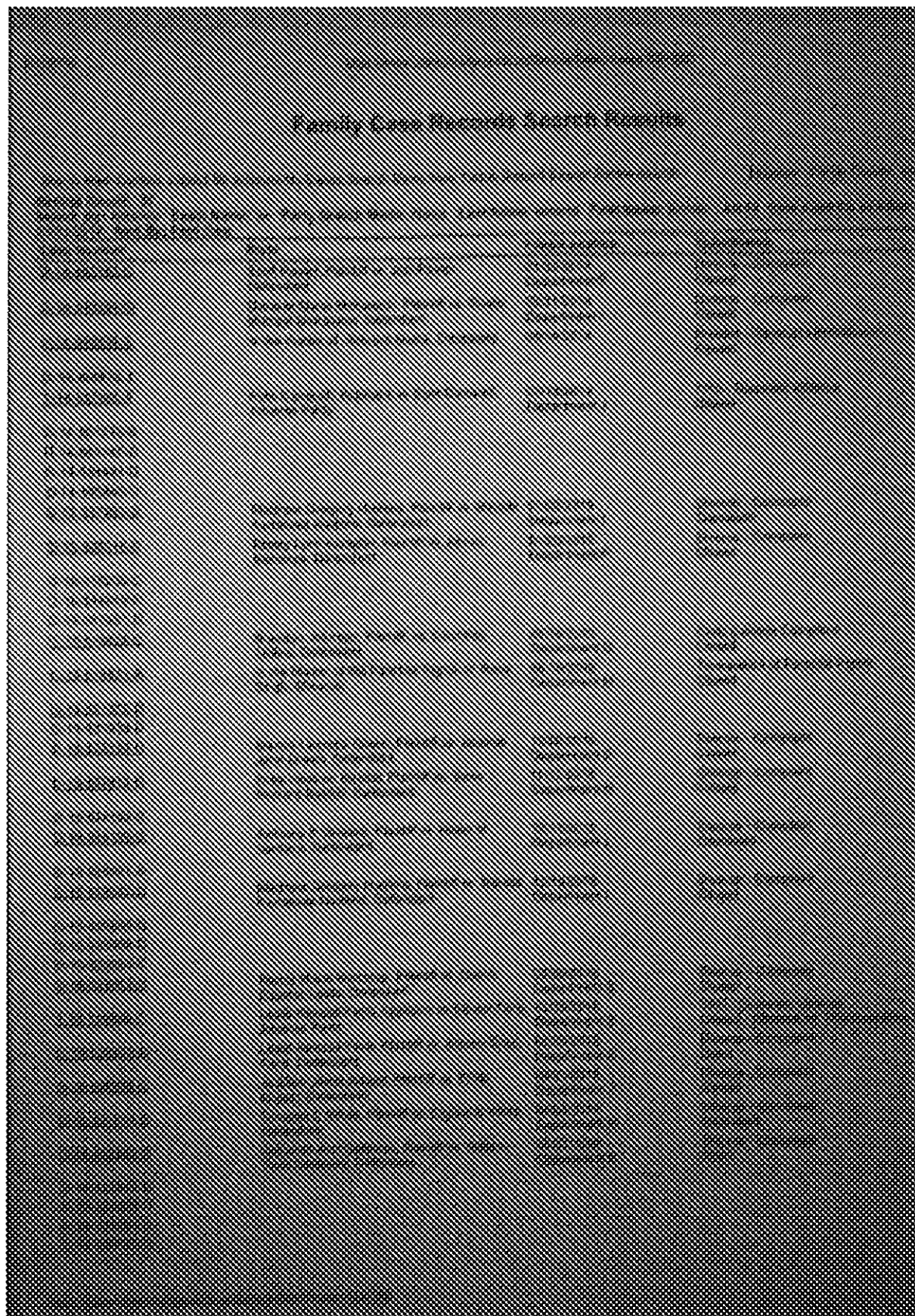
"the cornerstones of an effective, functioning judicial system are openness and transparency. Safeguarding these cornerstones requires public access not only to the judicial proceedings but also to judicial records and documents."



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

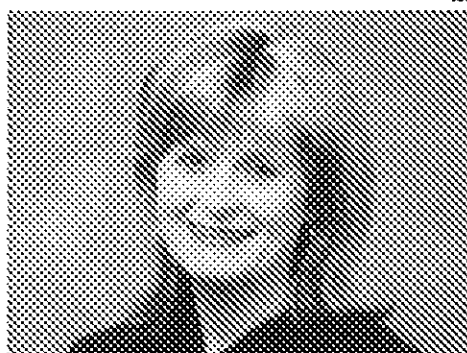


It also appears, however, that at least one of her cases, and perhaps more, may have been sealed to protect her own reputation, rather than to serve a compelling client privacy or safety interest.



[Learn More](#)

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



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

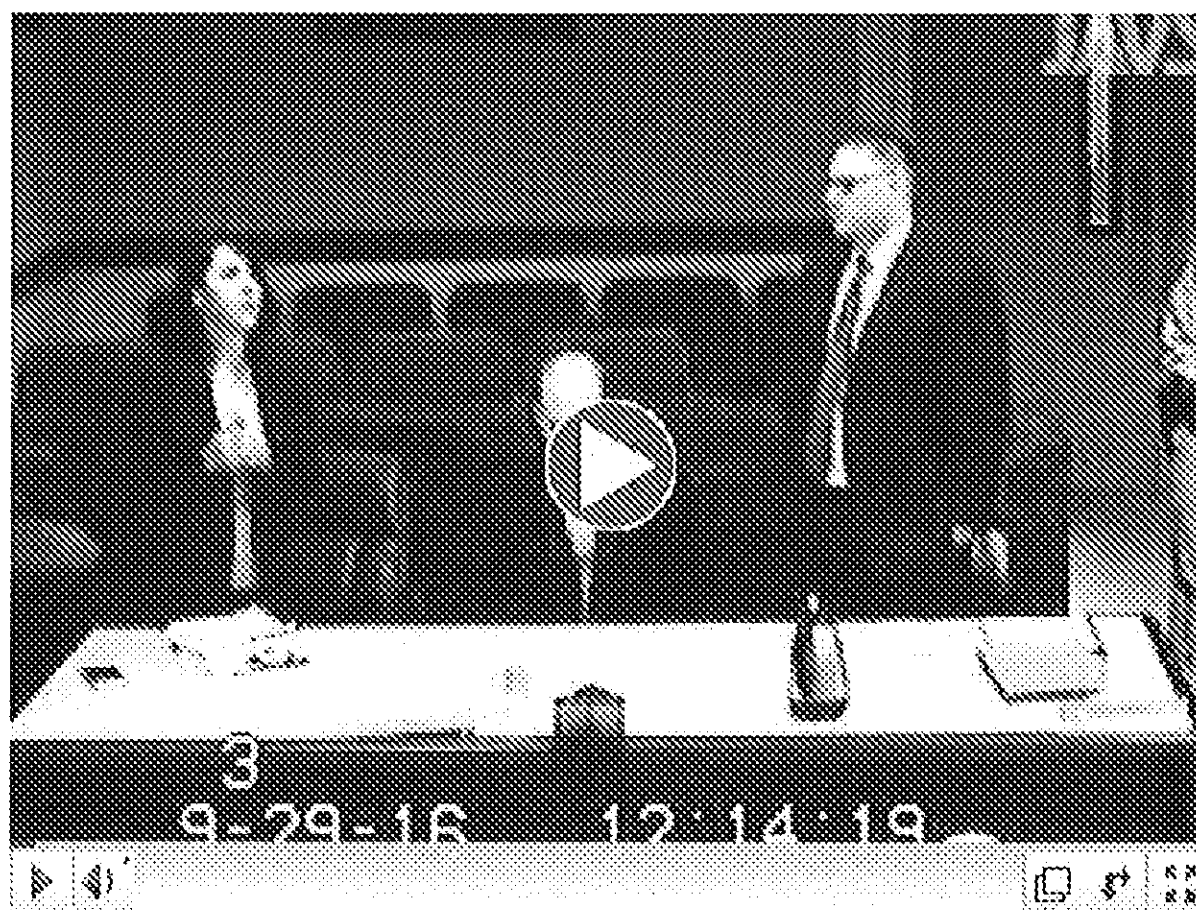
In response to our article, Abrams sought and obtained a court order from Judge Elliott which does not name VIPI, but which purports to apply to the entirety of the general population. VIPI, however, was

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

[Click onto District Court Judge Bullied by Family Attorney Jennifer Abrams](#)

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

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



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

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

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

[Click onto Standards for sealing civil cases tougher](#)

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



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

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

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

The Court stated:

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

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

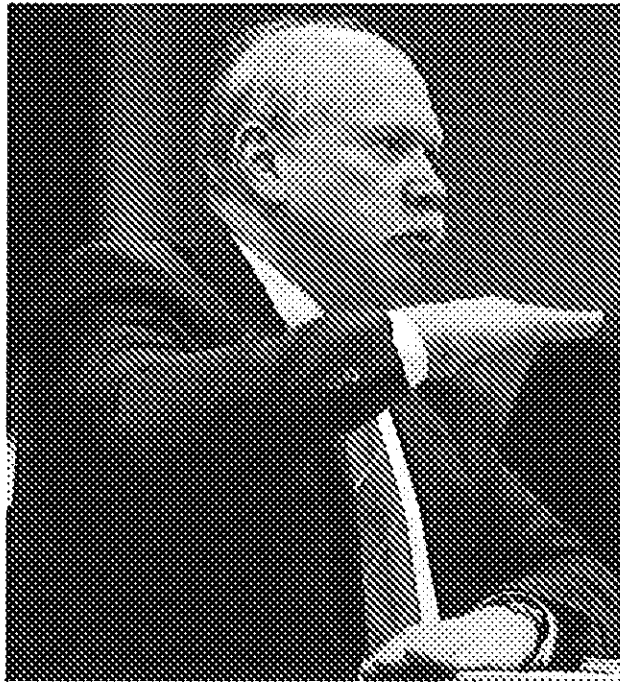
In the *Saiter* case, no notice was given to the general public for a hearing before the Order was issued, there was no opportunity for the public to be heard, no specific findings were made in the Order, and the Order was not drafted narrowly.

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

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

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

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



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



So, who is to blame here?


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

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

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

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

[Learn More](#)

<p>  JENNIFER ABRAMS CLERK OF THE COURT </p>	
<p> DISTRICT COURT FAMILY COURT DIVISION CLARK COUNTY, NEVADA </p>	
BRANIM PALI SALTER, Plaintiff,	CASE NO. D-15-0017-D DEPT NO. 1
vs. TINA MARIE SALTER, Defendant	HEARING DATES: 9/15/16 HEARING TIMES: 10:00 a.m.
<p> <u>ORDER PROHIBITING DISSEMINATION OF CASE MATERIAL</u> </p>	
<p> This matter having come before the Court for several pending matters on the 29th day of September at 10:00 a.m., Plaintiff Branim Salter represented by Jennifer Abrams, Esq. and Shannon Leavelle Esq. and Defendant Tina Marie Salter represented by Louis Schneider, Esq., and the Court hearing preliminary matters, entertained and granted Mr. Abrams request for a closed hearing pursuant to NRS 3.017, with the exception of permitting the parents of Defendant to remain pursuant to NRS 121.040 (3)(d). </p>	
<p> Thereafter, the videotape of this hearing was posted on youtube and a link to the video was emailed to multiple third parties not involved in the case on or about the 3rd day of October, 2016. </p>	
<p> On October 3, 2016, the parties received all orders required for a license of lawyers. Counsel then attempted to seal the case and to disallow any further release of </p>	

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

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

DATED this 1st day of October, 2016.


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

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devildog1235@cs.com

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EXHIBIT 4

EXHIBIT 4

EXHIBIT 4



Lawyers acting badly in a Clark County Family Court



Steve Sanson



197 views

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Published on Oct 9, 2016

District Court Judge Bullied by Family Attorney Jennifer Abrams

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

SHOW MORE

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And a public message.

Top comments



Richard Harris Law Firm

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Judge Alex Painsful Racial Mistake Pt 1

Time2Justice

8,571 views



What The Flush?

Up to the Mountains - Official Site

154,070 views



11h02m43s

Steve Sanson

51 views



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

Steve Sanson

Recommended for you



Judge Elliott gave child custody to pedophile

Time2Justice

25,755 views



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

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5



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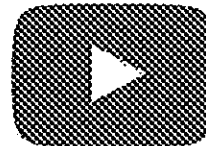
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You are here: [Home](#) / [News](#) / Clark County Family Court Judge willfully deceives a young child

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



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

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



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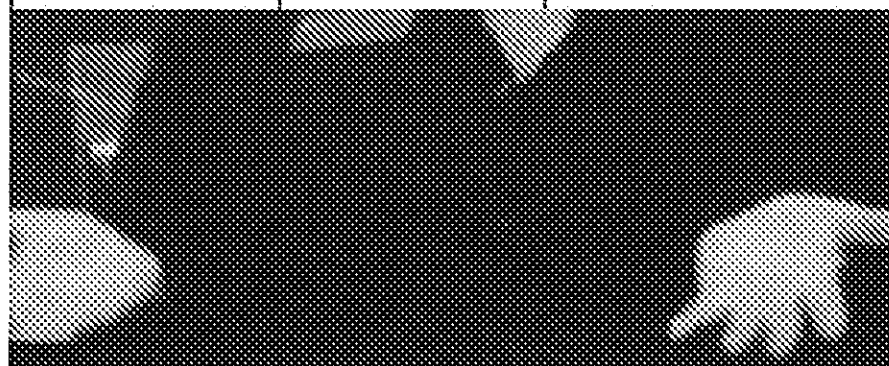
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Clark County Nevada; in a recent article "Deplorable actions by Family Court Judge Rena Hughes against a minor child".

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

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

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

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

Click onto video:

Part 3 threatened the minor child with Child Haven

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

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

Child Haven Website:



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See other related Videos:

Part 1 on the Record

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

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

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

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

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

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

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

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

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



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

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

Questions and Recommendations

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

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

Does this Family Court Judge have children of her own?

Should this Judge be reprimanded for this?

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

State of Nevada Commission on Judicial Discipline:

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

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

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

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

November 17, 2016

1



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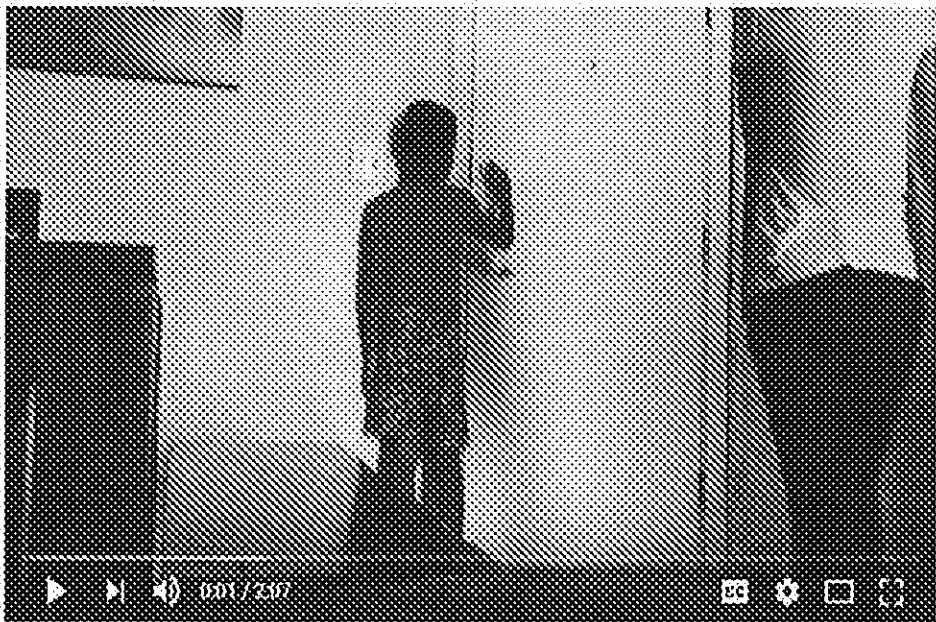
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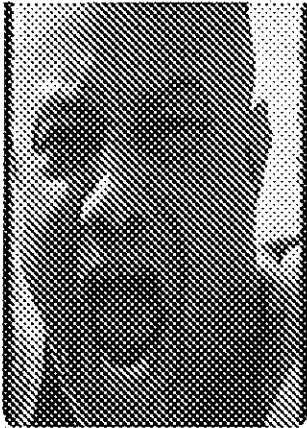
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@VIPSteveSanson

Steve Sanson strong commitment to his country and his community has been demonstrated through his leadership and service in the United States Marine Corps.


Las Vegas, Nevada

veteransinpolitics.org

Joined February 2009

Born on September 22

3,285 Photos and videos



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41

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

DECLARATION OF SERVICE

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**JENNIFER V. ABRAMS and THE ABRAMS & MAYO
LAW FIRM,**

Alvin D. Burton
Case No. 17-749318
CLERK OF THE COURT

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK ss.:

SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM Received by NOW! Services, Inc. on 01/10/2017 with instructions to serve **LOUIS C. SCHNEIDER** at **430 S. 7th Street, Las Vegas, NV89101**.

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

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

On **01/11/2017** at **11:34 AM**, I served the within **SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM** on **LOUIS C. SCHNEIDER** at **430 S. 7th Street, Las Vegas, NV89101** in the manner indicated below:

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

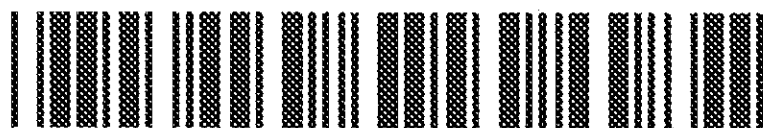
A description of the Recipient is as follows:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Male	Caucasian	Salt and Pepper	60	6'1"	230
Other Features:					

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

Executed this 12 day of Jan, 2017.

No Notary is required per NRS 53.045.



15856

X

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

3

3

**DISTRICT COURT
CLARK COUNTY, NEVADA**

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Case No :A-17-749318
CLERK OF THE COURT

**JENNIFER V. ABRAMS and THE ABRAMS & MAYO
LAW FIRM,**

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,

STATE OF NEVADA
COUNTY OF CLARK ss.:

SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM Received by NOW! Services, Inc. on 01/10/2017 with instructions to serve **LAW OFFICE OF LOUIS C. SCHNEIDER, LLC c/o Manager: Louis C. Schneider** at 430 S. 7th Street, Las Vegas, NV89101.

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

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

On **01/11/2017** at **11:34 AM**, I served the within **SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM** on **LAW OFFICE OF LOUIS C. SCHNEIDER, LLC c/o Manager: Louis C. Schneider** at 430 S. 7th Street, Las Vegas, NV89101 in the manner indicated below:

SUITABLE AGE: By delivering thereat a true copy of each to **Louis C. Schneider, Manager** authorized to accept service on behalf of **LAW OFFICE OF LOUIS C. SCHNEIDER, LLC c/o Manager: Louis C. Schneider**, a person of suitable age and discretion. Said premises is **LAW OFFICE OF LOUIS C. SCHNEIDER, LLC c/o Manager: Louis C. Schneider's** usual place of business within the state.

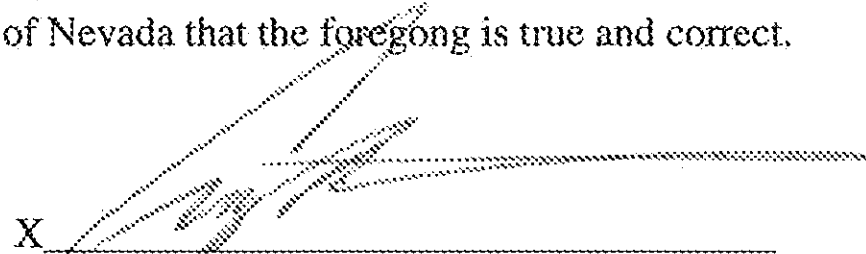
A description of the Recipient, or other person served on behalf of the Recipient is as follows:

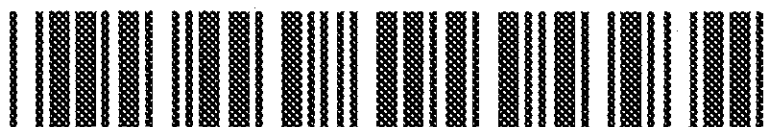
Sex	Color of skin/race	Color of hair	Age	Height	Weight
Male	Caucasian	Salt and Pepper	60	6'1"	230
Other Features:					

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

Executed this 12 of Jan, 2017

No Notary is required per NRS 53.045.

X

Craig Burton
License#: 1361
NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3
Las Vegas, NV89102
(702) 669-7378
Atty File#:



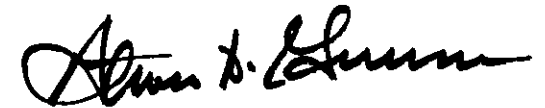
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4

DISTRICT COURT
CLARK COUNTY, NEVADA

DECLARATION OF SERVICE



CLERK OF THE COURT

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

Case No :A-17-749318

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,

STATE OF NEVADA,
COUNTY OF CLARK ss.:

SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM Received by NOW! Services, Inc. on 01/10/2017 with instructions to serve VETERANS IN POLITICS INTERNATIONAL, INC. c/o Registered Agent: Clark McCourt at 7371 Prairie Falcon Road, Ste. 120, Las Vegas, NV89128.

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

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

On 01/11/2017 at 9:04 AM, deponent served the within SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM on VETERANS IN POLITICS INTERNATIONAL, INC. c/o Registered Agent: Clark McCourt at 7371 Prairie Falcon Road, Ste. 120, Las Vegas, NV89128 in the manner indicated below:

By personally delivering and leaving a true copy of this process with Rebecca Thole, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which is the address of the Resident Agent as shown on the current certificate of designation filed with the Secretary of State.

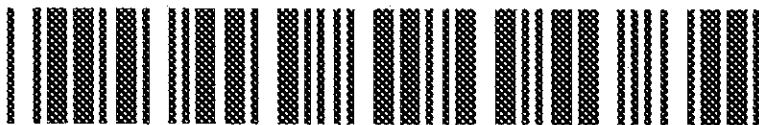
A description of the Defendant(s), or other person served on behalf of the Defendant(s) is as follows:

Sex	Color of skin/race	Color of hair	Age(Approx)	Height(Approx)	Weight(Approx)
Female	Caucasian	Brown	50	5'3"	165
Other Features:					

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

Executed this 12 day of Jan, 2017.

No Notary is required per NRS 53.045.



15063

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

Client File No:

5

5

DISTRICT COURT
CLARK COUNTY, NEVADA

DECLARATION OF SERVICE

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

Plaintiff/Petitioner,

vs.

LOUIS C. SCHNEIDER; et al.,

Defendant/Respondent,



Case No :A-17-749318

CLERK OF THE COURT

STATE OF NEVADA
COUNTY OF CLARK

ss.:

SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM Received by NOW! Services, Inc. on
01/10/2017 with instructions to serve STEVE W. SANSON at 2402 Tenaya Way, Las Vegas, NV.

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

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

On **01/14/2017** at **1:46 PM**, I served the within **SUMMONS; COMPLAINT; INITIAL FEE DISCLOSURE FORM**
on **STEVE W. SANSON** at **2402 Tenaya Way, Las Vegas, NV** in the manner indicated below:

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

A description of the Recipient is as follows:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Male	African American	Black	45-50	6'2"	210
Other Features:					

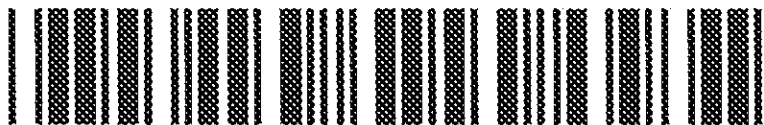
I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 24 day of Jan, 2017.

No Notary is required per NRS 53.045.

X

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



15859

6

6


CLERK OF THE COURT

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

DISTRICT COURT
CLARK COUNTY, NEVADA

JENNIFER V. ABRAMS and THE ABRAMS & MAYO LAW FIRM,)	Case No.:	A-17-749318-C
)		
Plaintiff,)	Department:	XXI
)		
vs.)		
)		
LOUIS C. SCHNEIDER; LAW OFFICES OF)	Hearing Date:	N/A
LOUIS C. SCHNEIDER, LLC; STEVE W.)	Hearing Time:	N/A
SANSON; HEIDI J. HANUSA; CHRISTINA)		
ORTIZ; JOHNNY SPICER; DON)		
WOOLBRIGHT; VETERANS IN POLITICS)		
INTERNATIONAL, INC.; SANSON)		
CORPORATION; KAREN STEELMON; and)		
DOES I THROUGH X,)		
)		
Defendant.)		

ACTION IN TORT

ARBITRATION EXEMPTION
CLAIMED

AMENDED COMPLAINT FOR DAMAGES

I.
INTRODUCTION

1. Plaintiffs, Jennifer V. Abrams and The Abrams & Mayo Law Firm ("Plaintiffs") bring this action for damages based upon, and to redress, Defendants' Intentional Defamation of the character of the Plaintiffs through libelous writings and slander, for Intentional Infliction of Emotional Distress, Negligent Infliction of Emotional Distress, False Light, Business Disparagement, Harassment, Concert of

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

6 **II.**
VENUE AND JURISDICTION

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

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

13 **III.**
PARTIES

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

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

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

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

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

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

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

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

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

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

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

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

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

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 Steelmon, 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 Steelmon, and Does I through X inclusive, acted individually and/or through their officers, agents, employees and co-conspirators, each of whom was acting within the purpose and scope of that agency, employment, and conspiracy, and these acts and omissions were known to, and authorized and ratified by, each of the other Defendants.

IV. FACTUAL ALLEGATIONS

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

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

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

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

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

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

24

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

1 h. Veterans in Politics: groups/OperationNeverForget

2 i. Nevada-Veterans-In-Politics

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

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

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

11 b. Abrams has “no boundaries in our courtrooms”;

12 c. Abrams is unethical;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

22 54. The “Seal-Happy” article, containing a link to the “Attack” article,
23 containing a link to the “BULLY” article, and containing a link to the September 29,
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³ A copy of the published “Seal-Happy” article is attached as Exhibit 3.

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

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

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

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

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

- a. Abrams “appears to be ‘seal happy’ when it comes to trying to seal her cases”;
- b. That Abrams seals cases in contravention of “openness and transparency”;
- c. That Abrams’ sealing of cases is intended “to protect her own reputation, rather than to serve a compelling client privacy or safety interest”;
- d. That Abrams engaged in “judicial browbeating”;
- e. That Abrams obtained an order that “is specifically disallowed by law”;
- f. That Abrams obtained the order against the “general public” with “no opportunity for the public to be heard”;
- g. That “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”;
- h. That Abrams obtained an “overbroad, unsubstantiated order to seal and hide the lawyer’s actions”; and
- i. That Abrams is an “over-zealous, disrespectful lawyer[] who obstruct[s] the judicial process and seek[s] to stop the public from having access to otherwise public documents.”

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

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

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

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

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

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

24 ⁴ 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”).⁵

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

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

- 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 Family Court Facebook groups including but not limited to “Family Court Support Group (Clark County, NV).”

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

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

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

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

- a. "VIDEO 1 The Abrams Law Firm 10 05 15,"
- b. "VIDEO 2 The Abrams Law Firm Inspection part 1,"
- c. "VIDEO 3 The Abrams Law Firm Practices p 2."

(hereinafter "the 'Inspection' videos").⁶

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

V.
FIRST CLAIM FOR RELIEF
(DEFAMATION)

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

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

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

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

1 or written false or misleading statements which were intended to impugn 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.

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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.

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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.

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

VIII.
FOURTH CLAIM FOR RELIEF
(FALSE LIGHT)

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

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

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

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

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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.

IX.
FIFTH CLAIM FOR RELIEF
(BUSINESS DISPARAGEMENT)

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

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

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

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

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.

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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.

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

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

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

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

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

24

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

24 / / /

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

24 / / /

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

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

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

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

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

9 WHEREFORE, Plaintiffs request the following injunctive relief:

- 10 a. That all defamatory writings, video, postings, or any other documents
11 or public display of the same, concerning Jennifer Abrams, The
12 Abrams & Mayo Law Firm, and the employees of the same, be removed
13 from public view within 10 days of the issuance of the injunction.
- 14 b. That all innuendo of illegal, immoral, or unethical conduct that has
15 already been attributed by defendants to Plaintiffs, must never be
16 repeated by any named Defendant or any member of any of the named
17 organizations. Generalities toward lawyers in general will constitute a
18 violation of the injunction.
- 19 c. That a full retraction and apology be authored by Defendants Steve W.
20 Sanson and Louis C. Schneider and disseminated everywhere the
21 defamation occurred, including, but not limited to, the entirety of the
22 mailing list(s), each and every social media site (Facebook, Twitter,
23 Google+, Pinterest, etc.) and anywhere else the defamatory material
24 was disseminated.

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XVI.
CONCLUSION

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

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

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

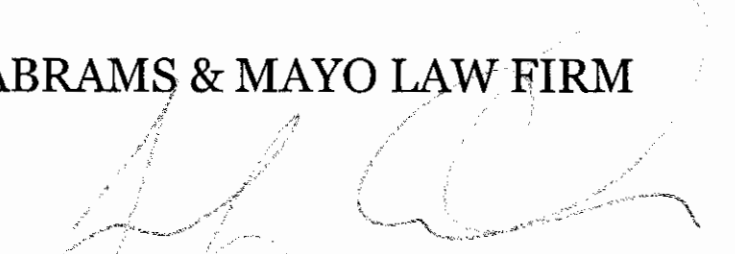
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1 6. For such other and further relief this Court may deem just and proper.

2 **DATED** this 27th day of January, 2017.

3 Respectfully submitted:

4 THE ABRAMS & MAYO LAW FIRM

5
6 
JENNIFER V. ABRAMS, ESQ.

Nevada State Bar Number: 7575

6252 South Rainbow Boulevard, Suite 100

Las Vegas, Nevada 89118

Phone: (702) 222-4021

Email: JVAGroup@theabramslawfirm.com

Attorney for Plaintiffs

1 **VERIFICATION**

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

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

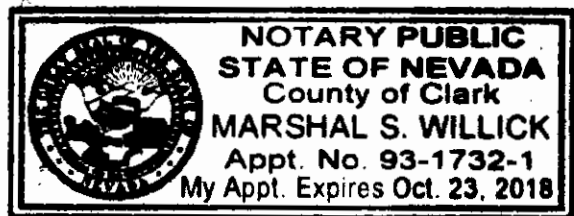
6 That her business is the Plaintiff in the above-entitled action; that she has
7 read the above and foregoing *Amended Complaint for Damages* and knows the
8 contents thereof and that the same is true of her own knowledge, except as to those
9 matters therein stated on information and belief, and as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

11 FURTHER, AFFIANT SAYETH NAUGHT.

12
13 
JENNIFER V. ABRAMS, ESQ.

14
15 SUBSCRIBED and SWORN to before me
16 this 27th day of January, 2017, by Jennifer V. Abrams, Esq.

17 
18 NOTARY PUBLIC



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CERTIFICATE OF SERVICE

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

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

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

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

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

Johnny Spicer
3589 East Gowan Road
Las Vegas, Nevada 89115

Don Woolbright
20 Fernwood Drive
Saint Peters, Missouri 63376

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

Karen Steelmon
2174 East Russell Road
Las Vegas, Nevada 89119

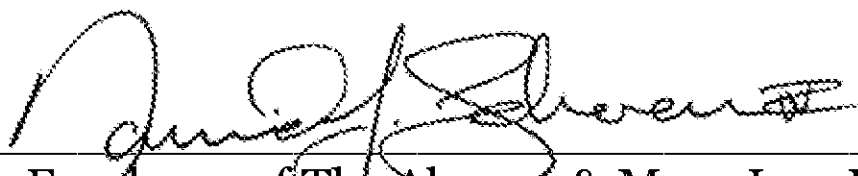

An Employee of The Abrams & Mayo Law Firm

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

Share:

Twice

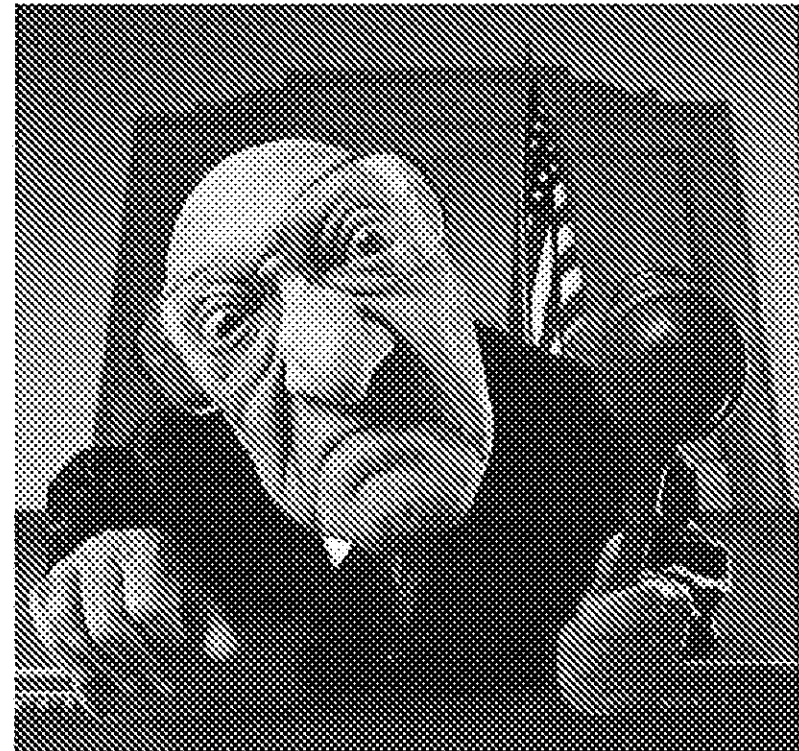


VETERANS

IN POLITICS

*A behind the scenes look
inside our courtroom*

FIND OUT MORE



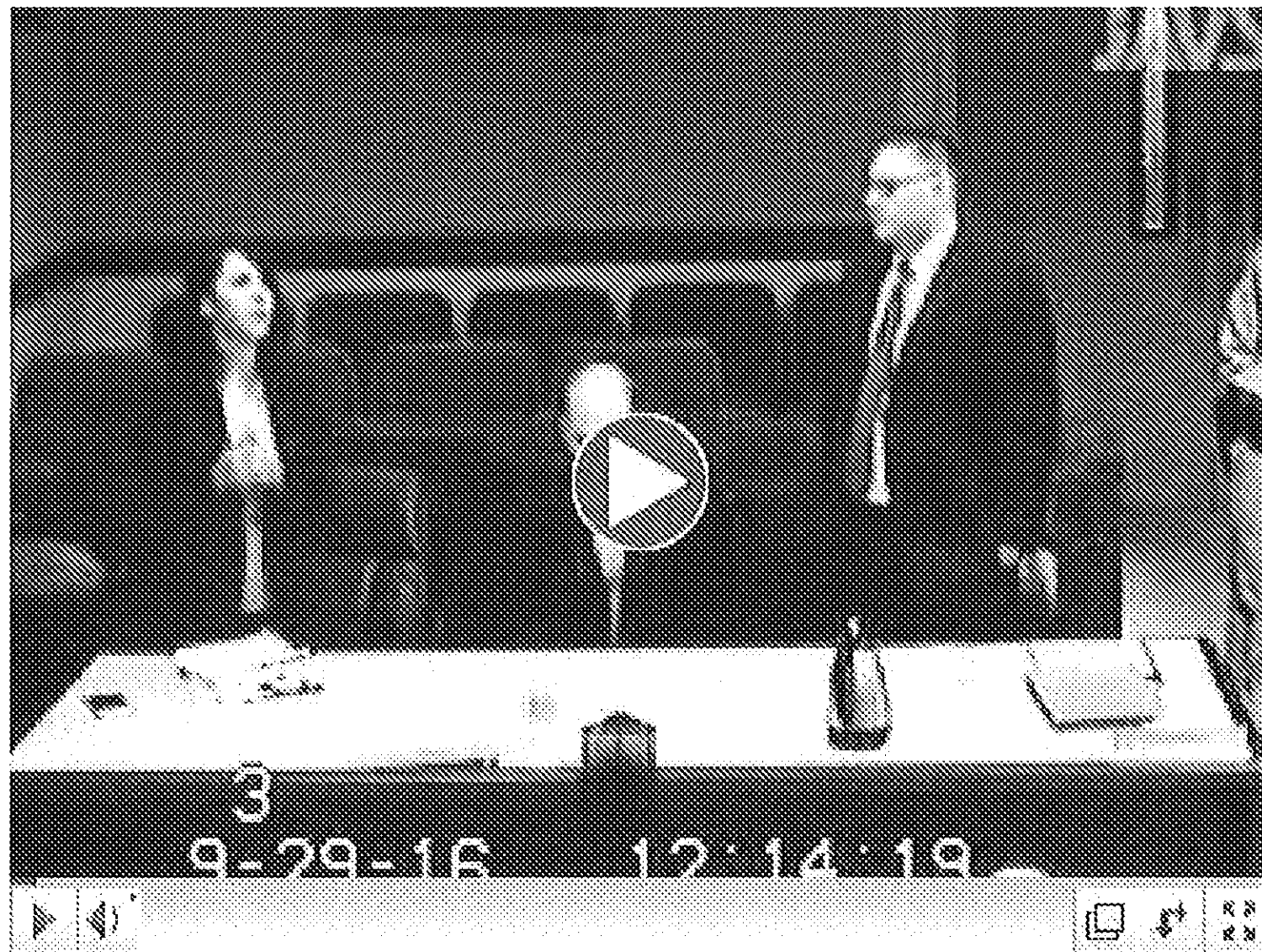
In Clark County Nevada, we have noticed Justice of the Peace handcuffing Public Defenders unjustly as well as Municipal Court Judges incarcerating citizens that are not even before their court.

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.

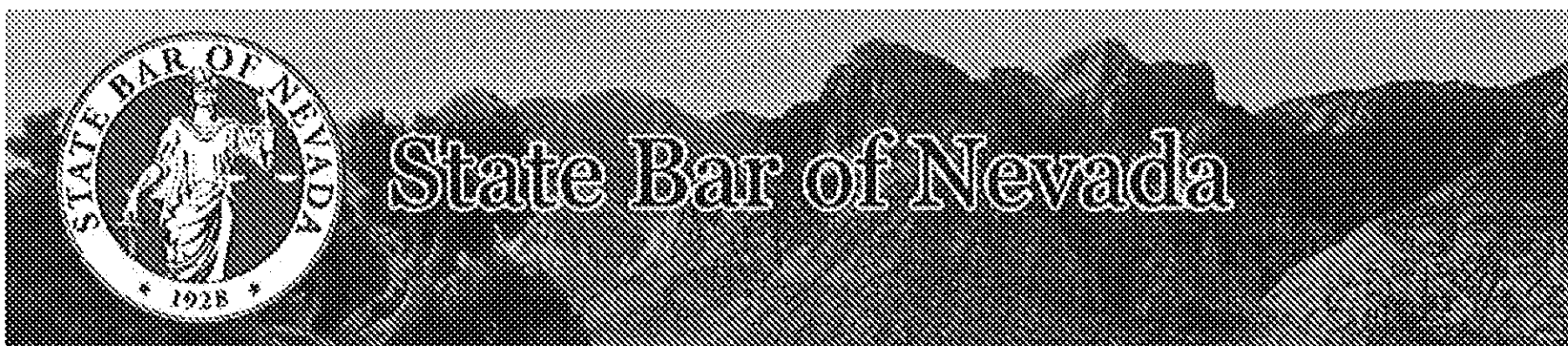
I am the Judge not you.

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

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

UPCOMING EVENTS

CONTACT US



www.veteransinpolitics.org

SIGN UP FOR EMAILS

Click the "Like" button.

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

49.	Reply to Oppositions to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/23/2018	JVA001471 - JVA001539
41.	Reply to Plaintiff's Opposition to an Award of Attorney's fees, Costs, and Statutory Sanctions	1/24/2018	JVA001260 - JVA001265
46.	Reply to Plaintiffs' Opposition to Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	2/5/2018	JVA001398 - JVA001451
66.	Reply to Plaintiffs' Opposition to Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order and Opposition to Countermotion for Attorney's Fees	5/18/2018	JVA001718 - JVA001731
55.	Reply to Plaintiffs' Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	4/10/2018	JVA001633 - JVA001663
25.	Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	5/30/2017	JVA000809 - JVA000817
35.	Schneider Defendants' Motion for Statutory Damages ad Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; and Motion for Sanction	9/12/2017	JVA001005 - JVA001013
18.	Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	3/28/2017	JVA000337 - JVA000367
19.	Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	3/28/2017	JVA000368 - JVA000405
81.	Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/13/2017	JVA001754 - JVA001756

30.	Transcript Re: All Pending Motions	7/5/2017	JVA000884 - JVA000950
26.	VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	5/30/2017	JVA000818 - JVA000859
29.	VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	6/9/2017	JVA000867 - JVA000883

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DISTRICT COURT CIVIL COVER SHEET

CLARK

County, Nevada

Case No. A-17-749318-C Dept I

(Assigned by Clerk's Office)

I. Party Information *(provide both home and mailing addresses if different)*

Plaintiff(s) (name/address/phone): JENNIFER V. ABRAMS and THE ABRAMS & MAYO LAW FIRM 6252 S. Rainbow Blvd., Suite 100 Las Vegas, Nevada 89118 (702) 222-4021	Defendant(s) (name/address/phone): (See attached)
Attorney (name/address/phone): Jennifer V. Abrams, Esq. (NV Bar # 7575) 6252 S. Rainbow Blvd., Suite 100 Las Vegas, Nevada 89118 (702) 222-4021	Attorney (name/address/phone): Unknown

II. Nature of Controversy *(please select the one most applicable filing type below)*

Civil Case Filing Types

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate <i>Probate (select case type and estate value)</i> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

01/09/2017

Date

Signature of initiating party or representative

See other side for family-related case filings.

Defendants

LOUIS C. SCHNEIDER

Pers.: 808 San Gabriel Ave
Henderson, Nevada 89002

Bus.: 430 S. 7th Street
Las Vegas, Nevada 89101

LAW OFFICES OF LOUIS C. SCHNEIDER, LLC

Reg. Agent: c/o Philomena Moloney, Moloney & Associates CPA Firm
8905 W. Post Road, Ste. 210
Las Vegas, Nevada 89148

Business: 430 S. 7th Street
Las Vegas, Nevada 89101
Tel: (702) 435-2121

STEVE W. SANSON

Phys.: 8908 Big Bear Pines Ave
Las Vegas, Nevada 89143

Mailing: P.O. Box 28211
Las Vegas, Nevada 89126

HEIDI J. HANUSA

Pers.: 8908 Big Bear Pines Ave
Las Vegas, Nevada 89143

Bus.: 2620 Regatta Drive, Suite 102
Las Vegas, Nevada 89128

CHRISTINA ORTIZ

Pers.: 10632 Valley Edge Court
Las Vegas, Nevada 89141

JOHNNY SPICER

Pers.: 3589 East Gowan Road
Las Vegas, Nevada 89115

DON WOOLBRIGHT

Pers.: 4230 Saint Linus Ln.
Saint Ann, Missouri 63074

VETERANS IN POLITICS INTERNATIONAL, INC.

Reg. Agent: c/o Clark McCourt
7371 Prairie Falcon Road, Ste. 120
Las Vegas, Nevada 89128

SANSON CORPORATION

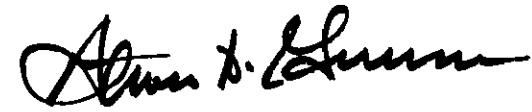
Reg. Agent: c/o Clark McCourt
7371 Prairie Falcon Road, Ste. 120
Las Vegas, Nevada 89128

KAREN STEELMON

2174 East Russell Road
Las Vegas, Nevada 89119

DOES I THROUGH X

(Unknown)



CLERK OF THE COURT

1 **COMP**

JENNIFER V. ABRAMS, ESQ.

2 Nevada State Bar Number: 7575

THE ABRAMS & MAYO LAW FIRM

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4 Phone: (702) 222-4021

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5 Attorney for Plaintiffs

6
7 DISTRICT COURT
CLARK COUNTY, NEVADA

8 JENNIFER V. ABRAMS and THE ABRAMS) Case No.: A-17-749318-C
& MAYO LAW FIRM,)

9 Plaintiff,)
10)

11 vs.)

12 LOUIS C. SCHNEIDER; LAW OFFICES OF) Hearing Date: N/A

LOUIS C. SCHNEIDER, LLC; STEVE W.) Hearing Time: N/A

13 SANSON; HEIDI J. HANUSA; CHRISTINA)

ORTIZ; JOHNNY SPICER; DON)

14 WOOLBRIGHT; VETERANS IN POLITICS)

INTERNATIONAL, INC.; SANSON)

15 CORPORATION; KAREN STEELMON; and)

DOES I THROUGH X,)

16 Defendant.)

ACTION IN TORT

ARBITRATION EXEMPTION
CLAIMED

17
18 **COMPLAINT FOR DAMAGES**

19 **I.**

INTRODUCTION

20 1. Plaintiffs, Jennifer V. Abrams and The Abrams & Mayo Law Firm
21 ("Plaintiffs") bring this action for damages based upon, and to redress, Defendants'
22 Intentional Defamation of the character of the Plaintiffs through libelous writings
23 and slander, for Intentional Infliction of Emotional Distress, Negligent Infliction of
24 Emotional Distress, False Light, Business Disparagement, Harassment, Concert of

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

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

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

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

13 **III.**
14 **PARTIES**

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

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

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

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

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

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

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

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

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

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

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

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

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

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 Steelmon, 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 Steelmon, and Does I through X inclusive, acted individually and/or through their officers, agents, employees and co-conspirators, each of whom was acting within the purpose and scope of that agency, employment, and conspiracy, and these acts and omissions were known to, and authorized and ratified by, each of the other Defendants.

IV. FACTUAL ALLEGATIONS

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

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

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

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

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

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

24

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

1 h. Veterans in Politics: groups/OperationNeverForget

2 i. Nevada-Veterans-In-Politics

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

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

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

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

12 c. Abrams is unethical;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 (hereinafter "the 'BULLY' article") along with a copy of the Order Prohibiting
2 Dissemination of Case Material.²

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

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

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

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

23
24

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- a. Abrams “appears to be ‘seal happy’ when it comes to trying to seal her cases”;
- b. That Abrams seals cases in contravention of “openness and transparency”;
- c. That Abrams’ sealing of cases is intended “to protect her own reputation, rather than to serve a compelling client privacy or safety interest”;
- d. That Abrams engaged in “judicial browbeating”;
- e. That Abrams obtained an order that “is specifically disallowed by law”;
- f. That Abrams obtained the order against the “general public” with “no opportunity for the public to be heard”;
- g. That “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”;
- h. That Abrams obtained an “overbroad, unsubstantiated order to seal and hide the lawyer’s actions”; and
- i. That Abrams is an “over-zealous, disrespectful lawyer[] who obstruct[s] the judicial process and seek[s] to stop the public from having access to otherwise public documents.”

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

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

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

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

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

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

24

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

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

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

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

- a. steve.sanson.1

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

- 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 Family Court Facebook groups including but not limited to “Family Court Support Group (Clark County, NV).”

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

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

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

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

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

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

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

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

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

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

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

23 ///

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

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

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

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

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

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

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

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.

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

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

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

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

V.
FIRST CLAIM FOR RELIEF
(DEFAMATION)

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

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

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

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

1 or written false or misleading statements which were intended to impugn 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 / / /

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

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

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

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

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

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

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

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

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**
7 **(BUSINESS DISPARAGEMENT)**

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

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

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

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

22 WHEREFORE, Plaintiffs, Jennifer Abrams and The Abrams & Mayo Law
23 Firm, demand judgment against named Defendants for actual, special,
24 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.

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

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

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

- 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. Harrassment (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.¹⁰

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

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

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

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

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

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

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

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

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

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

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

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

24 ///

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 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.

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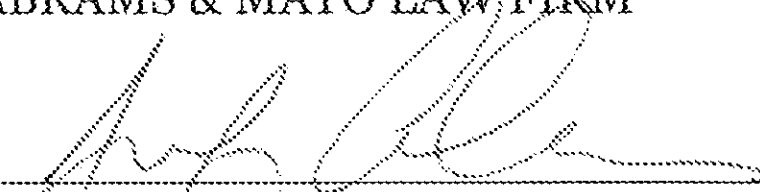
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1 6. For such other and further relief this Court may deem just and proper.

2 **DATED** this 9th day of January, 2017.

3 Respectfully submitted:

4 THE ABRAMS & MAYO LAW FIRM

5 
6 JENNIFER V. ABRAMS, ESQ.
7 Nevada State Bar Number: 7575
8 6252 South Rainbow Boulevard, Suite 100
9 Las Vegas, Nevada 89118
10 Phone: (702) 222-4021
11 Email: JVAGroup@theabramslawfirm.com
12 Attorney for Plaintiffs
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24


1 VERIFICATION

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

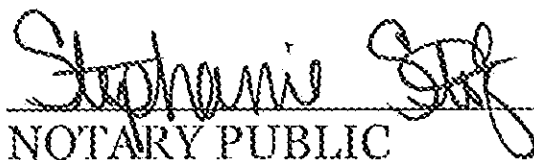
4 JENNIFER V. ABRAMS, ESQ., principal of THE ABRAMS & MAYO LAW
5 FIRM first being duly sworn, deposes and says:

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

11 FURTHER, AFFIANT SAYETH NAUGHT.

12
13 
JENNIFER V. ABRAMS, ESQ.

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

17 
18 NOTARY PUBLIC

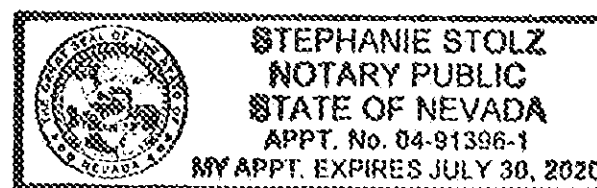


EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

Like 47

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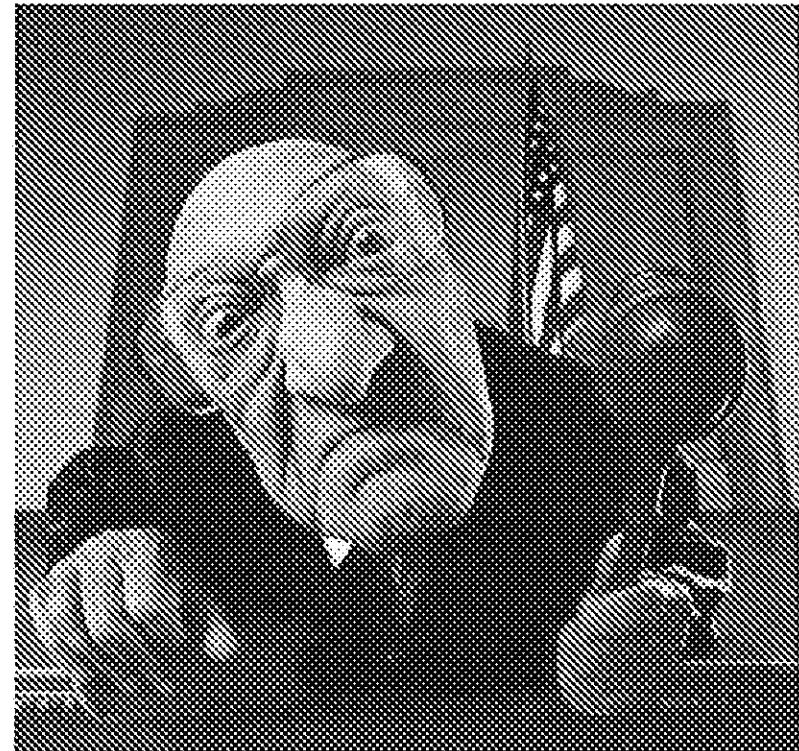


VETERANS
IN POLITICS

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

*A behind the scenes look
inside our courtroom*

FIND OUT MORE



No boundaries in our courtrooms!

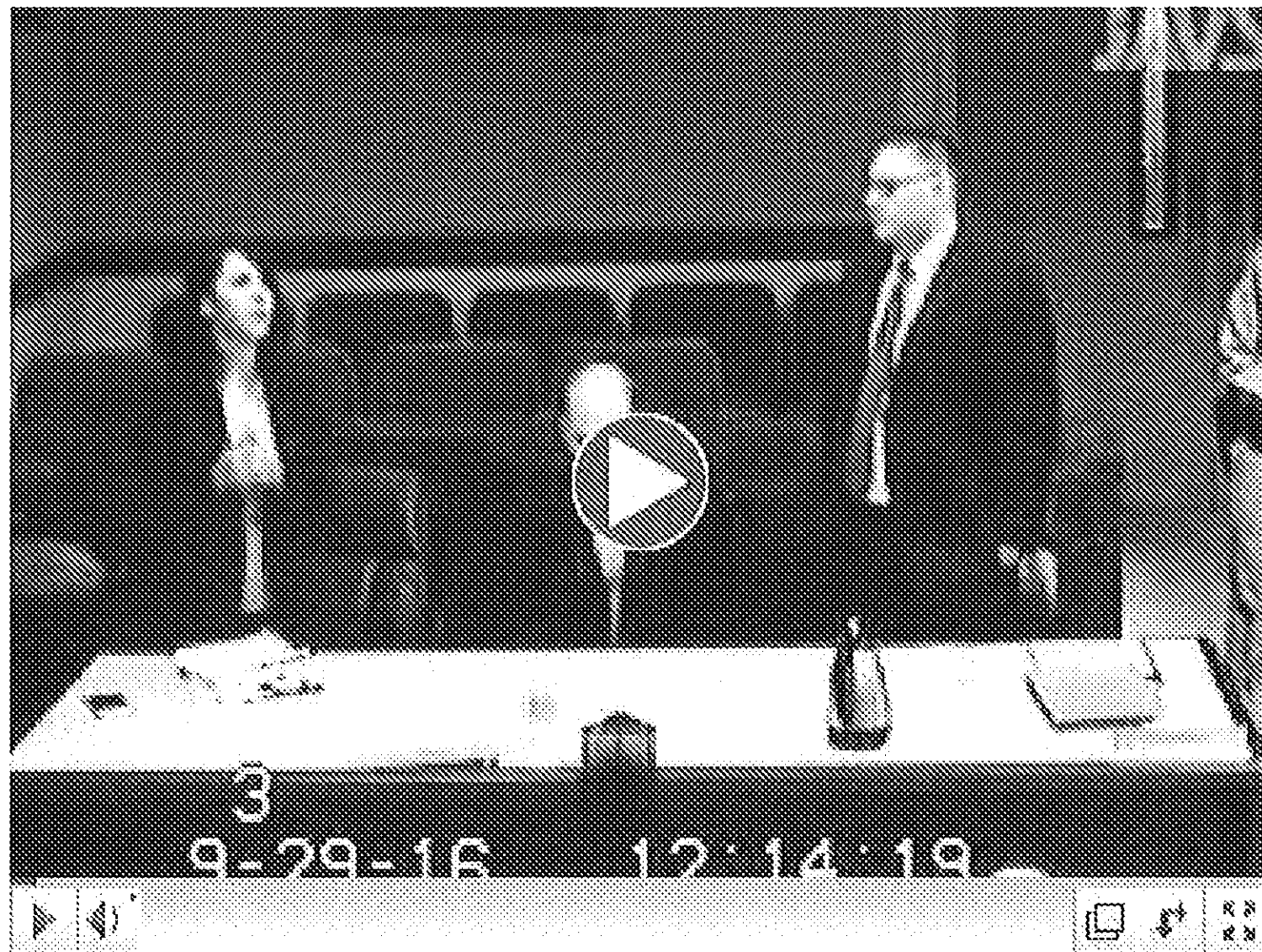
In Clark County Nevada, we have noticed Justice of the Peace handcuffing Public Defenders unjustly as well as Municipal Court Judges incarcerating citizens that are not even before their court.

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

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

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

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



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

Judge Jennifer Elliot:



I find that there is undue influence in the case.

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

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

Court is charged to making sure that justice is done.

Your client lied about his finances.

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

Your firm does this a lot and attack other lawyers.

I find it to be a pattern with your firm.

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

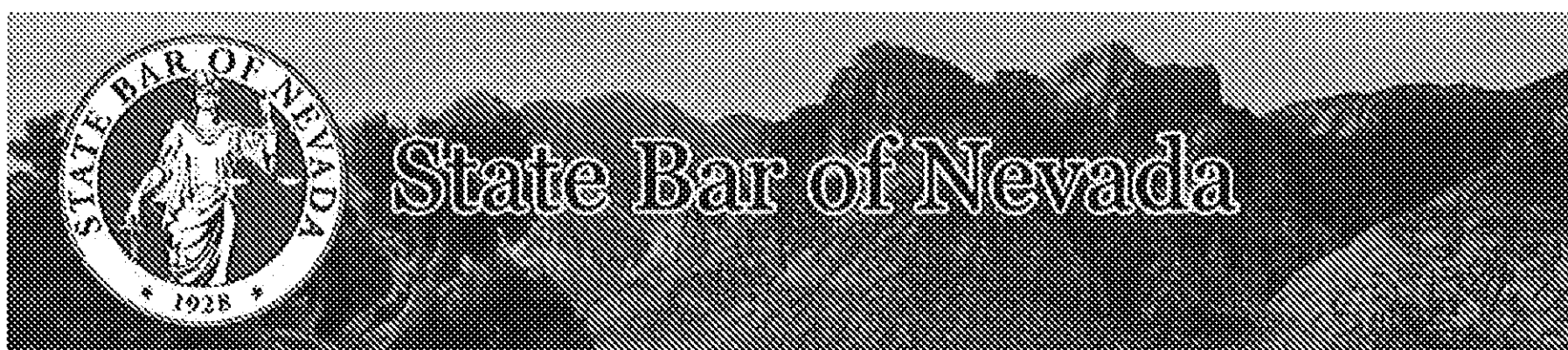
I am the Judge not you.

Jennifer Abrams:



Excuse me I was in the middle of a sentence.

Is there any relationship between you and Louis Schneider?



At what point should a judge sanction an attorney?

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

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

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.

702-283-8888

devildog1235@cs.com

www.veteransinpolitics.org

[SIGN UP FOR EMAILS](#)

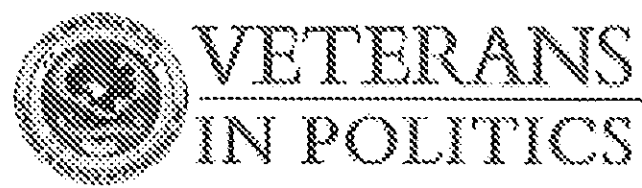
Confirm that you like this.

Click the "Like" button.

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2



District Court *Judge Bullied* by Family Attorney Jennifer Abrams



FIND OUT MORE

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



Clark County, Nevada

October 9, 2016

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

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

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



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

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

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

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

See order:

<p>Case No. 16-00000000-00000000 DISTRICT COURT FAMILY COURT DIVISION CLARK COUNTY, NEVADA</p>	
<p>BRANDON PAUL SAITER, Plaintiff,</p>	<p>CASE NO. 16-00000000-00000000 DEPT NO. 1.</p>
<p>vs.</p>	
<p>TINA MARIE SAITER, Defendant.</p>	<p>HEARING DATES: 9/29/16 HEARING TIMES: 10:00 a.m.</p>
<p><u>ORDER PROHIBITING DISSEMINATION OF CASE MATERIAL</u></p>	
<p>This matter having come before the Court for several pending matters on the 28th 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 Louise Schneider, Esq., and the Court having previously matters entertained and granted Mr. Abrams request for a closed hearing pursuant to FRCR 1.02, with the exception of permitting the parents of Defendant to remain present to FRCR 1.02 (b)(4).</p>	
<p>Therefore, the videography of this hearing was posted on youtube and a link to the video was emailed to multiple third parties not involved in the case on or about the 3rd day of October, 2016.</p>	
<p>On October 3, 2016, the parties received all issues required for a Dispute of Dispute. Counsel then requested to end the case and to disallow any further release of</p>	

case information and is demanded that the current post of the September 29, 2016 hearing video, or any other hearing video from this case be immediately removed from the internet and to prohibit any portion of these proceedings from being disseminated or published and that any such publication or posting by anyone be immediately removed, as the September 29, 2016 hearing was a closed hearing. Additionally, counsel and the parties recognize that the case has been settled and that such an Order is in the best interest of the four (4) children in this case and is also authorized by NRS 125.080, NRS 125.110, DRCR 5.02, and Supreme Court Rules, Part VII, Rule 32(a) and 3(4).

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the current post of the September 29, 2016 hearing video, or any and all other hearing video(s) from this case shall be immediately removed from the internet. All persons or entities shall be prohibited from publishing, displaying, showing, or making public any portion of these case proceedings; nothing from the case at bar shall be disseminated or published and that any such publication or posting by anyone or any entity shall be immediately removed as the Court finds the stipulation of the parties and this Court's Order to be in the best interest of the four (4) children in this case and to be fully supported by law (NRS 125.080, NRS 125.110, DRCR 5.02, and Supreme Court Rules, Part VII, Rule 32(a) and 3(4)).

DATED this 1st day of October, 2016.


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

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

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

Appellant,

vs.

LOUIS C. SCHNEIDER; LAW OFFICES
OF LOUIS C. SCHNEIDER, LLC; STEVE
W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC;

Respondent.

SC NO: 73838/75834
DC NO: A-17-749318-C
Electronically Filed
Oct 15, 2018 09:43 a.m.
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Clerk of Supreme Court

**APPELLANT'S
INDEX TO
APPENDIX -
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VOLUME I

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APPENDIX INDEX

#	DOCUMENT	FILE STAMP DATE	PAGES
	Volume I		
1.	Complaint for Damages	1/9/2017	JVA00001 - JVA000080
2.	Declaration of Service	1/13/2017	JVA00081
3.	Declaration of Service	1/13/2017	JVA00082
4.	Declaration of Service	1/13/2017	JVA00083
5.	Declaration of Service	1/25/2017	JVA00084
6.	Amended Complaint for Damages	1/27/2017	JVA000085- JVA000164
7.	Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)	1/30/2017	JVA000165 - JVA000177
8.	Declaration of Service	2/8/2017	JVA000178
9.	Declaration of Service	2/8/2017	JVA000179
10.	Declaration of Service	2/8/2017	JVA000180
11.	Declaration of Service	2/8/2017	JVA000181
12.	Opposition to "Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)" and Countermotion for Attorney's Fees	2/14/2017	JVA000182 - JVA000204
	Volume II		
13.	Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof	2/16/2017	JVA000205 - JVA000265
14.	Motion to Strike	2/16/2017	JVA000266 - JVA000273

15.	Opposition to “Defendants Steve Sanson and Veterans in Politics International, Inc’s Motion to Dismiss” and Countermotion for Attorney’s Fees	3/6/2017	JVA000274 - JVA000315
16.	Opposition to “Motion to Strike” and Countermotion for Attorney’s Fees	3/6/2017	JVA000317 - JVA000330
17.	Errata to Opposition to “Defendants Steve W. Sanson and Veterans in Politics International, Inc’s Motion to Dismiss” and Countermotion for Attorney’s Fees	3/6/2017	JVA000331 - JVA000336
18.	Schneider Defendants’ Special Motion to Dismiss Plaintiffs’ Slapp Suit Pursuant to NRS 41.660 and Request for Attorney’s Fees, Costs, and Damages Pursuant to NRS 41.670	3/28/2017	JVA000337 - JVA000367
19.	Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	3/28/2017	JVA000368 - JVA000405
	Volume III		
20.	Declaration of Steve Sanson in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000406 - JVA000469
21.	Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000470 - JVA000538
	Volume IV		
22.	Exhibit 13 to Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss - Sealed	3/28/2017	JVA000539 - JVA000655

	Volume V		
23.	Plaintiffs' Omnibus Opposition To: 1. Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti Slapp Statute, NRS 41.660	4/28/2017	JVA000656 - JVA000804
24.	Defendants' Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 to Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	5/26/2017	JVA000805 - JVA000808
25.	Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	5/30/2017	JVA000809 - JVA000817
26.	VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	5/30/2017	JVA000818 - JVA000859
27.	Louis Schneiders Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendant's Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	6/1/2017	JVA000860 - JVA000862

28.	Plaintiffs' Supplement to Their Omnibus Opposition to: 1. Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti Slapp Statute, NRS 41.660	6/6/2017	JVA000863 - JVA000866
29.	VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	6/9/2017	JVA000867 - JVA000883
	Volume VI		
30.	Transcript Re: All Pending Motions	7/5/2017	JVA000884 - JVA000950
31.	[Proposed] Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-Slapp)	7/24/2017	JVA000951 - JVA000970
32.	Notice of Entry of Order	7/24/2017	JVA000971 - JVA000994
33.	Notice of Appeal	8/21/2017	JVA000995 - JVA000998
34.	Case Appeal Statement	8/21/2017	JVA000999 - JVA001004
35.	Schneider Defendants' Motion for Statutory Damages ad Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; and Motion for Sanction	9/12/2017	JVA001005 - JVA001013
36.	Motion for Attorney Fees and Costs Pursuant to NEV. Rev. Stat. 41.670	9/13/2017	JVA001014 - JVA001076

37.	Notice of Change of Hearing	9/13/2017	JVA001077
38.	Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendants' Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	9/15/2017	JVA001078 - JVA001080
39.	Corrected Motion for Attorney Fees ad Costs and Additional Awards Pursuant to Nev. Rev. Stat. 41.670	10/5/2017	JVA001081 - JVA001143
	Volume VII		
40.	Plaintiffs' Omnibus Opposition to Defendants' Motion for Attorney's Fees, Costs, and Sanctions	10/27/2017	JVA001144 - JVA001259
41.	Reply to Plaintiff's Opposition to an Award of Attorney's fees, Costs, and Statutory Sanctions	1/24/2018	JVA001260 - JVA001265
42.	Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	1/24/2018	JVA001266 - JVA001370
43.	Affidavit of Counsel Cal J. Potter, IV. Esq.	1/26/2018	JVA001371 - JVA001383
44.	Opposition to Motion to Disqualify	1/31/2018	JVA001384 - JVA001393
	Volume VIII		
45.	Affidavit of Judge Michelle Leavitt in Response to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program Or, Alternatively, to a District Court Judge Outside of Clark County	2/2/2018	JVA001394 - JVA001397
46.	Reply to Plaintiffs' Opposition to Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	2/5/2018	JVA001398 - JVA001451

47.	Court Minutes	2/7/2018	JVA001452
48.	Joinder to Louis Schneider's Opposition to Plaintiff's Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/7/2018	JVA001453 - JVA001469
49.	Reply to Oppositions to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/23/2018	JVA001471 - JVA001539
50.	Court Minutes	3/2/2018	JVA001540
51.	Notice of Department Reassignment	3/5/2018	JVA001541
52.	Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify	3/12/2018	JVA001542 - JVA001617
53.	Joinder in Motion for Reconsideration	3/13/2018	JVA001618 - JVA001620
54.	Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	3/26/2018	JVA001621 - JVA001632
	Volume IX		
55.	Reply to Plaintiffs' Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	4/10/2018	JVA001633 - JVA001663
56.	Notice of Hearing	4/18/2018	JVA001664 - JVA001665
57.	Court Minutes	4/20/2018	JVA001666 - JVA001667

58.	Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order	4/20/2018	JVA001668 - JVA001673
59.	Court Minutes	4/23/2018	JVA001674
60.	Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001675 - JVA001683
61.	Notice of Entry of Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001684 - JVA001695
62.	Notice of Appeal	5/7/2018	JVA001696 - JVA001698
63.	Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/7/2018	JVA001699 - JVA001707
64.	Errata to Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/8/2018	JVA001708 - JVA001712
65.	Case Appeal Statement	5/9/2018	JVA001713 - JVA001717
66.	Reply to Plaintiffs' Opposition to Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order and Opposition to Countermotion for Attorney's Fees	5/18/2018	JVA001718 - JVA001731
67.	Court Minutes	5/25/2018	JVA001732
68.	Order	7/2/2018	JVA001733 - JVA001735

69.	Notice of Entry of Order	8/1/2018	JVA001736 - JVA001741
70.	Declaration of Service	1/13/2017	JVA001742
71.	Declaration of Service	1/13/2017	JVA001743
72.	Declaration of Service	1/13/2017	JVA001744
73.	Declaration of Service	1/13/2017	JVA001745
74.	Declaration of Due Diligence	1/25/2017	JVA001746 - JVA001747
75.	Declaration of Service	2/8/2017	JVA001748
76.	Declaration of Service	2/8/2017	JVA001749
77.	Declaration of Service	2/8/2017	JVA001750
78.	Declaration of Service	2/8/2017	JVA001751
79.	Declaration of Service	2/10/2017	JVA001752
80.	Declaration of Service	3/29/2017	JVA001753
81.	Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/13/2017	JVA001754 - JVA001756
82.	Notice of Entry of Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/16/2017	JVA001757 - JVA001762

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

JENNIFER V. ABRAMS AND
THE ABRAMS & MAYO LAW FIRM,

Appellant,

vs.

STEVE W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC; LOUIS
C. SCHNEIDER; AND LAW OFFICES
OF LOUIS C. SCHNEIDER, LLC;

Respondent.

SC NO: 73838/75834
DC NO: A-17-749318-C

**APPELLANTS'
INDEX TO
APPENDIX -
ALPHABETICAL
ORDER**

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APPENDIX INDEX

EXHIBIT	DOCUMENT	FILE STAMP DATE	PAGES
43.	Affidavit of Counsel Cal J. Potter, IV. Esq.	1/26/2018	JVA001371 - JVA001383
45.	Affidavit of Judge Michelle Leavitt in Response to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program Or, Alternatively, to a District Court Judge Outside of Clark County	2/2/2018	JVA001394 - JVA001397
6.	Amended Complaint for Damages	1/27/2017	JVA000086- JVA000164
34.	Case Appeal Statement	8/21/2017	JVA000999 - JVA001004
65.	Case Appeal Statement	5/9/2018	JVA001713 - JVA001717
1.	Complaint for Damages	1/9/2017	JVA000001 - JVA000080
39.	Corrected Motion for Attorney Fees ad Costs and Additional Awards Pursuant to Nev. Rev. Stat. 41.670	10/5/2017	JVA001081 - JVA001143
47.	Court Minutes	2/7/2018	JVA001452
50.	Court Minutes	3/2/2018	JVA001540
57.	Court Minutes	4/20/2018	JVA001666 - JVA001667
59.	Court Minutes	4/23/2018	JVA001674
67.	Court Minutes	5/25/2018	JVA001732

74.	Declaration of Due Diligence	1/25/2017	JVA001746 - JVA001747
21.	Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000470 - JVA000538
2.	Declaration of Service	1/13/2017	JVA00082
3.	Declaration of Service	1/13/2017	JVA00083
4.	Declaration of Service	1/13/2017	JVA00084
70.	Declaration of Service	1/13/2017	JVA001742
71.	Declaration of Service	1/13/2017	JVA001743
72.	Declaration of Service	1/13/2017	JVA001744
73.	Declaration of Service	1/13/2017	JVA001745
5.	Declaration of Service	1/25/2017	JVA00085
8.	Declaration of Service	2/8/2017	JVA000178
9.	Declaration of Service	2/8/2017	JVA000179
10.	Declaration of Service	2/8/2017	JVA000180
11.	Declaration of Service	2/8/2017	JVA000181
75.	Declaration of Service	2/8/2017	JVA001748
76.	Declaration of Service	2/8/2017	JVA001749
77.	Declaration of Service	2/8/2017	JVA001750
78.	Declaration of Service	2/8/2017	JVA001751
79.	Declaration of Service	2/10/2017	JVA001752
80.	Declaration of Service	3/29/2017	JVA001753
20.	Declaration of Steve Sanson in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000406 - JVA000469

7.	Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)	1/30/2017	JVA000165 - JVA000177
24.	Defendants' Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 to Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	5/26/2017	JVA000805 - JVA000808
17.	Errata to Opposition to "Defendants Steve W. Sanson and Veterans in Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees	3/6/2017	JVA000331 - JVA000336
64.	Errata to Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/8/2018	JVA001708 - JVA001712
22.	Exhibit 13 to Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss - Sealed	3/28/2017	JVA000539 - JVA000655
48.	Joinder to Louis Schneider's Opposition to Plaintiff's Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/7/2018	JVA001453 - JVA001469
53.	Joinder in Motion for Reconsideration	3/13/2018	JVA001618 - JVA001620
38.	Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendants' Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	9/15/2017	JVA001078 - JVA001080

27.	Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendants'Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	6/1/2017	JVA000860 - JVA000862
36.	Motion for Attorney Fees and Costs Pursuant to NEV. Rev. Stat. 41.670	9/13/2017	JVA001014 - JVA001076
42.	Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	1/24/2018	JVA001266 - JVA001370
58.	Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order	4/20/2018	JVA001668 - JVA001673
52.	Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify	3/12/2018	JVA001542 - JVA001617
14.	Motion to Strike	2/16/2017	JVA000266 - JVA000273
33.	Notice of Appeal	8/21/2017	JVA000995 - JVA000998
62.	Notice of Appeal	5/7/2018	JVA001696 - JVA001698
37.	Notice of Change of Hearing	9/13/2017	JVA001077
51.	Notice of Department Reassignment	3/5/2018	JVA001541
32.	Notice of Entry of Order	7/24/2017	JVA000971 - JVA000994
69.	Notice of Entry of Order	8/1/2018	JVA001736 - JVA001741

61.	Notice of Entry of Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001684 - JVA001695
82.	Notice of Entry of Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/16/2017	JVA001757 - JVA001762
56.	Notice of Hearing	4/18/2018	JVA001664 - JVA001665
16.	Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof	2/16/2017	JVA000205 - JVA000265
68.	Order	7/2/2018	JVA001733 - JVA001735
60.	Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001675 - JVA001683
12.	Opposition to "Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)" and Countermotion for Attorney's Fees	2/14/2017	JVA000182 - JVA000204
15.	Opposition to "Defendants Steve Sanson and Veterans in Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees	3/6/2017	JVA000274 - JVA000315
44.	Opposition to Motion to Disqualify	1/31/2018	JVA001384 - JVA001393
54.	Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/7/2018	JVA001699 - JVA001707

43.	Opposition to “Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs’ Motion to Disqualify” and Countermotion and Attorney’s Fees	3/26/2018	JVA001621 - JVA001632
16.	Opposition to “Motion to Strike” and Countermotion for Attorney’s Fees	3/6/2017	JVA000317 - JVA000330
23.	Plaintiffs’ Omnibus Opposition To: 1. Schneider Defendants’ Special Motion to Dismiss Plaintiffs’ Slapp Suit Pursuant to NRS 41.660 and Request for Attorney’s Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants’ Special Motion to Dismiss Under Nevada’s Anti Slapp Statute, NRS 41.660	4/28/2017	JVA000656 - JVA000804
40.	Plaintiffs’ Omnibus Opposition to Defendants’ Motion for Attorney’s Fees, Costs, and Sanctions	10/27/2017	JVA001144 - JVA001259
28.	Plaintiffs’ Supplement to Their Omnibus Opposition to: 1. Schneider Defendants’ Special Motion to Dismiss Plaintiffs’ SLAPP Suit Pursuant to NRS 41.660 and request for Attorney’s Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants’ Special Motion to Dismiss Under Nevada’s Anti Slapp Statute, NRS 41.660	6/6/2017	JVA000863 - JVA000866
31.	[Proposed] Order Granting VIPI Defendants’ Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-Slapp)	7/24/2017	JVA000951 - JVA000970