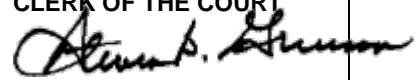


EXHIBIT “3”

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NEOJ

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Attorneys for Plaintiffs

Jennifer V. Abrams and The Abrams & Mayo Law
Firm

DISTRICT COURT

CLARK COUNTY, NEVADA

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

Plaintiffs,

vs.

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,

Defendants.

Case No. A-17-749318-C
Dept. No. SENIOR JUDGE PROGRAM

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

PLEASE TAKE NOTICE that an 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 was entered on April 24, 2018; a true and correct copy of which is attached hereto.

DATED this 24th day of April, 2018.

BAILEY❖KENNEDY

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

AND

JENNIFER V. ABRAMS
THE ABRAMS & MAYO LAW FIRM
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Attorneys for Plaintiffs
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Mayo Law Firm

CERTIFICATE OF SERVICE

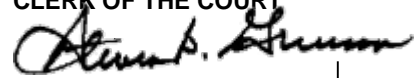
I certify that I am an employee of BAILEY❖KENNEDY and that on the 24th day of April, 2018, service of the foregoing Notice of Entry of Order Granting Schneider Defendants’ Special Motion to Dismiss Plaintiffs’ SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney’s Fees, Costs, and Damages Pursuant to NRS 41.670 was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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---	--

JOSEPH HOUSTON 430 S. 7 th Street Las Vegas, NV 89101	Email: <i>Attorneys for Defendant,</i> LOUIS C. SCHNEIDER
--	---

/s/ Susan Russo
Employee of BAILEY❖KENNEDY



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DOES I through X,

Defendants.

Case No. A-17-749318-C
Dept. No. SENIOR JUDGE PROGRAM

**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**

Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP¹ Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670 (the "Special Motion to Dismiss") having come on for hearing on June 5, 2017, the Honorable Michelle Leavitt presiding;² Plaintiffs Jennifer V. Abrams ("Ms. Abrams") and the Abrams & Mayo Law Firm (together, the "Abrams Parties"), appearing by and through their attorneys, Joshua P. Gilmore, Esq. of Bailey ♦ Kennedy and Marshal S. Willick, Esq. of Willick Law Group; Defendants Steve W. Sanson ("Sanson") and Veterans in Politics International, Inc. ("VIPI") (collectively, the "VIPI Defendants"), appearing by and through their attorneys, Margaret A. McLetchie, Esq. and Alina M. Shell, Esq. of McLetchie Shell LLC; and Defendants Louis C. Schneider, Esq. ("Schneider") and Law Office of Louis C. Schneider (together, the "Schneider Defendants"), appearing by and through their attorney, Cal Potter, Esq. of Potter Law Offices; and the Court, having read and considered all of the papers and pleadings on file, including the transcript from the June 5, 2017 hearing, and being fully advised, and good cause appearing therefor, hereby makes the following findings of fact and conclusions of law, and order granting the Schneider Defendants' Special Motion to Dismiss:

I.

FINDINGS OF FACT

1. Schneider is a licensed attorney in Las Vegas, Nevada.
2. On January 9, 2017, the Abrams Parties filed a Verified Complaint against the Schneider Defendants, as well as several other Defendants. The original Complaint included causes of action for defamation, intentional infliction of emotional distress, negligent infliction of emotional distress, false light, business disparagement, harassment, concert of action, civil conspiracy, RICO, and injunctive relief.
3. On January 27, 2017, the Abrams Parties filed a First Amended Verified Complaint, adding copyright infringement as a cause of action.

¹ "SLAPP" is an acronym for "strategic lawsuit against public participation."

² This matter was reassigned to the undersigned Senior Judge pursuant to the March 5, 2018 Notice of Department Reassignment.

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4 Defendants' 12(b)(5) Motion to Dismiss and Countermotion for Attorney's Fees.

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7 anti-SLAPP motions filed by the Defendants, including the Special Motion to Dismiss filed by the
8 Schneider Defendants.

8. On June 5, 2017, the Court heard oral arguments on the Defendants' anti-SLAPP motions to dismiss, including the Special Motion to Dismiss filed by the Schneider Defendants. During the hearing, the Abrams Parties' counsel stated that the Schneider Defendants are alleged to be responsible for all acts committed by the VIPI Defendants based on the civil conspiracy claim. The Abrams Parties' counsel separately agreed to dismiss the harassment, RICO, injunctive relief, and copyright infringement claims pursuant to N.R.C.P. 12(b)(5). With that in mind, the Court considered whether the Abrams Parties met their burden (for purposes of the Schneider Defendants' Special Motion to Dismiss) with regard to the remaining claims in the First Amended Complaint (i.e., defamation, intentional infliction of emotional distress, negligent infliction of emotional distress, false light, business disparagement, concert of action, and civil conspiracy).

19 9. On June 6, 2017, the Abrams Parties filed a Supplement to their Omnibus Opposition
20 to the VIPI Defendants' Special Motion to Dismiss.

10. On June 22, 2017, the Court entered a minute order granting the Schneider' Defendants' Special Motion to Dismiss.

II.

CONCLUSIONS OF LAW

11. Nevada's Anti-SLAPP statute provides that if "an action is brought against a person based upon a good faith communication in furtherance of ... the right to free speech in direct connection with an issue of public concern, [t]he person against whom the action is brought may file a special motion to dismiss." NRS 41.660(1)(a).

1 12. Courts must evaluate a special anti-SLAPP motion to dismiss using a two-step
2 process. First, the defendant bears the burdens of persuasion and production: He must show by a
3 preponderance of the evidence that each of the plaintiff's claim "is based upon a good faith
4 communication in furtherance of the right to petition or the right to free speech in direct connection
5 with an issue of public concern." NRS 41.660(3)(a); *see also John v. Douglas County Sch. Dist.*,
6 125 Nev. 746, 754, 219 P.3d 1276, 1282 (2009).

7 13. Second, assuming that the defendant satisfies the aforementioned threshold
8 showing, a court must then "determine whether the plaintiff has demonstrated with prima facie
9 evidence a probability of prevailing on the claim[s]." NRS 41.660(3)(b).

10 14. NRS Section 41.637 defines a "good faith communication in furtherance of the right
11 to petition or the right to free speech in direct connection with an issue of public concern" in
12 pertinent part as follows:

13 Written or oral statement made in direct connection with an issue under consideration
14 by a legislative, executive or judicial body, or any other official proceeding
authorized by law; or

15 Communication made in direct connection with an issue of public interest in a place
16 open to the public or in a public forum,

17 ↳ which is truthful or is made without knowledge of its falsehood.

18 NRS 41.637(4).

19 15. In *Shapiro v. Welt*, 133 Nev., Adv. Op. 6, 389 P.3d 262 (2017), the Nevada
20 Supreme Court outlined the following guiding principles for determining what constitutes "public
21 interest" for purposes of NRS Section 41.637(4):

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

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

25 (3) there should be some degree of closeness between the challenged statements and
26 the asserted public interest—the assertion of a broad and amorphous public interest is
not sufficient;

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

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

3 *Shapiro*, 389 P.3d at 268.

4 ***The Schneider Defendants Met Their Initial Burden***

5 16. The Court finds that no statement at issue in this case was directly made by Mr.
6 Schneider. As noted above, the Abrams Parties seek to hold the Schneider Defendants liable for
7 statements made by the VIPI Defendants.

8 17. Having reviewed the communications at issue in the First Amended Verified
9 Complaint, the Court finds that the VIPI Defendants' statements concerning the Abrams Parties
10 arise from good faith communications in furtherance of the right to free speech in direct connection
11 with an issue of public concern.

12 18. Moreover, the Court finds that a majority of the statements at issue in this case took
13 place on the public forum of the internet – e.g., they were published on VIPI's website.

14 19. Finally, the Court finds that the statements at issue in this case were made without
15 knowledge of falsehood, or were statements of opinion which are incapable of being true or false.

16 ***The Abrams Parties Have Failed to Demonstrate a Probability of Success on Their Claims***

17 20. Because the Schneider Defendants met their burden, the burden now shifts to the
18 Abrams Parties to demonstrate "with prima facie evidence a probability of prevailing on the[ir
19 remaining] claims." NRS 41.660(3)(b).

20 21. The Abrams Parties have failed to meet their burden, as they cannot show a
21 probability of success on their remaining claims.

22 **Defamation**

23 22. In Nevada, the elements of a defamation claim are: (1) a false and defamatory
24 statement by a defendant concerning the plaintiff; (2) an unprivileged publication of this statement
25 to a third person; (3) fault of the defendant, amounting to at least negligence; and (4) actual or
26 presumed damages. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 718, 57 P.3d 82, 90 (2002).

1 23. The Schneider Defendants made none of the statements at issue in this case, and the
2 VIPI Defendants' statements consist of either opinions or facts. Thus, the Abrams Parties have not
3 established a probability of success on their defamation claim.

4 **Intentional Infliction of Emotional Distress**

5 24. The elements of a cause of action for intentional infliction of emotional distress
6 ("IIED") are: "(1) extreme and outrageous conduct with either the intention of, or reckless
7 disregard for, causing emotional distress, (2) the plaintiff's [sic] having suffered severe or extreme
8 emotional distress and (3) actual or proximate causation." *Dillard Dep't Stores, Inc. v. Beckwith*,
9 115 Nev. 372, 378, 989 P.2d 882, 886 (1999) (quoting *Star v. Rabello*, 97 Nev. 124, 125, 625 P.2d
10 90, 92 (1981)).

11 25. The Abrams Parties fail to allege facts sufficient to show that the Schneider
12 Defendants' conduct was "extreme and outrageous" or that the Abrams Parties suffered emotional
13 distress. Thus, the Abrams Parties have not established a probability of success on their IIED
14 claim.

15 **Negligent Infliction of Emotional Distress**

16 26. Nevada courts recognize that "the negligent infliction of emotional distress can be
17 an element of the damage sustained by the negligent acts committed directly against the victim-
18 plaintiff." *Shoen v. Amerco, Inc.*, 111 Nev. 735, 748, 896 P.2d 469, 477 (1995). Thus, a cause of
19 action for negligent infliction of emotional distress ("NIED") has essentially the same elements as
20 a cause of action for negligence: (1) duty owed by defendant to plaintiff, (2) breach of said duty by
21 defendant, (3) said breach is the direct and proximate cause of plaintiff's emotional distress, and
22 (4) damages (i.e., emotional distress).

23 27. The Abrams Parties fail to allege facts sufficient to show that the Schneider
24 Defendants owed Ms. Abrams or her law firm any duty of care. The Abrams Parties also fail to
25 allege facts sufficient to show that they suffered emotional distress. Thus, the Abrams Parties have
26 not established a probability of success on their NIED claim.

1 **False Light**

2 28. The false light tort requires that “(a) the false light in which the other was placed
3 would be highly offensive to a reasonable person, and (b) the actor had knowledge of or acted in
4 reckless disregard as to the falsity of the publicized matter and the false light in which the other
5 would be placed.” *Franchise Tax Bd. of Cal. v. Hyatt*, 130 Nev., Adv. Op. 71, 335 P.3d 125, 141
6 (2014) (quoting RESTATEMENT (SECOND) OF TORTS § 652E (1977)).

7 29. The Abrams Parties fail to allege facts sufficient to show that the Schneider
8 Defendants (or the VIPI Defendants) placed them in a false light that would be “highly offensive to
9 a reasonable person.” Furthermore, the Abrams Parties fail to allege facts sufficient to show that
10 they have suffered emotional distress from any of the Schneider Defendants’ actions, much less as
11 a result of being placed in a “false light.” Thus, the Abrams Parties have not established a
12 probability of success on their false light claim.

13 **Business Disparagement**

14 30. The elements of a business disparagement cause of action are: “(1) a false and
15 disparaging statement, (2) the unprivileged publication by the defendant, (3) malice, and (4) special
16 damages.” *Clark Cty. Sch. Dist. v. Virtual Educ. Software, Inc.*, 125 Nev. 374, 386, 213 P.3d 496,
17 504 (2009) (citing *Hurlbut v. Gulf Atlantic Life Ins. Co.*, 749 S.W.2d 762, 766 (Tex. 1987)).

18 31. The Abrams Parties cannot prevail on their business disparagement claim for the
19 same reason that their defamation claim fails. Thus, the Abrams Parties have not established a
20 probability of success on their business disparagement claim.

21 **Concert of Action**

22 32. The elements of a cause of action for concert of action are that two defendants
23 commit a tort while acting in concert or pursuant to a common design. *Dow Chemical Co. v.*
24 *Mahlum*, 114 Nev. 1468, 1488, 970 P.2d 98, 111 (1998). The plaintiff must also show that the
25 defendants “agreed to engage in conduct that is inherently dangerous or poses a substantial risk of
26 harm to others.” *Tai-Si Kim v. Kearney*, 838 F. Supp. 2d 1077, 1092 (D. Nev. 2012) (quoting *GES,*
27 *Inc. v. Corbitt*, 117 Nev. 265, 270-71, 21 P.3d 11, 14-15 (2001)).

1 33. The conduct alleged in this case is not inherently dangerous. Further, because the
2 other tort claims fail, so does this one.

3 **Civil Conspiracy**

4 34. The elements of a cause of action for civil conspiracy are: (1) defendants, "by some
5 concerted action, intend to accomplish an unlawful objective for the purpose of harming another;
6 and (2) damage resulting from the act(s). *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*,
7 114 Nev. 1304, 1311, 971 P.2d 1251, 1255 (1999) (quoting *Hilton Hotels v. Butch Lewis*
8 *Productions*, 109 Nev. 1043, 1048, 862 P.2d 1207, 1210 (1993)).

9 35. Because the other tort claims fail, so does this one.

10 **III.**

11 **ORDER**

12 36. Accordingly, for the reasons stated above, the Schneider Defendants' Special
13 Motion to Dismiss is GRANTED.

14 37. If a Court grants a special anti-SLAPP motion to dismiss, the defendants are entitled
15 to an award of reasonable costs and attorneys' fees. NRS 41.670(1)(a). A Court may also award
16 up to \$10,000.00. NRS 41.670(1)(b).

17 38. Additionally, upon the granting of a special anti-SLAPP motion to dismiss, the
18 defendants can bring a separate cause of action against the plaintiffs for compensatory damages,
19 punitive damages, and attorney's fees and costs of bringing the separate action. NRS 41.670(c).

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1 39. The Schneider Defendants may file any additional motions pursuant to NRS 41.670
2 on or before July 24, 2017 (subsequently extended to September 12, 2017 by Order dated August
3 31, 2017).

4 IT IS SO ORDERED this 20 day of April, 2018.

5
6  DISTRICT COURT JUDGE (fn)

7 Submitted by:

8 BAILEY ♦ KENNEDY

9
10 By: 

11 DENNIS L. KENNEDY
JOSHUA P. GILMORE

12 AND
JENNIFER V. ABRAMS
13 **THE ABRAMS & MAYO LAW FIRM**

14 AND
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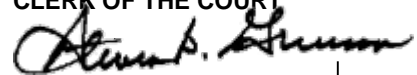
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(fn) The Chief Judge signs this for Sr. Judge
K. Hardcastle pending decision by the parties
related to the disclosure ^{Page 9 of 9} made on 20 April 2018.

EXHIBIT “2”

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CONCLUSIONS OF LAW

11. Nevada's Anti-SLAPP statute provides that if "an action is brought against a person based upon a good faith communication in furtherance of ... the right to free speech in direct connection with an issue of public concern, [t]he person against whom the action is brought may file a special motion to dismiss." NRS 41.660(1)(a).

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16 open to the public or in a public forum,

17 ↳ which is truthful or is made without knowledge of its falsehood.

18 NRS 41.637(4).

19 15. In *Shapiro v. Welt*, 133 Nev., Adv. Op. 6, 389 P.3d 262 (2017), the Nevada
20 Supreme Court outlined the following guiding principles for determining what constitutes "public
21 interest" for purposes of NRS Section 41.637(4):

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

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

25 (3) there should be some degree of closeness between the challenged statements and
26 the asserted public interest—the assertion of a broad and amorphous public interest is
not sufficient;

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

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

3 *Shapiro*, 389 P.3d at 268.

4 ***The Schneider Defendants Met Their Initial Burden***

5 16. The Court finds that no statement at issue in this case was directly made by Mr.
6 Schneider. As noted above, the Abrams Parties seek to hold the Schneider Defendants liable for
7 statements made by the VIPI Defendants.

8 17. Having reviewed the communications at issue in the First Amended Verified
9 Complaint, the Court finds that the VIPI Defendants' statements concerning the Abrams Parties
10 arise from good faith communications in furtherance of the right to free speech in direct connection
11 with an issue of public concern.

12 18. Moreover, the Court finds that a majority of the statements at issue in this case took
13 place on the public forum of the internet – e.g., they were published on VIPI's website.

14 19. Finally, the Court finds that the statements at issue in this case were made without
15 knowledge of falsehood, or were statements of opinion which are incapable of being true or false.

16 ***The Abrams Parties Have Failed to Demonstrate a Probability of Success on Their Claims***

17 20. Because the Schneider Defendants met their burden, the burden now shifts to the
18 Abrams Parties to demonstrate "with prima facie evidence a probability of prevailing on the[ir
19 remaining] claims." NRS 41.660(3)(b).

20 21. The Abrams Parties have failed to meet their burden, as they cannot show a
21 probability of success on their remaining claims.

22 **Defamation**

23 22. In Nevada, the elements of a defamation claim are: (1) a false and defamatory
24 statement by a defendant concerning the plaintiff; (2) an unprivileged publication of this statement
25 to a third person; (3) fault of the defendant, amounting to at least negligence; and (4) actual or
26 presumed damages. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 718, 57 P.3d 82, 90 (2002).

1 23. The Schneider Defendants made none of the statements at issue in this case, and the
2 VIPI Defendants' statements consist of either opinions or facts. Thus, the Abrams Parties have not
3 established a probability of success on their defamation claim.

4 **Intentional Infliction of Emotional Distress**

5 24. The elements of a cause of action for intentional infliction of emotional distress
6 ("IIED") are: "(1) extreme and outrageous conduct with either the intention of, or reckless
7 disregard for, causing emotional distress, (2) the plaintiff's [sic] having suffered severe or extreme
8 emotional distress and (3) actual or proximate causation." *Dillard Dep't Stores, Inc. v. Beckwith*,
9 115 Nev. 372, 378, 989 P.2d 882, 886 (1999) (quoting *Star v. Rabello*, 97 Nev. 124, 125, 625 P.2d
10 90, 92 (1981)).

11 25. The Abrams Parties fail to allege facts sufficient to show that the Schneider
12 Defendants' conduct was "extreme and outrageous" or that the Abrams Parties suffered emotional
13 distress. Thus, the Abrams Parties have not established a probability of success on their IIED
14 claim.

15 **Negligent Infliction of Emotional Distress**

16 26. Nevada courts recognize that "the negligent infliction of emotional distress can be
17 an element of the damage sustained by the negligent acts committed directly against the victim-
18 plaintiff." *Shoen v. Amerco, Inc.*, 111 Nev. 735, 748, 896 P.2d 469, 477 (1995). Thus, a cause of
19 action for negligent infliction of emotional distress ("NIED") has essentially the same elements as
20 a cause of action for negligence: (1) duty owed by defendant to plaintiff, (2) breach of said duty by
21 defendant, (3) said breach is the direct and proximate cause of plaintiff's emotional distress, and
22 (4) damages (i.e., emotional distress).

23 27. The Abrams Parties fail to allege facts sufficient to show that the Schneider
24 Defendants owed Ms. Abrams or her law firm any duty of care. The Abrams Parties also fail to
25 allege facts sufficient to show that they suffered emotional distress. Thus, the Abrams Parties have
26 not established a probability of success on their NIED claim.

1 **False Light**

2 28. The false light tort requires that “(a) the false light in which the other was placed
3 would be highly offensive to a reasonable person, and (b) the actor had knowledge of or acted in
4 reckless disregard as to the falsity of the publicized matter and the false light in which the other
5 would be placed.” *Franchise Tax Bd. of Cal. v. Hyatt*, 130 Nev., Adv. Op. 71, 335 P.3d 125, 141
6 (2014) (quoting RESTATEMENT (SECOND) OF TORTS § 652E (1977)).

7 29. The Abrams Parties fail to allege facts sufficient to show that the Schneider
8 Defendants (or the VIPI Defendants) placed them in a false light that would be “highly offensive to
9 a reasonable person.” Furthermore, the Abrams Parties fail to allege facts sufficient to show that
10 they have suffered emotional distress from any of the Schneider Defendants’ actions, much less as
11 a result of being placed in a “false light.” Thus, the Abrams Parties have not established a
12 probability of success on their false light claim.

13 **Business Disparagement**

14 30. The elements of a business disparagement cause of action are: “(1) a false and
15 disparaging statement, (2) the unprivileged publication by the defendant, (3) malice, and (4) special
16 damages.” *Clark Cty. Sch. Dist. v. Virtual Educ. Software, Inc.*, 125 Nev. 374, 386, 213 P.3d 496,
17 504 (2009) (citing *Hurlbut v. Gulf Atlantic Life Ins. Co.*, 749 S.W.2d 762, 766 (Tex. 1987)).

18 31. The Abrams Parties cannot prevail on their business disparagement claim for the
19 same reason that their defamation claim fails. Thus, the Abrams Parties have not established a
20 probability of success on their business disparagement claim.

21 **Concert of Action**

22 32. The elements of a cause of action for concert of action are that two defendants
23 commit a tort while acting in concert or pursuant to a common design. *Dow Chemical Co. v.*
24 *Mahlum*, 114 Nev. 1468, 1488, 970 P.2d 98, 111 (1998). The plaintiff must also show that the
25 defendants “agreed to engage in conduct that is inherently dangerous or poses a substantial risk of
26 harm to others.” *Tai-Si Kim v. Kearney*, 838 F. Supp. 2d 1077, 1092 (D. Nev. 2012) (quoting *GES,*
27 *Inc. v. Corbitt*, 117 Nev. 265, 270-71, 21 P.3d 11, 14-15 (2001)).

1 33. The conduct alleged in this case is not inherently dangerous. Further, because the
2 other tort claims fail, so does this one.

3 **Civil Conspiracy**

4 34. The elements of a cause of action for civil conspiracy are: (1) defendants, "by some
5 concerted action, intend to accomplish an unlawful objective for the purpose of harming another;
6 and (2) damage resulting from the act(s). *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*,
7 114 Nev. 1304, 1311, 971 P.2d 1251, 1255 (1999) (quoting *Hilton Hotels v. Butch Lewis*
8 *Productions*, 109 Nev. 1043, 1048, 862 P.2d 1207, 1210 (1993)).

9 35. Because the other tort claims fail, so does this one.

10 **III.**

11 **ORDER**

12 36. Accordingly, for the reasons stated above, the Schneider Defendants' Special
13 Motion to Dismiss is GRANTED.

14 37. If a Court grants a special anti-SLAPP motion to dismiss, the defendants are entitled
15 to an award of reasonable costs and attorneys' fees. NRS 41.670(1)(a). A Court may also award
16 up to \$10,000.00. NRS 41.670(1)(b).

17 38. Additionally, upon the granting of a special anti-SLAPP motion to dismiss, the
18 defendants can bring a separate cause of action against the plaintiffs for compensatory damages,
19 punitive damages, and attorney's fees and costs of bringing the separate action. NRS 41.670(c).

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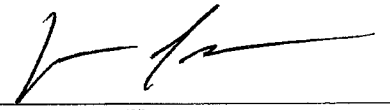
1 39. The Schneider Defendants may file any additional motions pursuant to NRS 41.670
2 on or before July 24, 2017 (subsequently extended to September 12, 2017 by Order dated August
3 31, 2017).

4 IT IS SO ORDERED this 20 day of April, 2018.

5
6  DISTRICT COURT JUDGE (fn)

7 Submitted by:

8 BAILEY ♦ KENNEDY

9
10 By: 

11 DENNIS L. KENNEDY
JOSHUA P. GILMORE

12 AND
JENNIFER V. ABRAMS
13 **THE ABRAMS & MAYO LAW FIRM**

14 AND
MARSHAL S. WILLICK
WILLICK LAW GROUP

15 *Attorneys for Plaintiffs,*
JENNIFER V. ABRAMS and
16 THE ABRAMS & MAYO LAW FIRM

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8984 SPANISH RIDGE AVENUE
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702.562.8820

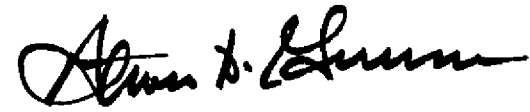
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(fn) The Chief Judge signs this for Sr. Judge
K. Hardcastle pending decision by the parties
related to the disclosure ^{Page 9 of 9} made on 20 April 2018.

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”



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

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

12 **III.**
PARTIES

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

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

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

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

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.

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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.

// // //

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.

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.

- 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).

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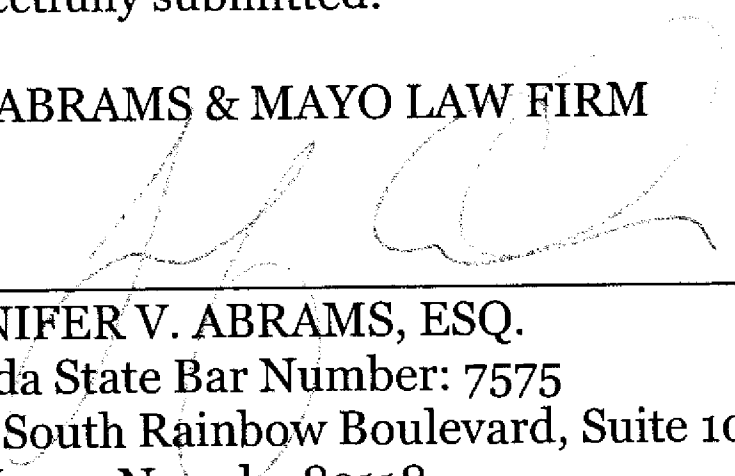
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6. For such other and further relief this Court may deem just and proper.

DATED this 27th day of January, 2017.

Respectfully submitted:

THE ABRAMS & MAYO LAW FIRM



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

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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

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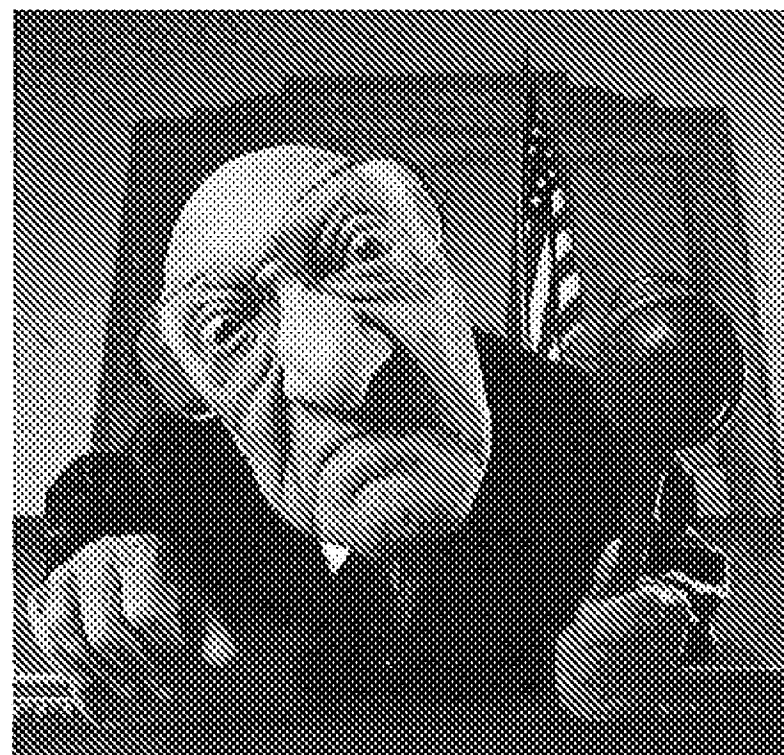


VETERANS
IN POLITICS

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!

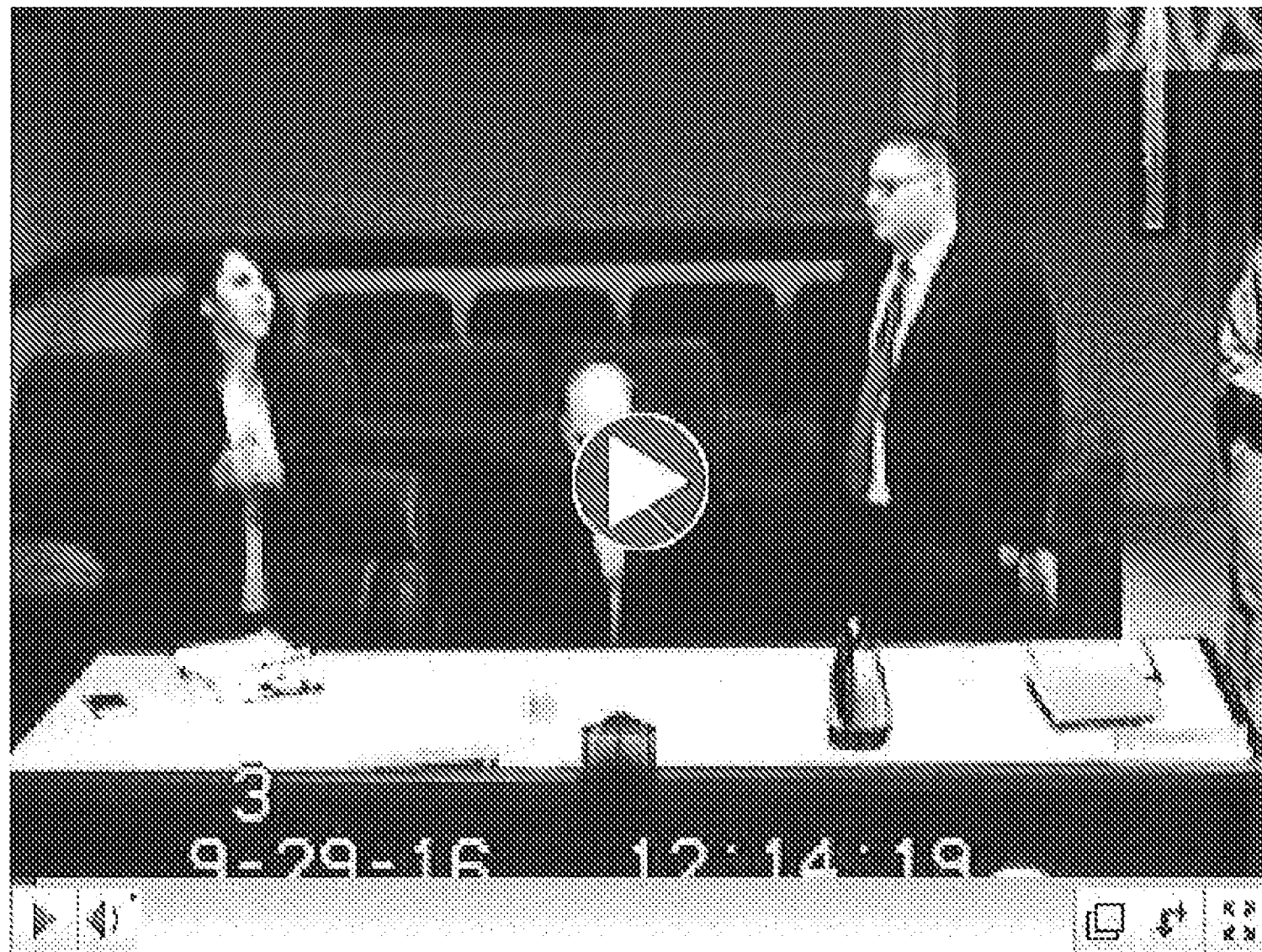
In Clark County Nevada, we have noticed Justice of the Peace handcuffing Public Defenders unjustly as well as Municipal Court Judges incarcerating citizens that are not even before their court.

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.

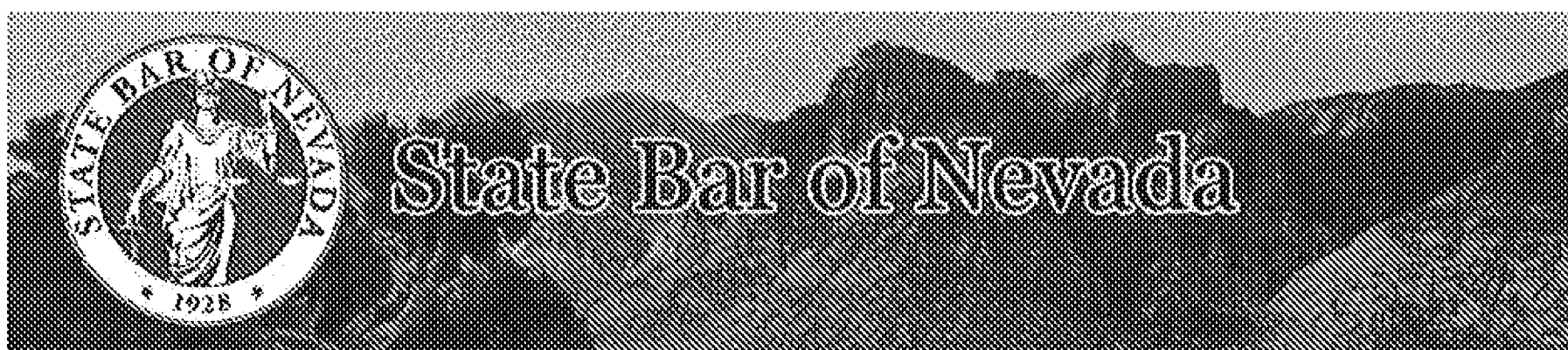
I am the Judge not you.

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](#)

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Veterans In Politics International Inc.

702-283-8988

devildog1235@cs.com

www.veteransinpolitics.org

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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 VIPJ 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:

CLARK COUNTY DISTRICT COURT
FAMILY COURT DIVISION
CLARK COUNTY, NEVADA

BRANDON PAUL SALTER,
Plaintiff
vs.
TINA MARIE SALTER,
Defendant

CASE NO. 16-00172-0
DEPT NO. 1
HEARING DATES: 9/29/16
HEARING TIMES: 10:00 a.m.

**ORDER PROHIBITING
DISSEMINATION OF CASE MATERIAL**

This matter having come before the Court for several pending matters on the 29th day of September at 10:00 a.m., Plaintiff Brandon Salter represented by Jennifer Abrams, Esq. and Brandon Leavitt, Esq. and Defendant Tina Marie Salter represented by Louis Schneider, Esq. and the Court having previously matters entertained and granted Mr. Abrams request for a closed hearing pursuant to FRC 2.102, with the exception of permitting the parents of Defendant to remain present to 11:15 a.m. (7:40)

Thereafter, 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.

On October 3, 2016, the parties received all issues required for a Dispute or Dispute. Counsel then requested to end the case and to disallow any further release of

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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 34.)

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 law 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 34.)

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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EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

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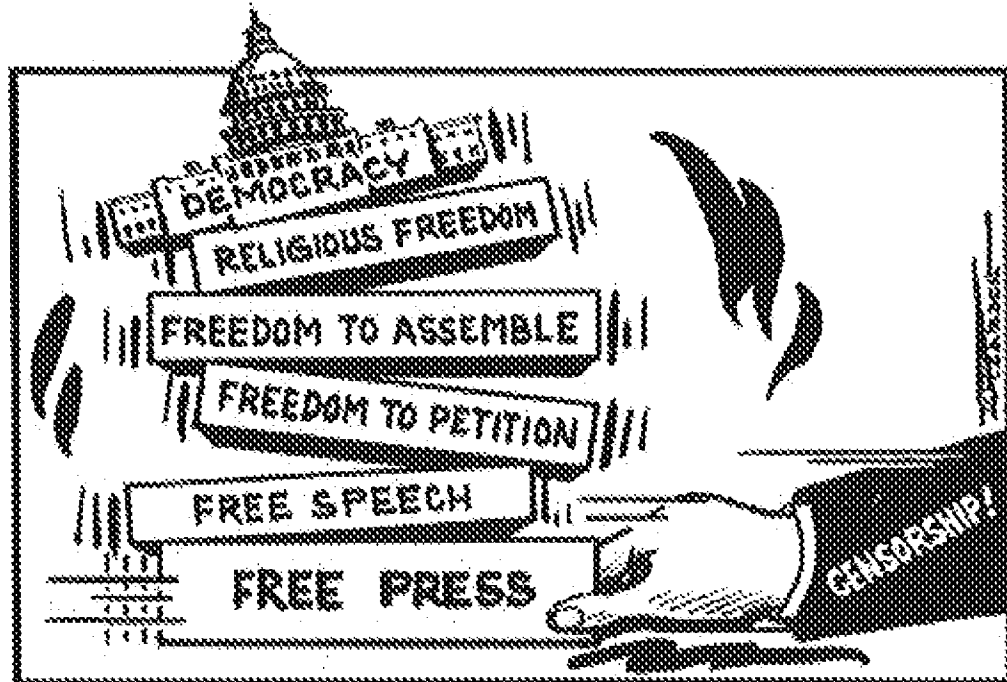
VETERANS
IN POLITICS

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,

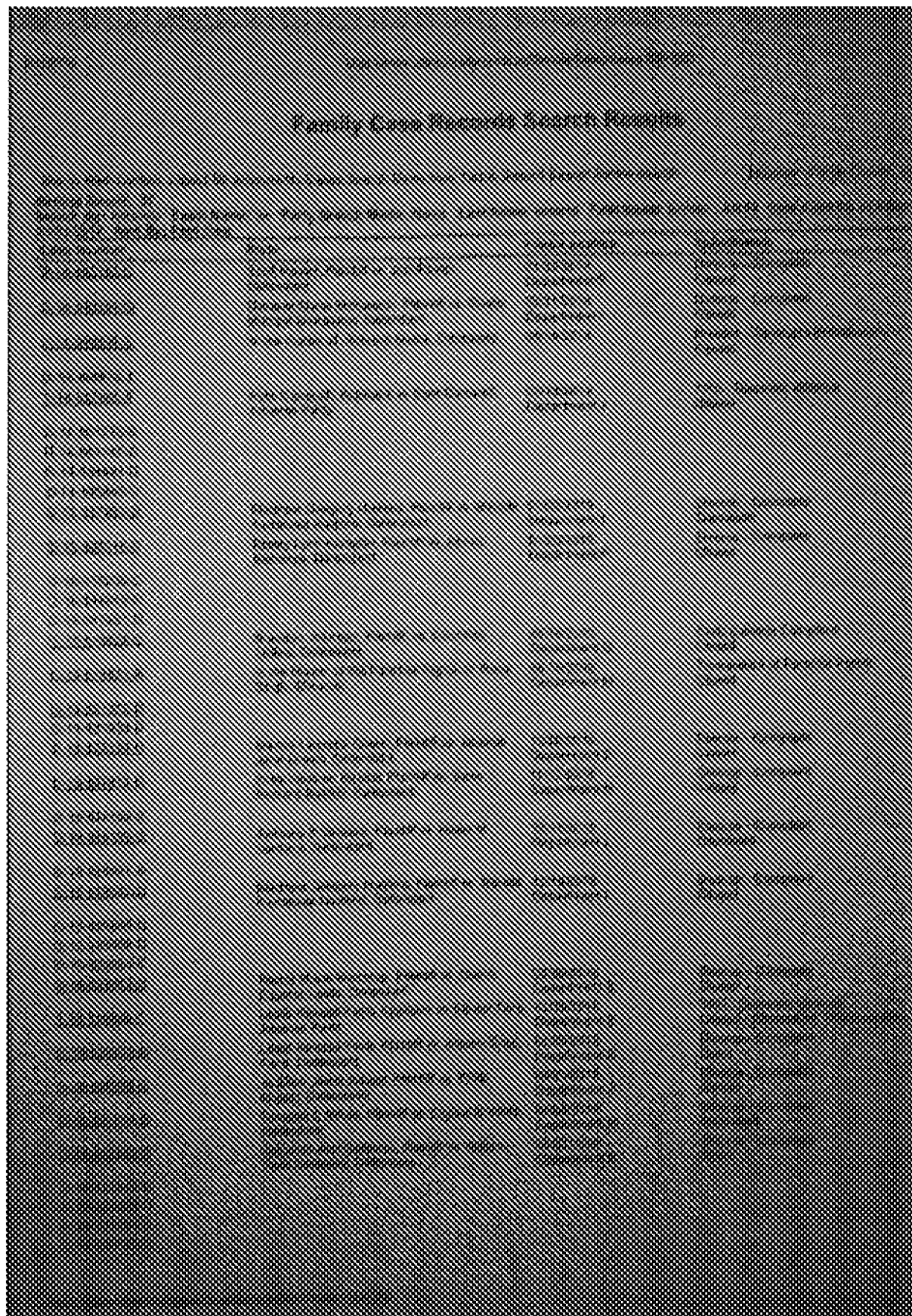
"the cornerstones of an effective, functioning judicial system are openness and transparency. Safeguarding these cornerstones requires public access not only to the judicial proceedings but also to judicial records and documents."



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!

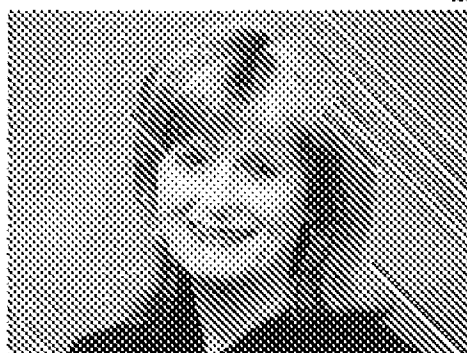


It also appears, however, that at least one of her cases, and perhaps more, may have been sealed to protect her own reputation, rather than to serve a compelling client privacy or safety interest.



[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](#)

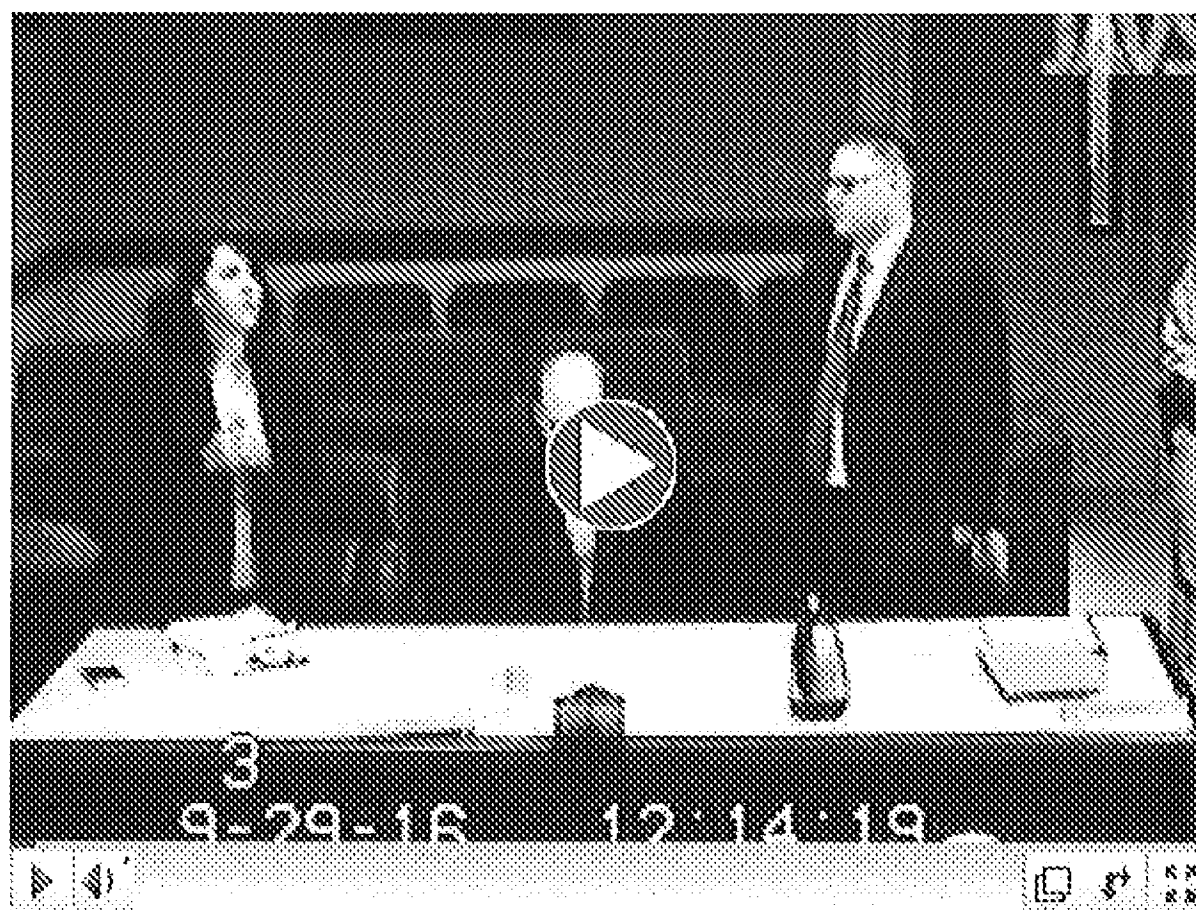
In response to our article, Abrams sought and obtained a court order from Judge Elliott which does not name VIPI, but which purports to apply to the entirety of the general population. VIPI, however, was

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.



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

Learn More

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

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

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

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

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



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

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

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

The Court stated:

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

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

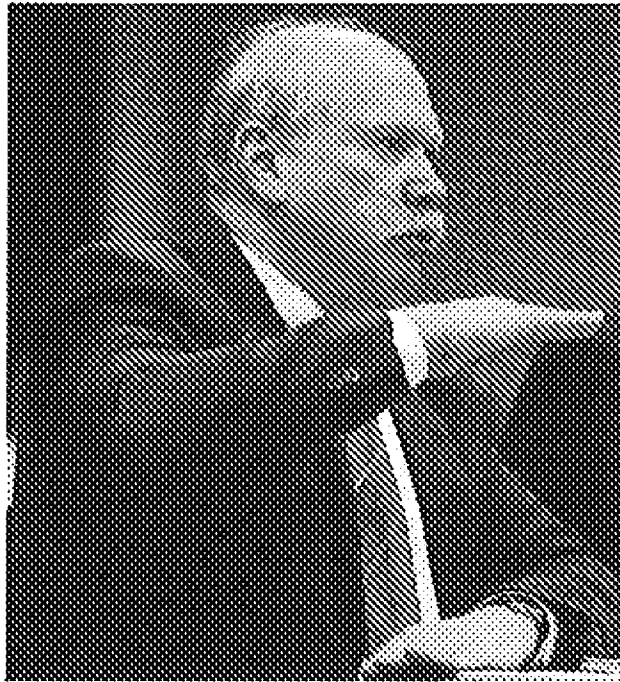
In the *Saiter* case, no notice was given to the general public for a hearing before the Order was issued, there was no opportunity for the public to be heard, no specific findings were made in the Order, and the Order was not drafted narrowly.

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

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

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

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



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



So, who is to blame here?

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

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

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

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

[Learn More](#)

JENNIFER ABRAMS
 DISTRICT COURT CLERK
 CLARK COUNTY, NEVADA
 10/10/2016 10:01 AM
 10/10/2016 10:01 AM

DISTRICT COURT
 FAMILY COURT DIVISION
 CLARK COUNTY, NEVADA

BRANIM PALM SAUER, Plaintiff, vs. TINA MARIE SAUER Defendant.	CASE NO. 16-0017-D DEPT NO. 1 HEARING DATES: 9/28/16 HEARING TIMES: 10:00 AM
---	---

**ORDER PROHIBITING
 DISSEMINATION OF CASE MATERIAL**

This matter having come before the Court for several pending matters on the
 28th day of September at 10:00 a.m., Plaintiff Branim Palm Sauer represented by Jennifer
 Abrams, Esq. and Brandon Leavelle Esq. and Defendant Tina Marie Sauer represented
 by Louis Schneider, Esq. and the Court hearing preliminary matters, continued 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 pursuant to FRCR 1.02(b)
 (3)(d).

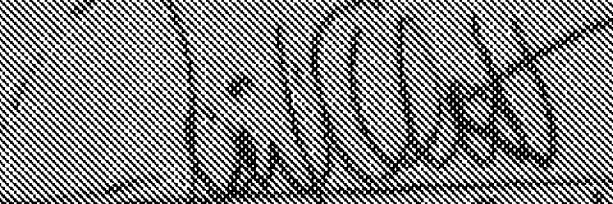
Thereafter, the videotape of this hearing was posted on youtube and a link to
 the video was emailed to multiple third parties not involved in the case on or about the
 3rd day of October, 2016.

On October 3, 2016, the parties received all orders required for a hearing on
 grounds. Counsel then stipulated to seal the case and to disallow any further release of

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 123.080, NRS 123.110, 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, seeking 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 123.080, NRS 123.110, 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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Veterans In Politics International Inc.

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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.

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Judge Alex Painful Racial Mistake Pt 1

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What The Flush?

Time 2:10:00
10,000 views



11h02m43s

Steve Sanson
51 views



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

Steve Sanson
Recommended for you NEW



Judge Elliott gave child custody to pedophile

Time 2:10:00
25,759 views



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

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5



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IN POLITICS

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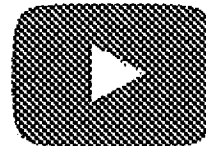
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You are here: [Home](#) / [News](#) / Clark County Family Court Judge willfully deceives a young child

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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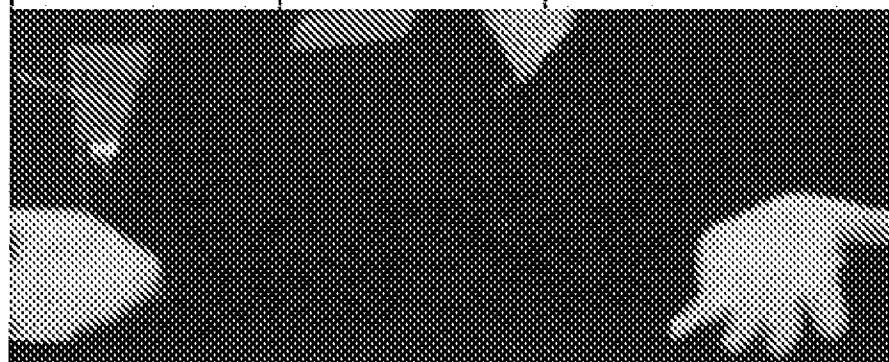
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Photos



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=cmGgluVIjQk>

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=wIITWLABhxo>

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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[Welthy Silva to Appear On
the "Veterans In Politics"
Video-Talk-Show to discuss a
Judge unethical behavior](#)

12

12

EXHIBIT 6

EXHIBIT 6

EXHIBIT 6




VIDEO 2 The Abrams

https://www.youtube.com/watch?v=9--DFZPN-wE

Apps Clark County - Docu... Galaxy Career Study Lab Business Entry Search Clark County Record... Parcel Number Look... Site Index - MLaw

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Steve Sanson

14 views

Published on Dec 21, 2016

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

The Book of Enoch: The Book for the Final Generation! The Awakening.

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

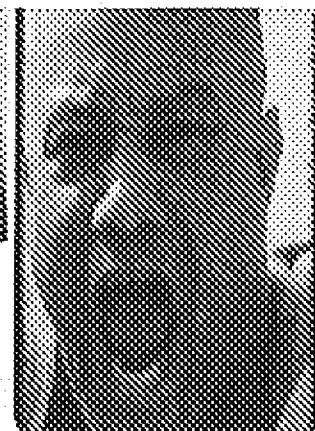
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Veterans In Politics

@VIPSteveSanson

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

Las Vegas, Nevada

veteransinpolitics.org

Joined February 2009

Born on September 22

3,285 Photos and videos



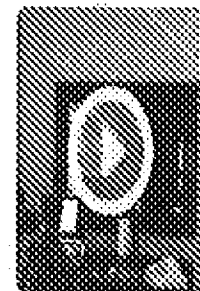
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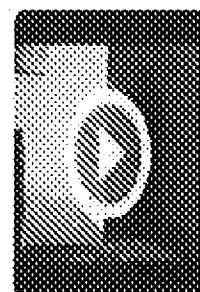


VIDEO 3 The Abrams Law Firm Practices p 2
[youtube.com](https://youtu.be/DEdjsdCd1tE?)



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VIDEO 2 The Abrams Law Firm Inspection part 1: youtu.be/9--DFZPN-wE? via @YouTube



VIDEO 2 The Abrams Law Firm Inspection part 1
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Veterans In Politics @VIPSteveSanson

Steve Sisolak & Isaac E. Barron & Michael Davis to appear on the

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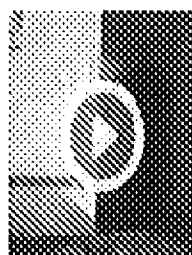
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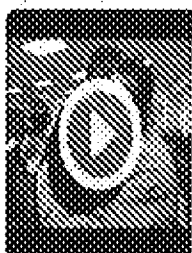
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Judge spends night in jail with man he
sentenced



Judge spends night in jail with man he sentenced
A North Carolina judge felt he had to hold a man
accountable for lying about a urine test although there

Steve Sanson · Public 3d



VIDEO 3: The Abrams Law Firm Practices p2

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Steve Sanson · Public 2d



VIDEO 2: The Abrams Law Firm Inspection part 1

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Steve Sanson · Public 6d

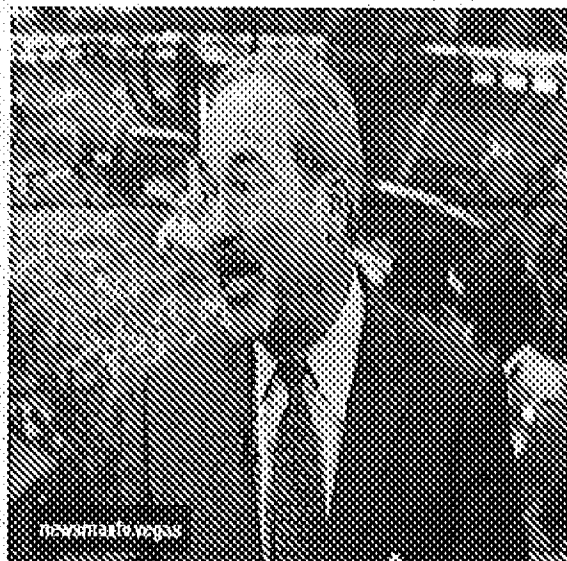


VIDEO 1: The Abrams Law Firm 10 05 15

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DOCKETING STATEMENT CIVIL APPEALS

1. Judicial District: EIGHTH Department: XII
County: CLARK Judge: MICHELLE LEAVITT
District Ct. Case No.: A-17-749318-C

2. Attorney(s) filing this docket statement:

Attorney: MARSHAL S. WILICK, ESQ. Telephone: (702) 438-4100

Firm: WILICK LAW GROUP

Address: 3591 East Bonanza Road, Suite 200
Las Vegas, Nevada 89110-2101

Co-Counsel: JOSHUA P. GILMORE, ESQ. Telephone: (702) 562-8820

Firm: BAILEY KENNEDY, LLP

Address: 8984 Spanish Ridge Ave,
Las Vegas, Nevada 89148

Client(s): Jennifer V. Abrams and The Abrams & Mayo Law Firm

If this is a joint statement completed on behalf of multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondent(s):

Attorney: JOSEPH W. HOUSTON, ESQ. Telephone: (702) 982-1200

Firm: Joseph Houston Law Office

Address: 430 S. Seventh St.
Las Vegas, Nevada 89101

Client(s): Louis C. Schneider, and Law Offices of Louis C. Schneider,
LLC

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- | | |
|---|--|
| <input type="checkbox"/> Judgment after bench trial | <input checked="" type="checkbox"/> Dismissal: |
| <input type="checkbox"/> Judgment after jury verdict | <input type="checkbox"/> Lack of jurisdiction |
| <input type="checkbox"/> Summary judgment | <input type="checkbox"/> Failure to state a claim |
| <input type="checkbox"/> Default judgment | <input type="checkbox"/> Failure to prosecute |
| <input type="checkbox"/> Grant/Denial of NRC 60(b) relief | <input checked="" type="checkbox"/> Other (specify): <u>Dismissal of</u> |
| | <u>Claims pursuant to NRS 41.660.</u> |
| <input type="checkbox"/> Grant/Denial of injunction | <input type="checkbox"/> Divorce Decree: |
| <input type="checkbox"/> Grant/Denial of declaratory relief | <input type="checkbox"/> Original <input type="checkbox"/> Modification |
| <input type="checkbox"/> Review of agency determination | <input type="checkbox"/> Other disposition (specify): <u>N/A</u> |

5. Does this appeal raise issues concerning any of the following? N/A.

- ☐ Child custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

- ***Jennifer V. Abrams; and The Abrams & Mayo Law Firm v. Steve W. Sanson; and Veterans in Politics International, Inc.***, Supreme Court Case No. 73838 (District Court Case No. A-17-749318-C).
- ***Veterans In Politics, International, Inc., et al. v. Marshal S. Willick, et al.***, Supreme Court Case No. 72778 (District Court Case No. A-17-750171-C).

- ***Brandon Paul Saiter v. Tina Marie Saiter***, Supreme Court Case No. 72819 (District Court Case No. D-15-521372-D)

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (*e.g.*, bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

N/A

8. Nature of the action. Briefly describe the nature of the action and the result below:

Jennifer V. Abrams and her law firm, The Abrams and Mayo Law Firm (together, the “Abrams Parties”), initiated this action against, among others, Louis Schneider and its principal, Louis C. Schneider (together, the “Schneider Parties”) for hiring Veterans in Politics International, Inc. (together with its principal Steve W. Sanson, the “VIPI Parties”) - a corrupt organization widely known for trying to intimidate and influence state court judges - to commence an unrelenting online smear campaign designed to harm the reputation of Ms. Abrams and the goodwill of her law firm in an effort to use out-of-court pressure to leverage results in a case in which Ms. Abrams and Mr. Schneider represented opposing parties.

The Schneider Parties filed a special motion to dismiss (a/k/a SLAPP¹ Motion) pursuant to NRS 41.660, arguing that they were sued for engaging in statutorily-protected speech and that the Abrams Parties lacked prima facie evidence supporting their claims.

The Abrams Parties opposed the SLAPP Motion, arguing that they did not sue the Schneider Parties for making communications (i) that were either truthful when

¹ “SLAPP” is an acronym for strategic lawsuit against public participation.

1 made or made without knowledge of their falsehood; (ii) in direct connection with an
2 issue of public interest; or (iii) in a place open to the public or in a public forum.
3 Even though the burden did *not* shift to them, the Abrams Parties also submitted
4 substantial evidence demonstrating that they have a probability of prevailing on their
5 claims; notwithstanding, the Abrams Parties requested time to conduct limited
6 discovery in the event that the District Court questioned the sufficiency of the
7 evidence supporting their claims, to prove how and why Schneider had hired VIPI to
8 conduct the smear campaign.

9 On July 5, 2017, Judge Leavitt rendered an oral decision, but no written
10 decision was submitted or entered in regard to the Schneider Parties.

11 On April 24, 2018, the District Court entered an Order Granting Schneider
12 Defendants' Special Motion to Dismiss Plaintiffs' Suit Pursuant to NRS 41.660. This
13 appeal timely followed.

14
15 **9. Issues on appeal.** State concisely the principal issue(s) in this appeal (attach
16 separate sheets as necessary):

- 17
18 ● Whether the Schneider Defendants met their initial burden of proof,
19 pursuant to NRS 41.660(3)(a), for each cause of action at issue in the
20 Abrams Parties' First Amended Complaint, including:
- 21 ○ Whether the Schneider Parties demonstrated, by preponderance
22 of the evidence, that they were sued for making communications
23 "in direct connection with an issue of public interest," NRS
24 41.637(4);

- Whether the Schneider Parties demonstrated, by preponderance of the evidence, that they were sued for making communications “in a place open to the public or in a public forum,” *id.*;
- Whether the Schneider Parties demonstrated, by preponderance of the evidence, that they were sued for making communications that were “Truthful or [were] made without knowledge of [their] falsehood;
- Assuming (*arguendo*) that the Schneider Parties met their burden, whether the Abrams Parties demonstrated, with prima facie evidence, a probability of prevailing on at least some of their claims in accordance with NRS 41.660(3)(b); and
- Whether the Abrams Parties should have been permitted to conduct limited discovery pursuant to NRS 41.660(4).²

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceeding presently pending before this court which raise the same or similar issues raised in this appeal, list the case name and docket number and identify the same or similar issues raised:

Abrams v. Sanson, Supreme Court Case No. 73838, was raised on the exact same issues only relating to the Sanson Parties as the defendants in the same underlying case. The *Veterans In Politics, International, Inc., et al. v. Marshal S. Willick, et al.*, case is extremely similar, with the only notable variation being the exact words used in the smear campaign at issue in that case.

² The Abrams Parties reserve the rights to raise any issue on appeal arising out of or relating to the District Court’s April 24, 2018 Order.

1 **11. Constitutional issues.** If this appeal challenges the constitutionality of a
2 statute, and the state, any state agency, or any officer or employee thereof is not
3 a party to this appeal, have you notified the clerk of this court and the attorney
4 general in accordance with NRAP 44 and NRS 30.130?

5 ☒ N/A

6 ☐ Yes

7 ☐ No

8 If not, explain:

9 **12. Other issues.** Does this appeal involve any of the following issues?

10 ☐ Reversal of well-settled Nevada precedent (identify the case(s))

11 ☐ An issue arising under the United States and/or Nevada Constitutions

12 ☒ A substantial issue of first impression

13 ☒ An issue of public policy

14 ☐ An issue where en banc consideration is necessary to maintain uniformity
15 of this court's decisions

16 ☐ A ballot question

17 If so, explain.

18 This appeal presents a substantial issue of first-impression and of public policy.
19 Specifically, this appeal requires this court to address the following related to NRS
20 41.637(4):

21 a. Whether any statement about an attorney is automatically deemed to be
22 a matter of "public interest."

23 b. Whether defamatory comments can nonetheless be entitled to "first
24 amendment protection."

25 c. Whether a paid-for on line smear campaign is entitled to constitutional
26 protections.

- 1 d. Whether any statement related to a “closed” hearing in a divorce
2 proceeding (EDCR 5.02(a)) is automatically deemed to be a matter of
3 “public interest.”
4 e. Whether an email to a company’s private listserv constitutes a statement
5 that is “open to the public or in a public forum.” And
6 f. Whether a defendant can avoid proving that he or she was sued for
7 making a statement “which is truthful or is made without knowledge of
8 its falsehood” by instead arguing that the statement is a matter of
9 “opinion” that is incapable of defamatory import.

10 Resolution of these issues will affect defendants’ burden of proof in seeking
11 dismissal of claims pursuant to NRS 41.660.

12
13 **13. Assignment to the Court of Appeals or retention in the Supreme Court.**

14 Briefly set forth whether the matter is presumptively retained by the Supreme
15 Court or assigned to the Court of Appeals under NRAP 17, and cite the
16 subparagraph(s) of the Rule under which the matter falls. If appellant believes
17 that the Supreme Court should retain the case despite its presumptive
18 assignment to the Court of Appeals, identify the specific issue(s) or
19 circumstance(s) that warrant retaining the case, and include an explanation of
20 their importance or significance:

21
22 This appeal is not presumptively assigned to the Court of Appeals pursuant to
23 NRAP 17(b). This Court should retain the appeal because it raises an issue of first
24 impression involving both common law and a matter of statewide public importance
25 as noted *supra*. NRAP 17(a)(13) - (14). In particular, attorneys licensed to practice
26 law in Nevada have an interest in knowing whether publicized statements about what
27

they say or do (whether true or false) automatically fall within the purview of NRS 41.637(4), and whether they are subject to on-line defamation campaigns without recourse because they “practice in a taxpayer-funded courtroom.”

Moreover, any defamation plaintiff facing a SLAPP motion has an interest in knowing whether the defendant can avoid satisfying the truth component of NRS 41.637 by instead arguing that his or her statement about the plaintiff was a matter of opinion - a finding that should be made in conjunction with the second part of the SLAPP analysis under NRS 41.660(3)(b) (e.g., determining whether the plaintiff sued the defendant for making a false statement of *fact*) after the defendant meets his or her initial burden under NRS 41.660(3)(a).

Finally, because this Court hears and decides “an interlocutory appeal” from an order denying a SLAPP motion, NRS 41.670(4), so, too, this Court should hear and decide an appeal from an order granting a SLAPP motion.

14. Trial. If this action proceeded to trial, how many days did the trial last?

N/A

15. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal. If so, which Justice?

N/A

TIMELINESS OF NOTICE OF APPEAL

16. Date of entry of written judgment or order appealed from April 24, 2018

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review: N/A

17. **Date written notice of entry of judgment or order served** April 24, 2018

Was service by:

☐ Delivery

☒ Mail/electronic/fax

18. **If the time for filing the notice of appeal was tolled by a post-judgment motion**

(NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, and the date and method of service of the motion, and date of filing.

☐ NRCP 50(b) Date of filing _____

☐ NRCP 52(b) Date of filing _____

☐ NRCP59 Date of filing _____

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration do not toll the time for filing a notice of appeal. See *AA Primo Builders v. Washington*, 126 Nev. ___, 245 P.3d 1190 (2010).

(b) Date of entry of written order resolving tolling motion _____

(c) Date written notice of entry of order resolving motion served _____

Was service by:

☐ Delivery

☐ Mail/electronic/fax

N/A

19. **Date notice of appeal was filed** May 7, 2018

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

Appellants **Jennifer V. Abrams** and **The Abrams & Mayo Law Firm** jointly filed their Notice of Appeal on May 7, 2018.

- 20. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a), NRS 155.190, or other NRAP 4(a)(1)**

SUBSTANTIVE APPEALABILITY

- 21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:**

(a)

- | | |
|---|---------------------------------------|
| <input checked="" type="checkbox"/> NRAP 3A(b)(1) | <input type="checkbox"/> NRS 38.205 |
| <input type="checkbox"/> NRAP 3A(b)(2) | <input type="checkbox"/> NRS 233B.150 |
| <input type="checkbox"/> NRAP 3A(b)(3) | <input type="checkbox"/> NRS 703.376 |
| <input type="checkbox"/> Other(specify) _____ | |

- (b) Explain how each authority provides a basis for appeal from the judgment or order:

NRAP 3A(b)(1) provided that an appeal may be taken from a final judgment entered in an action. Pursuant to NRS 41.660(5), dismissal of an action based on a SLAPP motion “operates as an adjudication upon the merits.”

- 22. List all parties involved in the action or consolidated actions in the district court:**

(a) Parties:

- Plaintiffs: Jennifer V. Abrams; and The Abrams & Mayo Law Firm.

- Defendants: Louis C. Schneider; Law Offices of Louis C. Schneider, LLC; Steve W. Sanson; Veterans in Politics International, Inc.; Heidi J. Hanusa; Christina Ortiz; Johnny Spicer; Don Woolbright; Sanson Corporation; and Karen Steelmon.

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, e.g., formally dismissed, not served, or other:

The Sanson Parties are not parties to this appeal because they were granted relief (pursuant to NRS 41.660) under the District Court's July 24, 2017 Order. That Order has already been appealed from and is currently pending with the Supreme Court as case no. 73838.

Defendants Heidi J. Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Sanson Corporation, and Karen Steelmon (collectively, the "Hanusa Parties") are not parties to this appeal because on June 2, 2017, the Abrams Parties and the Hanusa Parties agreed in writing to dismissal (with prejudice) of all claims made by the Abrams Parties against the Hanusa Parties, with each party to bear his/her/its own fees and costs. The agreement was put on the record at the June 5, 2017 hearing. The *Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties* was entered on October 13, 2017, and was the *Notice of Entry* for that order was entered on October 16, 2017.

23. Give a brief description of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

The Abrams Parties Claims:

1st Cause of Action: Defamation

2nd Cause of Action: Intentional Infliction of Emotional Distress

3rd Cause of Action: Negligent Infliction of Emotional Distress

4th Cause of Action: False Light

5th Cause of Action: Business Disparagement

6th Cause of Action: Harassment

7th Cause of Action: Concert of Action

8th Cause of Action: Civil Conspiracy

9th Cause of Action: RICO Violations

10th Cause of Action: Copyright Infringement

11th Cause of Action: Injunction

All of the above causes of action brought by the Abrams Parties against the Schneider Parties were formally dismissed pursuant to the District Court's April 24, 2018, Order.³

24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☒ Yes

☐ No

With the *Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties* on file, the April 24, 2018, Order adjudicates any remaining claims.

25. If you answered "No" to question 24, complete the following:

³ During the June 5, 2017 hearing, the Abrams Parties agreed to dismissal of their cause of action for harassment, RICO, injunctive relief, and copyright infringement pursuant to N.R.C.P. 12(b)(5). Notwithstanding, those causes of action were encompassed by the District Court's April 24, 2018 Order.

1 (a) Specify the claims remaining pending below: N/A

2 (b) Specify the parties remaining below: N/A

3 (c) Did the district court certify the judgment or order appealed from as a final
4 judgment pursuant to NRCP 54(b)? N/A

5 ☐ Yes

6 ☐ No

7 (d) Did the district court make an express determination, pursuant to NRCP
8 54(b), that there is no just reason for delay and an express direction for the
9 entry of judgment? N/A

10 ☐ Yes

11 ☐ No

12 **26. If you answered “No” to any part of question 25, explain the basis for**
13 **seeking appellate review (e.g., order is independently appealable under**
14 **NRAP 3A(b)):**

15 N/A

16
17 **27. Attach file-stamped copies of the following documents:**

- 18 ● The latest-filed complaint, counterclaims, cross-claims, and third-party
19 claims
- 20 ● Any tolling motion(s) and order(s) resolving tolling motion(s)
- 21 ● Orders of NRCP 41(a) dismissals formally resolving each claim,
22 counterclaims, cross-claims and/or third-party claims asserted in the
23 action or consolidated action below, even if not at issue on appeal
- 24 ● Any other order challenged on appeal
- 25 ● Notice of entry for each attached order

26 **See the following attached documents:**

- Exhibit 1: First Amended Complaint, filed January 27, 2017
- Exhibit 2: 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 entered on April 24, 2018.
- Exhibit 3: 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 entered on April 24, 2018.

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VERIFICATION

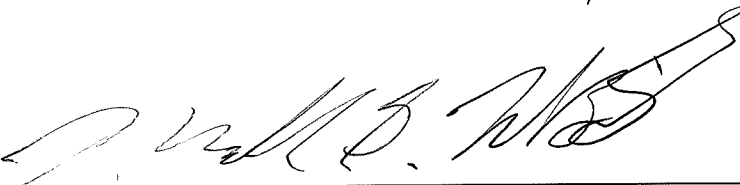
I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Jennifer V. Abrams and The Abrams & Mayo Law Firm

Name of appellants

Marshal S. Willick, Esq.

Name of counsel of record



Signature of Counsel of Record

May 29, 2018

Date

Clark County, Nevada

State and county where signed

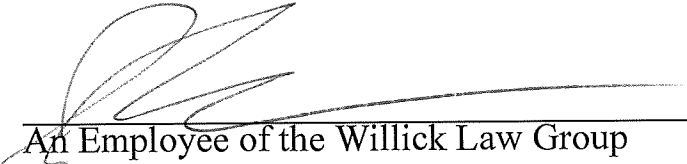
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 29th day of May, 2018, documents entitled *Docketing Statement - Civil Appeals* were filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorneys listed below at the address, email address, and/or facsimile number indicated below:

Maggie McLetchie, Esq.
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An Employee of the Willick Law Group

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