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Attorney for Appellant

Electronically Filed
Aug 17 2020 01:10 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

****

GREG ELLIOT PELKOLA, Appellant, HEIDI MARIE PELKOLA, Respondent.	Sup. Ct. No. : 80763 Dist. Ct. No. : D488682 APPELLANT'S APPENDIX VOLUME 3

DATED this 23rd day of July 2020.

/s/ Melvin R. Grimes
MELVIN R. GRIMES, ESQ.
Nevada Bar No. 12972
THE GRIMES LAW OFFICE
Attorney for Appellant

Docket 80763 Document 2020-30291

PELKOLA v. PELKOLA

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Steven D. Grierson
CLERK OF THE COURT

EXHS
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Nevada Bar No. 002791
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Nevada Bar No. 014085
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Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

HEIDI MARIE PELKOLA, Plaintiff, v. GREG ELLIOT PELKOLA, Defendant.	CASE NO.: D-13-488682-D DEPT NO.: L **FAMILY DIVISION**

PLAINTIFF'S APPENDIX OF EXHIBITS TO HER MOTION FOR RELOCATION TO OHIO AND FOR ATTORNEY'S FEES

COMES NOW, Plaintiff, HEIDI MARIE PELKOLA, by and through her attorneys, Radford J. Smith, Esq. and Kimberly A. Stutzman, Esq., of the Law Offices of Radford J. Smith, Chartered, pursuant to Rule 5.205 of the Rules of Practice For The Eighth Judicial

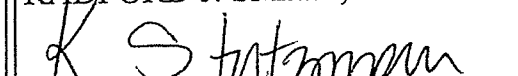
. . .

. . .

District Court of The State Of Nevada and does hereby submit his separate Appendix of Exhibits.

Dated this 1st day of October 2019.

RADFORD J. SMITH, CHARTERED



RADFORD J. SMITH, ESQ.
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Attorneys for Plaintiff

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5.	Phoenix Business Journal, dated 7/31/18
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7.	House Searches Hudson OH
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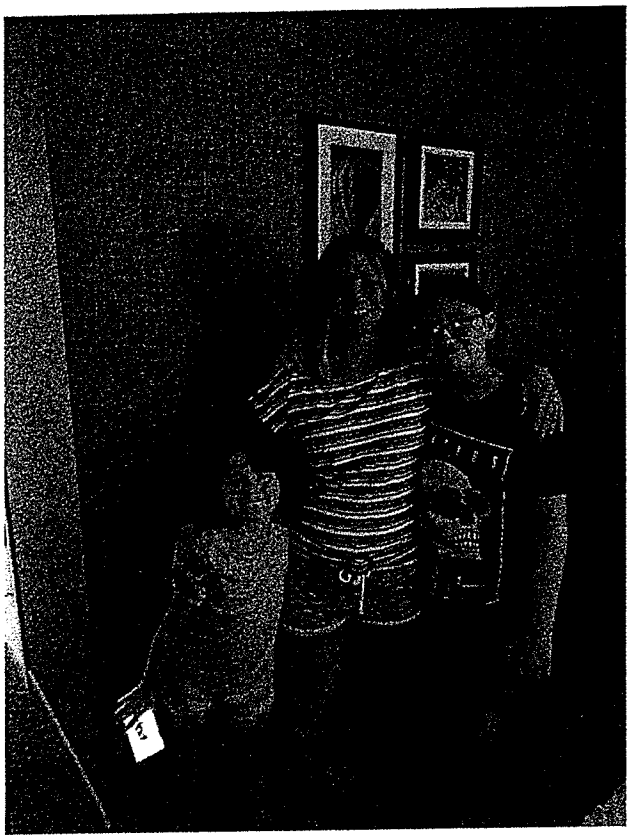
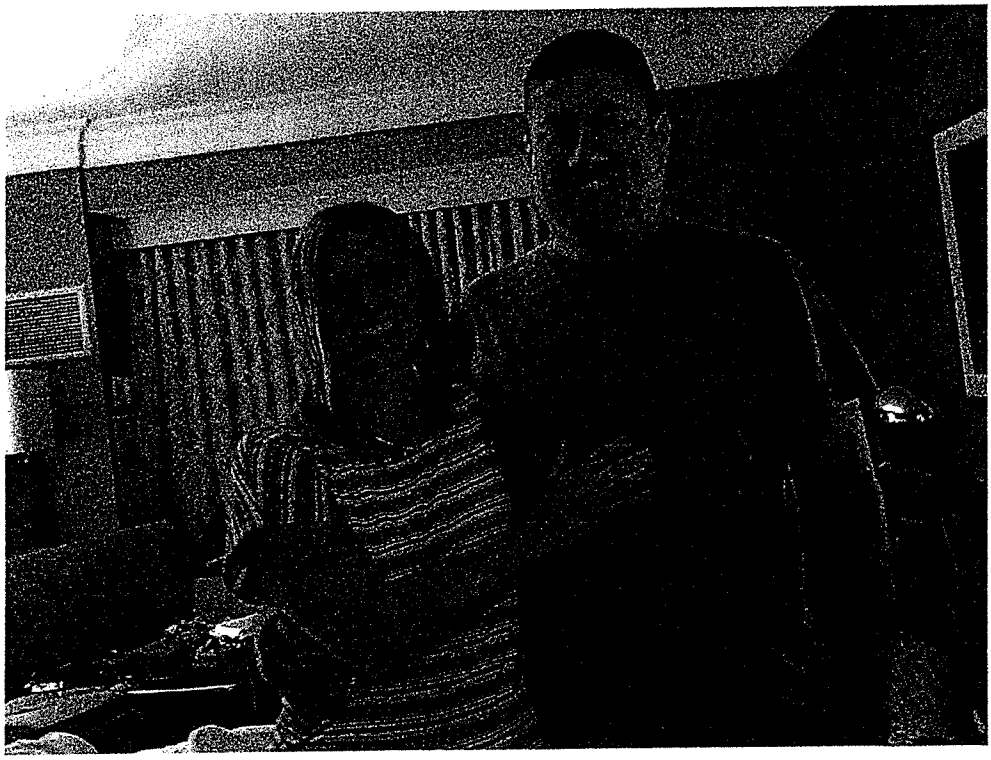
12.	Cost of Living Calculator: Phoenix AZ v. Cleveland, OH

EXHIBIT "1"





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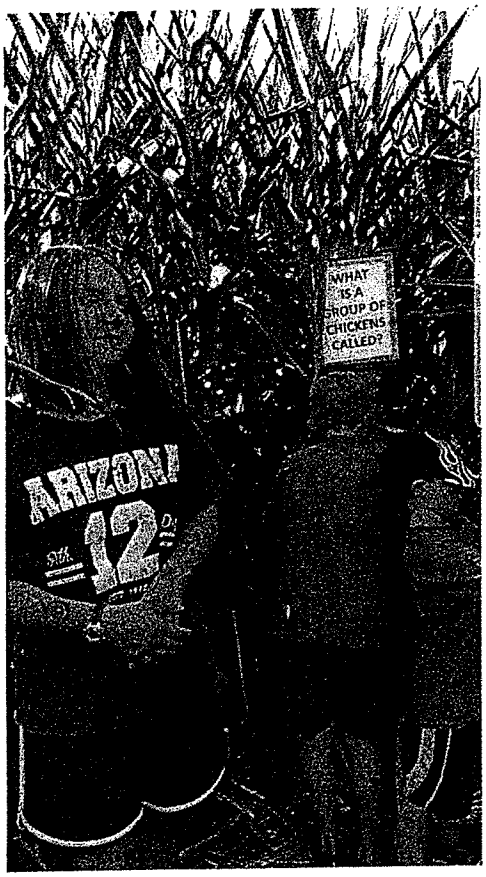
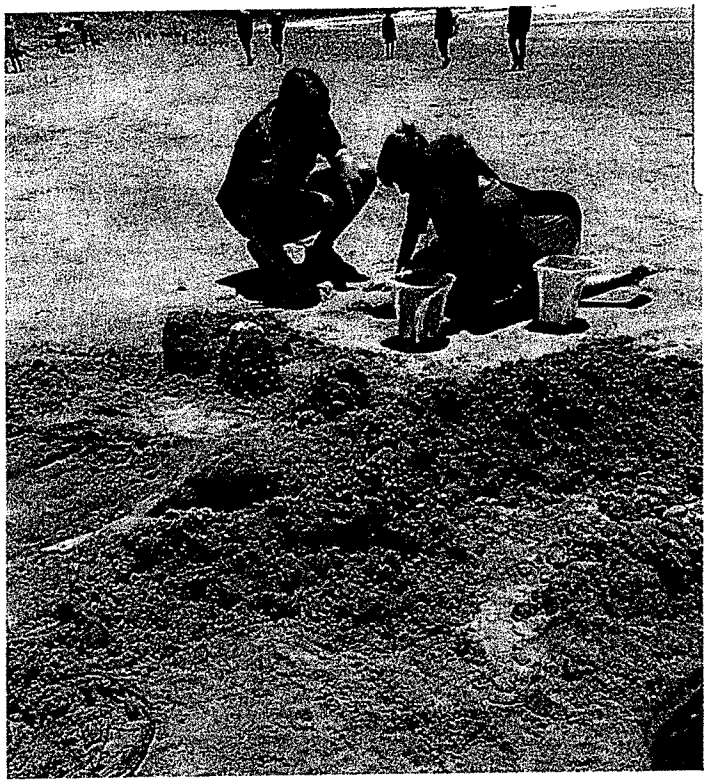
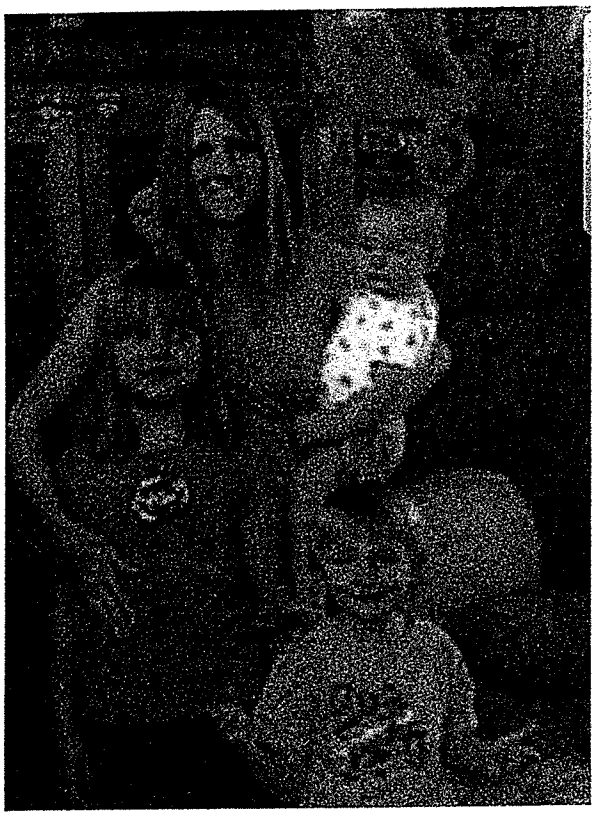
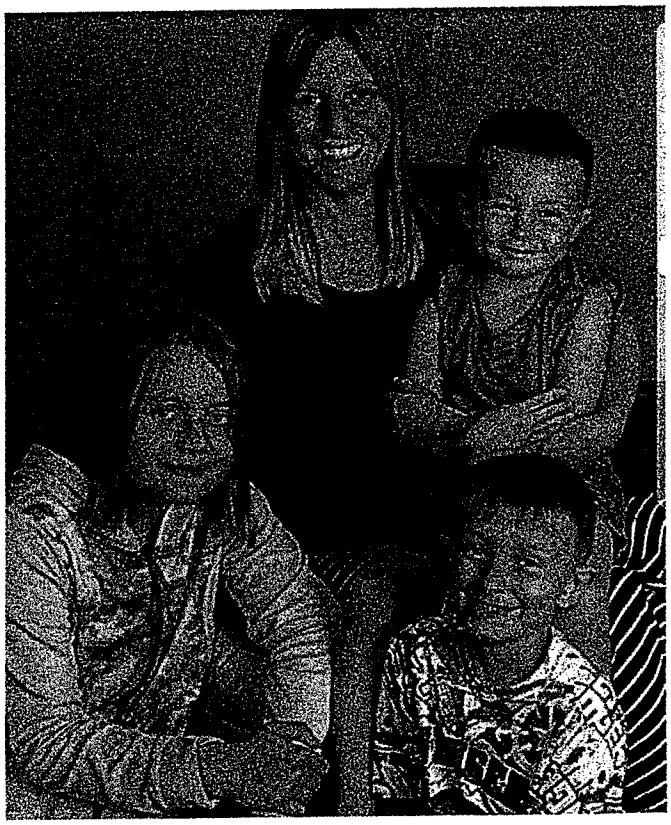
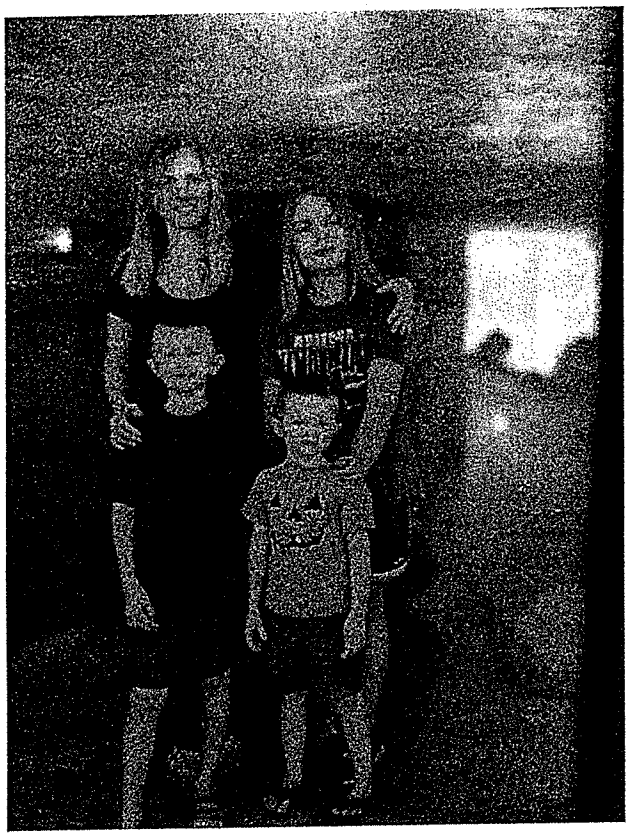
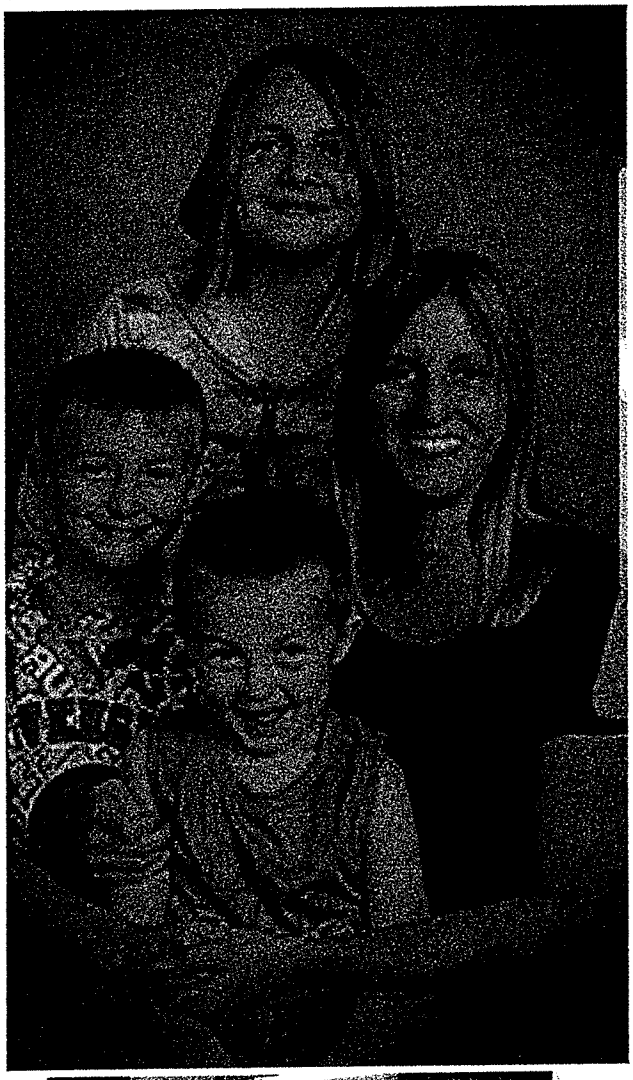

WHAT IS A GROUP OF CHICKENS CALLED?
ARIZONA
12

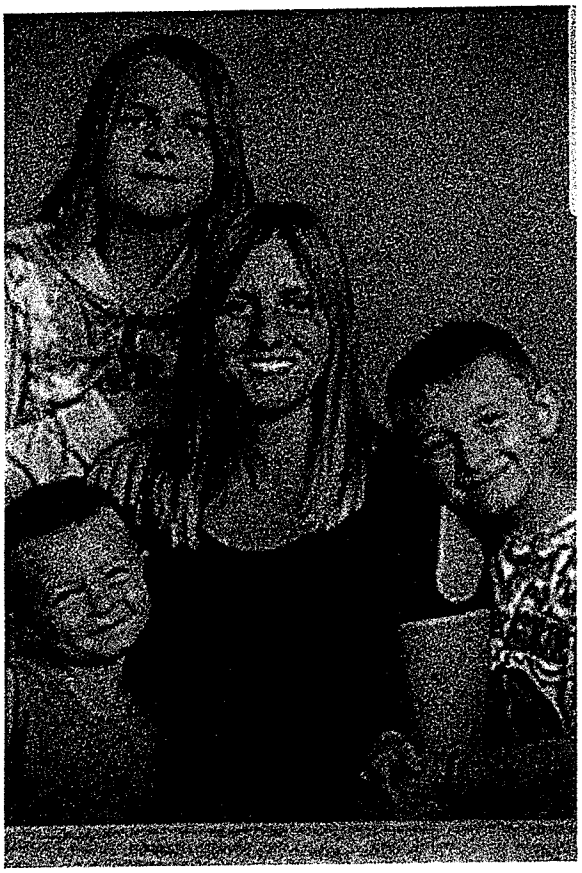


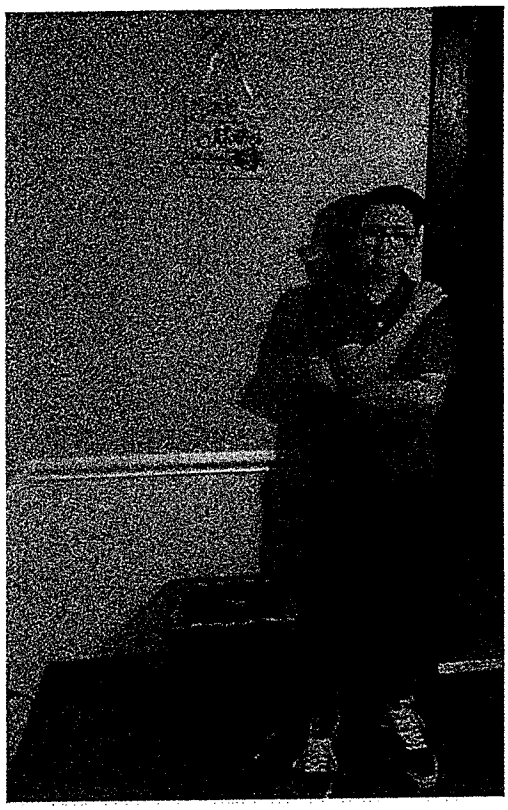












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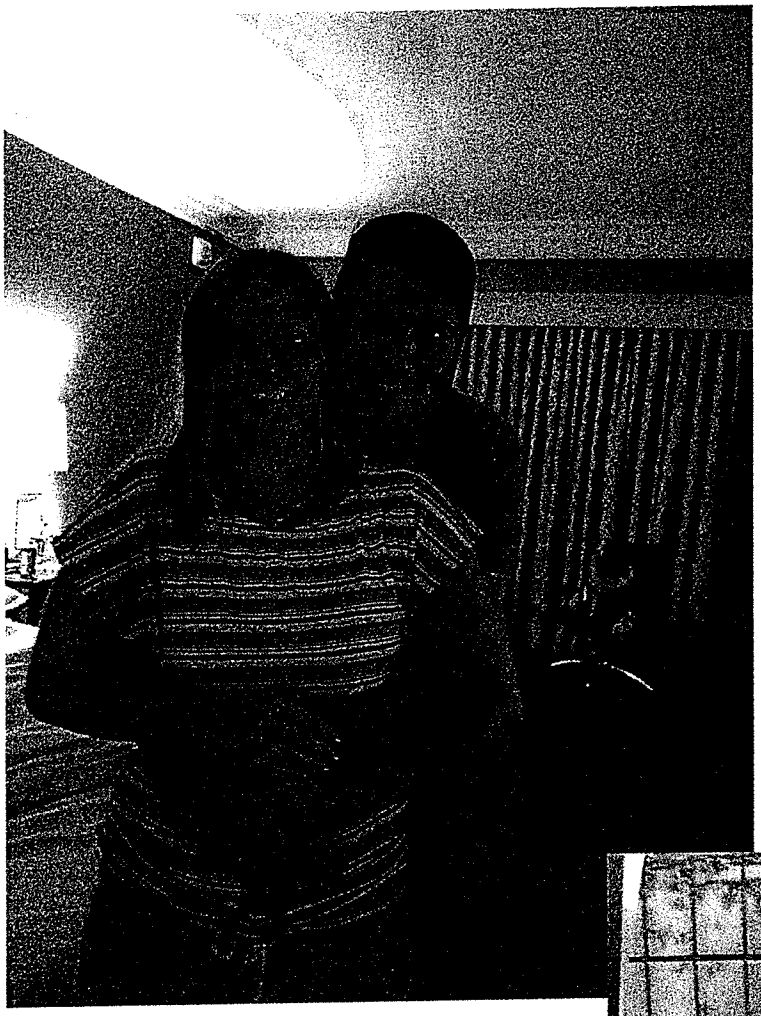


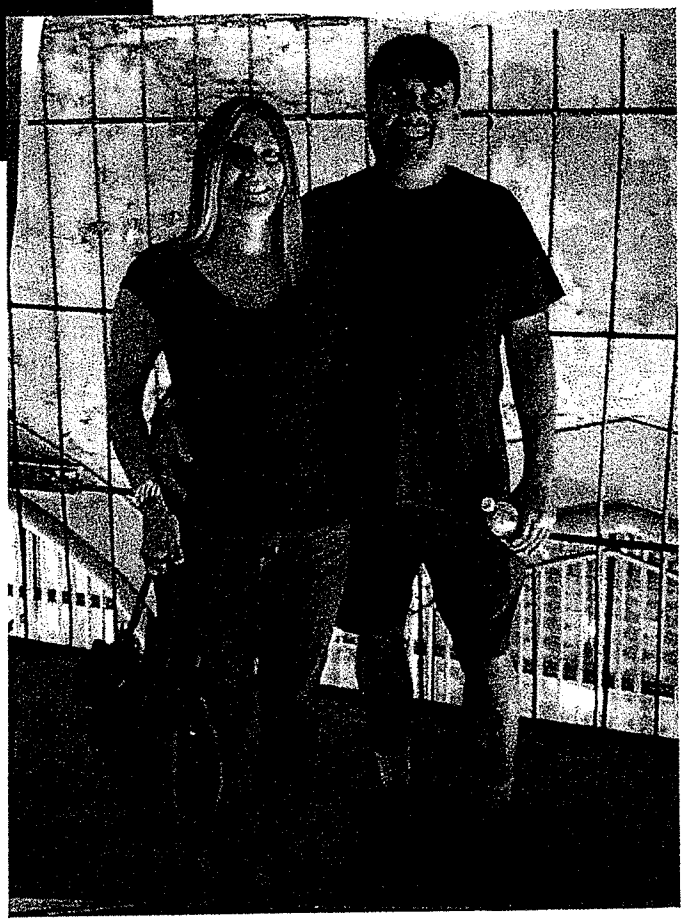


EXHIBIT "2"

4 days ago save job more...

2:30p-11p FT LPN - new

The Wellington at Northbend Crossing
Cincinnati, OH 45247

$22 an hour

Primary Purpose and Job Function: ... The LPN is on forefront of the nursing care. The LPN is expected to work within their scope of practice and remain appropriate...

Apply instantly

1 day ago save job more...

6AM-6PM LPN/RN - new

Main Street Terrace Care Center 8 reviews
Lancaster, OH 43130

Responsive employer

$27.50 - $28.50 an hour

We are currently looking for a full time day shift nurse in our 50 bed facility. Job Type: Full-time Salary: $27.50 to $28.50 /hour License: ' LPN ...

Easily apply to this job without a resume

1 day ago save job more...

LPN - Emergency Department, Marion General - new

Ohio Health 650 reviews
Marion, OH 43302

Equal employment is extended to all person in all aspects of the associate-employer relationship including recruitment, hiring, training, promotion, transfer....

OhioHealth save job more...

LPN Service Coordinator - new

Abbington of Pickerington
Pickerington, OH 43147

Assist with training and education of resident assistance. ... Complete resident assessments to determine initial and ongoing needs of the residents' medical and...

Apply instantly

Sponsored 2 days ago save job

LPN

Brookdale Senior Living
Beavercreek, OH

$20 - $23 an hour

Assist resident care coordinator in creating individualized service plans based on resident needs \". ... Want to join a great team, apply now!

Apply instantly

Sponsored save job

RN / LPN - Providence Care Center

CHI Living Communities 5 reviews
Sandusky, OH 44870

Providence Care Center, a continuing care retirement center in Sandusky, Ohio, is seeking energetic and dedicated RN or LPN with excellent clinical skills and...

Sponsored by Recruitology save job

« Previous 1 2 3 4 5 6 7 Next »

Nurses (LPN) - Full Time - New Wages! - Sign on Bonus!

Heritage of Hudson 11 reviews - Hudson, OH
$20.00 - $24.15 an hour

Apply Now

Heritage of Hudson is currently looking for energetic, caring Licensed Practical Nurses (LPNs) that want to grow within a positive environment.

Who we are:

We are an 80 bed, newly updated skilled nursing facility loca in Hudson, OH! We love our employees as much as we love our residents, and it shows through the working environment we provide. Often you will see teamwork taking place, becau we strive for a Culture of Care. If you choose to join our tean and family, you won't regret it.

What we can do for you:

- $3000 Sign on Bonus
- 12 hour shifts
- Night Shift Differential
- Medical, dental, vision insurance
- Tuition reimbursement
- Double Holiday pay
- Generous PTO plan
- Competitive wages
- 401k with employer match

Who we are looking for:

We are looking for nursing professionals that truly care abou the population they are assisting with. Are you a compassionate Licensed Practical Nurse (LPN) that stays in this profession because of the feeling you get from caring for others? If so, we want you on our team. Stop in and see why you will love working at Heritage of Hudson!

Job Type: Full-time

License:

- Licensed Practical Nurse (LPN) (Required)

Work Location:

- One location

Benefits:

- Health insurance
- Dental insurance
- Vision Insurance
- Signing bonus
- Paid time off
- Retirement plan
- Tuition reimbursement

Job Type: Full-time

Salary: $20.00 to $24.15 /hour

Experience:

- EMR systems: 1 year (Preferred)
- LTC: 1 year (Preferred)
- Healthcare: 1 year (Preferred)

Education:

- Associate (Preferred)

License:

- Licensed Practical Nurse (Preferred)

EXHIBIT "3"

MyTownNEO

Hudson High School ranked No. 1 in Northeast Ohio

By FROM STAFF REPORTS
Posted May 10, 2018 at 12:01 AM
Updated May 10, 2018 at 5:23 PM

HUDSON — Hudson HIgh School was ranked No. 1 in Northeast Ohio, and No. 8 in the state, according to a recent report released Wednesday by U.S. News & World Report. It also ranked in the top 300 out of 28,813 high schools in the nation.

"There are so many good public high schools around, each with their own flavor that makes them stand out," said Brian D. Wilch, Hudson High School principal. "To find ourselves in good company on this list, or any list, is gratifying."

According to information provided by usnews.com, to produce the 2018 Best High Schools rankings, which are only available online, U.S. News teamed up with North Carolina-based RTI International, a global nonprofit social science research firm.

Wilch said that Hudson's high school students "come focused on achieving success ... we owe our parents and guardians for that."

"Our faculty is second to none. Not only do they excel in their respective teaching disciplines, they strive to make connections with students to make school a safe and supportive environment," Wilch said, regarding the school's reasons for success. "Our entire district, K-12, knows its craft well. We work as a team to carry out a progressive vision that comes from the central office and our Board of Education. In Hudson, it's always been, 'students first.'"

Another highlight at Hudson High School that attracts and retains students is the array of programs and sports, arts and clubs available, Wilch said.

This list was posted for the first time in 2007, according to information from U.S. News. Hudson first appeared on the list in 2012, ranking No. 12 statewide, and 336th nationwide. Last year, the high school was seventh statewide and 216th nationwide.

A best high school must attain performance levels "that exceed statistical expectations given the school's relative level of student poverty, as measured by state accountability test scores for all the school's students in the core subjects of reading and math," according to information from U.S. News.

It also must equal or exceed proficiency rates for "historically underserved student groups" such as low-income or minority students. The school must graduated students above national standard, and the school must prepare its students for college, as measured by participation on Advanced Placement and International Baccalaureate tests.

Reporter April Helms can be reached at 330-541-9423, ahelms@recordpub.com, or @AprilKHelms_RPC

For more on this story see the May 13 Hudson Hub-Times.

This story was updated May 10 at 5:20 p.m.

EXHIBIT "4"

Schools

Undergraduate Education

The Hudson City School District provides education for 4,886 children, Pre-K-12, that maximizes the intellectual, physical, social and emotional development of each child in a safe, nurturing, and diverse environment. We rank in the top 2 percent of Ohio districts, with an 11-year track record of Excellent and Excellent with Distinction ratings. Hudson High School is a 2008 National Blue Ribbon Award Winner. AP programs rank in the top 3 percent in the nation. 97 percent of our students attend four-year colleges. In 2010, five graduates received appointments to Federal Service Academies. We are highly competitive in athletics and have award-winning art and music programs.

In addition to Hudson's excellent public school system, the City is home to some of the finest parochial and independent schools in the state and in the country. These include:

- Hudson Montessori
- Seton Catholic
- Western Reserve Academy

Hudson has many preschool/daycare options as well:

- Le Chaperon Rouge
- The Children's Center
- Early Childhood Center
- Gloria Dei Lutheran Preschool
- The Goddard School
- Hope Preschool
- Hudson United Methodist Nursery School
- KinderCare (two locations)
- Primrose School of Hudson
- St. Mary Preschool
- TLC Child Development Center

Higher Education

Thirty-two private and public colleges and universities are located within 50 miles of Hudson with an aggregate enrollment of approximately 150,000 students. The University of Akron, a part of the State University System of Ohio, provides Summit County with a major university and houses an internationally recognized College of Polymer Sciences. It is the third largest of the 13 State universities, with an enrollment of approximately 28,000 students attending for credit and 12,000 participating in noncredit programs. Other State universities located within commuting distance of Hudson are Cleveland State University, Case Western Reserve University, John Carroll University, Notre Dame College, Ursuline College, Youngstown State University and Kent State University, whose Liquid Crystal Institute is a national leader in liquid crystal technology, and the Northeast Ohio Medical University (NEOMED)

Northeast Ohio's colleges and universities comprise the second largest concentration of educational resources in the nation. Many of the universities and technical schools in Northeast Ohio are leading institutions in industrial technology and research, including the areas of polymer science, biomedical engineering and flat panel display technology. With its university resources and vocational training programs, the region provides a steady supply of technical and managerial workers to area employers.

EXHIBIT "5"

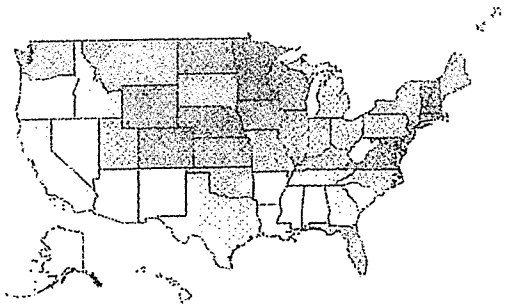
MENU

Sign In

Please Sign In and use this article's on page print button to print this article.

EDUCATION

Arizona ranks near bottom for U.S. school systems



The analysis shows Arizona suffers from a low pupil-to-teacher ratio.

WALLETHUB

By Adrian Marsh
Editorial Intern, Phoenix Business Journal
Jul 31, 2018, 7:13am MST
Updated Jul 31, 2018, 12:02pm EDT

Arizona has the fifth-worst school system in America, according to WalletHub's 2018 report on states with the best and worst school systems.

The personal finance website ranked Arizona No. 47 above Alaska, Washington D.C., Louisiana and New Mexico, the study said. Massachusetts ranked No. 1 with the best statewide school systems.

"What stands out in this report is the wide variation of public school system quality in each state," Jill Gonzalez, WalletHub analyst, told Phoenix Business Journal. "This is the result of differentiated funding from federal, state and local governments. More

2 OF 3 ARTICLES REMAINING To continue Create a FREE account or Sign in

Here are some more Arizona rankings with No. 1 being the best and 25 being average:

- Math test scores: No. 37
- Reading test scores: No. 38
- Pupil-to-teacher ratio: No. 50
- Median SAT score: No. 24
- Median ACT score: No. 39
- Percent of licensed/certified public K-12 teachers: No. 40
- Dropout rate: No. 43
- Bullying incident rate: No. 17
- Percent of threatened/injured high school students: No. 35

Gonzalez said one reason Arizona ranked so low is the pupil-to-teacher ratio, which is the highest in the country with 23.13 students per teacher. In addition, she noted an issue for Arizona high school students is access to illegal drugs, saying 29.1 percent reported they were offered drugs on school property.

For its report, WalletHub compared 25 key measures of quality and safety across the 50 states and Washington D.C. The data ranges from pupil-teacher ratio to dropout rate to median standardized test scores, according to the study.

The report isn't the first time this year Arizona has ranked in the bottom five when it comes to education. The state ranked No. 46 by the Quality Counts report by Education week, earning a D+ grade in the process.

RELATED CONTENT

2 OF 3 ARTICLES REMAINING To continue Create a FREE account or Sign in

EXHIBIT “6”

LAST CHANCE - Early Bird Premium Rates Expire September 1 close

2019 Compare Cities Education: Hudson, OH vs Phoenix, AZ

Change Cities

Highlights

- Phoenix spends 36.1% less per student than Hudson.
- The Student Teacher Ratio is 12.7% higher in Phoenix than in Hudson. (lower means fewer students in each classroom).
- Phoenix had 17.2% fewer residents who had graduated High School compared to Hudson

Education

	Hudson, OH	Phoenix, AZ	United States
Expend. per Student	$14,140	$9,039	$12,383
Educ. Expend. per Student	$13,107	$6,786	$10,574
Instr. Expend. per Student	$7,274	$3,917	$6,428
Pupil/Teacher Ratio	16.5	18.6	16.8
Students per Librarian	514	1573.9	538.1
Students per Counselor	367.1	1107.6	403.2
Grade School Educ.	0.7%	9.6%	5.4%
Some High School Educ.	1.2%	9.2%	7.2%
High School Educ.	98.0%	81.2%	87.3%
Some College Educ.	10.3%	22.1%	20.8%
2 yr College Grad.	6.0%	7.8%	8.3%
4 yr College Grad.	72.0%	27.8%	30.9%
Masters Grad.	22.1%	7.1%	8.4%
Professional Degree	5.8%	1.9%	2.0%
Doctorate Degree	4.1%	1.0%	1.4%

View More Data >

Reviews for Hudson

3 Reviews

KB - 2/19/2017
I lived in Hudson for 25 years. It's a wonderful place to raise a family. It has great public schools and an outstanding prep school in Western Reserve Academy. Crime... Read More

k | Hudson, OH | Reply | No Replies

COMPARE COST OF LIVING

Compare **Hudson, Ohio Cost of Living vs Phoenix, Arizona Cost of Living:** Taxes, Childcare, Groceries, Health...

Compare Now

ZIPS IN HUDSON, OHIO

44236

ZIPS IN PHOENIX, ARIZONA

85032, 85033, 85041, 85008, 85035, 85037, 85022, 85009, 85254, 85339, 47 total

SchoolDigger

Search

Find a School | School Rankings

Home / Ohio / Hudson City

Hudson City

District Summary

2400 Hudson Aurora Rd
Hudson, OH 44236-2322

(330) 653-1200

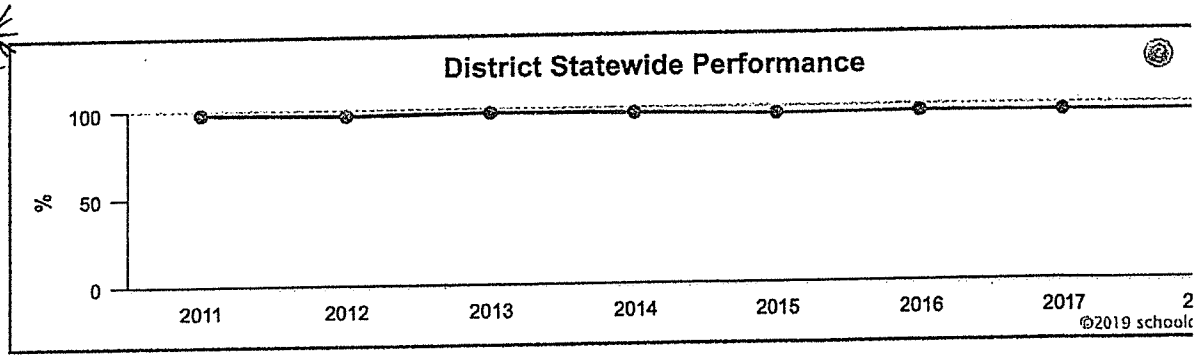
District Website

SchoolDigger Rank:
30th of 794 Ohio districts
★★★★★

Grades served: PK, KG-12
Students: 4,586

Primary Schools: 4
Middle Schools: 1
High Schools: 1
Alternative Schools: 0

See the 2018 Ohio District rankings!

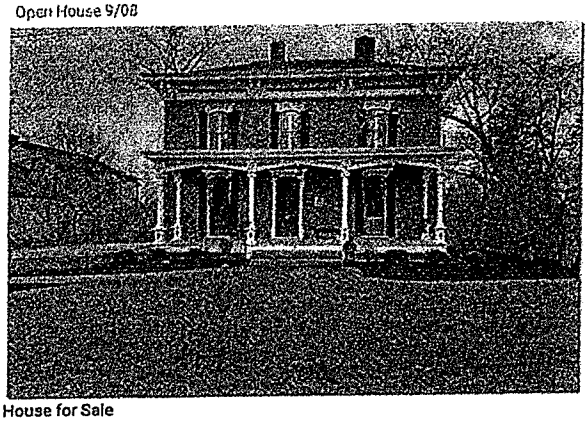


We found 6 schools.

EXHIBIT "7"

Brokered by Keller Williams Chervenic Rlty

Open House 9/08



House for Sale

$785,000

- 5 bed
- 3.5 bath
- 4,221 sqft
- 1.35 acres lot
- 2 car

278 N Main St, Hudson, OH 44236

Email Agent Contacted

Howard Hanna

Brokered by Howard Hanna - Mentor

New

House for Sale

$364,900

- 5 bed
- 2.5 bath
- 3,650 sqft
- 0.54 acres lot
- 2 car

734 Ashbrooke Way, Hudson, OH 44236

Email Agent Contacted

BERKSHIRE HATHAWAY HomeServices Professional Realty

Brokered by Berkshire Hathaway HomeServices Professional Realty

New

Photos

Contact Agent

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Share

For Sale: $350,000 (5 beds, 3 baths, 2,650 sqft)

realtor.com

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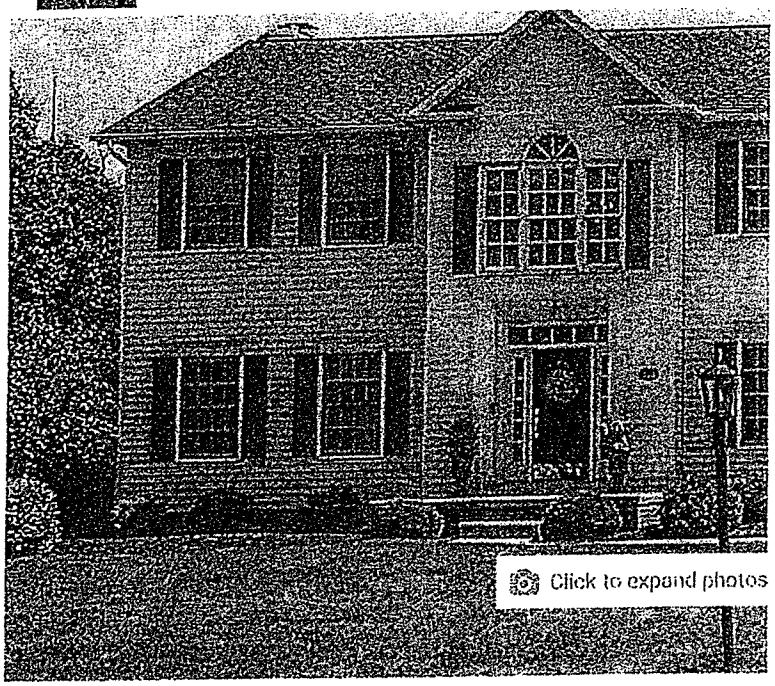
Hudson, OH

By Judie Crockett (440) 974-7444

Extraordinary Service that feels like Family!



$350,000.00
734 Ashbrooke Way
Hudson, Ohio
44236
5 bed 2.5 baths
3,650 sq ft.

PLTF000226

Save Share ooo More

$:

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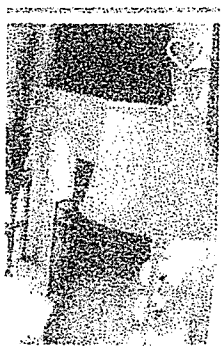
ha

1 bds 2 ba 1,522 sqft



1 bds 2 ba 1,326 sqft

PLTF000227

$350,000

Estimate Payment

Map	5	2.5	3,650	0.54
	beds	baths	sq ft	acres lot

Commute Time 734 Ashbrooke Way, Hudson, OH 44236

Add Note Hide Share

Email Agent

Open House

None at this time

Request a Private Showing

Property Details

Status	Price/Sq Ft	On realtor.com®	Type	Built
Active	$96	24 days	Single Family Home	1991

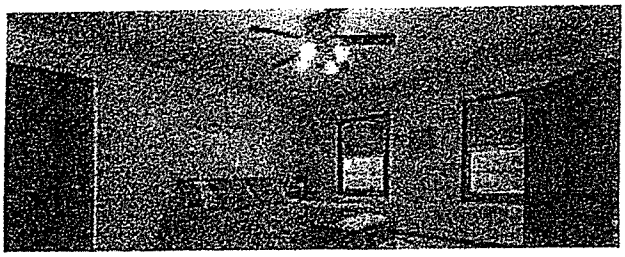
realtip Great find! This home has a finished basement. Did you find this useful?

Welcome to the lovely ashbrook. Located in an awesome community close to all amenities and highways. As you enter you will be greeted by a two story bright and spacious foyer & hardwood floors. You will find a living room and formal dining room which is adjoins to the spacious family room complete with beautiful built-ins, fireplace & lots of space

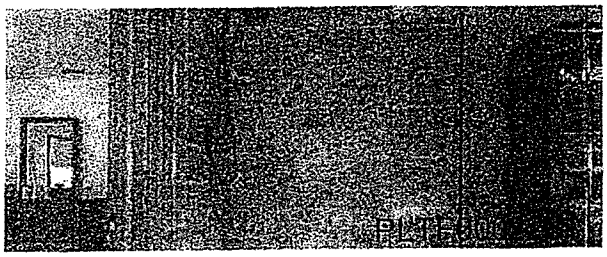
Read More

Property Features

Bedrooms



Bathrooms



WAYNE HOMES

Farmhouse Model Grand Opening Event

Tour the new Model at the Akron-Medina Model Center September 14 - 15

Get directions

Brokered by Howard Hanna - Hudson

New

House for Sale

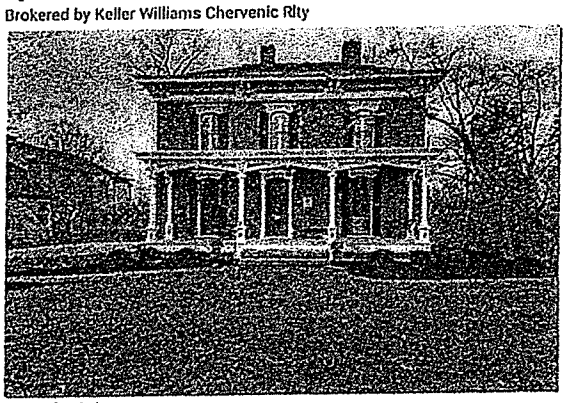
$375,000

- 5 bed
- 2.5 bath
- 2,352 sqft
- 0.74 acres lot
- 2 car

7897 Winterberry Dr, Hudson, OH 44236

Email Agent Contacted

Brokered by Keller Williams Chervenic Rlty



House for Sale

$785,000

- 5 bed
- 3.5 bath
- 4,221 sqft
- 1.35 acres lot
- 2 car

278 N Main St, Hudson, OH 44236

Email Agent Contacted

Brokered by Howard Hanna - Chesterland

New Open House 9/15

PLTF000229

House for Sale
$279,000

- 5 bed
- 3.5 bath
- 3,252 sqft
- 0.49 acres lot
- yes car

10151 Edgerton Rd, North Royalton, OH 44133
Email Agent Contacted

Howard Hanna

, Brooklyn Heights, OH
Brokered by Howard Hanna - Willoughby

Pending

List View | Map View

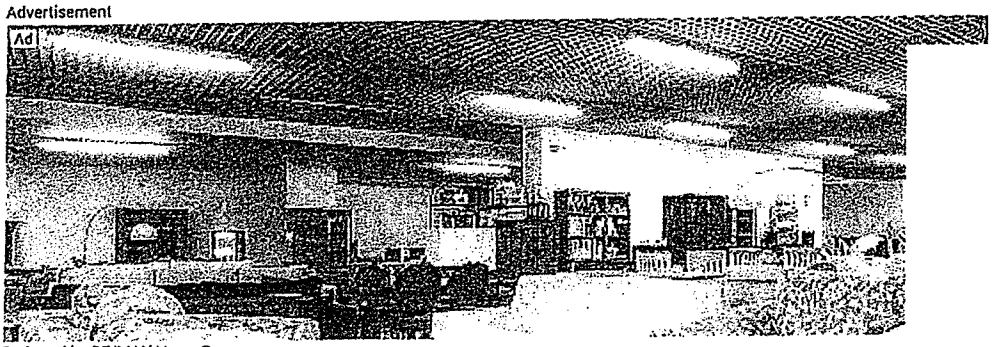
Multi-Family Home
$300,000

- 8 bed
- 4 bath
- 8,751 sqft lot
- 4 car

1423-29 Spring Garden Ave, Lakewood, OH 44107
Email Agent Contacted

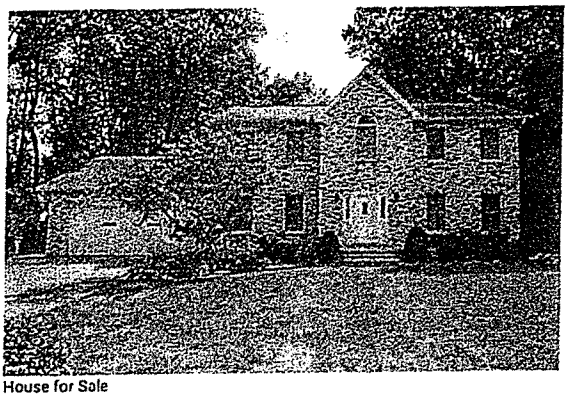
Advertisement
Advertisement

Ad



Brokered by RE/MAX HomeSource

New

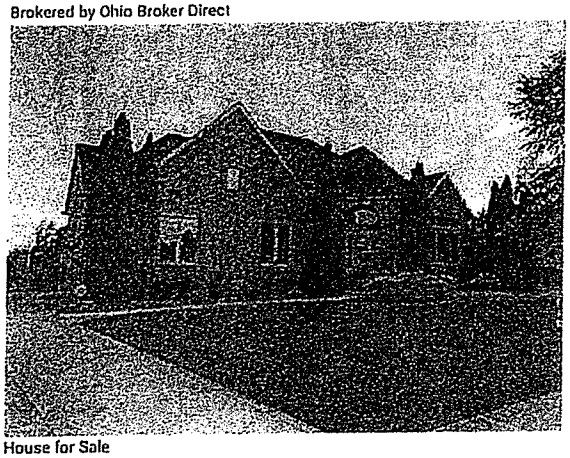


House for Sale
$274,900

- 5 bed
- 2.5 bath
- 3,896 sqft
- 0.42 acres lot
- 2 car

4141 Waxwing Trl, Stow, OH 44224
Email Agent Contacted

Brokered by Ohio Broker Direct



House for Sale
$514,900

- 5 bed
- 4.5 bath
- 6,104 sqft
- 0.55 acres lot
- 3 car

2776 Santa Anita Dr, Stow, OH 44224
Email Agent Contacted

Brokered by Cutler Real Estate Greun

Be prepared to buy

Get Pre-Approved

A pre-approval letter from a lender makes your offer stronger.

Get Pre-Approved

Moving Cost Calculator

Move From

ZIP code

Move To

ZIP code

Size of Move

2-3 Bedroom

Packing

None

Get Estimates

Silver Lake, OH Real Estate & Homes for Sale

Homes for Sale in Silver Lake, OH have a median listing price of $196,950 and a price per square foot of $117. There are 170 active homes for sale in Silver Lake, Ohio, which spend an average of 52 days on the market. Some of the hottest neighborhoods near Silver Lake, OH are Mud Brook, Fairchild, Heslop Morningview, East Village, Steels Corners. You may also be interested in homes for sale in popular zip codes like 44224, 44236, or in neighboring cities, such as Stow, Cuyahoga Falls, Hudson, Akron, Kent.

More

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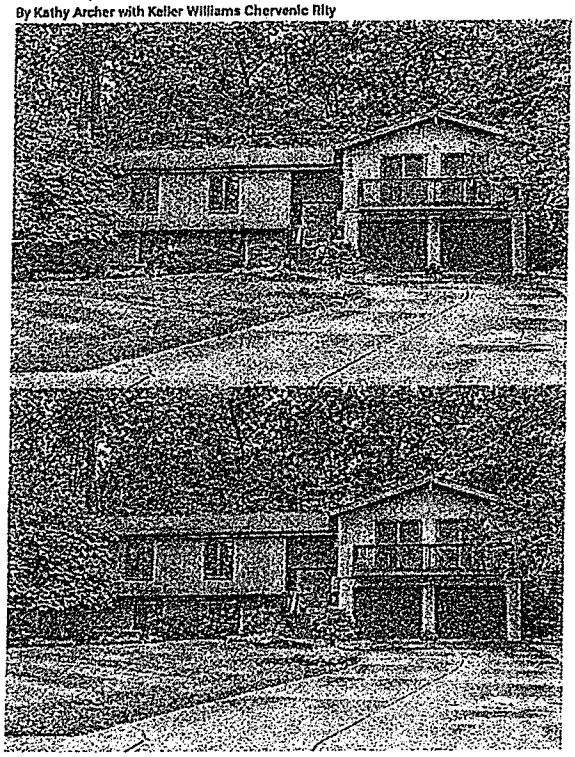
List | Map | Save Search

Email Agent Save Share

Exit Map Exit Gallery View Full Details

Presented by:
By Kathy Archer with Keller Williams Chervenic Rity



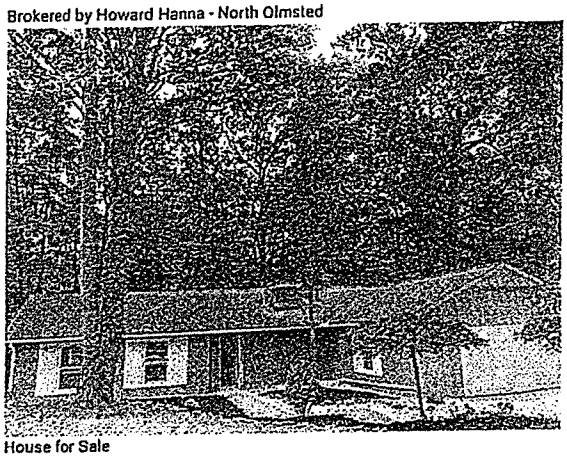
PLTF000232

- 0.4 acres lot
- 3 car

12649 Fieldstone Pt, Strongsville, OH 44149

Email Agent Contacted

Brokered by Howard Hanna - North Olmsted



House for Sale

$279,900

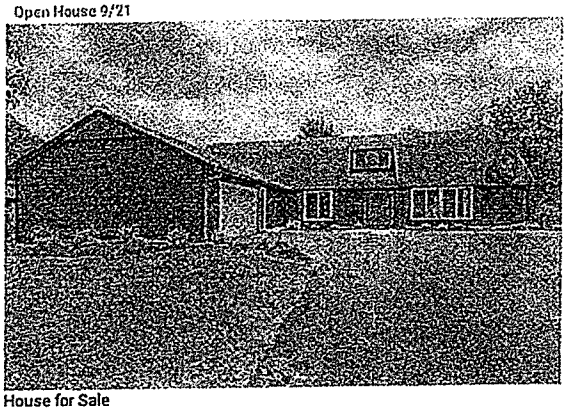
- 5 bed
- 2 bath
- 2,112 sqft
- 0.34 acres lot
- 2 car

12612 The Blfs, Strongsville, OH 44136

Email Agent Contacted

Brokered by The Russell Realty Company

Open House 9/21



House for Sale

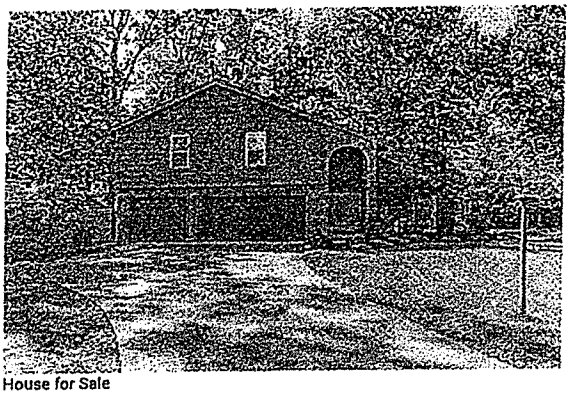
$459,900

- 6 bed
- 3.5 bath
- 3,646 sqft
- 8,006 sqft lot
- 2 car

10947 Sand Creek Cir, Strongsville, OH 44149

Email Agent Contacted

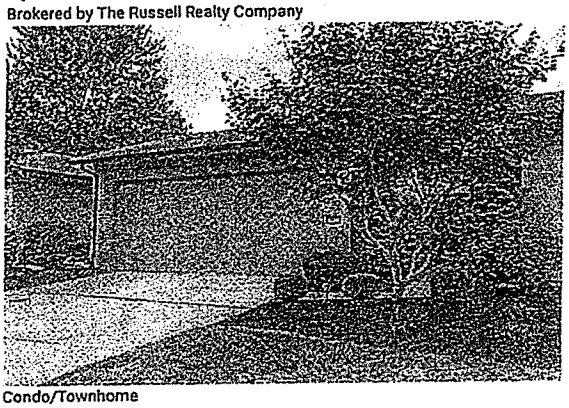
Brokered by Elite Realty, Inc.



House for Sale
$247,500
- 5 bed
- 2.5 bath
- 3,076 sqft
- 0.29 acres lot
- 3 car

16957 Hunting Meadows Dr, Strongsville, OH 44136
Email Agent Contacted

Brokered by The Russell Realty Company



Condo/Townhome
$180,000
- 3 bed
- 2.5 bath
- 1,610 sqft
- 1.48 acres lot
- 2 car

19375 Idlewood Trl Unit 18-2, Strongsville, OH 44149
Email Agent Contacted

PARKVIEW HOMES

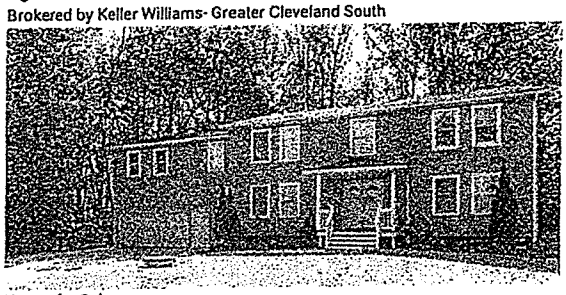
Built by Parkview Homes
New NEW CONSTRUCTION

PLTF000234

House for Sale
$359,900
- 5 bed
- 3 bath
- 2,800 sqft
- 3.0 acres lot
- 2 car

11047 Akins Rd, North Royalton, OH 44133
Email Agent Contacted

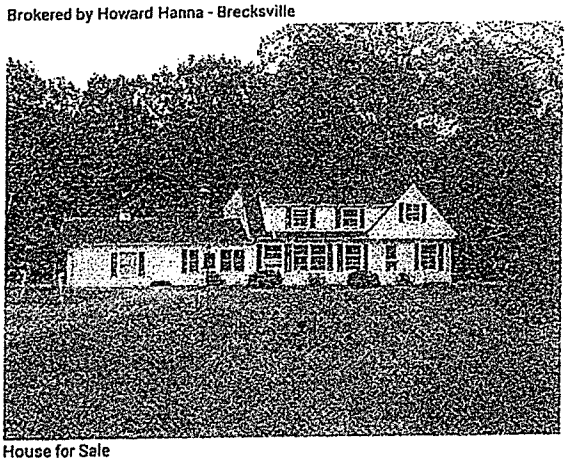
Brokered by Keller Williams- Greater Cleveland South



House for Sale
$279,000
- 5 bed
- 3.5 bath
- 3,252 sqft
- 0.49 acres lot
- yes car

10151 Edgerton Rd, North Royalton, OH 44133
Email Agent Contacted

Brokered by Howard Hanna - Brecksville



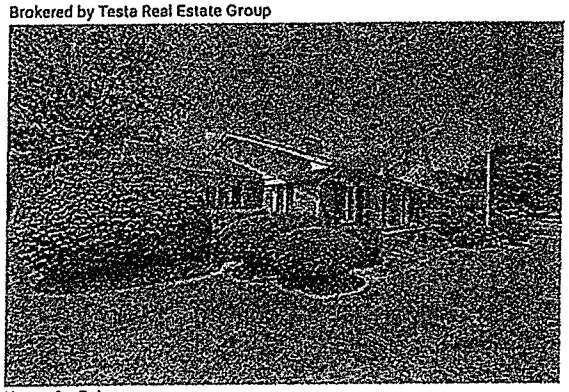
House for Sale
$299,900
- 5 bed
- 2.5 bath
- 3,504 sqft
- 2.64 acres lot
- 6 car

6383 Valley Pkwy, North Royalton, OH 44133
Email Agent Contacted

House for Sale
$375,000
- 5 bed
- 2.5 bath
- 2,352 sqft
- 0.74 acres lot
- 2 car

7897 Winterberry Dr, Hudson, OH 44236
Email Agent Contacted

Brokered by Testa Real Estate Group



House for Sale
$575,000
- 5 bed
- 4 bath
- 5,633 sqft
- 1.04 acres lot
- 4 car

3058 Silver Lake Blvd, Silver Lake, OH 44224
Email Agent Contacted

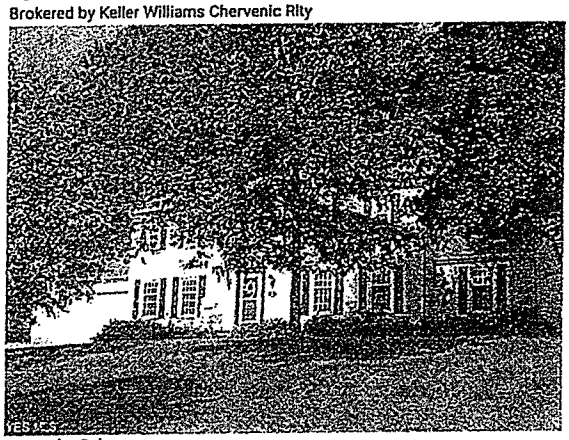
Advertisement
Advertisement

Brokered by RE/MAX Crossroads Properties

House for Sale
$399,500
- 5 bed
- 2.5 bath
- 3,930 sqft
- 0.43 acres lot
- 2 car

3124 Silver Lake Blvd, Silver Lake, OH 44224
Email Agent Contacted

Brokered by Keller Williams Chervenic Rlty



House for Sale
$289,900
- 5 bed
- 2.5 bath
- 2,644 sqft
- 0.44 acres lot
- 3 car

2977 Harriet Rd, Silver Lake, OH 44224
Email Agent Contacted

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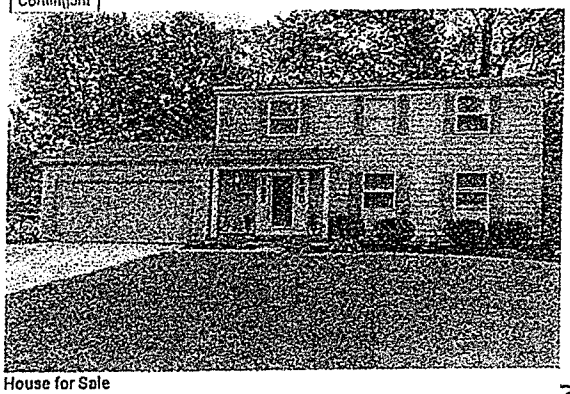
Advertisement

Brokered by Howard Hanna - Stow

Contingent



House for Sale

$215,000

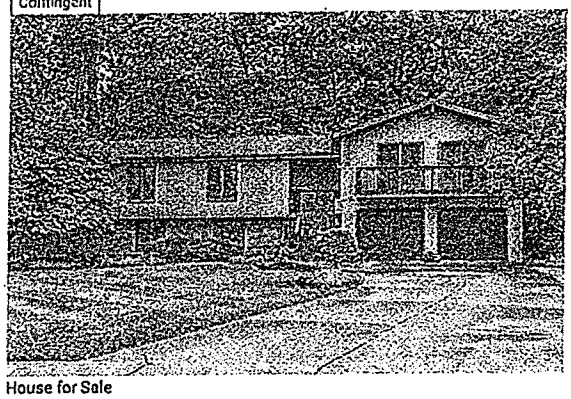
- 5 bed
- 2.5 bath
- 1,960 sqft
- 0.39 acres lot
- 2 car

1351 Whippoorwill Trl, Stow, OH 44224

Email Agent Contacted

Brokered by Keller Williams Chervenic Rlty

Contingent



House for Sale

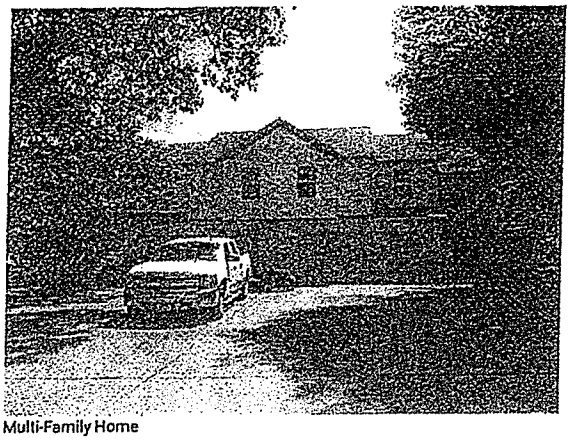
$229,900

- 5 bed
- 3 bath
- 2,652 sqft
- 0.28 acres lot
- 2 car

1445 Mockingbird Trl, Stow, OH 44224

Email Agent Contacted

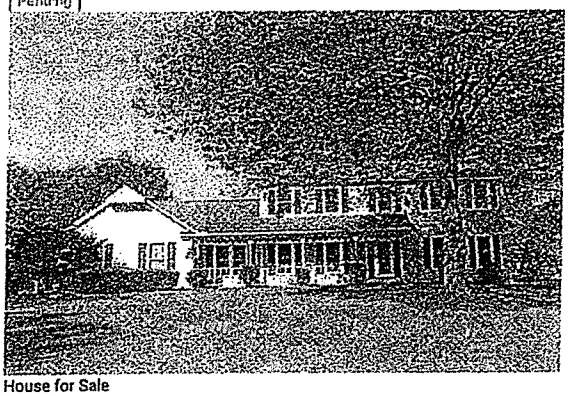
Brokered by Keller Williams Chervenic Rlty



Multi-Family Home
$297,500
- 6 bed
- 2.5+ bath
- 3,340 sqft
- 0.74 acres lot
- 4 car

1464-1466 McTaggart Rd, Stow, OH 44224
Email Agent Contacted

Brokered by Russell Real Estate Services
Pending



House for Sale
$259,900
- 5 bed
- 2.5 bath
- 3,107 sqft
- 0.32 acres lot
- 3 car

4480 Leewood Rd, Stow, OH 44224
Email Agent Contacted

Brokered by Keller Williams Chervenic Rlty
Contingent

House for Sale
$183,000

- 6 bed
- 3.5 bath
- 2,368 sqft
- 0.27 acres lot
- 3 car

4884 Algonquin Trl, Stow, OH 44224
Email Agent Contacted

Brokered by Keller Williams Chervenic Rlty

Contingent

House for Sale
$254,900

- 5 bed
- 3 bath
- 2,592 sqft
- 0.41 acres lot
- 2 car

4131 Chesterland Blvd, Stow, OH 44224
Email Agent Contacted

BERKSHIRE HATHAWAY
HomeServices
Northwood Realty Services
Brokered by Stow

EXHIBIT “8”

Google Hudson Sign in

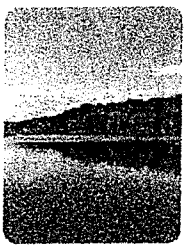
Travel guide Things to do

Hudson Springs Park

4.7 (402)

Vast park with a lake & trails

Large, 260-acre park with a huge lake for fishing, plus walking trails & pavilions.



Cuyahoga Valley National Park

4.7 (8,110)

Massive park with a scenic railroad

33,000-acre park with hiking trails, bike paths, a scenic railroad & vast array of flora & fauna.

Ohio & Erie Canal Towpath Trail

5.0 (2)

Recreation trail on historic towpath

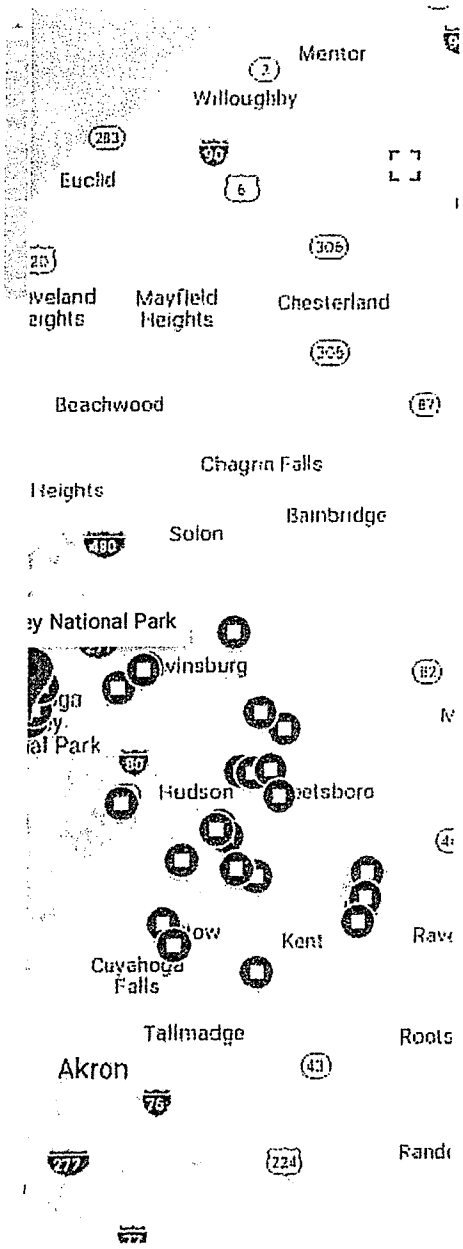
Historic 87-mi. trail for jogging, biking, birding & other activities on former canal towpath.

Bike and Hike Trail

Hiking

Barlow Farm Park

4.5 (118)



Google Maps

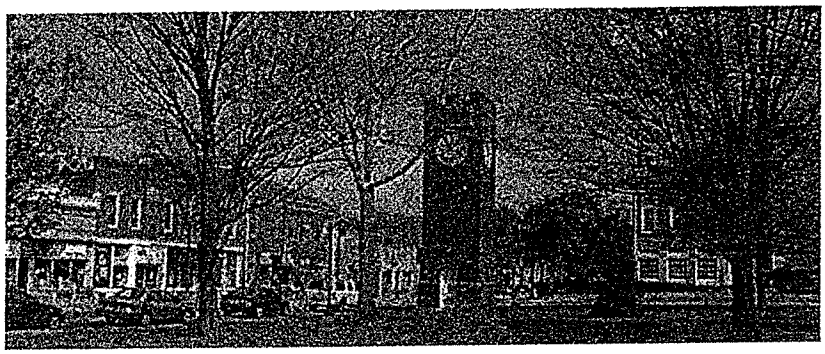
EXHIBIT “9”

HUDSON LOCAL ATTRACTIONS

HOME (HTTPS://TASTEOFHUDSON.COM/) / HUDSON LOCAL ATTRACTIONS

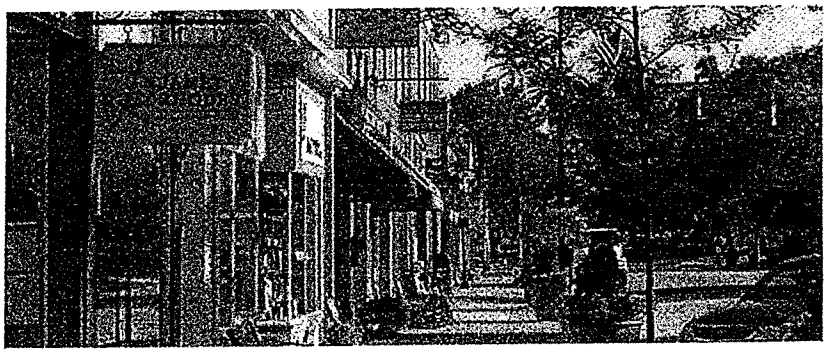
HUDSON LOCAL ATTRACTIONS

Check out these other activities in Hudson!



Destination Hudson

With more than 100 independently-owned, regional and national chain restaurants and retail shops, Hudson, Ohio is the perfect place for shopping, dining, and playing. Savor the charm of downtown Hudson as you stroll through the relaxed setting of our historic district and enjoy all Hudson has to offer. From summer concerts on the green, old-fashioned ice cream socials, home and garden tours to amazing food and wine events, Hudson offers something for everyone, and you can extend your stay with a night at one of our charming bed-and-breakfast inns. Learn More (http://www.destinationhudson.com/)



Merchants of Hudson

The Merchants of Hudson are more than 80 Hudson-based businesses — from unique retail shops and restaurants to service companies and national chains.

By working together, we ensure that visitors to Hudson have the best possible experience. Whether you're visiting for a morning or afternoon, or whether you're staying with family or enjoying one of our city's charming bed-and-breakfast inns, we want you to enjoy your visit to our city. Learn More (http://www.merchantsofhudson.com/)

Hudson Farmer's Market

The Hudson Farmers Market is a collaborative volunteer effort designed to help retain the special character of Hudson. It is a project of Leadership Hudson, a program sponsored by The Rotary Club of Hudson Clock Tower, and a collaboration between community leaders and civic-minded residents. Learn More (http://hudsonfarmersmarket.org/)

First & Main Summer Music Nights

Grab some chairs and a blanket and head over to the First & Main Village Green every Friday and Saturday in July and August for evenings of music, dancing, and giveaways. Enjoy the sounds of top bands from the area as they perform lively cover music and originals to suit all tastes. Concerts run from 7 p.m. – 9 p.m. and are FREE to the public. Organized by First & Main. Learn More (http://www.firstandmainhudson.com/)

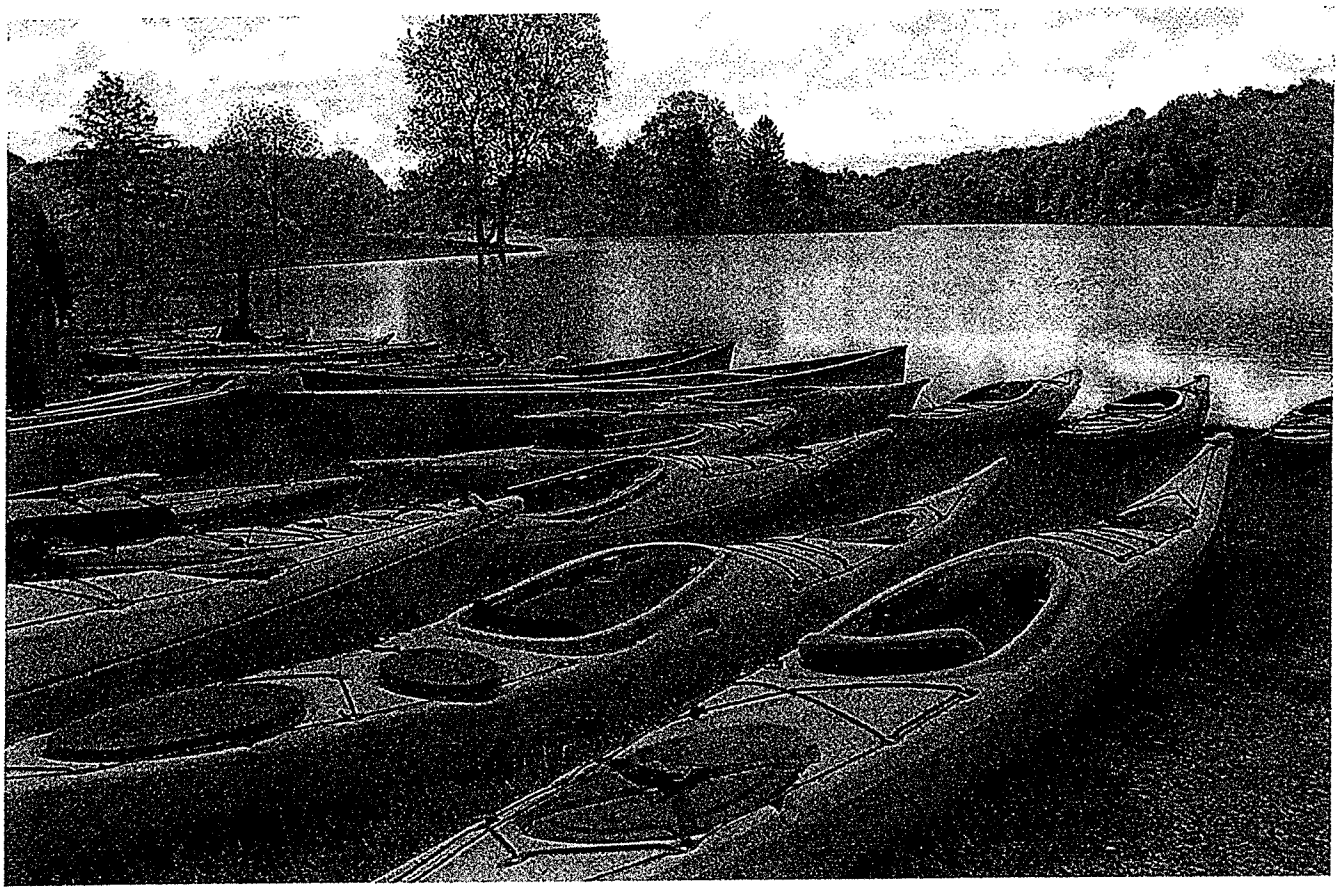
- Hudson Community Education and Recreation
- Summa Wellness

Shopping & Dining

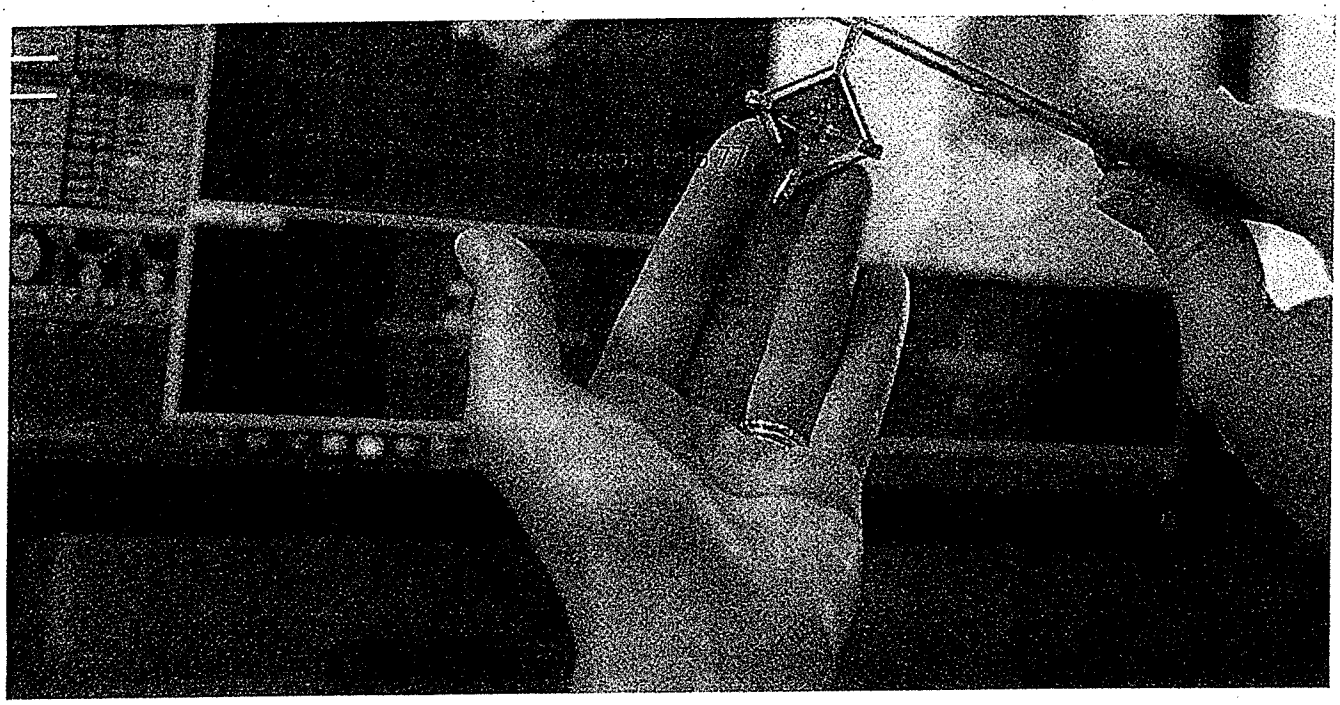
Hudson Ohio 77°

Enjoy the sights, sounds, and tastes when you visit:

- First & Main
- Destination Hudson
- Merchants of Hudson



Hudson Springs Park



Jewelry Art

Access to Culture & Entertainment

Located between Akron and Cleveland, Hudson residents have access to some of the best metropolitan cultural offerings in the country. Just 35 minutes northwest in Cleveland, you'll find one of America's "Big Five" orchestras, the second-largest theatre district in the nation, fantastic dining, and nationally acclaimed arts and entertainment attractions, including the Rock and Roll Hall of Fame and the Cleveland Museum of Art. Area attractions include:

- Cleveland Orchestra and Akron Symphony Orchestra
- Professional sports, including the Cleveland Browns, Indians, Cavaliers, and Akron Rubber Ducks
- Playhouse Square – the second largest theatre district in the U.S., next to Broadway in New York City
- The Cleveland Art Museum and Akron Art Museum
- The Cleveland Institute of Music
- The Cleveland Institute of Art
- Rock and Roll Hall of Fame
- Pro Football Hall of Fame
- Cleveland Museum of Natural History
- Cleveland Botanical Gardens
- Great Lakes Science Center
- Blossom Music Center
- Cedar Point Amusement Park
- Cleveland Zoo and Akron Zoo

History

EXHIBIT "10"

From there, we had a total of 67 places that reported data, and we looked at the crime per 100,000 people in order to fairly compare big and small places. We then ranked each place in each of the four crime types from one to 67, with rankings closer to one being safer. Because certain crimes are more serious than others, such as murder, the categories were weighted so that murders, violent crimes, and property crimes would be worth 30 percent of the overall score, where the total number of crimes would be worth 10 percent. From there, we averaged each place's scores into one Big Deal Score. The location with the number closest to one there became our safest place in the nation. Let's take a moment with each of our top 10 to examine why they placed where they did.

1. Hudson

If you're looking for a place that's violence-free, safe for your stuff, and incredibly welcoming, you couldn't do better than Hudson. Seriously, any place that offers locals a 1 in 154 chance of being the victim of a crime is worth a second glance if you want someplace safe to call home. Remember how we said violence-free? We meant it. Hudson had no rapes, no murders, and no assaults reported in 2012. In fact, it only had nine robberies per 100,000 people, making this easily the least violent location on our list. The property crime was the second lowest on our list, with no vehicle thefts reported and merely 104 burglaries per 100,000 people. This city also had the second lowest total e, which is pretty impressive for a place with a population of merely 22,181. For personal safety, erty safety, and just all around security, it really has to be Hudson.

Solon

locals are probably not surprised to see their city in the top 10, and for good reason. For ers, there were no murders and no rapes here in 2012, and only four robberies and 26 assaults 00,000 people. That resulted in this city having the third lowest violent crime rate overall. Of se, there were more good safety scores than just those. This city had the third lowest property e as well, with merely 833 crimes per 100,000 people of that type being reported. All in all, Solon had the third lowest total crime as well. What does this mean for those proud locals? It means that people who live there had a very small 1 in 116 chance of being the victim of a crime.

3. Upper Arlington

Anyone worried about their physical safety should definitely give Upper Arlington a look. Home to 34,221 people, this city had the second lowest crime, with no murders or rapes reported in 2012. In fact, none of our top three cities had any rapes or murders reported in 2012, so that's a happy statistic. Besides the mere 26 violent crime per 100,000 people here in 2012, Upper arlington had only 1,377 property crimes per 100,000 people that year, the sixth lowest on our list. All that came out to the total crime ranking sixth on our list. It also meant that locals had a 1 in 71 chance of being the victim of a crime, with it being very unlikely that it would be the violent sort.

4. Strongsville

While most places on this list are small, Strongsville was a bit bigger at 44,397 people. It was the second biggest, only to Parma, in our top 10, and still managed to offer locals a very small 1 in 55 chance of being the victim of a crime. Like the others in our top 10, Strongsville had no murders reported in 2012, which helped make it the third least violent spot in Ohio. Of course, the mere t30 violent crimes per 100,000 people helped a lot, too. For property crime and total crime, this city ranked

9. Stow

Safety comes in spades in Stow, and the numbers seriously support that statement. Like Athens, this city had a 1 in 51 chance of being the victim of a crime, making certain that residents can sleep easy at night. More specifically, this place had no murders in 2012, and also had a very low number of assaults. This lead to Stow having the 16th lowest violent crime, with only 75 crimes per 100,000 people being reported the year of our analysis. The other standout scores were probably the ninth lowest property crime, at 1,867 crimes per 100,000 of that type, and the ninth lowest total crime as well. Those stats were enough to rank this city as the ninth safest on our list, and to make sure that crime is just one less thing that locals have to be concerned about.

10. Centerville

In the small city of Centerville, safety is absolutely a priority for locals. If you don't want to take our word for it, just keep in mind that residents here had a 1 in 53 chance of being the victim of a crime, with it being very unlikely to be the violent sort. It's true that Centreville had slightly higher crime than the other places in our top 10, but the number here were still nothing to scoff at. There were no murders here, and only 79 violent crimes per 100,000 people in total for 2012. So, really, compared to other places on our full list, this was a pretty non-violent place. What's more is that the other es here were superb. This city had the eighth lowest property crime, the eighth lowest total crime, a lovely community of 24,107 people to enjoy.

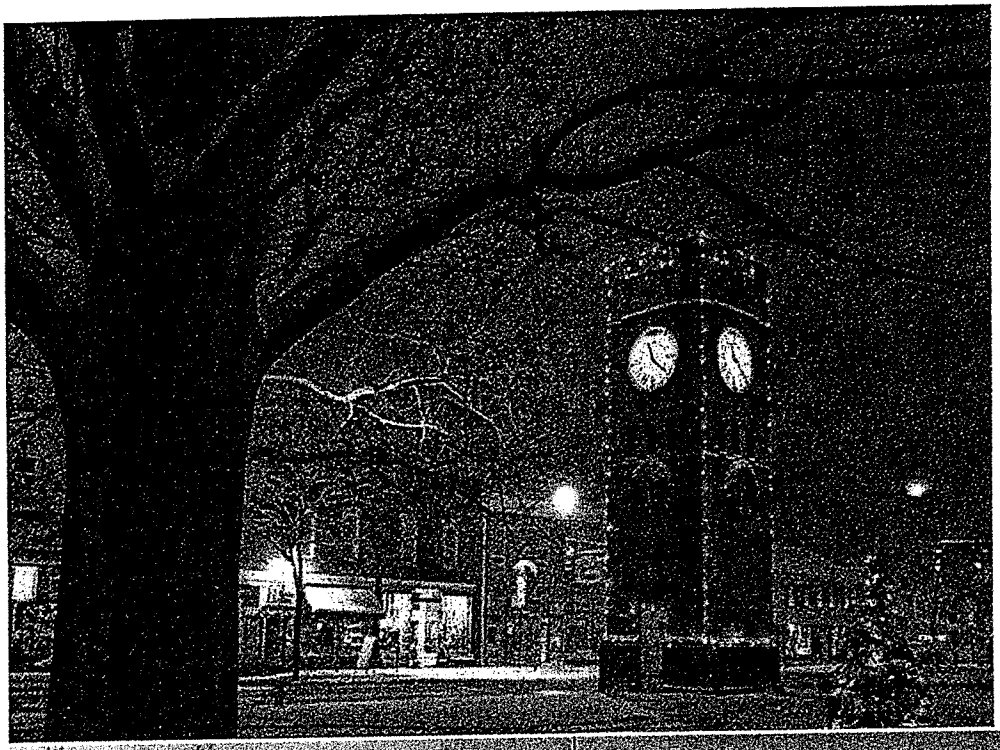
How Safe Ohio Is

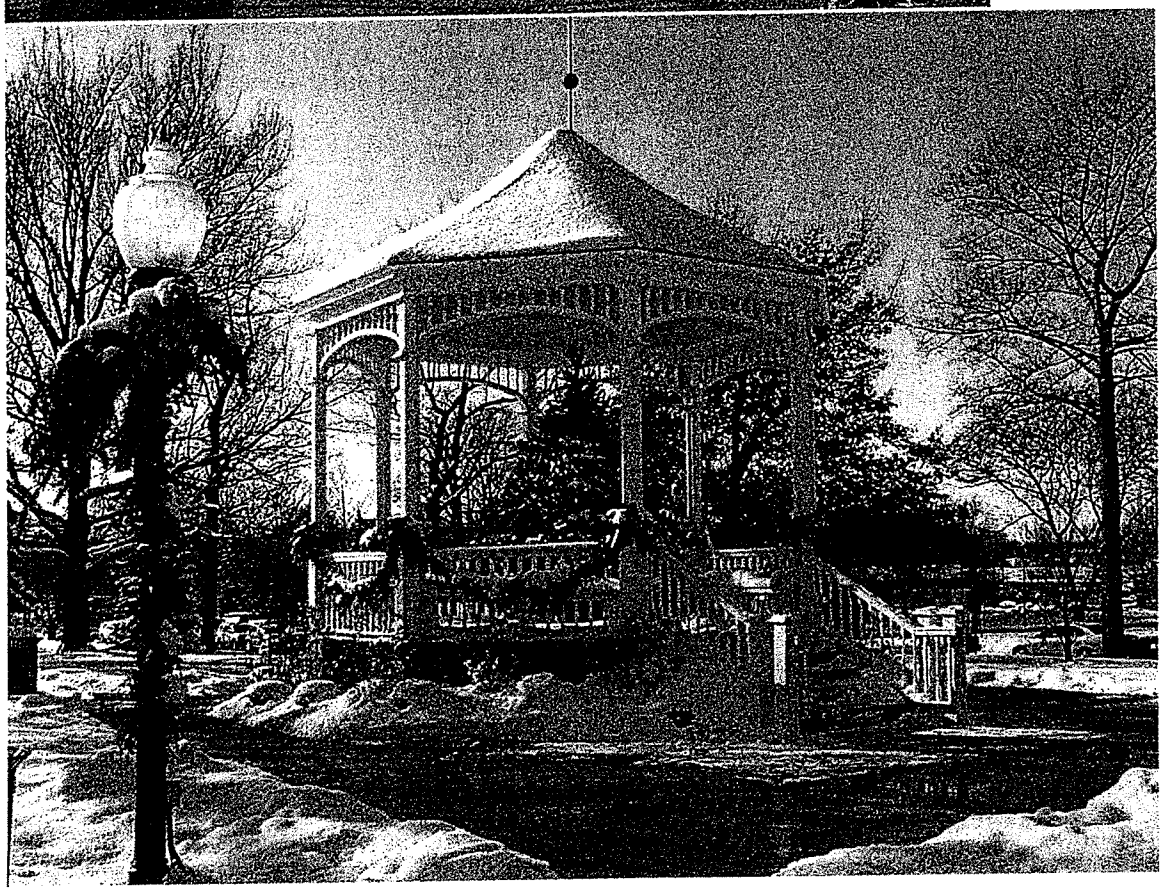
e home searches can be stressful—and we're doing our best to make them less so here at oto—safety should still be a factor. And, of course, some places are definitely safer than others, as emonstrated above. If you're considering moving to the Buckeye state, you might want to keep ist in mind. And if you happen to already live in one of our 10 safest spots, remember to hold your head high and walk without fear. You've got a great community and a great city watching your back.

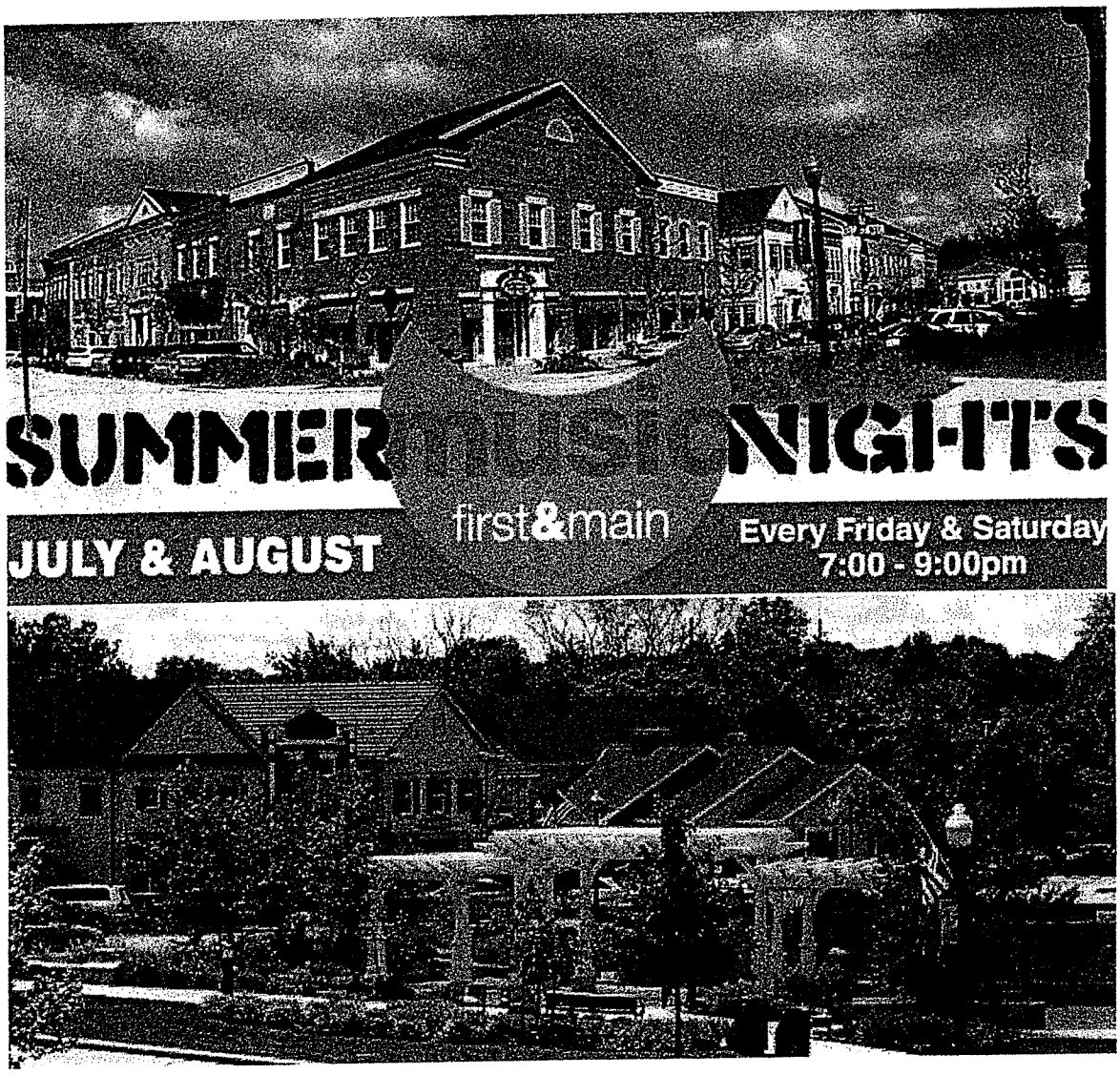
Movoto Real Estate's Safest Places In Ohio

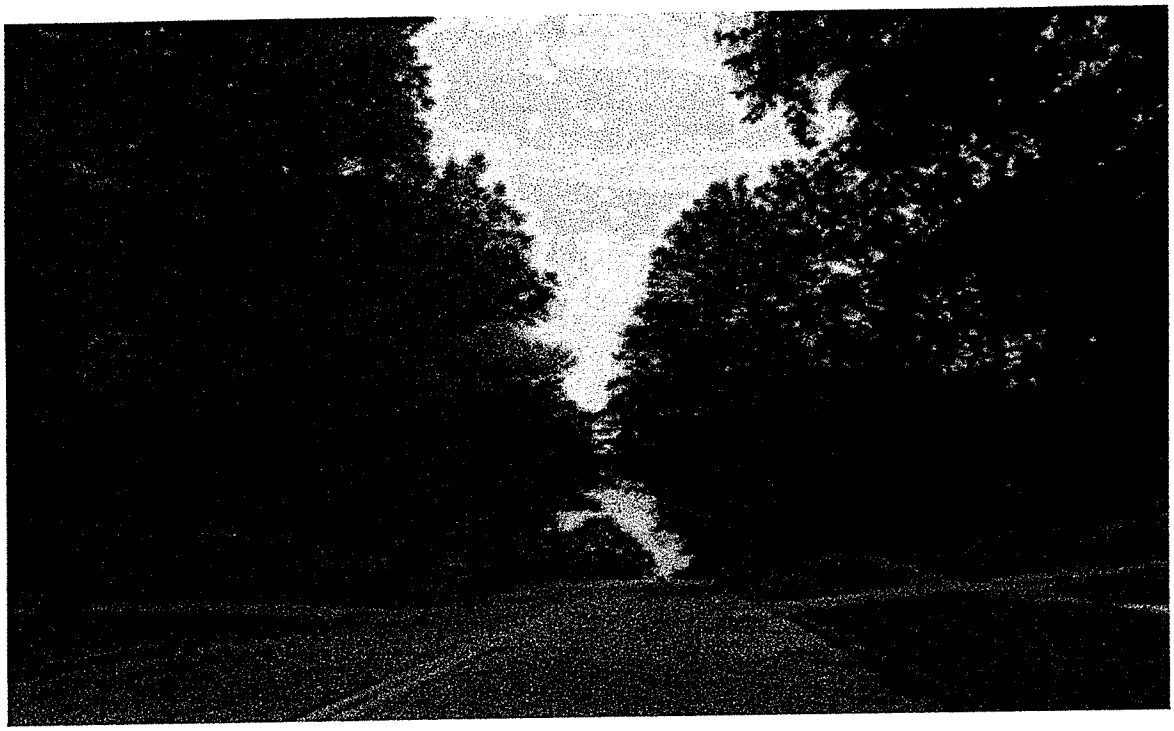
CITY	POPULATION	RANK	MURDERS PER 100,000 RESIDENTS	VIOLENT CRIMES PER 100,000 RESIDENTS	PROPERTY CRIMES PER 100,000 RESIDENTS	TOTAL CRIMES PER 100,000 RESIDENTS	CHANCE OF CRIME
Hudson	22,181	1	1	1	2	2	1:154
Solon	23,165	2	1	3	3	3	1:116
Upper Arlington	34,221	3	1	2	6	6	1:71
Strongsville	44,397	4	1	3	7	7	1:55
North Ridgeville	29,490	5	1	9	4	4	1:85
Parma	80,963	6	1	14	1	1	1:160
Mason	31,037	7	1	5	12	11	1:50
Athens	23,834	8	1	12	10	10	1:51
Stow	34,709	9	1	16	9	9	1:51

EXHIBIT "11"






SUMMER NIGHTS
JULY & AUGUST
first&main
Every Friday & Saturday
7:00 - 9:00pm



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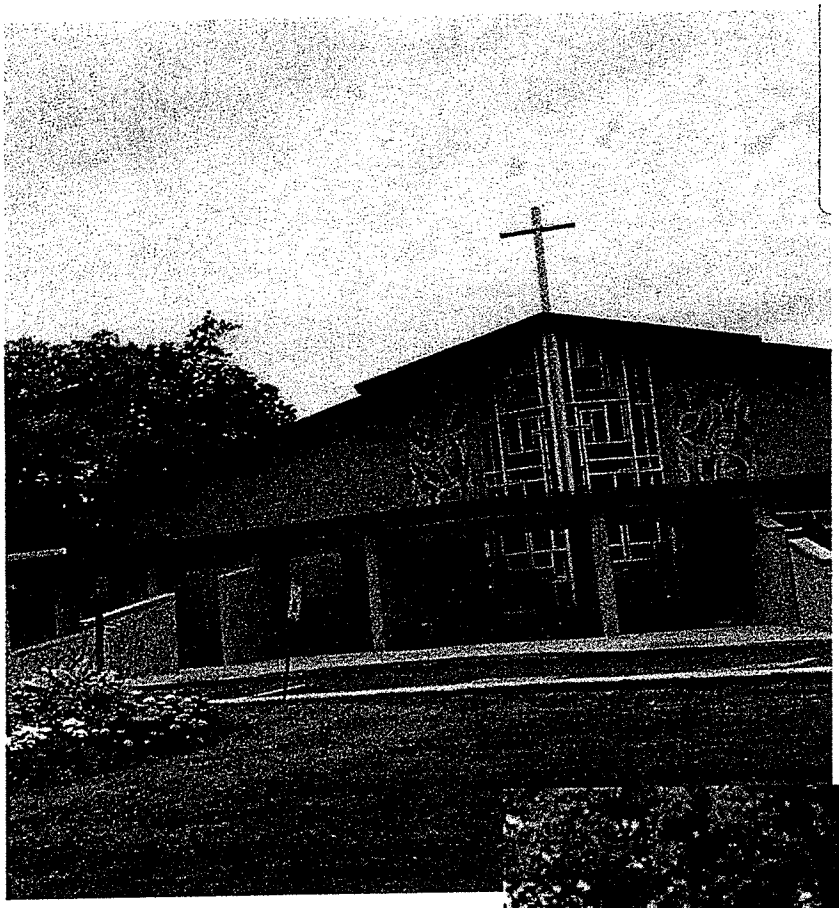

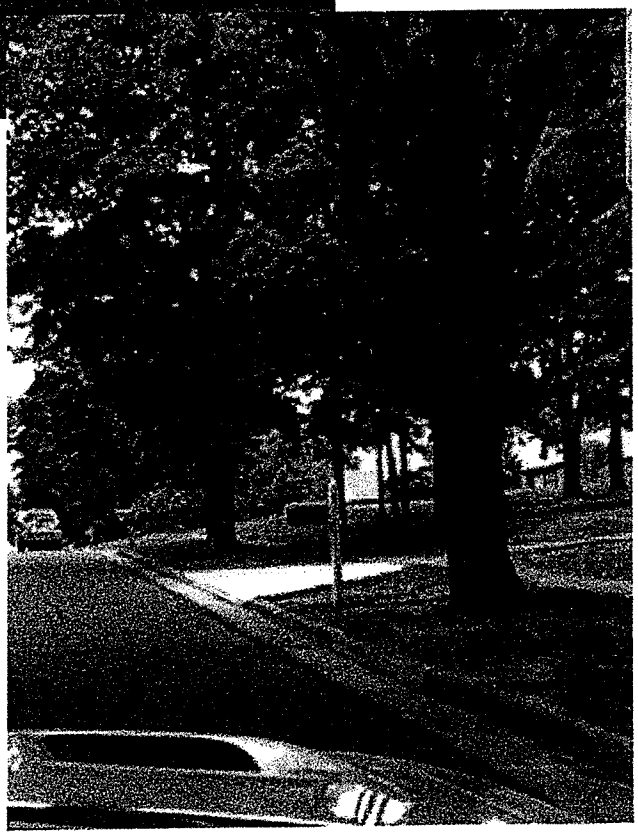

PLTF000220

PLTF000221

PLTF000222

EXHIBIT "12"

CATEGORIES
Overview
Food
Housing
Utilities
Commute
Health
Taxes
Child care
Misc.

2019 Cost of Living Calculator: Phoenix, Arizona vs Cleveland, Ohio

Change Places

A salary of $100,000 in Phoenix, Arizona could decrease to $67,989 in Cleveland, Ohio (assumptions include Homeowner, no Child Care, and Taxes are not considered. Click here to customize.)

Comparison Highlights

- Overall, Cleveland, Ohio is 30.0% cheaper than Phoenix, Arizona
- Median Home Cost is the biggest factor in the cost of living difference.
- Median Home Cost is 77% cheaper in Cleveland.

Overall Index: Homeowner, No Child care, Taxes Not Considered	103.7	72.6	30.0% less
Food & Groceries	97.3	93.5	3.9% less
Housing (Homeowner)	103.5	23.1	77.7% less
Median Home Cost	$239,400	$53,500	$185,900 (77.7% less)
Utilities	101.8	94.9	6.8% less
Transportation	117.9	90.5	23.2% less
Health	92.2	82.4	10.6% less
Miscellaneous	100.1	104.4	4.3% more

100 = US Average. (Below 100 means cheaper than the US average. Above 100 means more expensive.)

DID YOU KNOW?

In order to keep your same standard of living the $70,010 can vary greatly - whether you buy or rent, require child care, or want to include taxes. This is why we are now offering a Premium Salary & Cost of Living Calculator.

Our Premium Calculator Includes:
- Compare Cities cost of living across 9 different categories
- Personal salary calculations can optionally include Home ownership or rental, Child care, and Taxes (with details on state and local sales, income, property and automobile taxes)
- Includes the cost of Child Care for toddlers or infants, at a day care center or home care
- Groceries prices, detailed for 29 staple items in six categories
- Difference in cost of Utilities, including electric, gas and fuel oil
- Health Care Premiums and hospital expenses for major surgeries
- Taxes, Fees and Expenses you should know about, such as local car insurance rates, automobile taxes and registration, commuting costs.
- and 100s of other items you should consider before you relocate

Upgrade to Premium | See Example

Phoenix Housing Options
Homes For Sale
Multi-Family Homes
Condo TownHome or Row Home

Cleveland Housing Options
Homes For Sale
Multi-Family Homes
Condo TownHome or Row Home

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View More Data >

Most Recent Searches on Cost of Living

PREMIUM SUBSCRIPTION

Includes Cost of Living compares for child care, utilities, transportation, health, taxes, housing for home owners vs renters, weather, insurance premiums and so much more.

WHAT IS COST OF LIVING

Before moving to a new city you want to know how much it will cost to live there. "Cost of living" is the amount of money you need to maintain a certain lifestyle in a given place. The price of goods and services vary from one city to another, calculating the cost of living will help you determine how much more or less you need to make and help you factor in expenses.

The expenses that go in to determining cost of living include housing prices for renters or homeowners, housing affordability, entertainment costs, transportation expenses, food prices, and taxes.

WHAT IS COST OF LIVING INDEX

A cost of living index allows you to compare what it costs to live in one place against another, helping you get a glimpse of how far your money will go before you move. For example the cost of living in New York City is almost twice that of Portland, Oregon.

the Cost of
or is to help you
ident in

Los Angeles, California	San Diego, California	Compare
Richmond, Virginia	Tampa, Florida	Compare
Moscow, Idaho	Logan, Utah	Compare
San Diego, California	Monterey, California	Compare
New Orleans, Louisiana	Tacoma, Washington	Compare
Moscow, Idaho	Logan, Utah	Compare
Sacramento, California	Monterey, California	Compare
Beaumont, Texas	Denver, Colorado	Compare
Anderson, South Carolina	Medina, Ohio	Compare
San Diego, California	Monterey, California	Compare
Salt Lake City, Utah	Washington, District of Columbia	Compare
Richmond, Virginia	Tampa, Florida	Compare
Maple Shade, New Jersey	Kennebunkport, Maine	Compare
Huntington, West Virginia	Denver, Colorado	Compare
Pensacola, Florida	New Haven, Connecticut	Compare
Oldsmar, Florida	Aurora, Colorado	Compare
Orlando, Florida	Littleton, Colorado	Compare
Baltimore, Maryland	Ann Arbor, Michigan	Compare
Monroe, Ohio	Middletown, Ohio	Compare
Richmond, Virginia	Tampa, Florida	Compare

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Compare Crime Rates
Compare Climates
Best Places Ratings
Create Best Places List
Compare Schools
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Chicago, IL
Los Angeles, CA
Las Vegas, NV
Houston, TX
Miami, FL
Boston, MA

Best Places to Live
Best Places for Hygge
Best Places for Summer
Best Places to Retire
Best Places for Foodies
Best Places to Feel Safe
Best Places for Military Retirement
Charlottesville, VA
Pittsburgh, PA
Minneapolis, MN
Ames, IA
Sarasota, FL
Noblesville, IN
Oregon City, OR
Portland, OR
Bozeman, MT

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Attorney for Defendant

DISTRICT COURT
CLARK COUNTY, NEVADA
****

HEIDI MARIE PELKOLA, Plaintiff, vs. GREG ELLIOT PELKOLA, Defendant.	CASE NO.: D-13-488682-D DEPT NO.: L Hearing Date: 11/20/2019 Hearing Time: 9:30am

DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION TO RELOCATE

COMES NOW, Defendant, GREG PELKOLA ("GREG'), by and through his attorney of record MELVIN R. GRIMES, of the Grimes Law Office, and submits this Defendant's Opposition to Plaintiff's Motion to Relocate.

DATED this 22nd day of OCTOBER 2019.

THE GRIMES LAW OFFICE

/s/ Melvin R. Grimes
MELVIN R GRIMES, ESQ.
Nevada Bar No. 12972
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Attorney for Defendant

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MEMORANDUM OF POINTS AND AUTHORITIES

Introduction and statement of Facts:

The parties to this matter are Heidi Marie Pelkola, Plaintiff, and Greg Elliot Pelkola, Defendant. The Parties were married on or about September 1, 2003, in Las Vegas, NV. The Plaintiff was granted a Default Divorce Decree on May 2, 2014. The Parties divorced, and the Decree was entered on May 6, 2014. The Decree of Divorce was submitted by Plaintiff without the signature of Greg and was signed by this court May 2, 2014. The Notice of Entry was completed on May 6, 2014.

The Parties have three minor children of the relationship Sara M Pelkola (12/2/03), Justin R. Pelkola (03/04/08), and Daniel J Pelkola (12/09/11).

The court ordered the parties to attend a settlement conference on March 6, 2014. Neither party attended the settlement conference, Defendant was not well and believed the parties were reconciling as Plaintiff continued to climb into his bed every evening. The Court held a Case Management Conference and Return Hearing on March 12, 2014. Plaintiff was aware of the circumstances but misrepresented to the Court that the Defendant had chosen not to participate with the judicial process. (trial date 03-12-14; 09:08:43). In the absence of the Defendant, Plaintiff represented to the court that there were issues of domestic violence. *Id.* at 09:12:52. In response, the Court seemingly shifted its role from impartial arbiter and finder of fact to legal counsel for the Plaintiff. *Id.* at 09:09:15. The Court thoroughly explained legal options and provided, in great detail, instruction as to how to proceed in the case including suggestions as to how a Temporary Protective Order may be sought and granted. *Id.* at 09:12:20.

The Court held a Hearing for Divorce simultaneously with a hearing to extend a Temporary Protective Order on April 17, 2014. During the hearing, the Court continued to counsel the Plaintiff as to her option to continue with a Default Order and provide advice as to how to complete the process as her initial filing had been rejected for improper service. (trial date 04-17-14; 10:07:40). The Court went as far as

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denying a *pro se* litigant the right to file an Answer noting that she would be viewing all facts in the light most favorable to the Plaintiff because the Defendant had not yet filed an Answer. *Id.* at 08:49:26. The Court, against the wishes of both parties, ordered the Temporary Protective Order extended through the pendency of the trial based on its own theory rather than facts presented by the parties. *Id.* at 08:48:13. Additionally, absent even a modicum of evidence, the Court came to the conclusion that the Defendant had been stealing the Plaintiff's mail. *Id.* at 09:01:06.

Plaintiff's drafted the Decree of Divorce and submitted the same to the court without obtaining Greg's signature. Plaintiff's proposed Decree of Divorce contained the following provisions:

1. That the division of community property set forth below is, to the extent possible, an equal division of the community property; Decree, page 3: 23-24;
2. That the division of community debts set forth below is, to the extent possible, an equal division of the community debts; Decree, page 4: 2-3;
3. Plaintiff shall receive alimony in the amount of $350.00 per month for 5 years. Decree, page 9: 3-6.

Plaintiff awarded herself the 2002 Chevrolet Tahoe and 45% of Greg Elliot Pelkola's Retirement at time of disbursement. Decree, page 7: 22-26. Plaintiff was additionally awarded none of the community debts. Greg was awarded his two trucks and the family motorhome. Greg also received the family home subject to the mortgage. Decree, page 8:5-8. This matter was heard previously by this court and is presented for the purpose of reminding the court of Heidi's ongoing conduct and misrepresentations to the court.

Heidi previously sought to relocate the children. Heidi absconded with the children in December 2014. Heidi removed the children from school and took them to Arizona with an intention not to return. 20140102 Mot. for Return of Children. Heidi chose to return with the children prior to the hearing of February 25, 2014. Heidi also moved back into the marital home and resumed sleeping with Greg.

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Heidi next sought relocation with the children June 18, 2014. The court will note the Divorce was final May 6, 2014, Heidi remained in the marital home with Greg and the children through permission to relocate being granted. Heidi claimed improved employment and better schooling for the children.[1] Heidi further claimed she and the children suffered allergies to the "dust here in NV."[2] The matter was heard June 26, 2014 and Heidi was granted permission to relocate with the children to Alta Monte Springs Florida. Heidi left immediately with the children.

The court will note Heidi did not relocate to Florida. Heidi relocated to Arizona, filing a change of Address admitting as much August 21, 2014. Heidi has demonstrated repeatedly she will mislead the court to remove the children from Greg. The court should also note Heidi claimed improved schools and "a gifted program similar to the one my daughter currently attends here."[3] Heidi now asserts the daughter has Asperger's Syndrome and needs special education which can be better served in Ohio.

This court held an evidentiary hearing December 19, 2017 and made findings regarding the conduct of Heidi. The court determined Heidi was engaging in parental alienation and had wrongfully withheld the children. Greg was award 71 days of compensatory time. Greg was awarded attorney's fees and costs.

The court held another evidentiary hearing March 12, 2019 and March 18, 2019. The court was asked to resolve the issue of Greg's retirement and the improper distribution Heidi had awarded herself. The court determined to much time had lapsed and determined Greg failed to show an actual fraud.

The court, in conjunction with the two prior orders, granted Greg greated access and involvement with the children; specifically, regarding the health care and education of the children. Greg has travelled to Phoenix since that time. Greg has been

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[1] Exhibit 1 – Motion to Relocate and Exhibits 06/18/2014
[2] Id. at page 7
[3] Id.

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involved in Parent Teacher Conferences and IEP meetings. Greg has attended counseling and medical appointments for the children. The matter of a change of custody is presently set to be heard before this court November 20, 2019. Heidi files the present motion seeking to eliminate Greg's ability to be involved with the raising of his children.

Relevant Facts to this Matter

Heidi asserts she is seeking to move to Hudson, OH to be with her fiancé. Pltf. Mot. page 3:20-21. Heidi asserts her fiancé is Justin Ritter who has resided in Ohio since 2014. *Id.* Heidi asserts Justin works for EMJ Metals as a truck driver. *Id.* at 3:23. Heidi asserts Justin cannot move to Arizona as he would lose approximately $20,000 if transferred to Arizona. *Id.* at 4:1-3. Heidi is not being honest with the court.

Justin Ritter does not live in Hudson, OH. John Ritter lives in Akron, OH; specifically, 320 Palm Ave., Akron OH[4]. Mr. Mr. Ritter lived in Barberton, OH in 2014, prior to moving to Akron. Mr. Ritter lived in Glendale, AZ prior to relocating to OH in 2014.[5] Mr. Ritter purchased his current residence with his wife Mary Pitz in September 2016.[6] Mr. Ritter and Ms. Pitz owned and operated JJRM Trucking out of Glendale AZ.[7] The court will note the unfortunate passing of Ms. Pitz in April 2019.[8]

Heidi fails to inform this court she was involved in a two-year relationship with Martin Brown, Heidi fails to inform this court the relationship ended with Martin Brown in May 2019 after she illegally entered his home and took several items from his home[9]. Heidi wishes this court to believe she is now engaged to a man who was

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[4] See Exhibit A, PELK 2.
[5] Id.
[6] Id. at pelk 28
[7] Id. at pelk 29
[8] Exhibit B, pelk 34
[9] Mr. Brown is listed as a witness for Defendant and is expected to testify Heidi broke into her home and used one of the minor children to turn his security system off, as the child was the person who knew the security code. Mr. Brown is also expected to testify about the timing of the relationship.

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widowed only five months ago and a mere four months after ending a two-year relationship.

Heidi fails to inform the court Mr. Ritter's employer, EMJ Metals, is headquartered in Los Angeles CA. EMJ Metals has numerous locations around the United States, including Phoenix AZ.[10] Heidi informs the court Mr. Ritter would lose money by relocating to Arizona, that is not true. Truck Drivers earn an average of $59.384.00 in Ohio[11]. Truck Drivers in Arizona earn an average of $64,146.00.[12] Mr. Ritter might lose some salary if he is paid at a higher than average rate, certainly not the $20,000.00 represented by Heidi.

Heidi raises the availability of services through Hopebridge and Applied Behavioral Services for Sara. Heidi fails to inform this court current evaluations of Sara indicate her behavior is far more behavior related rather than autism related.[13] Heidi fails to inform this court Hopebridge has a location in Glendale AZ, while there are no centers located in Akron Ohio.[14] The court must ask why Heidi has failed to enroll Sara in these services previously. Heidi fails to inform this court Applied Behavior Service is also not in Akron; rather it is located in Cincinnati OH more than three hours away.

Heidi next asserts career opportunities in Ohio as an LPN. Heidi fails to show the court she is losing earning capacity by relocating. The court will note an LPN in Ohio makes and average wage of $21.90 per hour.[15] The court will further note an LPN in Arizona makes an average wage of $25.43 per hour.[16] Heidi fails to inform the court Ohio has a 4.997% personal income tax rate while Arizona has a 4.54% personal income tax rate.[17] Heidi would be taking a significant income decrease if she relocated

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[10] Exhibit C, pelk 49
[11] Exhibit D, pelk 54
[12] Id. at pelk 58
[13] Exhibit F, pelk 78-82
[14] Exhibit E, pelk 62-70
[15] Exhibit H, pelk 101
[16] Id. at pelk 100
[17] https://files.taxfoundation.org/20180315173118/Tax-Foundation-FF576-1.pdf

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to Ohio.

Heidi next asserts she will have a greater support system in Ohio than in Arizona. Pltf. Mot. page 6: 7-9. Heidi declines to inform this court her mother resides very near Heidi's present residence. Heidi has been dependent on her mother to provide transportation to the exchanges over than last couple years. Heidi declines to inform this court she has other family in the Phoenix area. Heidi's family was the basis for her seeking to relocation to Phoenix in the first place. Heidi now seeks to be removed from her support system and to isolate the children further from their father.

Heidi next provides a false narrative regarding the school systems. Heidi asserts "Arizona is the fifth worst school system in America." Pltf. Mot. page 7:4. Heidi's assertion is a false narrative and the court must look to the schools and the school districts in making it's analysis.

Here the court must actually evaluate three schools in making the determination about education: 1) Moon Valley in Arizona; 2) Garfield in Akron Ohio; and 3) Cheyenne in Las Vegas. The court's evaluation in this area is among the simplest ever presented to a court.

The three schools are all evaluated by US News according to academic performance of the students without regard to per student spending, transiency rates, and various other factors which skew results against southwest schools. The three schools were each evaluated based on student performance on overall student performance on state required testing.[18] Moon Valley received an impressive score of 80.3%[19] while Garfield scored a rather bleak 11.6%[20]. Moon Valley prepares 80.3% of their students to pass the proficiency exams while Garfield manages to prepare on 11.6% of its students. The court will note Cheyenne scores even worse at only 6.6%[21]

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[18] Exhibit G
[19] Id. at 91
[20] Id. at 94
[21] Id. at 98

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passage rate.

The court can come to no other conclusion but that the children do not gain an educational advantage by relocating to Ohio.

Heidi next raises the issue of housing but asserts relocation to Hudson Ohio. Greg has previously shown Mr. Ritter lives in Akron and owns a home in that city.[22] Mr. Ritter's home is a five-bedroom home which is not currently listed for sale.[23] Heidi fails to remind this court she currently owns her home in Phoenix. Heidi and the children will end up living at this residence based on Heidi's past manipulation of facts to this court. Heidi asserts this housing argument to overcome the very obvious deficiencies in schools at the home she will be living. Heidi again fails to show an actual advantage to the relocation of the children.

Heidi next asserts the environment as cooler. Pltf. Mot. page 7:4. Heidi, once again, asserts a false narrative in order to persuade the court. The court is reminded the children have grown up in Las Vegas and Phoenix. Heidi previously asserted allergies to "dust" yet relocated the children to Phoenix. Heidi's assertions are simply false.

-Points and Authorities

I. Argument

A. Heidi's Request to Relocate Must be Denied

NRS 125C.006 provides:

1. If primary physical custody has been established pursuant to an order, judgment or decree of a court and the custodial parent intends to relocate his or her residence to a place outside of this State or to a place within this State that is at such a distance that would substantially impair the ability of the other parent to maintain a meaningful relationship with the child, and the

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[22] Exhibit A, pelk 26.
[23]

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custodial parent desires to take the child with him or her, the custodial parent shall, before relocating:

(a) Attempt to obtain the written consent of the noncustodial parent to relocate with the child; and

(b) If the noncustodial parent refuses to give that consent, petition the court for permission to relocate with the child.

2. The court may award reasonable attorney's fees and costs to the custodial parent if the court finds that the noncustodial parent refused to consent to the custodial parent's relocation with the child:

(a) Without having reasonable grounds for such refusal; or

(b) For the purpose of harassing the custodial parent.

3. A parent who relocates with a child pursuant to this section without the written consent of the noncustodial parent or the permission of the court is subject to the provisions of NRS 200.359.

NRS 125C.070 then continues:

1. In every instance of a petition for permission to relocate with a child that is filed pursuant to NRS 125C.006 or 125C.0065, the relocating parent must demonstrate to the court that:

(a) There exists a sensible, good-faith reason for the move, and the move is not intended to deprive the non-relocating parent of his or her parenting time;

(b) The best interests of the child are served by allowing the relocating parent to relocate with the child; and

(c) The child and the relocating parent will benefit from an actual advantage as a result of the relocation.

2. If a relocating parent demonstrates to the court the provisions set forth in subsection 1, the court must then weigh the following factors and the impact of each on the child, the relocating parent and the non-relocating parent,

including, without limitation, the extent to which the compelling interests of the child, the relocating parent and the non-relocating parent are accommodated:

(a) The extent to which the relocation is likely to improve the quality of life for the child and the relocating parent;

(b) Whether the motives of the relocating parent are honorable and not designed to frustrate or defeat any visitation rights accorded to the non-relocating parent;

(c) Whether the relocating parent will comply with any substitute visitation orders issued by the court if permission to relocate is granted;

(d) Whether the motives of the non-relocating parent are honorable in resisting the petition for permission to relocate or to what extent any opposition to the petition for permission to relocate is intended to secure a financial advantage in the form of ongoing support obligations or otherwise;

(e) Whether there will be a realistic opportunity for the non-relocating parent to maintain a visitation schedule that will adequately foster and preserve the parental relationship between the child and the non-relocating parent if permission to relocate is granted; and

(f) Any other factor necessary to assist the court in determining whether to grant permission to relocate.

3. A parent who desires to relocate with a child pursuant to NRS 125C.006 or 125C.0065 has the burden of proving that relocating with the child is in the best interest of the child.

The statute requires the relocating parent to demonstrate both the child and the parent will benefit by an actual advantage. *Melinkoff v. Sanchez-Losada*, No. 71380,

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at *3 (Nev. App. Feb. 26, 2018)[24]. The Movant must show an actual advantage by "substantial evidence." *Flynn v. Flynn*, 120 Nev. 436, 444, 92 P.3d 1224, 1229 (2004).

Heidi fails to show a sensible, good-faith reason for the relocation. Heidi's primary reason provided for the relocation is the new engagement of Heidi to her fiancé. The court is reminded of Heidi's last relocation, where it was a ruse to relocate to Phoenix; Heidi seems to always have ulterior motives rather than a good-faith reason. The court is further reminded Heidi was just recently in a two-year relationship with another man. Mr. Ritter was just widowed in May. Heidi's recently created relationship is not a good-faith reason for relocation.

Heidi asserts improved employment and education as other good-faith reasons to relocate. Greg has shown this court in a convincing manner neither of these assertions are true.

Heidi has represented to this court, and we have not discussed, that Greg intends to relocate to Michigan. Greg is not relocating Michigan. Heidi will tell this court anything to obtain her goal which is to minimize Greg in the lives of these children.

Heidi has failed to illustrate a good-faith reason for the relocation.

Heidi has failed to illustrate an actual advantage to herself and the children by relocating.

The children will no longer be able to enjoy weekend visits from Greg. The children will not benefit from Greg's involvement in their education and healthcare. The children will be forced to attend a school vastly inferior to the one they currently enjoy.

Heidi and her fiancé will actually decrease their potential earning capacity.

[24] This case was decided by the Nevada Court of Appeals and is therefore only persuasive and not precedent.

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Heidi fails to show the child and the relocating parent will benefit from an actual advantage as a result of the relocation. The court must therefore Deny the motion.

Heidi fails to show the best interest of the children are served by the relocation. Heidi fails to even address the well-known best interest factors outlined in NRS 125C.0035(4).

The wishes of the child if the child is of sufficient age and capacity to form an intelligent preference as to his or her physical custody.

The children are old enough to express and opinion. Sara dislikes change of any kind and will likely object. The boys given all facts regarding location from their father would also likely object.

Any nomination of a guardian for the child by a parent.

Not a factor

Which parent is more likely to allow the child to have frequent associations and a continuing relationship with the noncustodial parent.

Heidi has repeatedly shown she will make any accusation and take any action to minimize the children's relationship with Greg.

The level of conflict between the parents.

This case has been before this court on a constant basis because the allegation and filings of Heidi. Heidi has been and remains the source of the conflict in this matter.

The ability of the parents to cooperate to meet the needs of the child.

Greg wants nothing more than to co-parent and play an active role in the children's lives. Heidi continues to assert false narratives and false allegations in order to remove Greg from the children's lives.

The mental and physical health of the parents.

The court is well-aware Greg has serious concerns about the mental well-being of Heidi. Heidi has falsely asserted Greg has PTSD which was shown at a prior

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evidentiary hearing to be untrue.

The physical, developmental and emotional needs of the child.

The children need a stable home with both parents playing a role in the children's lives. Heidi's request is just her latest attempt to remove Greg from the children's lives.

The nature of the relationship of the child with each parent.

The children have a loving and bonded relationship with both parents. Sara is far more bonded with her mother.

The ability of the child to maintain a relationship with any sibling.

Greg has a stepdaughter in his current relationship which the children have bonded. Heidi has no other children.

Any history of parental abuse or neglect of the child or a sibling of the child.

It was found previously that Heidi's parental alienation was "hurting the children." Parental alienation is a form of child abuse.

Whether either parent or any other person seeking physical custody has engaged in an act of domestic violence against the child, a parent of the child or any other person residing with the child.

Not a factor. Heidi continues to assert Greg abused her. This matter has been presented twice and has never been substantiated nor any evidence other than her testimony has ever been presented to the court.

Whether either parent or any other person seeking physical custody has committed any act of abduction against the child or any other child.

Heidi absconded with the children to Arizona upon filing for divorce. Greg was forced to file a motion and Heidi returned to the marital home and the marital bed prior to the motions being heard. The motion was dismissed as mute for that reason.

The children's best interest is not served nor has Heidi presented any reason for the court to believe the children's best interest is served in the relocation.

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Greg currently participates in school conferences and health care decisions and appointments.

Heidi fails to show any advantage for either herself or the children.

B. Heidi Fails to Show Adequate Cause for Granting the Motion under NRS 125C.070(2)

(a) The extent to which the relocation is likely to improve the quality of life for the child and the relocating parent;

Heidi asserts the children will be enrolled in an excellent school in Hudson, OH. Heidi misleads this court as her current boyfriend lives in Akron, OH and the school the children would be attending is not outstanding. Heidi chooses Hudson for her motion because Hudson is an outstanding school.

Heidi has not found a job. Heidi has not found a home. Heidi has repeatedly misled this court to undermine the relationship between Greg and the children. Heidi has not presented anything which the court can consider to show an intent to move to Hudson OH. Heidi will simply end up living with the current boyfriend.

Greg has shown Heidi and her boyfriend can each earn more in Arizona than they can in Ohio.

(b) Whether the motives of the relocating parent are honorable and not designed to frustrate or defeat any visitation rights accorded to the non-relocating parent;

Heidi's motives have always been less than honorable. Heidi has acted for the sole purpose of denying Greg his time with his children for the last three years. The court should see through this farce and end this matter immediately.

Heidi's present motion is just the most recent attempt to remove Greg from the children's lives.

(c) Whether the relocating parent will comply with any substitute visitation orders issued by the court if permission to relocate is granted;

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The court is reminded Heidi has previously ignored the orders of this court and Greg currently has sixty-four days of compensatory time remaining for her last wrongful withholding of the children. Heidi has continued to ignore the orders of this court regarding visitation of Sara and the joint legal decisions regarding the children; Heidi has greatly improved on this area though.

(d) Whether the motives of the non-relocating parent are honorable in resisting the petition for permission to relocate or to what extent any opposition to the petition for permission to relocate is intended to secure a financial advantage in the form of ongoing support obligations or otherwise;

Greg resisted the prior relocation and sought joint physical custody of the children. Greg was denied that opportunity by the prior court. Greg has fought and only just received the ability to be involved and informed regarding his children. Greg does not want the children relocated to Ohio because he would no longer be able to attend regular school meetings and activities. Greg would again be relinquished to the role of absentee father.

Greg's motives are honorable, and he wishes increased time with the children and not less time with the children.

(e) Whether there will be a realistic opportunity for the non-relocating parent to maintain a visitation schedule that will adequately foster and preserve the parental relationship between the child and the non-relocating parent if permission to relocate is granted.

Heidi asserts the Scwartz factors in her analysis and the court must ignore all such assertions.

The leading rule of statutory construction is to ascertain the intent of the legislature in enacting the statute. *McKay v. Bd. of Supervisors of Carson City*, 102 Nev. 644, 650, 730 P.2d 438, 443 (1986). To determine legislative intent, we first consider and give effect to the statute's plain meaning because that is the best indicator of the Legislature's intent. *Pub. Emps.' Benefits Program v. Las Vegas*

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Metro. Police Dep't, 124 Nev. 138, 147, 179 P.3d 542, 548 (2008). [I]t is the duty of this court, when possible, to interpret provisions within a common statutory scheme harmoniously with one another in accordance with the general purpose of those statutes and to avoid unreasonable or absurd results, thereby giving effect to the Legislature's intent." *Torrealba v. Kesmetis*, 124 Nev. 95, 101, 178 P.3d 716, 721 (2008).

The Nevada legislature passed AB 263, now codified in NRS 125C. The legislature in adopting NRS 125C.006 – 125C.008 adopted portions of the *Schwartz v. Schwartz* holding. 107 Nev. 378 (Nev. 1991). The legislature also chose to not adopt portions of that holding, such as the factors listed by Heidi in her motion. The court must ignore those "sub factors" in total.

Heidi fails to acknowledge she has far more family in Phoenix. Heidi also ignores the fact Greg is available to assist with the children with short notice. Heidi's mother is in close proximity to her present home and assists her with the children and the driving.

Heidi next asserts a proposed holiday schedule which seems to ignore the fact Greg has the totality of Christmas vacation for the next seven years. Heidi is likely using this motion to circumvent the findings of this court previously.

Greg currently has the ability to be involved with the children's school and healthcare providers. Granting Heidi's relocation would remove him from this opportunity.

(f) Any other factor necessary to assist the court in determining whether to grant permission to relocate.

The court is reminded Sara is currently engaged in counseling to repair the damage done to the relationship with her father. The causes of this have never been specifically addressed, but Judge K. Hardcastle made it very clear Heidi was harming her children. Further this court indicated it was leaning toward a finding of parental alienation at the end of the last evidentiary hearing.

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The court is also reminded of the blatant lie told by Heidi previously regarding relocation to Florida. Heidi's actions were a ruse to obtain the ability to leave Nevada.

The court must consider each of these factors and can come to the only conclusion which is the court must deny the ability to relocate to Ohio.

C. Heidi's Request for Attorney's Fees Must be Denied.

Heidi asserts EDCR 7.60(b) as grounds for attorney's fees; Heidi asserts the incorrect statute to govern this matter. The governing statute here is NRS 1245C.006(2), which states:

2. The court may award reasonable attorney's fees and costs to the custodial parent if the court finds that the noncustodial parent refused to consent to the custodial parent's relocation with the child:

(a) Without having reasonable grounds for such refusal; or

(b) For the purpose of harassing the custodial parent.

Greg has reasonable grounds for the refusal as outlined above. Greg has never been the person harassing Heidi. Heidi has filed repetitive motions with the sole intention of removing Greg from the lives of the children. Greg has finally become a equal in the decision making process and has become involved in the children's school and Heidi brings the present motion.

Heidi is only entitled to Attorney's Fees IF she demonstrated one of the factors above. Heidi has failed on both accounts because neither is the case. The court must deny Heidi's request for attorney's fees and costs.

II. COUNTERMOTION

A. Greg Should be Awarded Primary Physical Custody Should Heidi Relocate

NRS 125C.007(3) states, "A parent who desires to relocate with a child pursuant to NRS 125C.006 or 125C.0065 has the burden of proving that relocating with the child is in the best interest of the child." Heidi has failed to meet her obligation to show the best interest of the children are served in granting relocation.

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The court is reminded Heidi failed to even address best interest as outlined in NRS 125C.0035(4).

The court must modify custody granting Greg Primary Physical Custody should Heidi declare her intention to relocate.

B. Greg Should be Awarded Attorney's Fees and Costs

Heidi's claim for attorney's fees are governed by NRS 125C.006; however, Greg's claim is governed by NRS 18.010 and NRS 125C.250.

NRS 18.010 provides,

1. The compensation of an attorney and counselor for his or her services is governed by agreement, express or implied, which is not restrained by law.
2. In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:

(a) When the prevailing party has not recovered more than $20,000; or

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

3. In awarding attorney's fees, the court may pronounce its decision on the fees at the conclusion of the trial or special proceeding without written motion and with or without presentation of additional evidence.

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4. Subsections 2 and 3 do not apply to any action arising out of a written instrument or agreement which entitles the prevailing party to an award of reasonable attorney's fees.

The Nevada or purposes of an award of attorney's fees pursuant to NRS 18.010(2)(b), "[a] claim is groundless if `the allegations in the complaint . . . are not supported by any credible evidence at trial. *Bobby Berosini, Ltd. v. People for the Ethical Treatment of Animals*, 114 Nev. 1348, 1354 (Nev. 1998).

Alternatively, NRS 125C.250 provides, "Except as otherwise provided in NRS 125C.0689, in an action to determine legal custody, physical custody or visitation with respect to a child, the court may order reasonable fees of counsel and experts and other costs of the proceeding to be paid in proportions and at times determined by the court."

The district court generally may not award attorney fees absent authority under a statute, rule, or contract. *Albios v. Horizon Cmtys., Inc.*, 122 Nev. 409, 417, 132 P.3d 1022, 1028 (2006). In family law matters, the district court must also consider the disparity in the parties' incomes when awarding attorney fees. *Miller v. Wilfong*, 121 Nev. 619, 623 (Nev. 2005).

Heidi has failed to present a prima facia case for relocation as required by NRS 125C.006. Heidi's history makes clear there is no maneuver she will not pursue to minimize Greg's involvement with the children. Heidi has previously misled this court regarding relocation to obtain an ulterior motive.

The court should grant Greg leave to submit a Memorandum of fees and cost and a *Brunzell* affidavit. The court should then order Heidi to pay all fees and costs associated with the present litigation.

III. CONCLUSION

WHEREFORE Defendant requests the following relief from the Court:

1. That the court Deny the Plaintiff's Motion to Relocate;

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2. That the court make a finding Plaintiff's motion is brought in bad-faith and designed to curtail the rights of Defendant;
3. That the court modify custody to Primary Physical Custody to the Father;
4. That the court award attorney's fees and costs for the present litigation
5. Any other such Orders as this Court deems Just and Proper.

DATED this 22nd day of October, 2019.

THE GRIMES LAW OFFICE

/s/ Melvin R. Grimes
MELVIN R GRIMES, ESQ.
Nevada Bar No. 12972
8540 South Eastern Ave., Ste. 100
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Attorney for Defendant

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MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Heidi Marie Alkola
Plaintiff/Petitioner

v. Greg Elliot Alkola
Defendant/Respondent

Case No. D-13-488682-D

Dept. L

MOTION/OPPOSITION FEE INFORMATION SHEET

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

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

☒ $25 The Motion/Opposition being filed with this form is subject to the $25 reopen fee.

-OR-

☐ $0 The Motion/Opposition being filed with this form is not subject to the $25 reopen fee because:

- ☐ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
- ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
- ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
- ☐ Other Excluded Motion (must specify) _____.

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

☒ $0 The Motion/Opposition being filed with this form is not subject to the $129 or the $57 fee because:

- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
- ☐ The party filing the Motion/Opposition previously paid a fee of $129 or $57.

-OR-

☐ $129 The Motion being filed with this form is subject to the $129 fee because it is a motion to modify, adjust or enforce a final order.

-OR-

☐ $57 The Motion/Opposition being filing with this form is subject to the $57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of $129.

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

The total filing fee for the motion/opposition I am filing with this form is:
☐$0 ☒$25 ☐$57 ☐$82 ☐$129 ☐$154

Party filing Motion/Opposition: The Gunn Law Office for GEP Date 10/22/2019

Signature of Party or Preparer _____

Electronically Filed
10/22/2019 4:21 PM
Steven D. Grierson
CLERK OF THE COURT

EXHB (FAM)
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Attorney for Defendant

DISTRICT COURT
CLARK COUNTY, NEVADA
****

HEIDI MARIE PELKOLA, Plaintiff, vs. GREG ELLIOT PELKOLA, Defendant.	CASE NO.: D-13-488682-D DEPT: L Hearing Date: 11/20/2019 Hearing Time: 9:30a.m.

EXHIBITS APPENDIX FOR DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION TO RELOCATE WITH THE MINOR CHILDREN

COMES NOW, Defendant, Greg Pelkola, by and through his Attorney of Record, Melvin R. Grimes, ESQ of The Grimes Law Office and Submits this Exhibits Appendix for Defendant's Opposition to Plaintiff's Motion to Relocate With The Minor Children.

Respectfully submitted this 22nd day of October, 2019.

THE GRIMES LAW OFFICE

/s/ Melvin R. Grimes
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Attorney for Plaintiff

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EXHIBITS

Exhibit	Title of Document(s)	Bates Stamp No.
A	Comprehensive Person Report for Justin Ryan Ritter	Pelk 1 – Pelk 33
B	Online Obituary for Mary Beth Pitz	Pelk 34
C	Earle M. Jorgensen Company Locations	Pelk 35 – Pelk 53
D	Average Truck Driver Salary in Ohio	Pelk 54 – Pelk 61
E	HopeBridge Autism Therapy Centers Locations	Pelk 62 – Pelk 70
F	2019 – 2020 Individualized Education Program Information for Sara M. Pelkola	Pelk 71 – Pelk 87
G	US News Best High Schools Ratings for Moon Valley, Garfield, and Cheyenne High Schools	Pelk 88 – Pelk 99
H	Average Licensed Practical Nurse Salaries in Arizona	Pelk 100 – Pelk 101
I	Zillow.com Listing for 320 Palm Avenue, Akron, OH 44301	Pelk 102 – Pelk 103

Dated this 22nd Day of October, 2019.

THE GRIMES LAW OFFICE

/s/ Melvin R. Grimes

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EXHIBIT A

COMPREHENSIVE PERSON REPORT

Mr Justin Ryan Ritter

DOB: xx/xx/1974 45 Years Old

SSN: 382-76-xxxx

Issued: 1976 in MI

Other Observed Names
G Cole
Gail Naber
Gayle A Cole
Gayle A Weible
Gayle Cole
Gayle Weible
J Ritter
Justin Ritter
Justin Ryan Ritter
Mr Justin R Ritter
Mr Justin Ritter

Other DOB'S
xx/xx/1974
xx/xx/1974
xx/xx/1962

Other SSN's
302-76-xxxx
433-11-xxxx

Person ID
G-6533152851776226429

jjrmtrucking@yahoo.com

(7) Phone Numbers

(623) 877-0476
Qwest Corporation
(12/1/1999 - CURRENT) CH, Other/Historic

(623) 581-9511
Qwest Corporation
(11/13/2000 - 5/15/2018) Other/Historic

(928) 772-8632
Qwest Corporation
(2/15/2004 - 5/15/2018) Other/Historic

(423) 234-2119
United Telephone Southeast Llc Dba Centurylink -Tn
(9/1/2012 - 5/15/2018) Other/Historic

(865) 932-6784
Bellsouth Telecommunications Inc Dba South Central Bell Telephone
(9/1/2012 - 5/15/2018) Other/Historic

(602) 843-8015
Qwest Corporation
(12/1/1999 - 12/1/1999) CH, Other/Historic

(602) 493-2579
Qwest Corporation
(3/16/2016 - 3/16/2016) Other/Historic

(4) Mobile Phone Numbers

(216) 308-6762
Cellco Partnership Dba Verizon Wireless - Oh
(12/1/1999 - CURRENT) CH

(234) 571-2604
Time Warner Cable Information Services (Ohio) Llc - Oh
(8/31/2016 - 8/31/2016) CH

(623) 776-5265
Cellco Partnership Dba Verizon Wireless - Az
(12/1/1999 - 12/1/1999) CH, Other/Historic

(602) 486-8331
New Cingular Wireless Pcs Llc
(7/13/2001 - 7/13/2001) Other/Historic

Address History - (32) Addresses

320 Palm Ave
Akron, OH 44301-2135
(8/31/2016 - CURRENT) CH1, Property

(2) associated phones
(216) 308-6762
(234) 571-2604

71 31St Sw St
Barberton, OH 44203-7315
(12/15/2014 - 12/15/2014) CH2, Other/Historic

12408 W Marshall Ave
Litchfield Park, AZ 85340-3442
(10/31/2014 - 10/31/2014) CH3, Other/Historic

10115 W Colter St
Glendale, AZ 85307-4140
(12/31/2010 - 12/31/2010) CH, Other/Historic

5150 N 99Th Ave Apt 2163
Glendale, AZ 85305-3027
(4/3/2007 - 4/3/2007) CH, Other/Historic

7615 E Addis Ave Apt B
Prescott Valley, AZ 86314-3361
(3/1/2003 - 3/1/2003) CH, Other/Historic

71 31St Sw St # B
Barberton, OH 44203-7315
(2/28/2003 - 2/28/2003) CH, Other/Historic

3 Bn 17Th Fa Serv Bty
Fort Sill, OK 73503
(12/1/1999 - 12/1/1999) CH, Other/Historic

(4) associated phones
(216) 308-6762
(623) 877-0476
(623) 776-5265
(602) 843-8015

196 31St Sw St
Barberton, OH 44203-7658
(12/15/2014 - 12/15/2014) Other/Historic

7813 Pioneer Trl
Knoxville, TN 37924-1852
(9/1/2012 - 5/15/2018) Other/Historic

527 Raby Town Rd
Philadelphia, TN 37846-2043
(9/1/2011 - 5/15/2018) Other/Historic

15120 W Bell Rd
Glendale, AZ 85305
(6/23/2008 - 6/23/2008) Other/Historic

5020 W Thunderbird Rd Apt 192
Glendale, AZ 85306-4928
(10/7/2006 - 10/7/2006) Other/Historic

8800 N 107Th Ave Unit 34
Peoria, AZ 85345-2976
(3/1/2005 - 3/1/2005) Other/Historic

10811 W Clair Dr
Sun City, AZ 85351-4307
(10/8/2004 - 10/8/2004) Other/Historic

7615 E Addis Ave Apt E
Prescott Valley, AZ 86314-3361
(3/17/2003 - 3/17/2003) Other/Historic

1528 W 1528 W
Phoenix, AZ 85027
(2/14/2003 - 2/14/2003) Other/Historic

171 Cherokee Ln
Blaine, TN 37709-2543
(12/24/2002 - 5/15/2018) Other/Historic

125 Nestledown Cir
Portland, TN 37148-1419
(7/18/2001 - 5/15/2018) Other/Historic

9680 W Olive Ave Apt 69
Peoria, AZ 85345-6956
(7/13/2001 - 7/13/2001) Other/Historic

6574 W Medlock Dr
Glendale, AZ 85301-7217
(11/13/2000 - 5/15/2018) Other/Historic

4026 Brown St
Westmoreland, TN 37186-2071
(11/13/2000 - 5/15/2018) Other/Historic

16621 N 25Th St
Phoenix, AZ 85032-2501
(9/1/1998 - 5/1/2000) Other/Historic

2880 Jearoldstown Rd
Chuckey, TN 37641-3310
(3/1/2000 - 5/15/2018) Other/Historic

2074 W Pines Rd
Afton, TN 37616-3038
(10/1/1999 - 5/15/2018) Other/Historic

1528 W Rockwood Dr
Phoenix, AZ 85027-5443
(11/30/1998 - 11/30/1998) Property

Maricopa, AZ
(11/30/1998 - 11/30/1998) Property

16621 N 25Th St Apt 43
Phoenix, AZ 85032-2528
(5/13/1998 - 10/1/1998) Other/Historic

1490 Po Box

Lawton, OK 73502-1490
(1/1/1996 - 1/31/1996) Other/Historic

Fort Sill, OK
(2/1/1994 - 2/1/1994) Other/Historic

1632 60Th Sta
Glendale, AZ 85301
(4/1/1993 - 9/30/1993) Other/Historic

1632 60Th N
Glendale, AZ 85301
(4/1/1993 - 4/1/1993) Other/Historic

(50) Relatives

Mary Pitz Ritter 1st Degree *DOB: Not Available*
SSN: *Not Available* **Age:**

Not Available
Not Available

Top (5) most recent addresses:

10115 W Colter St
Glendale, AZ 85307-4140
(8/1/2013 - CURRENT)

Arthur Ray Cole 1st Degree *DOB: xx/xx/1973*
SSN: 415-39-xxxx **Age:** 46

(865) 654-5624
Not Available

Top (5) most recent addresses:

450 Campbell Rd
Greeneville, TN 37745-2802
(12/18/2014 - CURRENT)

Cherokee Ln
Blaine, TN 37709
(12/31/1969 - 12/31/1969)

7813 Pioneer Trl
Knoxville, TN 37924-1852
(5/7/2013 - 5/7/2013)

171 Cherokee Ln
Blaine, TN 37709-2543
(5/4/2004 - 5/4/2004)

Grainger, TN
(4/4/2002 - 4/4/2002)

Autumn D Hensley 1st Degree *DOB: xx/xx/1973*
SSN: 382-76-xxxx **Age:** 46

(623) 329-8874
autumnritter36@yahoo.com

Top (5) most recent addresses:

7501 W Glenn Dr Apt 4
Glendale, AZ 85303-2454
(10/9/2015 - CURRENT)

10811 W Clair Dr
Sun City, AZ 85351-4307
(3/31/2008 - 3/31/2008)

407 Ne 46Th St
Lawton, OK 73507-6104
(1/31/2007 - 1/31/2007)

16775 Haven Dr
Saint Robert, MO 65584-4660
(5/7/2005 - 1/16/2007)

6706 N Dysart Rd Apt 151
Glendale, AZ 85307-3248
(10/22/2013 - 10/22/2013)

Debra Jean Sjerven 1st Degree *DOB: xx/xx/1964*
SSN: 526-25-xxxx **Age:** 54

(208) 571-4014
sjerven:j1987@gateway.net

Top (5) most recent addresses:

1110 N 9Th E
Mountain Home, ID 83647-2042
(9/10/2010 - CURRENT)

537 S 10Th E

Mountain Home, ID 83647-3216
(7/16/2010 - 7/16/2010)

871 Po Box
Eagle, ID 83616-0871
(6/18/2008 - 6/18/2008)

5204 Maple Grove Dr
Somerset, KY 42501-4229
(5/1/2008 - 5/1/2008)

201 Miller Rd Apt 50
Lebanon, OH 45036-1255
(10/1/2007 - 10/1/2007)

Gayle A Cole 1st Degree *DOB: xx/xx/1962*
SSN: 433-11-xxxx Age: 57

(865) 654-5623
tnmidwife@msn.com

Top (5) most recent addresses:

171 Cherokee Ln
Blaine, TN 37709-2543
(10/18/2003 - CURRENT)

Cherokee Ln
Blaine, TN 37709
(12/31/1969 - 12/31/1969)

7813 Pioneer Tri
Knoxville, TN 37924-1852
(10/16/2012 - 10/16/2012)

527 Raby Town Rd
Philadelphia, TN 37846-2043
(10/23/2011 - 10/23/2011)

538 Sw Alamo Dr
Lake City, FL 32025-0506
(10/25/2003 - 10/25/2003)

Matthew R Weible 1st Degree *DOB: xx/xx/1984*
SSN: 343-74-xxxx Age: 35

(865) 216-3500
sky_of_angels87@hotm

Top (5) most recent addresses:

7813 Pioneer Tri
Knoxville, TN 37924-1852
(8/30/2013 - CURRENT)

6116 S 114Th East Ave
Broken Arrow, OK 74012-1239
(8/19/2009 - 10/3/2009)

5000 Western Ave Apt 150
Knoxville, TN 37921-4143
(12/23/2006 - 12/23/2006)

22 Lincoln Dr
Rittman, OH 44270-1321
(6/10/2006 - 6/10/2006)

1011 Honor Heights Dr
Muskogee, OK 74401-1318
(7/3/2010 - 7/3/2010)

Rachael L Weible 1st Degree *DOB: xx/xx/1989*
SSN: 591-86-xxxx Age: 30

(865) 256-6730
sk8rzgrl714@excite.com

Top (5) most recent addresses:

3805 Crescent Ridge Ct
Maryville, TN 37804-4702
(12/5/2013 - CURRENT)

116 S Everett High Rd
Maryville, TN 37804-4177
(11/30/2018 - 11/30/2018)

225 White Pine Ln
Rockford, TN 37853-3417
(8/31/2011 - 8/31/2011)

171 Cherokee Ln
Blaine, TN 37709-2543
(1/2/2009 - 1/2/2009)

Tom Cole 1st Degree *DOB: xx/xx/1961*

Top (5) most recent addresses:

SSN: *Not Available* Age: 57

(865) 254-6691
midgetpickel@aol.com

171 Cherokee Ln
Blaine, TN 37709-2543
(2/25/2004 - CURRENT)

Wanda H Weible 1st Degree *DOB: xx/xx/1928*
SSN: 499-28-xxxx Age: DECEASED

(618) 532-7637
Not Available

Top (5) most recent addresses:

418 Fayette St
Centralia, IL 62801-5455
(10/1/1993 - CURRENT)

527 Raby Town Rd
Philadelphia, TN 37846-2043
(1/4/2012 - 1/4/2012)

Wanda Weible 1st Degree *DOB: Not Available*
SSN: *Not Available* Age:

Not Available
Not Available

Top (5) most recent addresses:

416 Fayette St
Centralia, IL 62801-5455
(6/15/2017 - CURRENT)

7813 Pioneer Trl
Knoxville, TN 37924-1852
(1/1/2017 - 1/1/2017)

Amber D Ritter 2nd Degree *DOB: xx/xx/1978*
SSN: 300-72-xxxx Age: 41

(513) 340-4321
greggueldner1fan@aol.com

Top (5) most recent addresses:

201 Miller Rd Apt 50J
Lebanon, OH 45036-1255
(4/13/2005 - CURRENT)

320 S Mill St
Blanchester, OH 45107-1430
(5/31/2019 - 5/31/2019)

104 Queens Rd
Milford, OH 45150-1943
(8/31/2018 - 8/31/2018)

5617 Happy Hollow Rd Apt 8
Milford, OH 45150-1869
(3/15/2017 - 2/15/2018)

5608 Zoar Rd Lot 243
Morrow, OH 45152-9661
(12/16/2009 - 3/7/2013)

Annie K Bernal 2nd Degree *DOB: xx/xx/1985*
SSN: 576-29-xxxx Age: 34

(208) 466-7737
annie.bernal@yahoo.com

Top (5) most recent addresses:

4945 S Murray Blvd Apt Q23
Salt Lake City, UT 84123-2727
(11/4/2016 - CURRENT)

4140 S Mackay Dr
Taylorsville, UT 84129-5314
(9/19/2016 - 9/19/2016)

1014 W Orchard Ave
Nampa, ID 83651-1877
(5/9/2013 - 5/9/2013)

5212 S 1950 W
Salt Lake City, UT 84129-1362
(3/10/2011 - 3/10/2011)

5204 Maple Grove Dr
Somerset, KY 42501-4229
(2/6/2011 - 2/6/2011)

Audrey Joan Naber 2nd Degree *DOB: xx/xx/1957*
SSN: 262-29-xxxx Age: 62

(352) 237-8785
audreynaber@gmail.com

Top (5) most recent addresses:

7728 Sw 102Nd Loop
Ocala, FL 34476-3761
(8/21/2015 - CURRENT)

217 Sw 138Th Ter
Newberry, FL 32669-3028
(12/9/2010 - 12/9/2010)

217 Sw 138Th Ter # Te
Newberry, FL 32669-3028
(12/9/2010 - 12/9/2010)

420 Se Seawolf Way
High Springs, FL 32643-1142
(4/11/2008 - 4/11/2008)

721 Creekwater Ter Apt 109
Lake Mary, FL 32746-6074
(10/25/2006 - 10/25/2006)

Blake E Atkins 2nd Degree *DOB: xx/xx/1961*
SSN: 415-19-xxxx Age: 58

(865) 659-4151
blakeatkins@fuse.net

Top (5) most recent addresses:

3805 Crescent Ridge Ct
Maryville, TN 37804-4702
(4/1/2001 - CURRENT)

116 S Everett High Rd
Maryville, TN 37804-4177
(6/15/2019 - 6/15/2019)

3107 Harrington Ct
Maryville, TN 37803-2983
(8/9/2016 - 5/9/2017)

3152 Valemont Dr
Maryville, TN 37803-2952
(4/7/2017 - 5/9/2017)

Blaine, TN
(11/10/1998 - 8/9/2016)

Brenda A Atkins 2nd Degree *DOB: xx/xx/1966*
SSN: 413-06-xxxx Age: 52

(865) 293-6252
aatkins@charterln.com

Top (5) most recent addresses:

3805 Crescent Ridge Ct
Maryville, TN 37804-4702
(5/31/2005 - CURRENT)

225 White Pine Ln
Rockford, TN 37853-3417
(4/3/2013 - 4/3/2013)

3807 Fieldview Rd
Maryville, TN 37804-3825
(7/24/1994 - 3/18/2001)

449 Wedgwood Dr
Alcoa, TN 37701-1751
(3/1/2000 - 3/1/2000)

116 S Everett High Rd
Maryville, TN 37804-4177
(6/30/2004 - 6/24/2014)

Brenda Sandoval 2nd Degree *DOB: Not Available*
SSN: *Not Available* Age:

(602) 885-3700
brenda.sandoval@tivejo.com

Top (5) most recent addresses:

83032 Po Box
Phoenix, AZ 85071-3032
(7/18/2001 - CURRENT)

18202 N Cave Creek Rd
Phoenix, AZ 85032-1058
(7/18/2001 - 7/18/2001)

31692 Po Box
Phoenix, AZ 85046-1692
(11/13/2000 - 11/13/2000)

41306 Po Box
Phoenix, AZ 85080-1306
(10/1/1999 - 10/1/1999)

Carol Ann Liming 2nd Degree *DOB: xx/xx/1958*
SSN: 306-66-xxxx Age: 61

(208) 477-4881
marine@clearwire.net

Top (5) most recent addresses:

16547 Alegre Way
Caldwell, ID 83607-8206
(4/6/2015 - CURRENT)

672 W Ramsbrook St
Meridian, ID 83646-6241
(4/30/2014 - 4/30/2014)

3216 Starlight Ave
Caldwell, ID 83605-6625
(10/25/2012 - 10/25/2012)

117 Hudson Ave Apt D
Nampa, ID 83651-2353
(12/12/2006 - 6/4/2008)

5212 W Kootenai St
Boise, ID 83705-2607
(4/1/2008 - 4/1/2008)

Chemae E Hensley 2nd Degree *DOB: xx/xx/1989*
SSN: 448-98-xxxx **Age:** 30

(580) 228-4164
joeii147@yahoo.com

Top (5) most recent addresses:

334 Po Box
Apache, OK 73006-0334
(11/7/2015 - CURRENT)

417 W Alabama Ave
Chickasha, OK 73018-5835
(2/28/2013 - 2/28/2013)

1521 S 17Th St
Chickasha, OK 73018-5303
(10/31/2012 - 10/31/2012)

1186 County Road 1386
Chickasha, OK 73018-1004
(10/22/2012 - 10/22/2012)

40 Ne 25Th St Lot 69
Lawton, OK 73507-7142
(4/30/2011 - 4/30/2011)

Christopher Blake Atkins 2nd Degree *DOB: xx/xx/1988*
SSN: 635-07-xxxx **Age:** 31

(865) 256-6730
Not Available

Top (5) most recent addresses:

116 S Everett High Rd
Maryville, TN 37804-4177
(8/25/2018 - CURRENT)

914 Doll Ave
Maryville, TN 37801-4651
(7/25/2016 - 7/25/2016)

3805 Crestridge Ct
Maryville, TN 37804
(12/31/1969 - 12/31/1969)

225 White Pine Ln
Rockford, TN 37853-3417
(4/20/2011 - 4/20/2011)

3805 Crescent Ridge Ct
Maryville, TN 37804-4702
(7/17/2007 - 7/17/2007)

Dallas Ritter 2nd Degree *DOB: xx/xx/2000*
SSN: 601-95-xxxx **Age:** 19

(623) 262-3446
Not Available

Top (5) most recent addresses:

33524 W Thomas Rd
Tonopah, AZ 85354-6746
(6/2/2019 - CURRENT)

Debra J Mcnaughton 2nd Degree *DOB: Not Available*
SSN: 526-25-xxxx **Age:**

Not Available
Not Available

Top (5) most recent addresses:

31692 Po Box
Phoenix, AZ 85046-1692
(12/1/1999 - CURRENT)

Dominga Sandoval 2nd Degree *DOB: xx/xx/1982*
SSN: *Not Available* **Age:** 37

Not Available
Not Available

Top (5) most recent addresses:

33 E Libby St
Phoenix, AZ 85022-1533
(7/11/2018 - CURRENT)

Elisha Lynn Bliese 2nd Degree *DOB: xx/xx/1970*
SSN: 469-88-xxxx Age: 48

(320) 360-9901
elishabliese@yahoo.com

Top (5) most recent addresses:

252 Po Box
Upsala, MN 56384-0252
(1/1/2002 - CURRENT)

18670 County 10
Long Prairie, MN 56347-4870
(2/9/2019 - 2/9/2019)

620 E Depue Ave
Olivia, MN 56277-1336
(1/12/2019 - 1/12/2019)

101 Rivercrest Dr Apt 4
Frazee, MN 56544-4612
(2/10/2018 - 2/10/2018)

727 E 18Th St Apt 203
Minneapolis, MN 55404-1978
(9/9/2017 - 9/9/2017)

Gary E Ritter 2nd Degree *DOB: xx/xx/1937*
SSN: 311-80-xxxx Age: 82

(608) 838-2537
gary.ritter@comcast.net

Top (5) most recent addresses:

15936 N 174Th Ave
Surprise, AZ 85388-0261
(7/1/2014 - CURRENT)

111-113 S Main St
Grant Park, IL 60940
(8/20/2015 - 7/8/2016)

4444 E Paradise Village N Pkwy # Py
Phoenix, AZ 85032-6818
(3/6/2015 - 3/6/2015)

111 S Main St
Grant Park, IL 60940-7107
(12/15/2014 - 12/15/2014)

305 Po Box
Mc Farland, WI 53558-0305
(7/31/2010 - 7/31/2010)

Jean D Biggard 2nd Degree *DOB: xx/xx/1940*
SSN: 526-56-xxxx Age: DECEASED

(208) 939-4389
Not Available

Top (5) most recent addresses:

1528 W Rockwood Dr
Phoenix, AZ 85027-5443
(12/1/2001 - CURRENT)

871 Po Box
Eagle, ID 83616-0871
(11/1/1995 - 11/1/1995)

1800 W Floating Feather Rd
Eagle, ID 83616-3718
(10/1/1995 - 2/15/2016)

Boise, ID 83704
(9/17/2007 - 9/17/2007)

4786 W Big Creek St
Meridian, ID 83642-4264
(6/1/2005 - 10/15/2007)

Jennifer Lynn Rosenberg 2nd Degree *DOB: xx/xx/1979*
SSN: 271-80-xxxx Age: 39

(330) 347-7661
jennifer.veemara@yahoo.com

Top (5) most recent addresses:

89 Strawberry Hl
Rittman, OH 44270-1827
(2/28/2011 - CURRENT)

135 E Sunset Dr
Rittman, OH 44270-1121
(11/8/2011 - 11/8/2011)

140 Ross Ave
Doylestown, OH 44230-1340
(1/1/2008 - 1/1/2008)

145 Meadowvale Ave
Rittman, OH 44270-1637
(12/15/2006 - 4/26/2007)

32 Bellevue St
Rittman, OH 44270-1102
(11/22/2004 - 11/22/2004)

Jeret W Ritter 2nd Degree *DOB: xx/xx/1969*
SSN: 382-76-xxxx **Age:** 50

(623) 262-3436
rose19101984@aol.com

Top (5) most recent addresses:

33524 W Thomas Rd
Tonopah, AZ 85354-6746
(12/17/2004 - CURRENT)

Williams, AZ 86046
(12/31/1969 - 12/31/1969)

, AZ
(12/31/1969 - 12/31/1969)

2701 W Michigan Ave
Phoenix, AZ 85053-1734
(12/10/2004 - 12/10/2004)

, AZ
(5/26/2010 - 6/16/2014)

Jesus Sandoval-Martinez 2nd Degree *DOB: Not Available*
SSN: *Not Available* **Age:**

Not Available
Not Available

Top (5) most recent addresses:

16621 N 25Th St Apt 43
Phoenix, AZ 85032-2528
(11/18/2008 - CURRENT)

Joshua Scott Mcnaughton 2nd Degree *DOB: xx/xx/1987*
SSN: 601-44-xxxx **Age:** 32

(602) 413-9128
Not Available

Top (5) most recent addresses:

3714 W Diana Ave
Phoenix, AZ 85051-4748
(2/28/2014 - CURRENT)

1110 N 9Th E
Mountain Home, ID 83647-2042
(3/31/2012 - 3/31/2012)

14002 N 49Th Ave Unit 1001
Glendale, AZ 85306-4933
(7/31/2011 - 7/31/2011)

10620 W Riviera Dr
Sun City, AZ 85351-3847
(5/21/2011 - 5/21/2011)

13421 N 43Rd Ave Apt 2073N
Phoenix, AZ 85029-1057
(8/16/2010 - 8/16/2010)

Joyce A Cole 2nd Degree *DOB: xx/xx/1948*
SSN: 411-84-xxxx **Age:** 71

(423) 335-1271
joyce.cole@yahoo.com

Top (5) most recent addresses:

925 Old Baileyton Rd
Greeneville, TN 37745-8265
(12/31/2015 - CURRENT)

532 Po Box
Jonesborough, TN 37659-0532
(8/31/2005 - 8/31/2005)

359 Po Box
Jonesborough, TN 37659-0359
(8/30/2005 - 8/30/2005)

125 Tilson Rd
Limestone, TN 37681-2213
(7/11/2006 - 7/11/2006)

925 Baileyton Rd
Greeneville, TN 37745-1288
(8/15/2005 - 8/15/2005)

Lisa M Fowler 2nd Degree *DOB: xx/xx/1974*
SSN: 414-39-xxxx Age: 45

(336) 342-0782
lmc2774@yahoo.com

Top (5) most recent addresses:

12459 Nc Hy 150
Reidsville, NC 27320
(5/7/2004 - CURRENT)

111 W Winged Foot Ct
Little Egg Harbor Twp, NJ 08087-3002
(1/27/2005 - 1/27/2005)

1249 Nc 150
Reidsville, NC 27320-8161
(1/26/2005 - 1/26/2005)

1373 Lees Chapel Rd Apt 101B
Greensboro, NC 27455-0903
(8/6/2003 - 2/7/2004)

12459 Nc 150 Apt 206D
Reidsville, NC 27320-0325
(5/9/2013 - 5/9/2013)

Mark L Sandoval 2nd Degree *DOB: xx/xx/1963*
SSN: 483-90-xxxx Age: 56

(623) 847-2969
mark.sandoval@hotmail.com

Top (5) most recent addresses:

4141 W Glendale Ave Apt 2008
Phoenix, AZ 85051-8168
(5/25/2006 - CURRENT)

1726 8Th Ave 5
Phoenix, AZ 85015
(3/21/2014 - 3/21/2014)

3221 W El Camino Dr
Phoenix, AZ 85051-5960
(6/26/2008 - 6/26/2008)

3221 W El Camino Dr
Phoenix, AZ 85051-5960
(6/26/2008 - 6/26/2008)

4101 W Union Hills Dr Apt 1089
Glendale, AZ 85308-1733
(5/24/2001 - 9/13/2005)

Melinda Marie Cole 2nd Degree *DOB: xx/xx/1973*
SSN: 272-86-xxxx Age: 46

(616) 698-8618
motherwolf7@aol.com

Top (5) most recent addresses:

4390 Timber Ridge Sw Tri Apt 12
Wyoming, MI 49519-6410
(1/10/2007 - CURRENT)

5204 Maple Grove Dr
Somerset, KY 42501-4229
(12/31/1969 - 12/31/1969)

3216 Starlight Ave
Caldwell, ID 83605-6625
(12/31/1969 - 12/31/1969)

6321 W Decker Rd
Franklin, OH 45005-2837
(4/11/1992 - 11/3/2009)

4687 N Breton Se Ct Apt 96
Kentwood, MI 49508-5240
(2/4/2005 - 4/20/2006)

Michael Hensley 2nd Degree *DOB: xx/xx/1980*
SSN: 412-47-xxxx Age: 39

Not Available
Not Availabl

Top (5) most recent addresses:

308 Turner St
Fort Leonard Wood, MO 65473-1135
(1/5/2007 - CURRENT)

Michael K Hensley 2nd Degree *DOB: xx/xx/1971*
SSN: 413-47-xxxx Age: 48

(402) 314-4516
cutlasslover2002@yahoo.com

Top (5) most recent addresses:

10811 W Clair Dr
Sun City, AZ 85351-4307
(3/14/2008 - CURRENT)

3054 E Country Villa Rd

Columbus, NE 68601-6365
(8/4/2011 - 8/4/2011)

2408 Nw 52Nd St # C
Lawton, OK 73505-1437
(4/24/2009 - 4/24/2009)

407 Ne 46Th St
Lawton, OK 73507-6104
(1/16/2007 - 1/16/2007)

4105 Po Box
Waynesville, MO 65583-4105
(1/2/2007 - 1/2/2007)

Michael K Hensley 2nd Degree *DOB: Not Available*
SSN: 485-03-xxxx Age: DECEASED

Not Available
Not Available

Top (5) most recent addresses:

16775 Haven Dr
Saint Robert, MO 65584-4660
(8/9/2005 - CURRENT)

Michael K Hensley 2nd Degree *DOB: xx/xx/1961*
SSN: 413-47-xxxx Age: 58

(573) 774-3585
Not Available

Top (5) most recent addresses:

407 Ne 46Th St
Lawton, OK 73507-6104
(4/12/2018 - CURRENT)

52496 E County Road 186
Gage, OK 73843-5193
(10/9/2017 - 3/15/2019)

23196 Spruce Rd Apt 102
Waynesville, MO 65583-3059
(2/25/2004 - 5/15/2018)

810 S Amy Ln Trlr 20
Harker Heights, TX 76548-1306
(7/17/2001 - 5/15/2018)

4828 Sherman St
Lincoln, NE 68506-3960
(7/17/2001 - 5/15/2018)

Mike Sandoval 2nd Degree *DOB: xx/xx/1967*
SSN: 526-77-xxxx Age: 51

(623) 698-8940
Not Available

Top (5) most recent addresses:

1917 N 3Rd St Apt 4
Flagstaff, AZ 86004-4274
(5/1/2001 - CURRENT)

13866 N 47Th Ave
Glendale, AZ 85306-4903
(4/1/2014 - 4/1/2014)

17249 N 7Th St Apt 2166
Phoenix, AZ 85022-2429
(1/11/2012 - 1/11/2012)

2505 N East St
Flagstaff, AZ 86004-3433
(6/16/2008 - 6/16/2008)

2505 N East St # C
Flagstaff, AZ 86004-3433
(6/16/2008 - 6/16/2008)

Norma C Naber 2nd Degree *DOB: xx/xx/1949*
SSN: 267-84-xxxx Age: 70

(386) 487-5004
Not Available

Top (5) most recent addresses:

538 Sw Alamo Dr
Lake City, FL 32025-0506
(10/1/2002 - CURRENT)

1090 Alamo Dr
Lake City, FL 32025
(3/1/1999 - 3/1/1999)

Joyce
Lake City, FL 32055
(2/1/1995 - 5/1/1999)

201 Sw Joyce Gln
Lake City, FL 32024-4763
(2/1/1997 - 2/15/1997)

168 Po Box
Lake City, FL 32056-0168
(6/1/1993 - 12/31/1996)

Patrick H Naber 2nd Degree *DOB: xx/xx/1953*
SSN: 266-86-xxxx Age: 66

(386) 752-4392
pnaber@worldnet.att.net

Top (5) most recent addresses:

538 Sw Alamo Dr
Lake City, FL 32025-0506
(10/25/2003 - CURRENT)

420 Se Seawolf Way
High Springs, FL 32643-1142
(4/3/2008 - 4/3/2008)

1871 Se Bible Camp St
High Springs, FL 32643-1102
(8/14/2002 - 12/27/2002)

7728 Sw 102Nd Loop
Ocala, FL 34476-3761
(11/1/2015 - 11/1/2015)

Bible Camp Rd
High Springs, FL 32643
(10/1/2008 - 7/1/2012)

Rachael Lee Atkins 2nd Degree *DOB: xx/xx/1989*
SSN: 591-86-xxxx Age: 30

Not Available
Not Available

Top (5) most recent addresses:

3805 Crescent Ridge Ct
Maryville, TN 37804-4702
(12/5/2013 - CURRENT)

Richard S Sjerven 2nd Degree *DOB: xx/xx/1967*
SSN: 526-59-xxxx Age: 52

(218) 240-6092
Not Available

Top (5) most recent addresses:

1809 1St Ave
International Falls, MN 56649-3441
(10/22/2014 - CURRENT)

, MN
(6/15/2018 - 6/15/2018)

1809 1St Ave
Intl Falls, MN 56649-3441
(6/15/2018 - 6/15/2018)

4958 Pinewood Dr
Hope Mills, NC 28348-8878
(1/2/2011 - 2/22/2012)

33 E Libby St
Phoenix, AZ 85022-1533
(4/9/1991 - 3/25/2003)

Sara Kathleen Synesael 2nd Degree *DOB: xx/xx/1987*
SSN: 316-02-xxxx Age: 32

(765) 714-3279
Not Available

Top (5) most recent addresses:

6531 W 600 S
Westpoint, IN 47992-9246
(6/25/2017 - CURRENT)

200 Main St
Battle Ground, IN 47920-9756
(7/31/2014 - 7/31/2014)

6413 State Road 25 S
Westpoint, IN 47992-9294
(9/5/2013 - 9/5/2013)

4105 Po Box
Waynesville, MO 65583-4105
(7/31/2012 - 7/31/2012)

320 Ichord Ave Ste H
Waynesville, MO 65583-3449
(12/31/2011 - 12/31/2011)

Scott D Maki 2nd Degree *DOB: xx/xx/1969*
SSN: 476-74-xxxx Age: 50

(623) 877-9533
makiamk@yahoo.com

Top (5) most recent addresses:

7501 W Glenn Dr Apt 4
Glendale, AZ 85303-2454
(2/6/2016 - CURRENT)

469 Virginia Ave
Long Lake, MN 55356-9503
(10/30/2011 - 10/30/2011)

8602 W Helen Ln
Glendale, AZ 85305-3957
(12/31/2009 - 12/31/2009)

1803 Trailway Dr
Eagan, MN 55122-3257
(7/30/2008 - 7/30/2008)

1529 W Mckinley St Apt 1
Phoenix, AZ 85007-2220
(2/25/2013 - 6/10/2013)

Scott Matthew Liming 2nd Degree *DOB: xx/xx/1961*
SSN: 284-68-xxxx Age: 58

(513) 444-3284
funson1961@yahoo.com

Top (5) most recent addresses:

16547 Alegre Way
Caldwell, ID 83607-8206
(4/3/2015 - CURRENT)

201 Miller Rd Apt 44
Lebanon, OH 45036-1254
(1/20/2015 - 1/20/2015)

672 W Ramsbrook St
Meridian, ID 83646-6241
(4/30/2014 - 4/30/2014)

3216 Starlight Ave
Caldwell, ID 83605-6625
(8/26/2012 - 8/26/2012)

2621 Stoll Ct
Caldwell, ID 83607-5054
(6/25/2012 - 6/25/2012)

Scott P Mcnaughton 2nd Degree *DOB: xx/xx/1962*
SSN: 145-44-xxxx Age: 57

(602) 578-7379
scott.mcnaughton@msn.com

Top (5) most recent addresses:

16630 N 43Rd Ave Apt 162
Glendale, AZ 85306-1535
(8/6/2006 - CURRENT)

10421 N 33Rd Ave Apt 243
Phoenix, AZ 85051-4504
(6/16/2017 - 6/16/2017)

5642 S Mission Rd
Fort Mohave, AZ 86426-9237
(10/7/2007 - 10/7/2007)

1845 E Lipan Blvd
Fort Mohave, AZ 86426-8836
(6/24/2006 - 10/7/2006)

10458 Sandra Lynn Dr
Dallas, TX 75228-2413
(3/11/2019 - 4/15/2019)

Sharon A Mcnaughton 2nd Degree *DOB: xx/xx/1962*
SSN: 526-57-xxxx Age: 56

(602) 228-0114
Not Available

Top (5) most recent addresses:

900 Jill Marie Ln
Fernley, NV 89408-3200
(11/24/2011 - CURRENT)

14002 N 49Th Ave Unit 1001
Glendale, AZ 85306-4933
(7/26/2010 - 7/26/2010)

13421 N 43Rd Ave Apt 2073
Phoenix, AZ 85029-1057

(7/25/2009 - 7/25/2009)

1845 E Lipan Blvd
Fort Mohave, AZ 86426-8836
(10/5/2006 - 10/5/2006)

5642 S Mission Rd
Bullhead City, AZ 86426-9237
(8/1/2010 - 8/1/2010)

Tatia J Miller 2nd Degree *DOB: xx/xx/1974*
SSN: 593-64-xxxx Age: 45

(352) 378-2251
tatiamiller74@gmail.com

Top (5) most recent addresses:

5406 Nw 52Nd Ter
Gainesville, FL 32653-3364
(9/26/2006 - CURRENT)

1871 Se Bible Camp St
High Springs, FL 32643-1102
(11/1/2002 - 11/1/2002)

599 Sw 130Th Ave
Davie, FL 33325-3302
(11/13/2000 - 11/15/2000)

7728 Sw 102Nd Loop
Ocala, FL 34476-3761
(12/15/2010 - 11/15/2015)

5406 Nw 52Nd Ter # Te
Gainesville, FL 32653-3364
(5/30/2014 - 5/30/2014)

Toni L Ritter 2nd Degree *DOB: xx/xx/1970*
SSN: 526-71-xxxx Age: 48

(623) 393-9618
Not Available

Top (5) most recent addresses:

33524 W Thomas Rd
Tonopah, AZ 85354-6746
(12/1/2004 - CURRENT)

. AZ
(12/31/1969 - 12/31/1969)

4348 W Cholla St
Glendale, AZ 85304-3532
(8/27/2004 - 12/10/2004)

Williams, AZ 86046
(12/10/2004 - 12/10/2004)

Coronado, AZ
(12/10/2004 - 12/10/2004)

Tracy L Donihue 2nd Degree *DOB: xx/xx/1975*
SSN: 415-51-xxxx Age: 44

(423) 863-4134
tdonihue@netzero.net

Top (5) most recent addresses:

2279 Suncrest Village Ln
Johnson City, TN 37615-3617
(11/8/2013 - CURRENT)

2279 Suncrest Village Ln
Gray, TN 37615-3617
(11/8/2013 - 11/8/2013)

14265 Horton Hwy
Greeneville, TN 37745-5307
(4/12/1997 - 10/23/2006)

16675 Kingsport Hwy
Fall Branch, TN 37656-3827
(10/2/2006 - 10/2/2006)

450 Campbell Rd
Greeneville, TN 37745-2802
(4/1/1997 - 4/1/1997)

(27) Associates

Amy L Pitz *DOB: xx/xx/1970*
SSN: 297-72-xxxx Age: 49

(623) 322-8663
Not Available

Top (5) most recent addresses:

7142 W Westview Dr
Phoenix, AZ 85033-3147
(8/1/1999 - CURRENT)

71 31St Sw St Unit B
Barberton, OH 44203-7315
(2/15/2016 - 2/15/2017)

196 31St St
Barberton, OH 44203-7658
(3/12/2008 - 3/12/2008)

7977 W Wacker Rd Unit 235
Peoria, AZ 85381-4070
(6/24/2004 - 6/24/2004)

7977 W Wacker Rd Unit 235
Maricopa, AZ
(6/24/2004 - 6/24/2004)

Catherine A Huard *DOB: xx/xx/1970*
SSN: 563-89-xxxx Age: 49

(602) 471-1546
Not Available

Top (5) most recent addresses:

1625 E Kelton Ln
Phoenix, AZ 85022-2815
(2/28/2010 - CURRENT)

1625 Ee Kelton Ln
Phoenix, AZ 85022
(7/7/2009 - 7/7/2009)

1625 E Kelton Ln # Ee
Phoenix, AZ 85022-2815
(7/7/2009 - 7/7/2009)

16621 N 25Th St Apt 43
Phoenix, AZ 85032-2528
(10/4/1994 - 7/30/1996)

5807 W Frier Dr
Glendale, AZ 85301-1319
(11/15/2015 - 10/15/2016)

Constance Renee Bechtel *DOB: xx/xx/1963*
SSN: 297-70-xxxx Age: 56

(330) 819-1387
Not Available

Top (5) most recent addresses:

175 Sand Run Rd
Akron, OH 44313-6063
(12/21/2017 - CURRENT)

1217 Salwa Ln
Wadsworth, OH 44281-7815
(7/3/2015 - 7/3/2015)

3800 Fairway Park Dr Apt 105
Copley, OH 44321-2968
(3/6/2012 - 3/6/2012)

14885 Clinton Rd
Doylestown, OH 44230-9749
(10/16/2005 - 10/16/2005)

133 Po Box
Doylestown, OH 44230-0133
(7/29/1995 - 7/29/1995)

Crystal G Lemon *DOB: xx/xx/1985*
SSN: 280-84-xxxx Age: 34

(330) 604-3170
tamaraheiderman@comcast.net

Top (5) most recent addresses:

3545 Easton Rd
Norton, OH 44203-5102
(4/13/2012 - CURRENT)

8590 Saint Peters Church Rd
Louisville, OH 44641-8302
(12/7/2004 - 1/1/2013)

227 Boggs Ave Fl 2
Pittsburgh, PA 15211-2015

(8/10/2007 - 8/10/2007)

71 31St Sw St Apt B
Barberton, OH 44203-7315
(10/31/2006 - 10/31/2006)

71 31St Sw St
Barberton, OH 44203-7315
(10/1/2008 - 7/1/2011)

F W Norton DOB: xx/xx/1927
SSN: 043-20-xxxx Age: DECEASED

(602) 946-2074
Not Available

Top (5) most recent addresses:

6574 W Medlock Dr
Glendale, AZ 85301-7217
(2/1/1999 - CURRENT)

116621 N 25Th St
Phoenix, AZ 85032
(8/1/2010 - 9/10/2014)

1528 W Rockwood Dr
Phoenix, AZ 85027-5443
(8/1/2010 - 9/10/2014)

F W Norton DOB: xx/xx/1927
SSN: 043-20-xxxx Age: 92

Not Available
Not Available

Top (5) most recent addresses:

116621 N 25Th St
New River, AZ 85087
(11/13/2000 - CURRENT)

1528 W Rockwood Dr
Phoenix, AZ 85027-5443
(11/13/2000 - 11/13/2000)

6574 W Medlock Dr
Glendale, AZ 85301-7217
(2/1/1999 - 2/1/1999)

Frank W Norton DOB: xx/xx/1927
SSN: 043-20-xxxx Age: DECEASED

Not Available
Not Available

Top (5) most recent addresses:

10811 W Santa Fe Dr
Sun City, AZ 85351-2609
(12/30/2000 - CURRENT)

6574 W Medlock Dr
Glendale, AZ 85301-7217
(8/1/1993 - 1/1/2004)

116621 25Th N St
New River, AZ 85087
(11/13/2000 - 11/13/2000)

116621 25Th
New River, AZ 85087
(11/13/2000 - 11/13/2000)

1528 W Rockwood Dr
Phoenix, AZ 85027-5443
(11/13/2000 - 11/13/2000)

Gayle P Pitz DOB: xx/xx/1917
SSN: 279-01-xxxx Age: 102

(330) 825-6806
gpitz@bigfoot.com

Top (5) most recent addresses:

196 31St Sw St
Barberton, OH 44203-7658
(8/1/2002 - CURRENT)

424 Monroe Dr
Lakeland, FL 33809-2223
(6/1/2003 - 6/1/2003)

7405 N Socrum Loop Rd Lot 63
Lakeland, FL 33809-2235
(5/1/2002 - 5/1/2002)

71 31St St
Barberton, OH 44203-7315
(2/13/2015 - 2/13/2015)

71 31St Sw St

Barberton, OH 44203-7315
(12/1/2014 - 12/1/2014)

Jacob Pitz *DOB: xx/xx/1995*
SSN: 600-57-xxxx Age: 23

(330) 234-3138
Not Available

Top (5) most recent addresses:

951 Pine Knoll Dr Apt 303
Spring Lake, NC 28390-5017
(9/3/2018 - CURRENT)

7 Grenado St
Fort Bragg, NC 28307-1901
(8/6/2017 - 8/6/2017)

320 Palm Ave
Akron, OH 44301-2135
(10/31/2016 - 10/31/2016)

71 31St Sw St Apt A
Barberton, OH 44203-7315
(4/1/2015 - 4/1/2015)

10115 W Collier St
Glendale, AZ 85307-4140
(5/1/2012 - 5/1/2012)

James F Lemon *DOB: xx/xx/1987*
SSN: 276-86-xxxx Age: 32

(330) 397-4906
Not Available

Top (5) most recent addresses:

1606 Antonio Dr Apt 2521
Fort Worth, TX 76108-1664
(7/9/2018 - CURRENT)

9515 Cherrycrest Apt 4256
Benbrook, TX 76126-3197
(7/7/2017 - 7/7/2017)

9515 Cherrycrest Apt 4256
Fort Worth, TX 76126-3197
(7/7/2017 - 7/7/2017)

2510 Windcliff Se Dr
Marietta, GA 30067-3808
(11/19/2016 - 11/19/2016)

673113 Po Box
Marietta, GA 30006-0052
(9/30/2016 - 9/30/2016)

Jessica Nicole Kiss *DOB: xx/xx/1983*
SSN: 232-23-xxxx Age: 36

(304) 619-5592
jessica73@collegeclub.com

Top (5) most recent addresses:

5871 Turnpike Rd
Summersville, WV 26651-4094
(5/2/2012 - CURRENT)

402 Heavenly Ln
Summersville, WV 26651-9111
(8/27/2010 - 8/27/2010)

105 T And K Acres
Summersville, WV 26651-9540
(7/22/2007 - 7/22/2007)

135 Dylan Heights Dr Apt 109
Summersville, WV 26651-1167
(9/30/2006 - 7/17/2007)

88 Heavenly Ln
Summersville, WV 26651-9559
(7/13/2001 - 7/13/2001)

Kara A Gardner *DOB: xx/xx/1988*
SSN: 274-92-xxxx Age: 31

(330) 402-8981
kagardner1688@gmail.com

Top (5) most recent addresses:

1183 Monterey Dr
Mansfield, OH 44907-2443
(6/30/2018 - CURRENT)

2575 Christensen Ave
Akron, OH 44314-3454
(5/6/2014 - 5/6/2014)

71 31St Sw St Apt B
Barberton, OH 44203-7315
(4/22/2013 - 4/22/2013)

71 31St Sw St
Barberton, OH 44203-7315
(4/22/2013 - 4/22/2013)

1313 Kellogg Ave
Akron, OH 44314-2207
(11/20/2012 - 11/20/2012)

Karl D Paxton *DOB: xx/xx/1994*
SSN: 600-45-xxxx **Age:** 25

(330) 988-7657
Not Available

Top (5) most recent addresses:

951 Pine Knoll Dr Apt 303
Spring Lake, NC 28390-5017
(7/6/2019 - CURRENT)

12408 W Marshall Ave
Litchfield Park, AZ 85340-3442
(10/12/2017 - 10/12/2017)

71 31St Sw St Apt A
Barberton, OH 44203-7315
(8/8/2016 - 8/8/2016)

7520 W Palmaire Ave
Glendale, AZ 85303-2422
(6/30/2013 - 6/30/2013)

Kathy Ann Hughson *DOB: xx/xx/1951*
SSN: 526-08-xxxx **Age:** 68

(602) 521-2207
Not Available

Top (5) most recent addresses:

2390 Po Box
Peoria, AZ 85380-2390
(10/27/2018 - CURRENT)

33524 W Thomas Rd
Tonopsh, AZ 85354-6746
(6/30/2018 - 6/30/2018)

320 Palm Ave
Akron, OH 44301-2135
(3/18/2018 - 3/18/2018)

9415 N 99Th Ave Apt 2111
Peoria, AZ 85345-6941
(9/27/2014 - 9/27/2014)

9834 W Forrester Dr
Sun City, AZ 85351-3245
(2/29/2012 - 2/29/2012)

Margaret Mary Norton *DOB: xx/xx/1953*
SSN: 527-04-xxxx **Age:** 65

(602) 904-2444
dengla3@yahoo.com

Top (5) most recent addresses:

9632 N 182Nd Ln
Waddell, AZ 85355-4270
(11/25/2011 - CURRENT)

15523 N 156Th Ln
Surprise, AZ 85374-7853
(3/13/2002 - 7/10/2007)

15131 W Country Gables Dr
Surprise, AZ 85379-7023
(8/1/2002 - 8/1/2002)

15137 W Country Gables Dr
Surprise, AZ 85379-7023
(8/1/2010 - 8/4/2011)

6617 N Scottsdale Rd Ste 101
Scottsdale, AZ 85250-7803
(9/6/2012 - 9/6/2012)

Marilyn A Pitz *DOB: xx/xx/1946*
SSN: 296-40-xxxx **Age:** DECEASED

Top (5) most recent addresses:

196 31St Nw St

(330) 825-6806
Not Available

Barberton, OH 44203-6700
(3/1/1993 - CURRENT)

71 31St Sw St
Barberton, OH 44203-7315
(3/15/1993 - 12/15/2014)

Barberton, OH 44203
(2/29/2000 - 2/29/2000)

196 31St Sw St
Barberton, OH 44203-7658
(3/1/1993 - 12/15/2014)

196 31St St
Barberton, OH 44203-6700
(3/1/1993 - 3/1/1993)

Mary B Pitz *DOB: xx/xx/1971*
SSN: 297-72-xxxx **Age:** 48

(623) 419-8718
marybethpitz@attbi.com

Top (5) most recent addresses:

12408 W Marshall Ave
Litchfield Park, AZ 85340-3442
(8/30/2016 - CURRENT)

10115 W Colter St
Glendale, AZ 85307-4140
(9/23/2014 - 9/23/2014)

5020 W Thunderbird Rd Apt 296
Glendale, AZ 85306-4931
(12/1/2002 - 12/1/2002)

13361 N 77Th Ave
Peoria, AZ 85381-4041
(5/8/2002 - 8/21/2002)

10115 W Colter St
Phoenix, AZ 85001
(4/1/2013 - 4/1/2013)

Mary Beth Pitz *DOB: xx/xx/1971*
SSN: *Not Available* **Age:** 48

Not Available
Not Available

Top (5) most recent addresses:

71 31St Sw St
Barberton, OH 44203-7315
(12/15/2014 - CURRENT)

196 31St Sw St
Barberton, OH 44203-7658
(12/15/2014 - 12/15/2014)

Michael P Harig *DOB: xx/xx/1962*
SSN: 302-58-xxxx **Age:** 57

(330) 315-3647
rj.blake.j66u@statefarm.com

Top (5) most recent addresses:

3411 E State St
Coventry Township, OH 44203-4411
(8/6/2012 - CURRENT)

71 31St Sw St
Barberton, OH 44203-7315
(12/28/2016 - 12/29/2016)

3411 E State St
Barberton, OH 44203-4411
(3/20/2013 - 3/20/2013)

235 Oak Grove Dr
Akron, OH 44319-2366
(10/17/2012 - 10/17/2012)

1605 Gregory Dr
Akron, OH 44312-4251
(5/26/2009 - 5/26/2009)

Olive I Norton *DOB: xx/xx/1926*
SSN: 048-12-xxxx **Age:** DECEASED

(623) 556-9239
onorton@bellsouth.net

Top (5) most recent addresses:

15131 W Country Gables Dr
Surprise, AZ 85379-7023
(11/11/2005 - CURRENT)

1479 E Bighorn Trl

, AZ
(12/31/1969 - 12/31/1969)

6574 W Medlock Dr
Glendale, AZ 85301-7217
(6/1/2010 - 6/26/2013)

10811 W Clair Dr
Sun City, AZ 85351-4307
(8/6/2003 - 10/25/2010)

15132 W Yucatan Dr
Surprise, AZ 85379-6300
(1/29/2007 - 1/29/2007)

Patti Day *DOB: Not Available*
SSN: *Not Available* **Age:**

Not Available
Not Available

Top (5) most recent addresses:

71 31St Sw St
Barberton, OH 44203-7315
(3/29/2015 - CURRENT)

196 31St Sw St
Barberton, OH 44203-7658
(9/29/2010 - 9/29/2010)

Racheal Weibile *DOB: xx/xx/1989*
SSN: *Not Available* **Age:** 30

(865) 932-6784
Not Available

Top (5) most recent addresses:

171 Cherokee Ln
Blaine, TN 37709-2543
(3/31/2007 - CURRENT)

Robert C Smith *DOB: xx/xx/1966*
SSN: 413-15-xxxx **Age:** 52

(865) 414-0040
Not Available

Top (5) most recent addresses:

527 Raby Town Rd
Philadelphia, TN 37846-2043
(10/23/2011 - CURRENT)

8 Po Box
Riceville, TN 37370-0008
(1/6/2014 - 1/6/2014)

7813 Pioneer Trl
Knoxville, TN 37924-1852
(10/5/2012 - 10/5/2012)

706 Wells Ave
Knoxville, TN 37917-6615
(2/20/2011 - 2/20/2011)

4027 Wrights Ferry Rd
Louisville, TN 37777-5137
(11/21/2010 - 11/21/2010)

Robert J Pitz *DOB: xx/xx/1943*
SSN: 281-40-xxxx **Age:** 76

(330) 612-2492
rpitz@bigfoot.com

Top (5) most recent addresses:

196 31St Sw St
Barberton, OH 44203-7658
(8/1/1982 - CURRENT)

71 31St Sw St
Barberton, OH 44203-7315
(12/1/2014 - 12/1/2014)

423 Monroe Dr
Lakeland, FL 33809-5226
(7/1/1982 - 7/1/1982)

196 31St St
Barberton, OH 44203-7658
(8/1/1982 - 4/9/2016)

196 31St Nw St
Barberton, OH 44203-6700
(11/8/1990 - 2/27/2012)

Ronald L Hughson *DOB: xx/xx/1929*
SSN: 573-56-xxxx **Age:** 90

Top (5) most recent addresses:

9834 W Forrester Dr

(623) 974-3061
Not Available

Sun City, AZ 85351-3245
(3/9/2012 - CURRENT)

10348 W Burnett Rd
Peoria, AZ 85382-2257
(4/6/2009 - 4/6/2009)

1990 W Camelback Rd Ste 215
Phoenix, AZ 85015-3464
(10/2/2008 - 10/2/2008)

10811 W Clair Dr
Sun City, AZ 85351-4307
(8/1/2003 - 8/1/2003)

9255 N Magnolia Ave Spc 266
Santee, CA 92071-3166
(4/1/2000 - 4/15/2000)

Sharon E Lemon *DOB: xx/xx/1950*
SSN: 278-48-xxxx Age: 69

(330) 607-0110
mstangrydr@aol.com

Top (5) most recent addresses:

1797 Westwood Ave Apt F
Alliance, OH 44601-5709
(11/25/2017 - CURRENT)

1850 S Seneca Ave Apt 117
Alliance, OH 44601-4375
(11/15/2016 - 10/15/2017)

8590 Saint Peters Church Rd
Louisville, OH 44641-8302
(7/31/2011 - 7/31/2011)

71 31St Sw St Unit B
Barberton, OH 44203-7315
(8/30/2006 - 8/30/2006)

796 Sherman St
Akron, OH 44311-2102
(8/22/2000 - 10/23/2003)

Virginia L Oliver *DOB: xx/xx/1954*
SSN: 266-86-xxxx Age: 65

(813) 679-8766
ginny@schropplaw.com

Top (5) most recent addresses:

2528 Krueger Ln
Tampa, FL 33618-3202
(10/1/1998 - CURRENT)

2531 W Wilder Ave
Tampa, FL 33614-6841
(11/13/2000 - 5/15/2018)

7008 Conifer Dr
Tampa, FL 33637-6466
(8/1/1993 - 8/1/1993)

320 Palm Ave
Akron, OH 44301-2135
(4/5/2018 - 5/15/2018)

9415 N 99Th Ave Apt 2111
Peoria, AZ 85345-6941
(10/28/2014 - 5/15/2018)

Neighbor Summary (Based on top 5 recent addresses)

(9) Neighbors found for Mr Justin Ryan Ritter at 320 Palm Ave Akron, OH 44301-2135

A V Dumitru
Not Available
Not Available

316 Palm Ave
Akron, Oh 44301-2135

Curtis L Riddle 3Rd

(330) 245-4670
Not Available
326 Palm Ave
Akron, Oh 44301-2135

Shirley J Pontius
(330) 773-6909
Not Available
312 Palm Ave
Akron, Oh 44301-2135

Aisha M Smith
(330) 801-5405
Not Available
330 Palm Ave
Akron, Oh 44301-2135

Ron Hartline
Not Available
Not Available
306 Palm Ave
Akron, Oh 44301-2135

Amanada Bunner
(234) 678-8865
Not Available
302 Palm Ave
Akron, Oh 44301-2135

Lou P Root
(330) 212-4200
tihisbd@gmail.com
355 Palm Ave
Akron, Oh 44301-2134

Mr Brandon M Randles
(330) 926-8654
Not Available
356 Palm Ave
Akron, Oh 44301-2136

Leann First R
(330) 724-1965
Not Available
361 Palm Ave
Akron, Oh 44301-2134

(10) Neighbors found for Mr Justin Ryan Ritter at 71 31St Sw St Barberton, OH 44203-7315

Christopher D Bucher
(440) 503-9909
booker69@aol.com
71 31St Nw St, Apt 1
Barberton, Oh 44203-7252

Gerri Schreiner
(234) 678-3439
Not Available
71 31St Nw St, Apt 2
Barberton, Oh 44203-7252

Sam W Jeffers Jr
(330) 283-8871
sanford.jeffers@att.net
71 31St Nw St, Apt 3
Barberton, Oh 44203-7252

Constance Vargo
(330) 706-9382
Not Available
71 31St Nw St, Apt 5
Barberton, Oh 44203-7252

Mr Howard B Curtiss
(330) 671-3156
howardcurtiss@comcast.net
71 31St Nw St, Apt 7
Barberton, Oh 44203-7252

Mr Christopher Delane Hill
(727) 289-3002
Not Available
71 31St Nw St, Apt 8
Barberton, Oh 44203-7252

Jeffrey Gasser
Not Available
Not Available
70 31St Sw St, # A
Barberton, Oh 44203-7343

Jill Gasser
Not Available
Not Available

70 31St St, Unit A
Barberton, Oh 44203-7343

Mr George L Moore

(330) 419-2603
xxkinkyxx@yahoo.com

68 31St Sw St
Barberton, Oh 44203-7343

Ms Kayla E Billiter

(330) 749-1611
Not Available

76 31St Sw St
Barberton, Oh 44203-7343

(10) Neighbors found for Mr Justin Ryan Ritter at 12408 W Marshall Ave Litchfield Park, AZ 85340-3442

Ms Margarita Gonzalez

(602) 820-6054
Not Available

12405 W Marshall Ave
Litchfield Park, Az 85340-3444

Natasha Armstronghughes
Not Available
Not Available

12404 W Marshall Ave
Litchfield Park, Az 85340-3442

Andrea Nicole Ball

(602) 765-8845
aball882000@juno.com

12411 W Marshall Ave
Litchfield Park, Az 85340-3444

Kathy Pabon

(623) 536-2815
Not Available

12412 W Marshall Ave
Litchfield Park, Az 85340-3442

Jessie I Bonilla Jr

(951) 385-0071
Not Available

12401 W Marshall Ave
Litchfield Park, Az 85340-3443

Cristian Hurtado
Not Available
Not Available

12414 W Marshall Ave
Litchfield Park, Az 85340-3442

Brittany N Page

(623) 326-8417
Not Available

12415 W Marshall Ave
Litchfield Park, Az 85340-3444

Mr Guillermo Flores

(623) 535-9782
fguillermo0@sbcglobal.net

12416 W Marshall Ave
Litchfield Park, Az 85340-3442

Ms Elizabeth C Wells

(623) 693-1127
Not Available

12420 W Marshall Ave
Litchfield Park, Az 85340-3442

Elizabethg Franco
Not Available
Not Available

12421 W Marshall Ave
Litchfield Park, Az 85340-3444

(10) Neighbors found for Mr Justin Ryan Ritter at 10115 W Colter St Glendale, AZ 85307-4140

Julio Martinez
Not Available
Not Available

10114 W Colter St
Glendale, Az 85307-4138

Craig Thompson

Not Available
Not Available

10118 W Colter St
Glendale, Az 85307-4139

Mr Joseph George Pacheco Sr
(623) 640-8459
jpacheco10@verizon.net

10111 W Colter St
Glendale, Az 85307-4140

Anthony Davis
Not Available
Not Available

10119 W Colter St
Glendale, Az 85307-4141

Krystle Moreland
(623) 225-2507
Not Available

10110 W Colter St
Glendale, Az 85307-4138

Montserrat Saldana
(702) 289-5856
Not Available

10122 W Colter St
Glendale, Az 85307-4139

Mr Samuel B Quijada
(623) 872-9618
Not Available

10106 W Colter St
Glendale, Az 85307-4138

La Bellamary
Not Available
Not Available

10105 W Colter St
Glendale, Az 85307-4140

Luis Enrique Ramirez-Leos
Not Available
Not Available

10126 W Colter St
Glendale, Az 85307-4139

Angelica Moctezumatapia
(602) 367-0489
Not Available

10101 W Colter St
Glendale, Az 85307-4140

(10) Neighbors found for Mr Justin Ryan Ritter at 5150 N 99Th Ave Apt 2163 Glendale, AZ 85305-3027

Renee Daniel Dajah
(602) 434-3136
Not Available

5150 N 99Th Ave, Apt 2162
Glendale, Az 85305-3027

Brengetta L Bradford
(757) 338-0381
brenda.bradford6@alltel.net

5150 N 99Th Ave, Apt 2164
Glendale, Az 85305-3027

Sherleen H Powell
(602) 814-7007
Not Available

5150 N 99Th Ave, Apt 2161
Glendale, Az 85305-3027

Amanely Palomerodealonzo
Not Available
Not Available

5150 N 99Th Ave, Apt 2165
Glendale, Az 85305-3027

Kaitlin Brown
Not Available
Not Available

5150 N 99Th Ave, Apt 2166
Glendale, Az 85305-3027

Veldayvatta H Pollard
Not Available
Not Available

5150 N 99Th Ave, Apt 2167
Glendale, Az 85305-3027

Jaime A Gonzalez

(520) 414-3595
Not Available

5150 N 99Th Ave, Apt 2158
Glendale, Az 85305-3026

Ann Makinano Gee

(480) 938-4131
Not Available

5150 N 99Th Ave, Apt 2168
Glendale, Az 85305-3027

Benjamin Grand

(623) 302-1258
Not Available

5150 N 99Th Ave, Apt 2157
Glendale, Az 85305-3026

Julio Perez

(623) 251-8177
Not Available

5150 N 99Th Ave, Apt 2156
Glendale, Az 85305-3026

(0) Birth Records

(0) Divorce Records

(0) Marriage Records

(1) Assessor Records

1 of 1 Assessor Records

APN #: 6717931
Purchase/Assessed Price: $64,500.00

Site Address
320 Palm AVE Akron, OH 44301-2135

Mailing Address
5 Statehouse PLZ, Ste 500 Little Rock, AR 72201-1435
58 Statehouse PLZ, # 500 Little Rock, AR 72201-1436

Most Recent Buyers/Owners
Pitz
Mary Pitz
Justin R Ritter
Ritter

Most Recent Sellers
SAI OM INC

Assessor Record for 2017 - 320 Palm AVE Akron, OH 44301-2135

Location Information
County: SUMMIT
Legal Description: SV-FIRESTONE PK LOT 196ALL
Subdivision: FIRESTONE PARK

Financial Information
Tax Year Delinquency: 0
Tax Year: 2016
Tax Value: $2,049.04
Appraisal Value: *Not Specified*

Structural Information
Year Built: 1919
Architecture Code: 7
Structure Code: (7) Colonial
Lot #1: 196

Dimensions
Lot Depth: 120
Lot Size: 5400.0000
Lot Width: 45
Garage Sq ft: 528

Assessor Information

Arms Length Flag DFS: (Y) Yes
Document Type: (W) Warranty Deed/Deed of Trust
FIPS Municipal Code: 153
Full Part Code: (C) Calculated
Lender/Seller Flag: Not Specified
Multi APN Flag Keyed: Not Specified
Municipal Code: SU
Municipal Name: SUMMIT
Municipal Use Code: 510
Ownership Status Code: Not Specified
Standard Use Code: RSFR
Township: Not Specified
Transfer Date: 01/04/2018
Transfer Type: R
Unique ID: 583686862
View Code: Not Specified

Assessed Improvement Value: $19,464.00
Assessed Land Value: $6,461.00
Assessed Value: $25,925.00
Current Limit Value: Not Specified
Exemption Value 1: Not Specified
Exemption Value 2: Not Specified
Exemption Value 3: Not Specified
Exemption Value 4: Not Specified
Exemption Value 5: Not Specified
Exemption Value 6: Not Specified
Improvement %: 07507
Market Improvement %: 75
Market Value Improvements: $55,610.00
Market Value Land: $18,460.00
Market Value: $74,070.00
No Value Transfer Date: Not Specified
No Value Document #: Not Specified
Transfer Value: $64,500.00
Full Cash Value: Not Specified
Value: $25,925.00

Lot #2: Not Specified
Lot #3: Not Specified
# of Rooms: 8
# of Stories: 2
# of Units: 1
# of 1/4 Baths: 0
# of 1/2 Baths: Not Specified
# of 3/4 Baths: 0
# of Full Baths: 2
# of Bedrooms: 5
Building Shape Code: Not Specified
Company Flag: Not Specified
Construction Code: Not Specified
Construction Quality: 0.0
Cooling Detail: (3) Central
Exterior Code 1: 92
Exterior Code 2: Not Specified
Fireplace Code: 1
Garage Carport: GD1
Heating Cooling Code: B
Heating Detail: (8) Central
Pool Code: Not Specified
Privacy Code: Not Specified
Quarter: Not Specified
Range: Not Specified
Roof Code: Not Specified
Section: Not Specified
Zoning: Not Specified

Pool Sq ft: 0
Additions Sq ft: 36
Attic Sq ft: 0
Basement Sq ft: 0
Unfinished Basement Sq ft: 0
Finished Sq ft: 676
Finished Sq ft Total: 1622
Total Assessed Sq ft: 1622
Total Sq ft: 1622

Assessor Record for **2016** - 320 Palm AVE Akron, OH 44301-2135

Location Information

County: SUMMIT
Legal Description: SV-FIRESTONE PK LOT 196ALL
Subdivision: FIRESTONE PARK

Assessor Information

Arms Length Flag DFS: (Y) Yes
Document Type: (W) Warranty Deed/Deed of Trust
FIPS Municipal Code: 153
Full Part Code: (C) Calculated
Lender/Seller Flag: Not Specified
Multi APN Flag Keyed: Not Specified
Municipal Code: SU
Municipal Name: SUMMIT
Municipal Use Code: 510
Ownership Status Code: Not Specified
Standard Use Code: RSFR
Township: Not Specified
Transfer Date: 12/07/2016
Transfer Type: R
Unique ID: 583686862
View Code: Not Specified

Financial Information

Tax Year Delinquency: 0
Tax Year: 2016
Tax Value: $2,049.04
Appraisal Value: Not Specified
Assessed Improvement Value: $19,464.00
Assessed Land Value: $6,461.00
Assessed Value: $25,925.00
Current Limit Value: Not Specified
Exemption Value 1: Not Specified
Exemption Value 2: Not Specified
Exemption Value 3: Not Specified
Exemption Value 4: Not Specified
Exemption Value 5: Not Specified
Exemption Value 6: Not Specified
Improvement %: 07507
Market Improvement %: 75
Market Value Improvements: $55,610.00
Market Value Land: $18,460.00
Market Value: $74,070.00
No Value Transfer Date: Not Specified
No Value Document #: Not Specified
Transfer Value: $64,500.00
Full Cash Value: Not Specified
Value: $25,925.00

Structural Information

Year Built: 1919
Architecture Code: 7
Structure Code: (7) Colonial
Lot #1: 196
Lot #2: Not Specified
Lot #3: Not Specified
# of Rooms: 8
# of Stories: 2
# of Units: 1
# of 1/4 Baths: 0
# of 1/2 Baths: Not Specified
# of 3/4 Baths: 0
# of Full Baths: 2
# of Bedrooms: 5
Building Shape Code: Not Specified
Company Flag: Not Specified
Construction Code: Not Specified
Construction Quality: 0.0
Cooling Detail: (3) Central
Exterior Code 1: 92
Exterior Code 2: Not Specified
Fireplace Code: 1
Garage Carport: GD1
Heating Cooling Code: B
Heating Detail: (8) Central
Pool Code: Not Specified
Privacy Code: Not Specified
Quarter: Not Specified
Range: Not Specified
Roof Code: Not Specified
Section: Not Specified
Zoning: Not Specified

Dimensions

Lot Depth: 120
Lot Size: 5400.0000
Lot Width: 45
Garage Sq ft: 528
Pool Sq ft: 0
Additions Sq ft: 36
Attic Sq ft: 0
Basement Sq ft: 0
Unfinished Basement Sq ft: 0
Finished Sq ft: 676
Finished Sq ft Total: 1622
Total Assessed Sq ft: 1622
Total Sq ft: 1622

Assessor Record for **2016** - 320 Palm AVE Akron, OH 44301-2135

Location Information
County: SUMMIT
Legal Description: SV-FIRESTONE PK LOT 196ALL
Subdivision: FIRESTONE PARK

Assessor Information
Arms Length Flag DFS: (Y) Yes
Document Type: (W) Warranty Deed/Deed of Trust
FIPS Municipal Code: 153
Full Part Code: (C) Calculated
Lender/Seller Flag: *Not Specified*
Multi APN Flag Keyed: *Not Specified*
Municipal Code: SU
Municipal Name: SUMMIT
Municipal Use Code: 510
Ownership Status Code: *Not Specified*
Standard Use Code: RSFR
Township: *Not Specified*
Transfer Date: 11/10/2016
Transfer Type: R
Unique ID: 583686862
View Code: *Not Specified*

Financial Information
Tax Year Delinquency: 0
Tax Year: 2016
Tax Value: $2,049.04
Appraisal Value: *Not Specified*
Assessed Improvement Value: $19,464.00
Assessed Land Value: $6,461.00
Assessed Value: $25,925.00
Current Limit Value: *Not Specified*
Exemption Value 1: *Not Specified*
Exemption Value 2: *Not Specified*
Exemption Value 3: *Not Specified*
Exemption Value 4: *Not Specified*
Exemption Value 5: *Not Specified*
Exemption Value 6: *Not Specified*
Improvement %: 07507
Market Improvement %: 75
Market Value Improvements: $55,610.00
Market Value Land: $18,460.00
Market Value: $74,070.00
No Value Transfer Date: *Not Specified*
No Value Document #: *Not Specified*
Transfer Value: $64,500.00
Full Cash Value: *Not Specified*
Value: $25,925.00

Structural Information
Year Built: 1919
Architecture Code: 7
Structure Code: (7) Colonial
Lot #1: 196
Lot #2: *Not Specified*
Lot #3: *Not Specified*
# of Rooms: 8
# of Stories: 2
# of Units: 1
# of 1/4 Baths: 0
# of 1/2 Baths: *Not Specified*
# of 3/4 Baths: 0
# of Full Baths: 2
# of Bedrooms: 5
Building Shape Code: *Not Specified*
Company Flag: *Not Specified*
Construction Code: *Not Specified*
Construction Quality: 0.0
Cooling Detail: (3) Central
Exterior Code 1: 92
Exterior Code 2: *Not Specified*
Fireplace Code: 1
Garage Carport: GD1
Heating Cooling Code: B
Heating Detail: (8) Central
Pool Code: *Not Specified*
Privacy Code: *Not Specified*
Quarter: *Not Specified*
Range: *Not Specified*
Roof Code: *Not Specified*
Section: *Not Specified*
Zoning: *Not Specified*

Dimensions
Lot Depth: 120
Lot Size: 5400.0000
Lot Width: 45
Garage Sq ft: 528
Pool Sq ft: 0
Additions Sq ft: 36
Attic Sq ft: 0
Basement Sq ft: 0
Unfinished Basement Sq ft: 0
Finished Sq ft: 676
Finished Sq ft Total: 1622
Total Assessed Sq ft: 1622
Total Sq ft: 1622

(2) Deed Records

1 of 2 Deed Records

APN #: 6717931
Purchase/Assessed Price: $64,500.00

Most Recent Buyers/Owners
Justin R Ritter

Most Recent Sellers
SAI OM INC

Site Address
320 Palm AVE Akron, OH 44301-2135

Mailing Address
320 Palm AVE Akron, OH 44301-2135

Recorder Record for 09/06/2016 - 320 Palm AVE Akron, OH 44301-2135

Arms Length Flag DFS: (Y) Yes
Lender/Seller Flag: *Not Specified*
Municipal Code: SU
Municipal Name: SUMMIT
FIPS Municipal Code: 153
FIPS State Code: 39

Document Type: (W) Warranty Deed/Deed of Trust
Quit Claim: 0
REO Flag: *Not Specified*
State Code: OH
Full Part Code: (C) Calculated
Transfer Type: (R) Resale

Transfer Date: 09/06/2016
Transfer Value: $64,500.00

2 of 2 Deed Records

APN #: Not Specified
Purchase/Assessed Price: $75,000.00

Most Recent Buyers/Owners
Justin R Ritter

Most Recent Sellers
Charles H Mott

Site Address
Maricopa, AZ

Mailing Address
1528 W Rockwood DR Phoenix, AZ 85027-5443

Recorder Record for 11/30/1998 - Maricopa, AZ

Arms Length Flag DFS: (Y) Yes
Lender/Seller Flag: *Not Specified*
Municipal Code: MA
Municipal Name: MARICOPA
FIPS Municipal Code: 013
FIPS State Code: 04

Document Type: *Not Specified*
Quit Claim: 0
REO Flag: *Not Specified*
State Code: AZ
Full Part Code: *Not Specified*
Transfer Type: (R) Resale

Transfer Date: 11/30/1998
Transfer Value: $75,000.00

(0) Aircrafts

(0) Domains

(0) Vessels

(1) DBA/FBN Records

1 of 1 DBA/FBN Records

Business Name: Jjrm Trucking Llc
Description: *Not Specified*
Record Type: FBN
Type: *Not Specified*
Status: *Not Specified*
Filing State: *Not Specified*
Reg #: *Not Specified*
Inc State: *Not Specified*
Filing Date: 12/2/2009

Officers/Agents

Contact
Justin Ryan Ritter *(382-76-xxxx)*

Addresses

10115 W Colter St
Glendale, Az 85307

10115 W Colter St
Glendale, Az 85307 4140

(2) FEIN Records

1 of 2 FEIN Records

Business Name: Jjrm Trucking
Description: General Freight Trucking, Long-Distance, Truckload
Record Type: FEIN
Type: *Not Specified*
Status: *Not Specified*
Filing State: *Not Specified*
Reg #: *Not Specified*
Inc State: *Not Specified*

FEIN Information

EIN #: *Not Specified*
Business Type: LLC
Legal Name: Jjrm Trucking
Trade Name: *Not Specified*
DBA: *Not Specified*
FBN: *Not Specified*
FKA: *Not Specified*
Business Specialty: *Not Specified*

Officers/Agents

Justin Ryan Ritter *(382-76-xxxx)*

Phones

(623) 776-5265

Addresses

10115 W Colter St
Glendale, Az 85307 4140

Url: *Not Specified*
CBSA: 38060
CBSA Name: Phoenix-Mesa-Scottsdale, AZ Metro
DBA: 0753
DBA Name: Phoenix
NAICS: 484121
NAICS Description: General Freight Trucking, Long-Distance, Truckload
Company Start Date: 12/2009
SIC Code: 4213-11
SIC Description: Trailers-Transporting

2 of 2 FEIN Records

Business Name: Md Remedy, Llc
Description: Freestanding Ambulatory Surgical And Emergency Centers
Record Type: FEIN
Type: *Not Specified*
Status: *Not Specified*
Filing State: *Not Specified*
Reg #: *Not Specified*
Inc State: *Not Specified*

FEIN Information

EIN #: *Not Specified*
Business Type: LLC
Legal Name: MD Remedy, LLC
Trade Name: *Not Specified*
DBA: *Not Specified*
FBN: *Not Specified*
FKA: *Not Specified*
Business Specialty: *Not Specified*
Url: *Not Specified*
CBSA: 38060
CBSA Name: Phoenix-Mesa-Scottsdale, AZ Metro
DBA: 0753
DBA Name: Phoenix
NAICS: 621493
NAICS Description: Freestanding Ambulatory Surgical and Emergency Centers
Company Start Date: 04/2004
SIC Code: 8011-11
SIC Description: Offices, Clinics Of Medicl Doctors, NEC

Officers/Agents

Justin Ryan Ritter *(382-76-xxxx)*

Phones

(623) 776-5265

Addresses

10436 W Medlock Dr
Glendale, Az 85307 4243

10115 W Colter St
Glendale, Az 85307 4140

(1) Corporate Records

1 of 1 Corporate Records

Business Name: Jjrm Trucking Llc
Description: Jjrm Trucking Llc
Record Type: Corp
Type: Domestic Llc
Status: Good Standing
Filing State: AZ
Reg #: L15683199
Inc State: *Not Specified*
Filing Date: 12/2/2009

Officers/Agents

Mb
Jeret Ritter W *(382-76-xxxx)*

Addresses

10115 W Colter St
Glendale, Az 85307

33524 W Thomas Rd
Tonopah, Az 85354

(0) Workplace Records

(0) Arrest Records

(2) Criminal Records

1 of 2 Criminal Records

Subject Identification
Name: Justin Ryan Ritter
DOB: xx/xx/1974

Subject Description

Case Information
Case #: 68063NDJR
Category: CRIMINAL
Court County: RIVERSIDE

Offense 1 of 2

Offense Description: NOT SPECIFIED

Charged File On: 6/16/2011
State: CA

Conviction Place: RIVERSIDE, DISTRICT: INDIO SUPERIOR

Offense 2 of 2

Offense Description: " No convicted charges found "

Charged File On: 6/16/2011
State: CA

2 of 2 Criminal Records

Subject Identification
Name: Justin R Ritter
DOB: xx/xx/1974

Subject Description

Case Information
Case #: 32475NDJR
Category: CRIMINAL
Court County: RIVERSIDE

Offense 1 of 2

Offense Codes: 22406A VC
Offense Description: NOT SPECIFIED

Charged File On: 6/20/2011
State: CA

Offense 2 of 2

Offense Codes: 22406A VC
Offense Description: NOT SPECIFIED BY STATE

Charged File On: 6/20/2011
State: CA

(0) Sex Offender Records

(0) National Warrant Records

(1) Traffic Records

1 of 1 Traffic Records

Subject Identification
Name: Justin R Ritter
DOB: xx/xx/1974

Subject Description

Case Information
Case #: 32475NDJR
Category: TRAFFIC
Court County: RIVERSIDE

Offense 1 of 1

Offense Description: 22406A

Charged File On: 6/20/2011
State: CA

(0) Bankruptcy Records

(0) Tax Lien Records

(0) Judgment Records

(1) Evictions

1 of 1 Evictions

Case #: CC2014144365
Court ID: AZMARMQ
Filing Type: CJ
Filing Type Description: Civil Judgment
Filing State: AZ
Unlawful Detainer: Y
Assets: *Not Specified*
Liability Amount: $950.00
Date Reported: 10/30/2014
Filing Date: 08/27/2014
Last Updated: *Not Specified*

Defendants
Justin R Ritter
Is Business: No

Mary B Pitz
Is Business: No

Addresses
601 W Jackson St
Phoenix, Az 85003 2436
12408 W Marshall Ave
Litchfield Park, Az 85340 3442

Plaintiffs
Greg Abel
Is Owner: No

(0) Foreclosures

(0) DEA Licenses

(0) Hunting & Fishing Licenses

(0) Pilot Licenses

(0) Professional Licenses

EXHIBIT B

1971 - 2019

View Guestbook

Share Memories

Print Obituary

Share 0

Tweet

Mary Beth Pitz born in Barberton, Ohio June 30, 1971. Passed away April 10, 2019. She was preceded in death by her mother, Shirley Pitz. Mary Beth is survived by her husband of 14 years, Justin Ritter; children, Jacob (Kari)

EARLE M. JORGENSEN COMPANY

(https://www.emjmetals.com/)

About EMJ (https://www.emjmetals.com/about)

What We Do (https://www.emjmetals.com/about/what_we_do)

How We Do It (https://www.emjmetals.com/about/how_we_do_it)

Who We Are (https://www.emjmetals.com/about/who_we_are)

Where We Are (https://www.emjmetals.com/about/where_we_are)

WHERE WE ARE:

Locations

Atlanta
5220 Minola Road
Lithonia GA, 30038

Phone: (678) 894-7241
Fax: (770) 322-6251

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Birmingham
133 Ed Gardner Drive
Pell City AL, 35125

Phone: (205) 814-0043

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Boston
59 South Street
Hopkinton MA, 01748

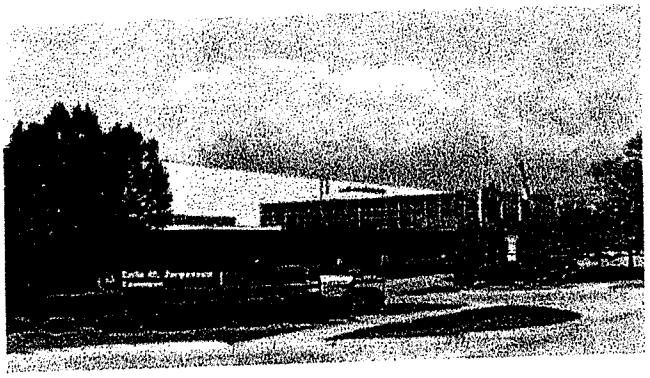
Phone: (508) 435-6854
Fax: (508) 435-2520

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Charlotte
4014 Westinghouse Boulevard
Charlotte NC, 28273

Phone: (704) 588-3001
Fax: (704) 588-6659

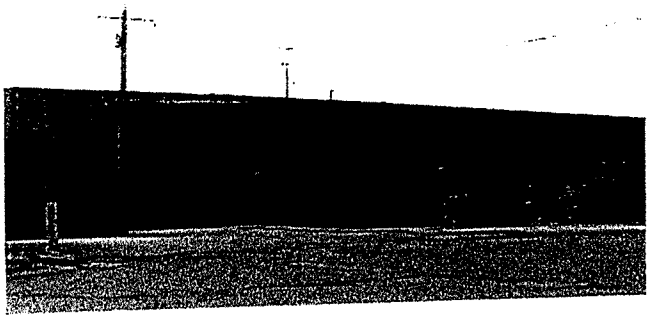
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Chicago
1900 Mitchell Boulevard
Schaumburg IL, 60193

Phone: (847) 301-6100
Fax: (847) 301-6114

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Cincinnati
601 Redna Terrace
Cincinnati OH, 45215

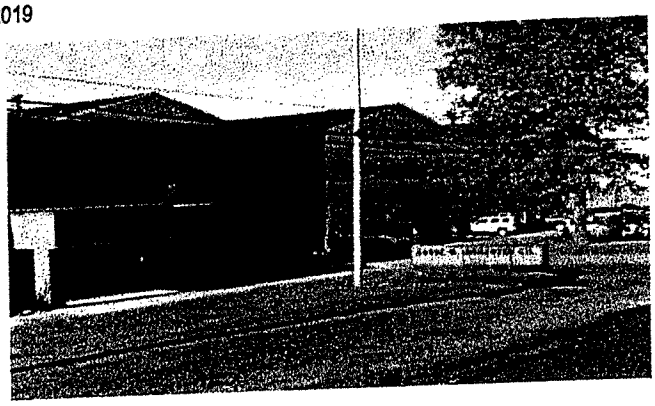
Phone: (513) 771-3223
Alt Phone: (800) 543-2020
Fax: (513) 771-6734

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Cleveland
2060 Enterprise Parkway
Twinsburg OH, 44087

Phone: (330) 425-1500
Alt Phone: (800) 321-3320
Fax: (330) 963-8188

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Cleveland Plate
26400 Richmond Rd
Bedford Heights OH, 44146

Phone: (330) 963-8150
Fax: (216) 292-6106

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Dallas
2030 W Commerce St
Dallas TX, 75208

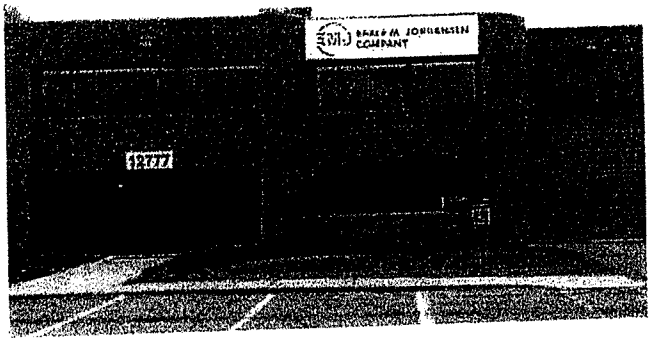
Phone: (214) 741-1761
Fax: (972) 263-6513

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Denver
6050 Downing Street
Denver CO, 80216

Phone: (303) 287-0381
Fax: (303) 288-0512

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Detroit
12777 Merriman Road
Livonia MI, 48150

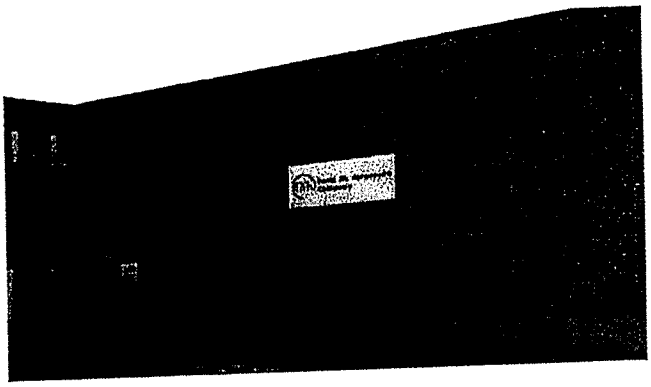
Phone: (734) 402-8110
Fax: (734) 425-0149

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Edmonton
6925 8th Street NW
Edmonton AB, Canada, T6P 1T9

Phone: (780) 801-4015
Alt Phone: (877) 907-5055
Fax: (780) 463-1215

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Hartford
500 Four Rod Road
Berlin CT, 06037

Phone: (508) 435-6854

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Hayward
31100 Wiegman Road
Hayward CA, 94544

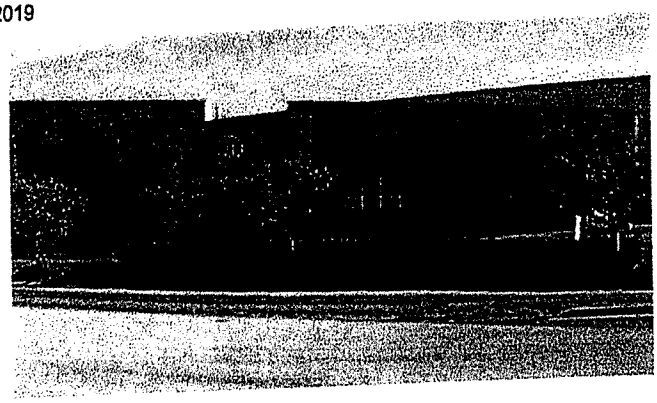
Phone: (510) 487-2700
Fax: (510) 487-5513

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Houston
6201 Lumberdale Rd
Houston TX, 77092

Phone: (713) 672-1621
Alt Phone: (800) 874-8345
Fax: (713) 672-0528

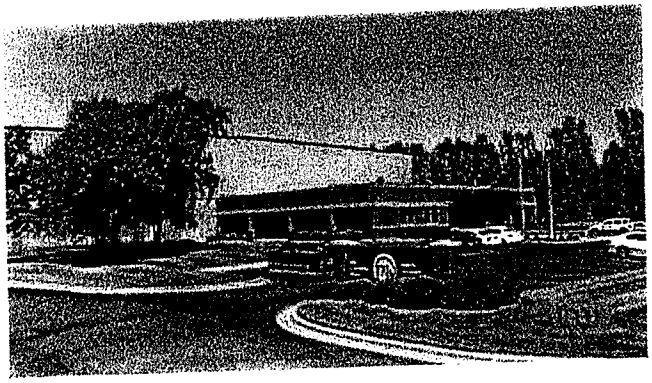
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Indianapolis
2301 Airwest Boulevard
Plainfield IN, 46168

Phone: (317) 838-8899
Alt Phone: (800) 876-3116
Fax: (317) 838-8455

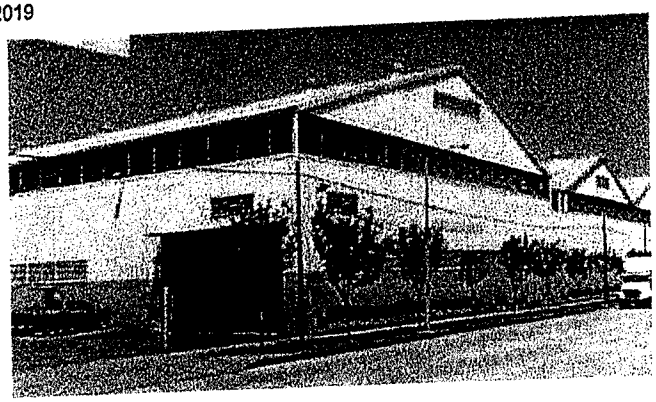
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Kansas City
1802 N Universal Avenue
Kansas City MO, 64120

Phone: (816) 483-4140
Fax: (816) 241-1020

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



LA Plate
1931 Martin Luther King Boulevard
Lynwood CA, 90262

Phone: (323) 563-5584
Fax: (323) 563-5504

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Lafayette
1361 Petroleum Parkway
Broussard LA, 70518

Phone: (713) 672-1621
Alt Phone: (713) 432-0510
Fax: (713) 672-0528

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Los Angeles
10650 S Alameda St
Lynwood CA, 90262

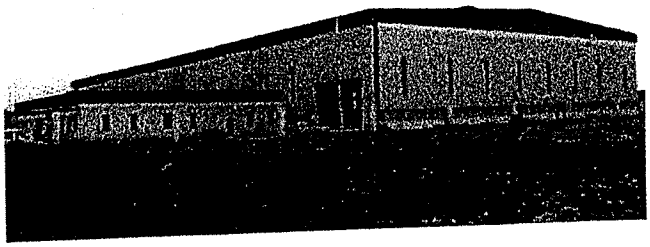
Corporate/General Inquiries:
(323) 567-1122

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Los Angeles
10650 S Alameda St
Lynwood CA, 90262

Sales & Material Inquiries:
(323) 567-1122

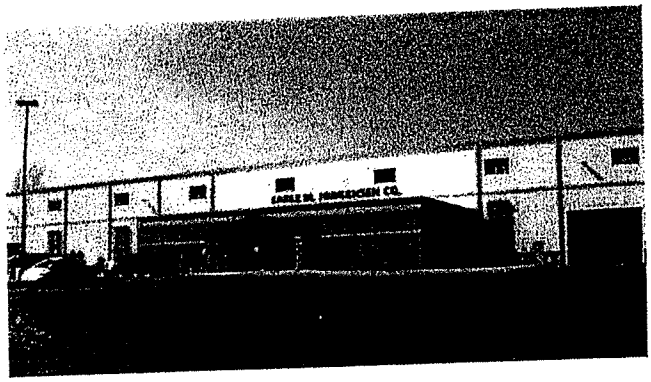
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Malaysia
PTD 5844, Jalan SiLC 2 Kawasan Perindustrian SiLC
Bandar Nusajaya 79200 Nusajaya Johor, Malaysia

Phone: (607) 531-9155
Fax: (607) 531-9159

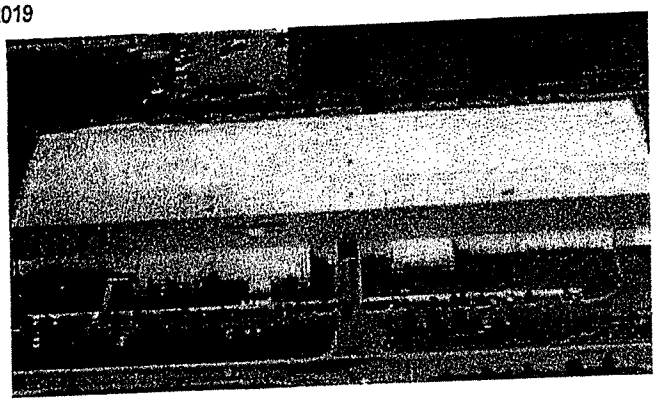
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Memphis
3169 Cypress Ridge Drive
Eads TN, 38028

Phone: (901) 317-4300
Fax: (901) 290-5060

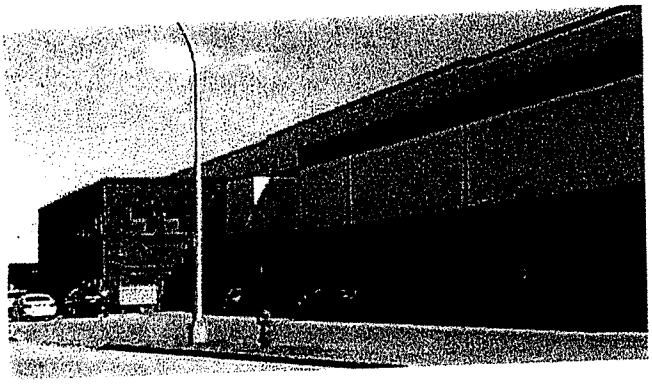
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Minneapolis
1775 101St Ave NE
Blaine MN, 55449

Phone: (763) 784-5000
Fax: (763) 784-2645

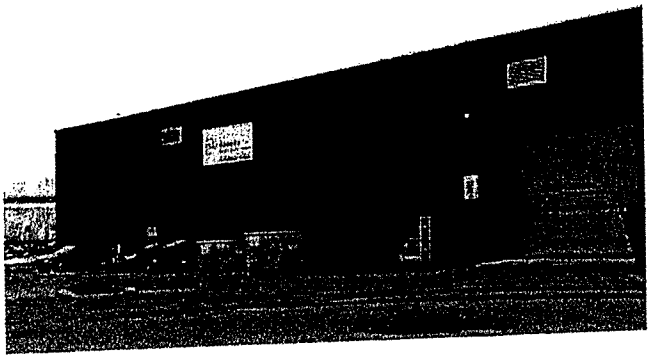
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Montreal
1255 Avenue Laplace
Laval Quebec Canada, H7C 2N6

Phone: (450) 661-5181
Alt Phone: (800) 361-0802
Fax: (450) 661-0422

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



North Bay
400 Kirkpatrick Street
North Bay Ontario Canada, P1B 9N1

Phone: (705) 474-0866
Alt Phone: (800) 668-5656
Fax: (705) 474-4682

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Orlando
8501 Florida Rock Road
Orlando FL, 32824

Phone: (800) 365-5454
Alt Phone: (704) 421-7227
Fax: (407) 226-1673

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Philadelphia
2200 Cabot Blvd West, Suite 100
Langhorne PA, 19047

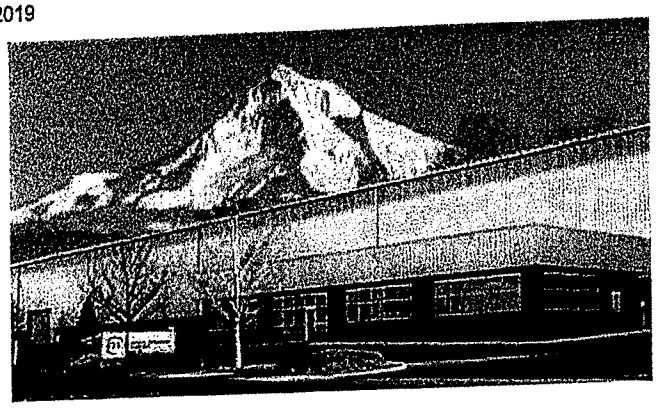
Phone: (215) 949-2850
Alt Phone: (800) 562-5370
Fax: (215) 949-1937

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Phoenix
5447 W Madison Street
Phoenix AZ, 85043

Phone: (602) 272-0461
Fax: (602) 278-1007

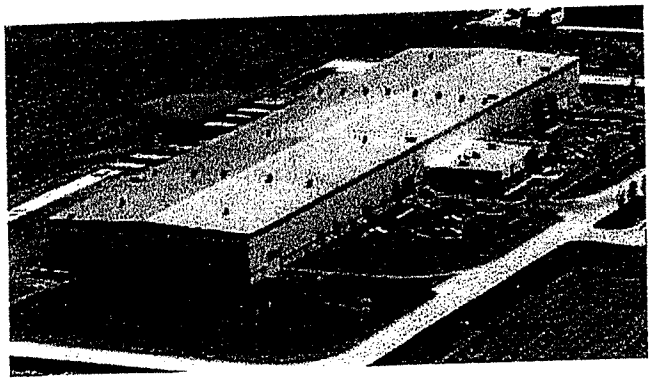
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Portland
16440 N.E. Mason Street
Portland OR, 97230

Phone: (503) 283-2251
Fax: (503) 283-1108

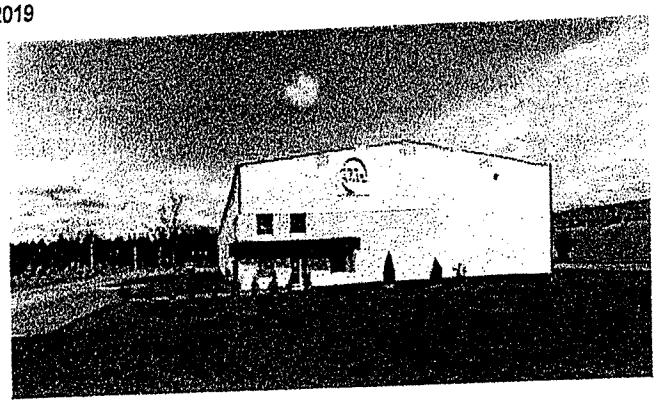
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Quad Cities
327 N 16th Avenue
Eldridge IA, 52748

Phone: (563) 285-5340
Fax: (563) 285-5350

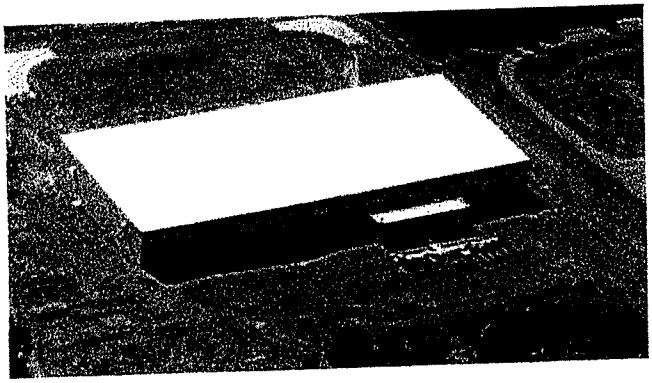
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Quebec City
180 Rue Des Grands-Lacs
St-Augustin De Desmaures Quebec Canada, G3A 2K1

Phone: (418) 870-1422
Alt Phone: (800) 361-0802
Fax: (418) 878-5811

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Richmond
25903 Simpson Road
Petersburg VA, 23803

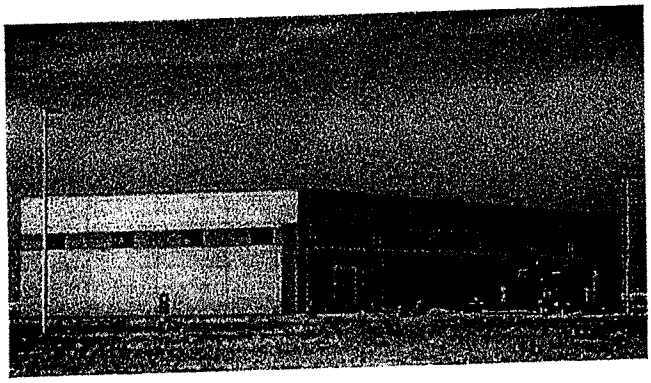
Phone: (804) 732-7491
Fax: (804) 732-7492

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Rochester
97 Bickford Street
Rochester NY, 14623

Phone: (330) 425-1500
Fax: (330) 963-8188

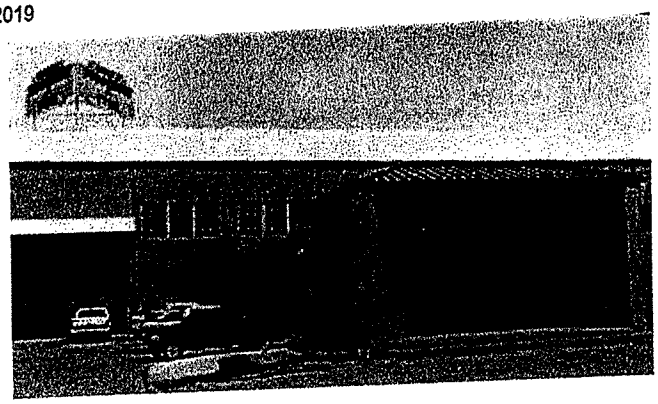
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Salt Lake City
450 South 5700 West
Salt Lake City UT, 84104

Phone: (801) 532-2543
Fax: (801) 532-2908

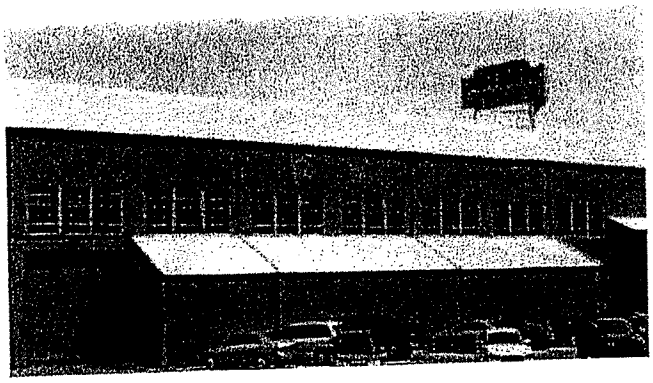
Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Tulsa
7313 E Pine Street
Tulsa OK, 74115

Phone: (918) 835-1511
Fax: (918) 836-2909

Contact Us (https://www.emjmetals.com/site/contact/contact-location)



Tulsa Honing
7314 E Pine Street
Tulsa OK, 74115

Phone: (918) 835-1511
Fax: (918) 836-2909

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

Wrightsville
200 Mifflin Drive
Wrightsville PA, 17368

Phone: (215) 949-2850
Fax: (717) 751-4100

Contact Us (https://www.emjmetals.com/site/contact/contact-location)

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EXHIBIT D

Truck driver

Explore career information by location

Ohio

How much does a truck driver make in Ohio?

Average salary

$1,142 per week

• Meets national average

113,338 salaries reported

The average salary for a **truck driver** is **$1,142** per week in Ohio.

Salary estimates are based on 113,338 salaries submitted anonymously to Indeed by **truck driver** employees, users, and collected from past and present job advertisements on Indeed in the past 36 months. The typical tenure for a Truck Driver is less than 1 year.

Where can a truck driver earn more?

Compare salaries for truck drivers in different locations

Ohio

vs

Enter a location

Compare

Explore truck driver openings

pelk 54

Where can truck drivers get the highest salary?

Top cities

Portland, OH
118 salaries reported
$306,415 per year

Ashville, OH
78 salaries reported
$1,279 per week

West Union, OH
33 salaries reported
$1,375 per week

Dexter City, OH
29 salaries reported
$1,177 per week

Woodsfield, OH
41 salaries reported
$1,274 per week

View more

Top companies

Lawrence Companies
63 salaries reported
$250,000 per year

Hansen & Adkins Auto Transport
585 salaries reported
$3,520 per week

Miller Transporters Inc.
66 salaries reported
$173,241 per year

Forward Air
307 salaries reported
$314,545 per year

Forward Air Transportation Services
214 salaries reported
$2,565 per week

Most common benefits for truck drivers

Health insurance

Paid time off

401(k)

Vision insurance

Dental insurance

Life insurance

Referral program

Disability insurance

Signing bonus

Tuition reimbursement

Performance bonuses

Monthly bonus

Salary satisfaction

Based on 31,930 ratings

51% of truck drivers in the United States think their salaries are enough for the cost of living in their area

How much do similar professions get paid?

Driver

Delivery Driver

pelk 56

9693 openings

Average salary
Ohio

$13.00
per hour

5520 openings

Average salary
Ohio

Learn more

Career insights

How to Negotiate Salary (With Tips and Examples)

Read the full article

Average Salary by Age

Read the full article

Jobs That Don't Require a Degree

Read the full article

View more articles

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Truck driver

Explore career information by location

Arizona

How much does a truck driver make in Arizona?

Average salary

$64,146 per year

▼ -14% below national average

8,553 salaries reported

The average salary for a **truck driver** is **$64,146** per year in Arizona.

Salary estimates are based on 8,553 salaries submitted anonymously to Indeed by **truck driver** employees, users, and collected from past and present job advertisements on Indeed in the past 36 months. The typical tenure for a Truck Driver is less than 1 year.

Where can a truck driver earn more?

Compare salaries for truck drivers in different locations

Arizona

vs

Enter a location

Compare

Explore truck driver openings

pelk 54

Where can truck drivers get the highest salary?

Top cities

New River, AZ 14 salaries reported	**$73,202** per year
Wickenburg, AZ 51 salaries reported	**$1,285** per week
Bisbee, AZ 13 salaries reported	**$91,515** per year
Surprise, AZ 306 salaries reported	**$56,137** per year
Show Low, AZ 27 salaries reported	**$72,030** per year

View more >

Top companies

Forward Air Transportation Services 13 salaries reported	**$18.97** per hour
Forward Air 205 salaries reported	**$185,059** per year
Transport America 13 salaries reported	**$180,000** per year
Contract Freighters Inc 299 salaries reported	**$128,018** per year
C.R. England 23 salaries reported	**$77,388** per year

Most common benefits for truck drivers

Health insurance

Paid time off

401(k)

Vision insurance

Dental insurance

Life insurance

Referral program

Disability insurance

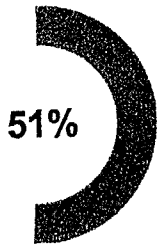
Signing bonus

Tuition reimbursement

Performance bonuses

Monthly bonus

Salary satisfaction



Based on 31,930 ratings

51% of truck drivers in the United States think their salaries are enough for the cost of living in their area

How much do similar professions get paid?

pelk 60

Driver
3316 openings

Average salary
Arizona

$14.01
per hour

Deliverv Driver
2299 openings

Average salary
Arizona

Learn more

Career insights

How to Negotiate Salary (With Tips and Examples)

Read the full article

Average Salary by Age

Read the full article

Jobs That Don't Require a Degree

Read the full article

View more articles

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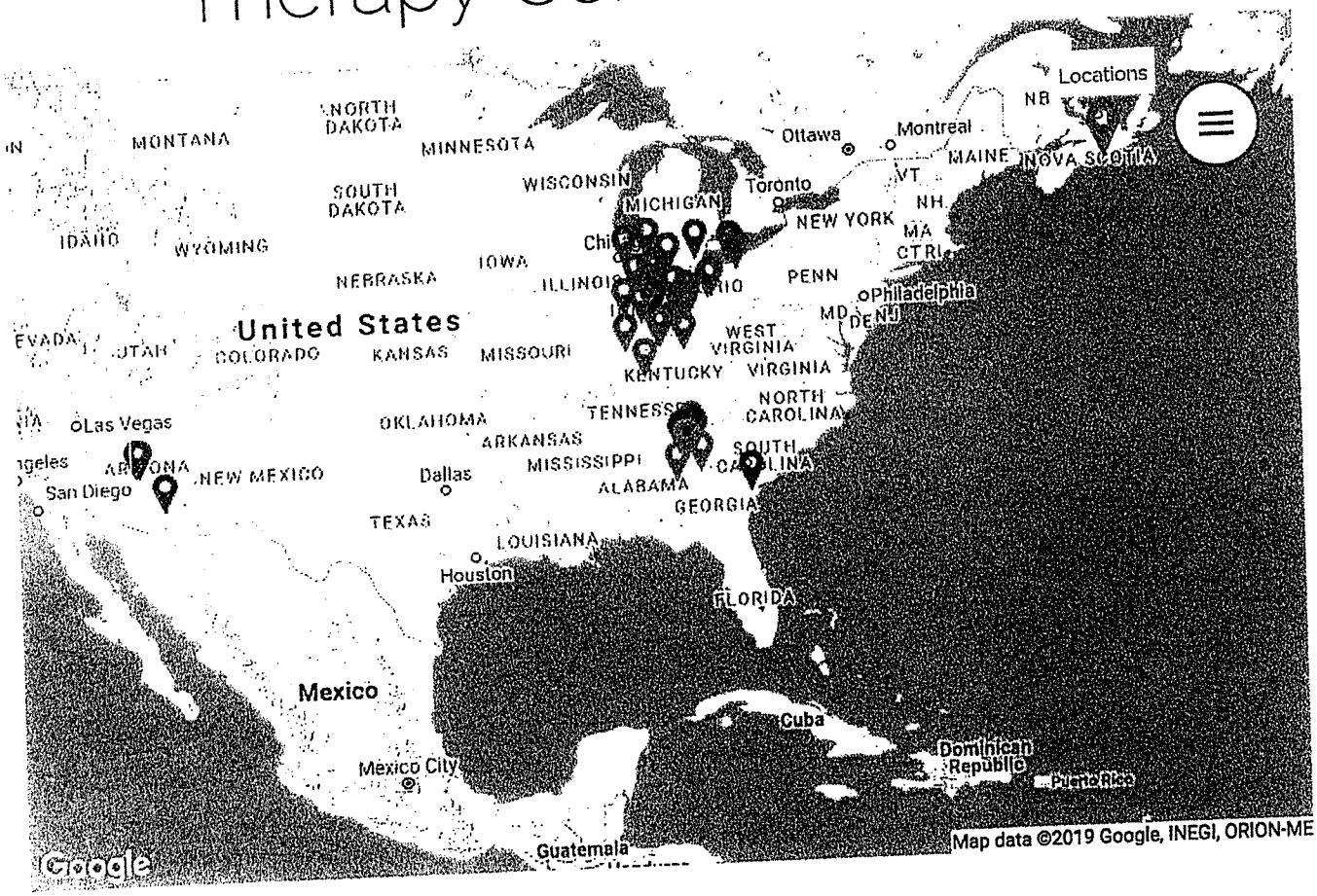
pelk 61

EXHIBIT E

hopebridge®
Autism Therapy Centers

Find a Hopebridge Autism Therapy Center Near You



Arizona

Therapy Center

5859 West Talavi Boulevard, Suite 180, Glendale, AZ 85306
(855) 324-0885

ABA DX

Locations

Tucson East Autism Therapy Center

9302 E. 22nd Street, Tucson, AZ 85710
(855) 324-0885

ABA DX

hopebridge®
Autism Therapy Centers

Phoenix
Autism
Therapy
Center

3602 E. Greenway
Rd, Suite 102,
Phoenix, AZ 85032
(855) 324-0885

Locations

ABA DX

Georgia

Indiana

pelk 64

hopebridge®
Autism Therapy Centers

Kentucky

Ohio

Westlake Autism Therapy Center

29077 Clemens Road, Westlake, OH 44145
(855) 324-0885

Locations

pelk 65

Autism Therapy Center

18151 Jefferson Park Rd, Cleveland, OH 44130
(330) 967-0325

ABA DX

Locations

Akron Autism Therapy Center

490 White Pond Drive, Akron, OH 44320
(330) 777-3284

ABA DX

Autism Therapy Center

1900 Indian Wood Circle, Maumee, OH 43537
(419) 830-0078

ABA DX

Locations

Dublin Autism Therapy Center

6085 Emerald Parkway, Dublin, OH 43016
(614) 482-4300

ABA DX

Autism Therapy Center

773 Brooksedge Blvd., Westerville, OH 43081
(614) 401-3366

ABA DX

Locations

Milford Autism Therapy Center

703 State Route 28
Milford, OH 45150
(513) 831-2578

ABA DX

pelk 68

Therapy Center

7264 Columbia Road, Suite 1000
Mason, OH 45039
(513) 402-1711

ABA DX

Miamisburg Autism Therapy Center

9260 Marketplace Dr Miamisburg, OH 45342
(937) 388-5110

ABA DX

hopebridge®
Autism Therapy Centers

Autism Therapy Center

1255 Kemper Meadow Dr, Suite 900 Cincinnati, OH 45240
(513) 294-1522

ABA DX

Find a location near you

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Home Office compliance@hopebridge.com

EXHIBIT F

Glendale Union HSD
Special Education Department
7650 N 43rd Ave
Glendale, AZ 85301
ne: 623-435-6067
FdX: 623-435-6078

Prior Written Notice

Date: 08/23/2019

Student Name:	Pelkola, Sara M.	Home Phone:	702-498-1359
Date Of Birth:	12/02/2003	Home Address:	4111 W Charter Oak Rd
Student No.:	277601219 Student State ID: 39618856		Phoenix, AZ 85029

Age	Gender	Grade	Home School	Attending School
15	Female	10		Moon Valley High School

Ethnicity	Primary Language	Home Language
White	English	English

Parent/Guardian

Name	Cell	Name	Cell
Heidi Pelkola	702-498-1359	Greg Pelkola	702-686-7445
Address	Work	Address	Work Phone
4111 W Charter Oak Rd Phoenix, AZ 85029	623-843-8433	2309 Bahama Point Ave N. Las Vegas, NV 89031	
	Emergency Phone		Emergency Phone

Description of Actions Proposed or Refused by the District:

The District proposes to initiate or change identification of a student.
he District proposes to initiate or change the evaluation of a student.
.he District proposes to initiate or change the educational placement of a student.
The District proposes to initiate or change the provision of free, appropriate public education (FAPE) to a student.

Description of the action proposed or refused relative to identification, evaluation/reeval, educational placement, or provision of a Explanation of why the school district proposes or refuses to take

The IEP team met an all agreed to benefit Sara at this time with her diagnosis she needs to be placed on Home bound and the IEP will be re-evaluated at the end of the year to see if it needs to be updated. She will focus on three classed and Speech language therapy: Biology, World History, English 3-4 and Geometry. Erin Jenkins will be her Home bound teacher. Lauren Hedani will be her will continue her speech services.

Description of any options the school district considered and the reasons why those options were rejected:

The IEP team reviewed medical documentation showing that Sara has Autism and Social anxiety, the Team determined to place Sara on home bound so she continue getting her academics and earning credits towards graduation for high school.

Description of each evaluation procedure, test, record or report the school district used/will use as a basis for the proposed or refused action.

Previous IEP, Doctor report, grade report, parent input, teachers input

Description of any other factors that are relevant to the school district's proposal or refusal:

Sara will be placed on home bound due to her Autism and Social anxiety as of August 23, 2019.

ents of a student and the student have protection under procedural safeguards in accordance with Federal Law. Contact the school ychologist or call the Special Education office if you want a copy of the procedural safeguards.

Name	Date of Birth	Student Number	Document Date
Pelkola, Sara M.	12/02/2003	277601219	08/23/2019

Procedural Safeguards provided to parent(s) LKD

Sources of assistance in understanding Procedural Safeguards are listed below

Arizona Department of Education:
Exceptional Student Services
1535 W Jefferson
Phoenix, AZ 85007
602-542-3184 or 800-352-4558

Parent Training and Information Center:
Raising Special Kids
5025 E Washington Street, Suite 204
Phoenix, AZ 85034
602-242-4366 or 800-237-3007

Protection and Advocacy Agency
Arizona Center for Disability Law
5025 E Washington Street, Suite 202
Phoenix, AZ 85034
602-274-6287 or 800-927-2260

Case Manager: Leslie Dismuke
Phone: 623-915-8145

This document was prepared by: Leslie Dismuke

Glendale Union HSD
Special Education Department
7650 N 43rd Ave
Glendale, AZ 85301
Phone: 623-435-6067
Fax: 623-435-6078

Meeting Request

Date: 08/23/2019

Student Name: Pelkola, Sara M.
Date Of Birth: 12/02/2003
Student No.: 277601219 Student State ID: 39618856

Home Phone: 702-498-1359
Home Address: 4111 W Charter Oak Rd
Phoenix, AZ 85029

Age	Gender	Grade	Home School	Attending School
15	Female	10		Moon Valley High School

Ethnicity	Primary Language	Home Language
White	English	English

Parent/Guardian Name	Cell	Name	Cell
Heidi Pelkola	702-498-1359	Greg Pelkola	702-686-7445
Address	**Work**	**Address**	**Work Phone**
4111 W Charter Oak Rd Phoenix, AZ 85029	623-843-8433	2309 Bahama Point Ave N. Las Vegas, NV 89031	
	Emergency Phone		**Emergency Phone**

Meeting Participants

Dear Parents/Guardians:

The District needs to schedule a meeting with you at a mutually convenient time. You are permitted to bring guests to the meeting, and are encouraged to invite your student's support coordinator or case manager if Sara M. Pelkola is supported by another state agency, such as Division of Developmental Disabilities or Vocational Rehabilitation. We do expect if you invite guests to the meeting you let us know in advance so we can ensure an appropriate meeting room and location to accommodate all Team members.

If you would like to review the records prior to the meeting, please contact .

The purpose of the meeting:

The following are invited to attend and participate in the meeting:

Positions	Names
Administrator	Steven Ducey
Case Manager	Leslie Dismuke
Case Manager	Dawn Ratke
Counselor	Denise El Habach
General Education Teacher	Peggy Armstrong
General Education Teacher	Rina Beukema
General Education Teacher	Timothy Clark
General Education Teacher	David Coates
General Education Teacher	Lora Zimmer
Individual to Interpret Instructional Implications	Debora Crawford
Psychologist	Derk Stephens
Speech/Language Pathologist	Lauren Hedani
Unassigned	Christy Wiley

Other specialists:

We would like to schedule a meeting with you at:

Meeting Location _____
Meeting Date _____
Meeting Time _____

Name	Date of Birth	Student Number	Document Date
Pelkola, Sara M.	12/02/2003	277601219	08/23/2019

If you need to change the date and/or time of the meeting, please call

_____ at _____

☐ Interpreter Needed

Parent Rights

A parent has the Right to participate in all meetings regarding Identification, Evaluation, Placement, and Free Appropriate Education (FAPE) for their child. A parent has the Right to sufficient notice of the meeting early enough to ensure they will have an opportunity to attend at a mutually agreed upon time and place.

Please check the following, if applicable:

☐ I plan to attend this meeting.

☐ I do not plan to attend at the proposed time, but am requesting an alternate meeting time. My available dates/times are: _____

☐ I do not plan to participate. Please meet and inform me of the outcome.

☐ Phone conference is requested.

☐ I need a copy of the Release of Student Records form and plan to bring _____ to the meeting, whose position is _____.

☐ I grant my consent for the individual(s) listed in the Other Specialists section of this document to attend this meeting.

Parent Signature: Kleidi Pelkola Date: 8-23-19

Glendale Union HSD
Special Education Department
7650 N 43rd Ave
Glendale, AZ 85301
Phone: 623-435-6067
Fax: 623-435-6078

Individualized Education Program

Student Name: Pelkola, Sara M.
Date Of Birth: 12/02/2003
Student No.: 277601219
State Student ID: 39618856

Home Phone: 702-498-1359
Home Address: 4111 W Charter Oak Rd
Phoenix, AZ 85029

Date: 08/23/2019

Age	Gender	Grade	Home School	Attending School
15	Female	10		Moon Valley High School

Ethnicity	Primary Language	Home Language
White	English	English

Parent/Guardian

Name	Home Phone	Name	Home Phone
Heidi Pelkola		Greg Pelkola	
Address	**Work Phone**	**Address**	**Work Phone**
4111 W Charter Oak Rd	623-843-8433	2309 Bahama Point Ave	
Phoenix, AZ 85029	**Emergency Phone** 702-498-1359	N. Las Vegas, NV 89031	**Emergency Phone** 702-686-7445

IEP Review Due Date : 08/22/2020 Re-evaluation Due Date: 02/27/2022

Interpreter Needed: ☐Y ☑N

Documentation of efforts to schedule the IEP Meeting:

Date	Description

School Age Eligibility: Autism

The student and parents have been informed of his/her rights under IDEA. These rights will transfer from the parents to the student at age 18. Parent Initial HP Student Initial _____.

B. IEP Team Members

The following were in attendance:

Names		Position	Signature	Date
Pelkola, Sara M.	Invited	Student		
Pelkola, Heidi M.	Invited	Mother	Heidi Pelkola	8-23-19
Pelkola, Greg E.	Invited	Father		
Dismuke, Leslie	Invited	Case Manager	[illegible]	8/23/19
El Habach, Denise L.	Invited	Counselor	[illegible]	8-23-19
Armstrong, Peggy S.	Invited	General Education Teacher		
Beukema, Rina A.	Invited	General Education Teacher	Rina Beukema	8-23-19
Clark, Timothy	Invited	General Education Teacher		
Coates, David E.	Invited	General Education Teacher		
Harman, Dawn	Invited	General Education Teacher	Dawn Harman	8-23-19

Name	Date of Birth	Student Number	Document Date
Pelkola, Sara M.	12/02/2003	277601219	08/23/2019

Zimmer, Lora	Invited	General Education Teacher		
Crawford, Debora L.	Invited	Individual to Interpret Instructional Implications & LEA Rep.	D. Crawford	8/23/19
Jenkins, Erin L.	Invited	Special Education Teacher	[illegible]	8/23/19
Hedani, Lauren K.	Invited	Speech/Language Pathologist	Lauren Hedani MS, CCC-SLP	8/23/19
Wiley, Christy	Invited	Unassigned		

C. PERTINENT MEDICAL INFORMATION

Vision Results:

Date: 01/23/2019

Referral	Referral Date	Referral Result
Right Eye Near		Left Eye Near
Without Glasses: R Pass	L Pass	B
With Glasses: R	L	B

Comments
Sara passed the school vision screening without glasses as on January 23, 2019. We have tried numerous attempt to get her to come to campus student will not get out of the car

Hearing Results:

Date: 01/23/2019 R/ P L/ P

Comments
Sara passed the school hearing screening without glasses as on January 23, 2019. We have tried numerous attempt to get her to come to campus student will not get out of the car

Health Issues:
Social Anxiety
Additional medical information is on file in the nurse's office and in the teacher's file. ☐Y ☐N

TRANSITION

ASSESSMENT RESULTS INCLUDING AGE-APPROPRIATE TRANSITION-BASED ASSESSMENTS

none

MEASURABLE POSTSECONDARY GOALS:

Training/Education
Sara wants to graduate from high school. She is a very bright and intelligent young lady. At this time, she is unsure what she wants to do after high school.

Employment
Sara is a Sophomore. She is currently enrolled in GUHSD at Glendale Union Online School, which is a home based online program. Sara is academically capable and would like to earn good grades. Sara is currently in out school attention zone. She will be moving from Online school to home bound. Once she is of age she will think about getting a part-time job.

Independent living skills, where appropriate
Sara plans to live mother. She spends all school breaks and summer with father. Sara parents are divorced. Both parent are very concerned about her academics.

PROJECTED COURSE OF STUDY:

School Year: 2018-2019
List Courses: Spanish 1-2, English 1-2, Integrated Science, Algebra 1-2, Engineer Science (currently she is in Algebra 1 and Integared Science at OLA)

School Year: 2019-2020
List Courses: English 3-4, Biology 1-2, World History, Geometry

COORDINATED ACTIVITIES

Transition Area: Education/Instruction
Transition Activity/Strategy: Sara plans on graduating from high school and attending a college after graduation. College and major is undecided.
Person/Agency Responsible: Sara, Parents, Counselor, SPE Teacher

Transition Area: Community Experience
Transition Activity/Strategy: Sara does liking hang out with family. She like going to the mall and restaurants.
Person/Agency Responsible: Sara, Parents

Transition Area: Employment

Transition Activity/Strategy: Sara is a freshman and is not thinking about getting a job at this time.

Person/Agency Responsible: Sara, Parents

Transition Area: Adult Living

Transition Activity/Strategy: Sara does not have an ATM card or a banking account. She has limited knowledge with budget and living arrangement.

Person/Agency Responsible: Sara, Parents

Transition Area: Daily Living Skills

Transition Activity/Strategy: Sara at this time does have limited cooking and cleaning skills. She does help mom with household chores when needed.

Person/Agency Responsible: Sara, Parents

Transition Area: Functional/Vocational

Transition Activity/Strategy: Sara is a freshman and has limited functional/vocational skills. As she matures and is exposed to different classes and situation she will increase her functional/vocational skills.

Person/Agency Responsible: Sara, Parents

Transition Area: Related Services

Transition Activity/Strategy: Sara does receive speech services.

Person/Agency Responsible: Sara, Speech therapist

D. SUMMARY OF PRESENT LEVELS OF ACADEMIC ACHIEVEMENT AND FUNCTIONAL PERFORMANCE

Standardized Testing

Summary of Test History

Scholastic Reading Inventory
5-30-18: Lexile of 1222

Summary of Current Assessments

Sara is a freshman student who formerly attended Moon Valley High School. She entered GUHSD from Sweetwater Elementary School in the Washington Elementary School District. Sara has had a stable school history with adequate attendance for instructional purposes. While attending Moon Valley High School, Sara receives all instruction in the general education setting. A 504 Evaluation and Accommodation Plan were completed during Sara's 7th grade year at Sweetwater Elementary School. Sara's mother, Ms. Pelkola, had requested the evaluation due to concerns related to Autism Spectrum Disorder. Sara also participated in the gifted program while at Sweetwater Elementary Shool. English is the primary language of the home and student.

Intellectual potential, as measured by the WISC-V, was within the Very High range with a FSIQ of 123. Statistically significant strengths were indicated in the areas of Fluid Reasoning and Working Memory. Academic achievement was assessed via the KTEA-3. Sara earned the following standard scores: Math Composite=117 (Above Average); Reading Composite=100 (Average); Reading Understanding Composite=96 (Average); and Written Expression=112. Social/emotional ratings completed by Sara's mother and teachers endorsed behaviors associated with Autism Spectrum Disorder- High Functioning.

Communication: Sara is a freshman who currently attends Moon Valley High School. She was referred for an evaluation due to concerns with her social and pragmatic language. The results of the TOPL-2 indicated that Sara's pragmatic language skills were below average for her chronological age. Sara would respond to questions, but did not voluntarily initiate conversation. Her responses were typically 1-2 words, however, as she became more familiar with the clinician she used longer, grammatically correct sentences. Sara appeared shy and anxious during the session. She did not make eye contact and spent most of the evaluation with her hands clasped in her lap and turned away from the clinician. Sara's response to questions were very literal and concrete. She had difficulty understanding abstract language and indirect requests and inferences. Sara struggles to understand the perspective of others and infer emotions and predict actions based on body language, facial expressions, and other visual cues. She demonstrated some understanding of emotions (i.e., happy, angry). Sara struggled with understanding when a communication breakdown had occurred and how to repair the breakdown. She used persuasive language appropriately and could identify when to apologize, but often could not explain her rationale for why the listener might be upset. The result of the evaluation indicate that Sara does exhibit a pragmatic language delay, which is consistent with her diagnosis of Autism.

Currently, Sara will receive home instruction through curriculum packets as the IEP team determines what is the best course of action to education Sara during this high anxiety time frame. She will also be eventuated by a Psychologist Autism specialist within the next couple of week. She will be doing packets in Algebra 1 and Science in hopes to get her physically back on Moon

Valley High School campus.With the IEP in place, Sara will get the support in with her classes via phone conversation with the online instructors.

SUMMARY OF PRESENT LEVELS OF ACADEMIC ACHIEVEMENT AND FUNCTIONAL PERFORMANCE

Strengths of Student (Academic, Behavioral, Learning Characteristics)

Academic Achievement/Cognitive Development

Sara's academic achievement/cognitive development was very strong for a student her age. Prior to her leaving school in December she was in three honors classes. Currently she is taking Algebra I, Integrated Science at OLA. She is no longer attending OLA due to have high anxiety and computer phobia. Currently, Sara will receive home instruction through curriculum packets as the IEP team determines what is the best course of action to education Sara during this high anxiety time frame. She will also be eventuated by a Psychologist Autism specialist within the next couple of week. She will be doing packets in Algebra 1 and Science in hopes to get her physically back on Moon Valley High School campus.With the IEP in place, Sara will get the support in with her classes via phone conversation with the online instructors

Functional Performance

Sara is a very smart and intelligent young lady. She has a very high functional performance level.

Motor

Sara is able to navigate the campus but refused to come to school.

Emotional/Social/Behavioral

Sara does have emotional issues. She will needs to seek out the social worker, school psychologist or case mgr if she is feeling stressed out. She does have social anxiety but no behavioral issues at this time. Sara is not coming to school and is refusing to attend OLA.

Self-help

Sara does need help with self-help. She has social anxiety. She will be seeing a psychiatrist and be evaluated by a Autistic special within the next couple of weeks.

Communication

Sara is able to communicate with staff, peers and teachers.

SPEECH-LANGUAGE

Sara is a freshman who attended Moon Valley High School. She was referred for an evaluation due to concerns with her pragmatic language skills. The speech-language pathologist's information regarding Sara's present levels of academic achievement and function are based on observations, information obtained from a pragmatic language evaluation, and consultation with the school psychologist.

Sara is a quiet, introverted student during conversational interactions. When she did converse with others, she exhibited good functional communication skills and there are no concerns for articulation, voice, and fluency at this time. Sara can listen to a short story and answer higher-level critical thinking questions independently. Given a vocabulary word, she can provide an appropriate definition or synonym. Sara can organize and integrate information to formulate generalized insights. Given a topic statement, she can provide her opinion or stance. Given a social problem or scenario, Sara can identify if a behavior is expected or unexpected behaviors. During a social setting, Sara will engage in social interactions with the clinician given extended time to establish rapport and with prompting

Weakness

Academic Achievement/Cognitive Development

Sara's academic achievement/cognitive development was very strong for a student her age. Prior to leaving school she was in three honors classes. Currently she is taking Algebra I, Integrated Science, and Forensic at OLA. With the IEP in place, Sara will get the support in her classes so she can be successful. Sara does struggle with some emotional issue which cause her not to attend school. If she does come back to campus she will need the support of the social worker, school psychologist and her case mgr. The IEP team feels she does need academic achievement/cognitive development services. Due to her not attending OLA due to social anxiety and computer phobia she will start doing packages at home and then have a aide input work into the computer.

Functional Performance

Sara is a very smart and intelligent young lady. She has a very high functional performance level.

Motor

Sara is able to navigate the campus but refused to come to school.

Emotional/Social/Behavioral

Sara does have emotional issues. She will need to meet with the social worker, school psychologist or case mgr if she is feel stressed out. or anxiety when she comes back to campus. She does have any social anxiety or behavioral issues at

this time. The IEP team does feel Sara does need emotional support but no behavioral support.

Self-help

Sara does need help with self-help. She has social anxiety. She will be seeing a psychiatrist and be evaluated by a Autistic special within the next couple of weeks.

Communication

SPEECH-LANGUAGE
Sara exhibits delays in her pragmatic language skills at this time. She has difficulty reading non-verbal cues and body language when interacting with adults and peers. Although she can identify expected and unexpected behaviors, she struggles with implementing those behaviors in real-time settings and situations. Sara's responses to social situations are very concrete and literal and she has difficulty understanding indirect requests and references. Although she can identify when a social breakdown has occurred, she has difficulty explaining how to repair a breakdown and providing a rationale for why a communication partner might be upset. Sara would benefit from learning strategies to help with these pragmatic language deficits in a safe, structured environment. Based upon the information gathered from evaluations, observations and consultation with the school psychologist, Sara would benefit from speech-language therapy services to address these needs.

Effect of disability on Progress in the General Curriculum and Needs of Student to Access the General Curriculum

It is recommended that the Multidisciplinary Education Team use the results of the present evaluation, as well as data collected from other sources, to determine the most appropriate educational planning and placement for Sara. Sara has documentation from a doctor diagnosing her with Social anxiety. She will be placement on home bound

Department of Developmental Disabilities (DDD) and Arizona Long Term Care System (ALTCS) offer various services to individuals identified as having one of four diagnoses. Some of the services offered, if an individual is determined eligible under ALTCS, are habilitation, respite care, speech and occupational therapy. The individual would have to be determined eligible and in need to receive access to additional services but can contact them to setup an intake at (844) 770-9500 for DDD and (602) 417-6600 for ALTCS. Individuals applying for ALTCS would have to be determined eligible under DDD before applying.

Parenting a child with an autism spectrum disorder can present challenges. Sara's parents may find it helpful to join a support group for parents of children with Pervasive Developmental Disabilities. Agencies that may be beneficial to the family are:

SAARC (Southwest Autism Research and Resource Center)
www.autismcenter.org.
Phone (602) 340-8717

Autism Society of Greater Phoenix
www.phxautism.org/resources

Sara may need to return to school on a shortened day and gradually increase the amount of time at school as she learns to tolerate being back in the school environment. Once Sara is attending school for an extended period of time, provide a quiet place for Sara to relax and "unwind," such as the social worker's office or the Academic Learning Center.

The goal is for Sara to attend school consistently. It may be beneifical if the school does not call home each time Sara is absent. Teachers should not emphasize the number of absences that Sara has obtained and should limit the amount of make-up work that is given at a time so as not to overwhelm her.

The team may also wish to have Sara arrive at school early or shortly after the school day begins. It may be helpful if Sara starts her day in a class of her choosing, such as math, since it is her preferred subject.

Sara may benefit from learning relaxation strategies, such as deep breathing, imagery, and mindfulness. Fidgets (e.g. Theraputty) may also be useful to Sara.

Sara may benefit from being involved in a school club, organization, or other structured activity.

In the school setting:
1. Prepare Sara for transitions and/or changes in routine by letting her know ahead of time the changes that are to come. It may also be beneficial to provide Sara a summary of what will happen and how it will be different.
2. When teaching academic and social skills, teach them in a step-by-step process.
3. The use of familiar and repetitive directions may also be useful.
4. Model and role-play social situations incorporating appropriate behaviors. Also, teach socially acceptable phrases

to be used in specific situations. The use of social stories may also be beneficial.
5. Rather than ask Sara if she needs help, ask if she is stuck on something.

Parent Input for Enhancing Child's Education

Sara parents are very concerned about her education. They want to see her graduate from Moon Valley High School and attend a college.

Performance In General Education

Additional Information:

Use visual aids
Emphasize main idea/major points
Allow additional time to complete assignments/tests
Highlight important information
Clarify and/or simplify directions
Re-direction to task
Provide a predictable routine and structure
Positive reinforcement
Preferential seating
Offer choices
Extended time for oral and written responses
Shortened assignments as needed
Repeat and rephrase as needed
Provide models/specific examples/demonstrations of concepts
Directions in 1-2 step chunks
Use of Academic Learning Center with the uses of notes
Have Sara repeat directions to ensure she understands
List the steps or procedures for multi-step problems and algorithms
Keep sample math problems on the board for student to reference
Seat Sara near someone who will be helpful
Break down large tasks into smaller tasks
Once Sara returns to school she will be allowed to have lunch in a quiet place on campus (Kim's office)
Once Sara does come back to school due to anxiety she will be allowed to leave class 2-3 minutes early to get to her next class.
Print out assignment for Sara to complete

Progress on IEP Goals:

Explanation for Lack of Progress:

The student is making appropriate progress on IEP Goals: ☐Yes ☑No ☐N/A

Sara refused to come to school. At the end of 2019, she went from school instruction to home instruction. She will now be placed on home bound

E. SPECIAL CONSIDERATIONS

Assistive Technology

The team considered the student's need for Assistive Technology and determined it is necessary.

Sara has access to the use of calculators, computers, internet and word processors which are accessible to all students. The team determined that she does not require any individualized or additional assistive technology or services in this area.

Sara is able to access technology devices; however, she is afraid to use the devices for fear that someone is spying on her and/or tracking her while using the computer.

Behavioral Needs

The team considered the student's need for positive behavioral interventions, supports and strategies to address behaviors that impede learning of self or others and determined these are not necessary.

English Language Learner (For the child who is limited English proficient.)

It has been determined that this student is not an English Language Learner.

Blind/Visually Impaired

The team considered if the student has a visual impairment that requires Braille services in order to function at a level consistent with expected achievement and determined are not needed.

Deaf/Hearing Impaired

The team considered if the student has communication needs that require educational communication in an alternate mode preferred by the student and determined is not necessary.

Communication

The team considered the student's needs for other communication services, supports and goals and determined are necessary.

Sara exhibits delays in her pragmatic language skills at this time.

F. ANNUAL GOALS AND BENCHMARKS OR SHORT TERM OBJECTIVES

Progress Report Frequency:

Progress reports on goals will be sent home in accordance with the grading periods.

Annual Goal(s)

Category: Speech-Pragmatics/Social Lang

By March 2020, given a pictured social scenario, Sara will describe the meaning behind various non-verbal communication signs (i.e., facial expressions, body language, tone of voice, etc) in 70% of opportunities as measured by clinician made data sheets.

Start Date 08/23/2019

Score 20% with cues

By March 2020, given a social scenario, Sara will identify the problem and provide an appropriate solution with at least 1 supporting rationale/detail in 70% of opportunities as measured by clinician made data sheets.

Start Date 08/23/2019

Score 20% with cues

Annual Goal(s)

Category: Ind. Instruction/Study Skills

By March 2020, Sara will able to attend high school again at Moon Valley high school without receiving home bound services.

Start Date 08/23/2019

Score She is not attending school now.

G. STATEMENT OF SPECIAL EDUCATION/RELATED SERVICES

Specially Designed Instruction	Provider	Location	Amount of Time		Date of Initiation On/About	Duration of Service
			Minutes	Frequency		
Individual instruction/study skills strategies	Special Education Teacher	Home	240	per week	08/23/2019	08/22/2020

Related Service

The team considered the need for related services and determined that the student is in need of related services.

Related Service	Provider	Location	Amount of Time		Date of Initiation On/About	Duration of Service
			Minutes	Frequency		
Speech/Language-Pragmatics/Social Language	Speech/Lang Therapist and/or Assistant	Therapy room	80	every month	08/23/2019	08/22/2020

Transportation:

☐Y ☑N The student will receive Special Education transportation for the duration of this IEP due to the disability and to access the program site. Curb to curb transportation to address needs that are indicated in the IEP will be provided.

☐Y ☑N The student will receive Special Education transportation for the duration of this IEP due to the disability and to access the program site. Adult assistance to address needs that are indicated in the IEP will be provided.

H. SUPPLEMENTARY AIDS AND SERVICES (ACCOMMODATIONS AND MODIFICATIONS)

Supplemental Aids and Services

The team considered the need for supplemental aids and services and determined that they are not needed.

Program Modifications and/or Supports for School Personnel

Programs supports and modifications were considered but not needed for the child to advance appropriately toward attaining annual goals.

Accommodations

☐ No accommodations are necessary.

☑ The following accommodations are necessary for this student to benefit from instruction in the general education classroom:

Use visual aids
Emphasize main idea/major points
Allow additional time to complete assignments/tests
Highlight important information
Clarify and/or simplify directions
Re-direction to task
Provide a predictable routine and structure
Positive reinforcement
Preferential seating
Offer choices
Extended time for oral and written responses
Shortened assignments as needed
Repeat and rephrase as needed

Provide models/specific examples/demonstrations of concepts
Directions in 1-2 step chunks
Use of Academic Learning Center with the uses of notes
Have Sara repeat directions to ensure she understands
List the steps or procedures for multi-step problems and algorithms
Keep sample math problems on the board for student to reference
Seat Sara near someone who will be helpful
Break down large tasks into smaller tasks

I. EXTENDED SCHOOL YEAR (ESY)

The team considered the need for ESY and determined that the student is eligible for ESY

Sara has been out of school since the middle of December of 2018. She will be returning back to campus on 3/27/2019. She will need ESY this summer to help her stay on track to graduate.

J. TESTING

District Assessment

- [x] The student will take the district assessment with universal accommodations.
- [ ] The student will take the district assessment with the following testing accommodations:
- [ ] The student will take an alternate district assessment as the student receives program modifications determined necessary by the IEP team in the following courses:
- [ ] The student will not take district assessments as the student is not enrolled in courses that require and/or offer district assessments.

Use visual aids
Emphasize main idea/major points
Allow additional time to complete assignments/tests
Highlight important information
Clarify and/or simplify directions
Re-direction to task
Provide a predictable routine and structure
Positive reinforcement
Preferential seating
Offer choices
Extended time for oral and written responses
Shortened assignments as needed
Repeat and rephrase as needed
Sara can test in the ALC with the uses of notes
Once Sara returns to school she will be allowed to have lunch in a quiet place on campus (Kim's office)
Once Sara does come back to school due to anxiety she will be allowed to leave class 2-3 minutes early to get to her next class
Print out assignment for Sara to complete

State Assessment

- [x] The student will take the state assessment with universal accommodations.
- [ ] The student will take the state assessment with the following allowable testing accommodations per ADE guidelines:
- [ ] The student will take the alternate state assessment due to having intellectual disabilities qualifying the student to take the alternate state assessment.
- [ ] The student will not take state assessments as the student is not enrolled in courses that are aligned with the required state assessments at this time.

Use visual aids
Emphasize main idea/major points
Allow additional time to complete assignments/tests
Highlight important information
Clarify and/or simplify directions

Re-direction to task
Provide a predictable routine and structure
Positive reinforcement
Preferential seating
Offer choices
Extended time for oral and written responses
Shortened assignments as needed
Repeat and rephrase as needed
Sara can test in the ALC with the uses of notes
Once Sara returns to school she will be allowed to have lunch in a quiet place on campus (Kim's office)
Once Sara does come back to school due to aniexty she will be allowed to leave class 2-3 minutes early to get to her next class.
Print out assignment for Sara to complete

Student meets eligibility for alternate or alternative assessment? No

State assessment will be taken at grade level.

☑ Sara will be required to meet the Regular Education requirements of Governing Board Policy IKF, "Graduation Requirements" and any state mandated assessments required for a student to graduate from high school.

☐ Sara will not be required to meet the Regular Education requirements of Governing Board Policy IKF, "Graduation Requirements" and any state mandated assessments required for a student to graduate from high school. Instead, the Special Education requirements of Policy IKF will apply and the Student's IEP team will be responsible for determining the Student's graduation requirements.

District Tests	In Grades 7 -12, students will take the district tests (if any) for the general education courses in which they are enrolled. If a course does not have a corresponding district test, no testing is required. Accommodations are allowed.

**Note* Accommodations used in the student's daily instruction will be considered by the team for use during district and state assessments.

K. LEAST RESTRICTIVE ENVIRONMENT (LRE)

H: Homebased/homebound/hospital Program

Rationale for LRE selection:

a. Progress in the general curriculum is impacted by the disability?
due to significant weaknesses/deficits in organizational skills
due to significant weaknesses/deficits in emotional factors
due to significant weaknesses/deficits in following directions
due to significant weaknesses/deficits in attention

Are services to be provided at the neighborhood school?

Yes

b. Potential harmful effects of the placement:
none

c. Explain to what extent the student will not participate with non-disabled peers in academic and non-academic environments
Sara has the right to participate in any actives or club her peers are participating in. She is not limited just because she has an IEP.

EXHIBIT G

Moon Valley High School Test Scores

3625 W Cactus Rd, Phoenix, Arizona 85029 | (623) 915-8000

#2,698 in National Rankings (/education/best-high-schools/national-rankings) | Overall Score 84.35/100

(https://www.facebook.com/sharer/sharer.php?u=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Farizona%2Fdistricts%2Fglendale-union-high-school-district%2Fmoon-valley-high-school-978%2Ftest-scores%3Fsrc=usn_fb)
(https://twitter.com/share?url=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Farizona%2Fdistricts%2Fglendale-union-high-school-district%2Fmoon-valley-high-school-978%2Ftest-scores%3Fsrc=usn_tw&text=Moon%20Valley%20High%20School%20Test%20Scores%20-%20US%20News%20Best%20High%20Schools)
(https://www.reddit.com/submit?url=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Farizona%2Fdistricts%2Fglendale-union-high-school-district%2Fmoon-valley-high-school-978%2Ftest-scores%3Fsrc=usn_rd)

MORE

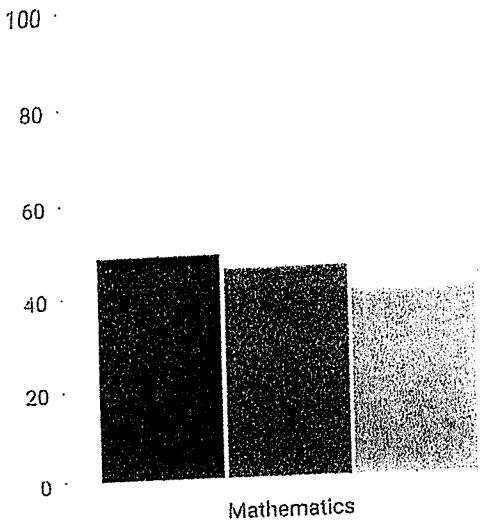
Overview (/education/best-high-schools/arizona/districts/glendale-union-high-school-district/moon-valley

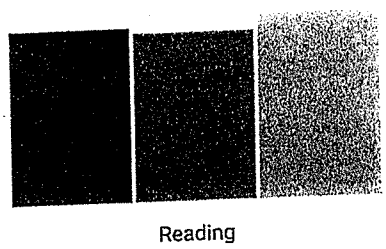
Subject Proficiency Testing

Arizona administered the Arizona's Measurement of Educational Readiness to Inform Teaching to high school students. These figures display how well the school as a whole performed in reading and mathematics.

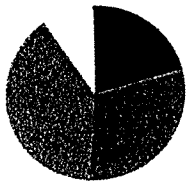
Subject Proficiency

School
District
State





Math Proficiency Distribution



Minimally Proficient **21%**
Partially Proficient **30%**
Proficient **40%**
Highly Proficient **9%**

Reading Proficiency Distribution

Minimally Proficient **34%**
Partially Proficient **28%**
Proficient **27%**
Highly Proficient **10%**

Overall Student Performance

This measures overall student performance on state-required tests.

Percentile Score on Arizona'S Measurement of Educational Readiness to Inform Teaching ?	80.3%
Arizona'S Measurement of Educational Readiness to Inform Teaching Scores Relative to U.S. News Expectations	Well Above Expectations

Underserved Student Performance

This measures the proficiency on state exams among typically underperforming subgroups.

Percentage of Underserved Students Who Are Proficient ?	37.8%
Percentage of Non-Underserved Students Who Are Proficient ?	46.4%
Gap Between School and State Among Underserved Students ?	12.7%

College-Ready Student Performance

High school students take AP® exams and IB exams to earn college credit and demonstrate success at college-level coursework. U.S. News calculated a College Readiness Index based on AP/IB exam participation rates and percentages of students passing at least one AP/IB exam.

National Percentile on College-level Exams	74.4%
Exam(s) Used for Index ?	AP®

Advanced Placement® (AP®) Student Performance

Many U.S. higher educational institutions grant credits or advanced placement based on student performance on AP® exams. This shows this school's student participation and performance on these exams if data were available.

Proportion of 12th Grade Class Who Took an Exam ?	42%
Proportion of 12th Grade Class Who Scored 3+ on an Exam ?	20%
Exam Takers in 12th Grade Class Who Scored 3+ on an Exam ?	49%
Exam Pass Rate ?	28%

Data are based on the 2016-2017 school year.

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International Baccalaureate (IB) data provided by International Baccalaureate of North America. Used with permission.

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Next: Map → (/education/best-high-schools/arizona/districts/glendale-union-high-school-district/moon-valley-high-school-978/map)

BEST HIGH SCHOOLS U.S.News & WORLD REPORT RANKINGS

Garfield High School Test Scores

435 N Firestone Blvd, Akron, Ohio 44301 | (330) 773-6831

#12,935-17,245 in National Rankings (/education/best-high-schools/national-rankings).

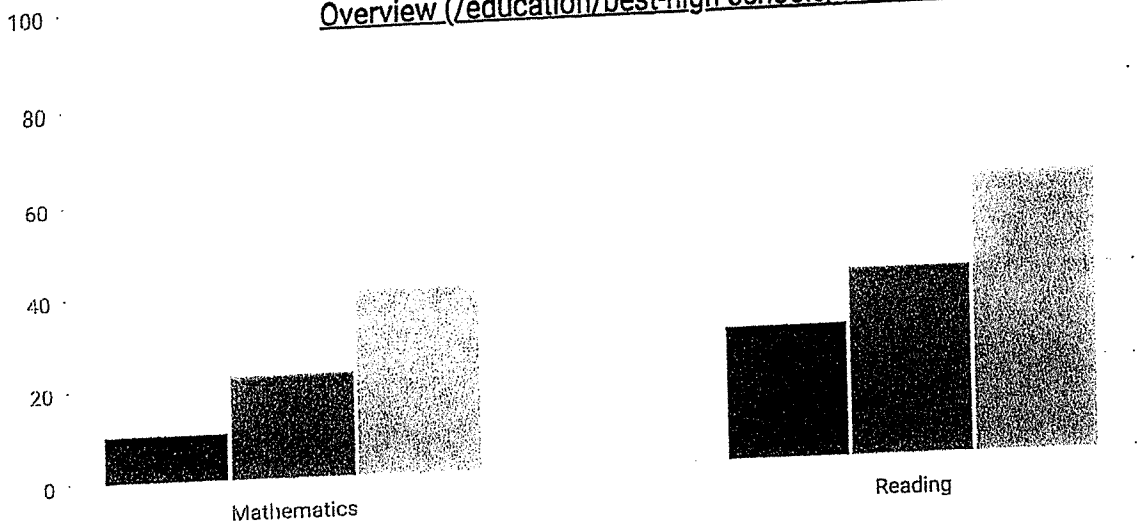
(https://www.facebook.com/sharer/sharer.php?u=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Fohio%2Fdistricts%2Fakron-city%2Fgarfield-high-school-15093%2Ftest-scores%3Fsrc=usn_fb)
(https://twitter.com/share?url=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Fohio%2Fdistricts%2Fakron-city%2Fgarfield-high-school-15093%2Ftest-scores%3Fsrc=usn_tw&text=Garfield%20High%20School%20Test%20Scores%20-%20US%20News%20Best%20High%20Schools)
(https://www.reddit.com/submit?url=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Fohio%2Fdistricts%2Fakron-city%2Fgarfield-high-school-15093%2Ftest-scores%3Fsrc=usn_rd)
MORE

Subject Proficiency Testing

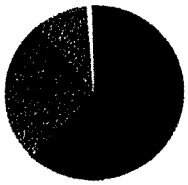
Ohio administered the Ohio Graduations Tests to high school students. These figures display how well the school as a whole performed in reading and mathematics.

Subject Proficiency

School
District
State

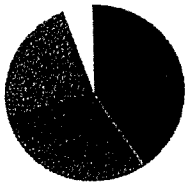


Math Proficiency Distribution



Limited **63%**
Basic **27%**
Proficient **10%**
Accelerated **1%**

Reading Proficiency Distribution



Limited **41%**
Basic **30%**
Proficient **24%**
Accelerated **4%**
Advanced **1%**

Overall Student Performance

This measures overall student performance on state-required tests.

Percentile Score on Ohio Graduations Tests ?	11.6%
Ohio Graduations Tests Scores Relative to U.S. News Expectations	Meets Expectations

Underserved Student Performance

This measures the proficiency on state exams among typically underperforming subgroups.

Percentage of Underserved Students Who Are Proficient ?	17.9%
Percentage of Non-Underserved Students Who Are Proficient ?	40.0%
Gap Between School and State Among Underserved Students ?	-18.7%

College-Ready Student Performance

High school students take AP® exams and IB exams to earn college credit and demonstrate success at college-level coursework. U.S. News calculated a College Readiness Index based on AP/IB exam participation rates and percentages of students passing at least one AP/IB exam.

National Percentile on College-level Exams	37.6%
Exam(s) Used for Index ?	AP®

Advanced Placement® (AP®) Student Performance

Many U.S. higher educational institutions grant credits or advanced placement based on student performance on AP® exams. This shows this school's student participation and performance on these exams if data were available.

Proportion of 12th Grade Class Who Took an Exam ?	7%
Proportion of 12th Grade Class Who Scored 3+ on an Exam ?	1%
Exam Takers in 12th Grade Class Who Scored 3+ on an Exam ?	10%
Exam Pass Rate ?	8%

Data are based on the 2016-2017 school year.

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Next: Map → (/education/best-high-schools/ohio/districts/akron-city/garfield-high-school-15093/map)

Cheyenne High School Test Scores

3200 W. Alexander Rd., North Las Vegas, Nevada 89032 | (702) 799-4830

#12,935-17,245 in National Rankings (/education/best-high-schools/national-rankings).

(https://www.facebook.com/sharer/sharer.php?u=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Fnevada%2Fdistricts%2Fclark-county-school-district%2Fcheyenne-high-school-12248%2Ftest-scores%3Fsrc=usn_fb) (https://twitter.com/share?url=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Fnevada%2Fdistricts%2Fclark-county-school-district%2Fcheyenne-high-school-12248%2Ftest-scores%3Fsrc=usn_tw&text=Cheyenne%20High%20School%20Test%20Scores%20-%20US%20News%20Best%20High%20Schools) (https://www.reddit.com/submit?url=https%3A%2F%2Fwww.usnews.com%2Feducation%2Fbest-high-schools%2Fnevada%2Fdistricts%2Fclark-county-school-district%2Fcheyenne-high-school-12248%2Ftest-scores%3Fsrc=usn_rd) MORE

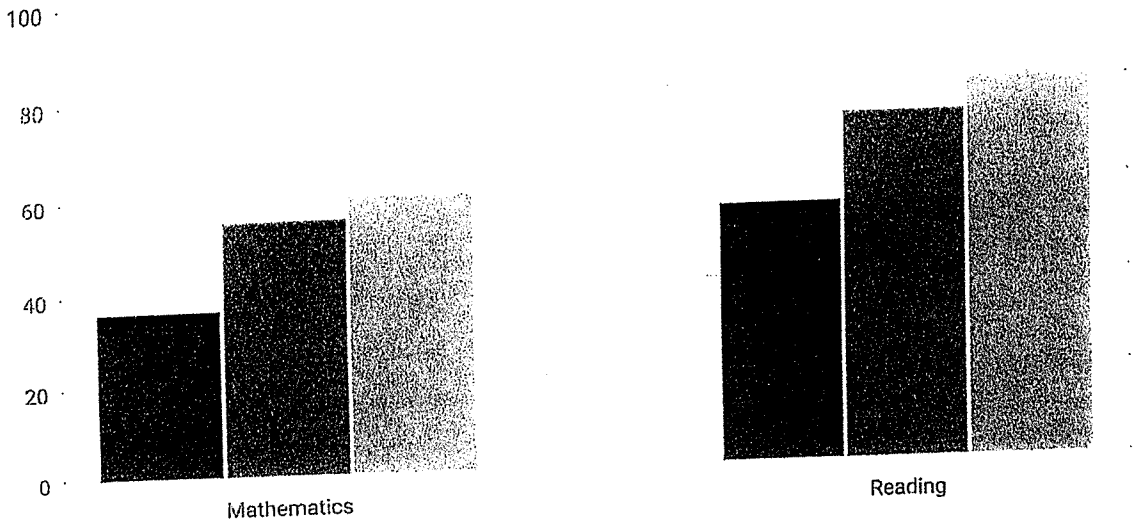
Overview (/education/best-high-schools/nevada/districts/clark-county-school-district/cheyenne-high-scho

Subject Proficiency Testing

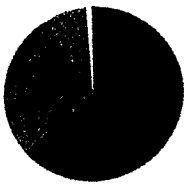
Nevada administered the Nevada End of Course Exams to high school students. These figures display how well the school as a whole performed in reading and mathematics.

Subject Proficiency

School
District
State



Math Proficiency Distribution



Level 1 **64%**
Level 2 **27%**
Level 3 **8%**
Level 4 **1%**

Reading Proficiency Distribution

Level 1 **45%**
Level 2 **24%**
Level 3 **22%**
Level 4 **8%**

Overall Student Performance

This measures overall student performance on state-required tests.

Percentile Score on Nevada End of Course Exams ?	6.6%
Nevada End of Course Exams Scores Relative to U.S. News Expectations	Somewhat Below Expectations

Underserved Student Performance

This measures the proficiency on state exams among typically underperforming subgroups.

Percentage of Underserved Students Who Are Proficient ?	42.6%
Percentage of Non-Underserved Students Who Are Proficient ?	54.0%
Gap Between School and State Among Underserved Students ?	-16.7%

College-Ready Student Performance

High school students take AP® exams and IB exams to earn college credit and demonstrate success at college-level coursework. U.S. News calculated a College Readiness Index based on AP/IB exam participation rates and percentages of students passing at least one AP/IB exam.

National Percentile on College-level Exams	40.2%
Exam(s) Used for Index ?	AP®

Advanced Placement® (AP®) Student Performance

Many U.S. higher educational institutions grant credits or advanced placement based on student performance on AP® exams. This shows this school's student participation and performance on these exams if data were available.

Proportion of 12th Grade Class Who Took an Exam ?	13%
Proportion of 12th Grade Class Who Scored 3+ on an Exam ?	3%
Exam Takers in 12th Grade Class Who Scored 3+ on an Exam ?	25%
Exam Pass Rate ?	21%

Data are based on the 2016-2017 school year.

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Next: Map → (/education/best-high-schools/nevada/districts/clark-county-school-district/cheyenne-high-school-12248/map)

EXHIBIT H

Licensed Practical Nurse Salaries in Arizona

Salary estimated from 880 employees, users, and past and present job advertisements on Indeed in the past 36 months. Last updated: October 9, 2019

Location

Arizona

Average in Arizona

$25.43 per hour

12% Above national average

Salary Distribution

$12.85 $38.95

Share

Average additional compensation

Overtime pay **$9,500** / year

Average additional compensation is based on information gathered from past and current employees in Arizona.

How much does a Licensed Practical Nurse make in Arizona?

The average salary for a Licensed Practical Nurse is **$25.43** per hour in Arizona, which is 12% above the national average. Salary estimates are based on 880 salaries submitted anonymously to Indeed by Licensed Practical Nurse employees, users, and collected from past and present job advertisements on Indeed in the past 36 months. The typical tenure for a Licensed Practical Nurse is 1-3 years.

Licensed Practical Nurse salaries by company in Arizona

Company	Average salary

Salary for related jobs

Charge Nurse
$32.78 per hour

Nurse
$65,947 per year

Registered Nurse
$34.16 per hour

Registered Nurse - Pediatrics
$1,547 per week

Registered Nurse - Operating Room
$1,770 per week

Licensed Practical Nurse job openings

Private Duty Nursing
Team Select Home Care
Phoenix, AZ
11 months ago

RN Traveler Full Time
HonorHealth
Scottsdale, AZ
30+ days ago

Wellness Nurse - AL
The Gardens of Scottsdale
Scottsdale, AZ
30+ days ago

Licensed Practical Nurse jobs in Arizona

pelk 100

Licensed Practical Nurse Salaries in Ohio

Salary estimated from 3,069 employees, users, and past and present job advertisements on Indeed in the past 36 months. Last updated: October 8, 2019

Location

Ohio

Average in Ohio

$21.90 per hour

Meets national average

Salary Distribution

$10.70 $36.95

Share

Average additional compensation

Overtime pay **$7,250** / year

Average additional compensation is based on information gathered from past and current employees in Ohio.

How much does a Licensed Practical Nurse make in Ohio?

The average salary for a Licensed Practical Nurse is **$21.90** per hour in Ohio, which meets the national average. Salary estimates are based on 3,069 salaries submitted anonymously to Indeed by Licensed Practical Nurse employees, users, and collected from past and present job advertisements on Indeed in the past 36 months. The typical tenure for a Licensed Practical Nurse is 1-3 years.

Licensed Practical Nurse salaries by company in Ohio

Company	Average salary
Wickliffe Country Place Licensed Practical Nurse 27 salaries Licensed Practical Nurse Job available	**$27.25** per hour
Arbors At Milford Licensed Practical Nurse 39 salaries Licensed Practical Nurse Job available	**$26.85** per hour

Salary for related jobs

Registered Nurse - Pediatrics
$672 per week

Charge Nurse
$22.22 per hour

Nurse
$24.25 per hour

Registered Nurse
$30.51 per hour

Registered Nurse - Operating Room
$1,630 per week

Licensed Practical Nurse job openings

Nurse 1
State of Ohio Jobs
Ohio
6 months ago

Licensed Practical Nurse
State of Ohio Jobs
Ohio
30+ days ago

Licensed Practical Nurse
State of Ohio Jobs
Ohio
4 months ago

Licensed Practical Nurse jobs in Ohio

pelk 101

EXHIBIT I

Zillow

<Back

Correct home facts Save Share More

Ohio · Akron · 44301 · Firestone Park · 320 Palm Ave

Public View Owner View

Public View Owner View

Street View

320 Palm Ave

Akron, OH 44301

5 beds 2 baths 1,834 sqft

Off Market Zestimate®: $84,724

Rent Zestimate®: $895 /mo

EST. REFI PAYMENT

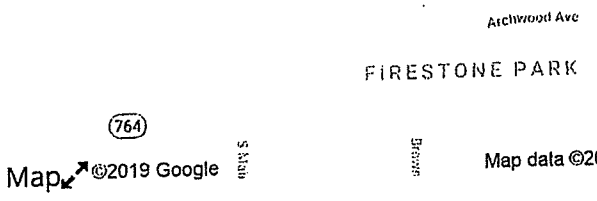
Est. Refi Payment: $336/mo

See current ra

See current rate

Save Share More

Contact Agent



Map ©2019 Google

Home Shoppers are Waiting

85 shoppers are looking in your neighborhood and price range.

Your name

Phone

Email

I own this home and would like to ask an agent about selling 320 Palm Ave, Akron, OH 44301.

Contact Agent

Or call 330-403-8633 for more info

Nearby Similar Sales

SOLD: $84,900
Sold on 05/06/19
3 bds, 2 ba, 1,403 sqft
1467 Elder Ave, Akron, OH 44301

Note: This property is not currently for sale or for rent. The description below may be from a previous listing.

5 BEDROOMS! NEW CARPET & PAINT THROUGHOUT. SPACIOUS ROOMS. GREAT LOCATION IN HEART OF FIRESTONE PARK. HUGE GARAGE LOTS OF PARKING. ENCLOSED FRONT PORCH TO SIT & WATCH THE NEIGHBORS. ROOM TO GROW!! SELLER OFFERING $1000.00 CLOSING COST FOR OFFER DAY OF OPEN HOUSE!!!

WHAT I LOVE ABOUT THE HOME

LOTS OF ROOM TO ROAM 5 GOOD SIZED BEDROOMS , NICE FRONT PORCH HUGE GARAGE LOTS OF PARKING.

SOLD: $85,000
Sold on 03/20/19
4 bds, 2 ba, 2,182 sqft
400 Lindenwood Ave, Akron, OH 44301

SOLD: $86,900
Sold on 09/30/19
3 bds, 1 ba, 1,504 sqft
1577 Larch St, Akron, OH 44301

SOLD: $88,300
Sold on 01/21/19
4 bds, 1 ba, 1,445 sqft
295 Ivy Pl, Akron, OH 44301

SOLD: $82,000
Sold on 05/01/19
3 bds, 2 ba, 1,249 sqft
473 N Firestone Blvd, Akron, OH 44301

Facts and Features

Type Single Family	Year Built 1919	Heating Forced air
Cooling Central	Parking 2 spaces	Lot 5,227 sqft

Interior Features
Bedrooms
Beds:
5
Heating and Cooling
Heating:
Forced air
Cooling:
Central
Attic
Attic size:

Electronically Filed
11/8/2019 5:52 PM
Steven D. Grierson
CLERK OF THE COURT

OPPS
RADFORD J. SMITH, CHARTERED
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Nevada Bar No. 002791
KIMBERLY A. STUTZMAN, ESQ.
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Telephone: (702) 990-6448
Facsimile: (702) 990-6456
rsmith@radfordsmith.com
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

HEIDI MARIE PELKOLA, Plaintiff, vs. GREG ELLIOT PELKOLA, Defendant.	CASE NO.: D-13-488682-D DEPT. NO.: L **FAMILY DIVISION**

PLAINTIFF'S OPPOSITION TO DEFENDANT'S COUNTERMOTION FOR PRIMARY PHYSICAL CUSTODY[1]

DATE OF HEARING: November 20, 2019
TIME OF HEARING: 9:00 a.m.

COMES NOW Plaintiff, HEIDI MARIE PELKOLA, by and through her attorneys Radford J. Smith, Esq. and Kimberly Stutzman, Esq. of the firm Radford J. Smith, Chartered,

[1] Plaintiff's Reply to Defendant's Opposition of her Motion to Relocate shall be filed within the timeframe allowed prior to the hearing on November 20, 2019. Her Opposition, however, was due prior to the Reply deadline and is thus filed separately.

and submits the following points and authorities in Opposition to Defendant, GREG ELLIOT PELKOLA's COUNTERMOTION FOR PRIMARY CUSTODY. Heidi requests that Greg's countermotion be denied in its entirety, and requests through this Opposition and that the Court enter its orders as follows:

1. Finding that Defendant's Countermotion to Modify Child Custody fails to set forth adequate cause for hearing on the issue of custody;

2. Finding that Defendant's Countermotion has not identified grounds to modify the current Order regarding Custody;

3. For attorney's fees and costs; and,

4. For such other and further relief as to the Court may deem proper in the premises.

This Opposition and Countermotion is made and based upon the points and authorities attached hereto, and any evidence or oral argument adduced at the time of the hearing of this matter.

DATED this 8th day of November 2019.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

RADFORD J. SMITH, ESQ.
Nevada Bar No. 002791
KIMBERLY A. STUTZMAN
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Attorneys for Plaintiff

I.

COUNTERSTATEMENT OF FACTS

The parties, Plaintiff, HEIDI PELKOLA ("Heidi") and Defendant, GREG PELKOLA ("Greg"), were divorced by Decree of Divorce, filed May 6, 2014.

The parties have three children: Sara Pelkola (15), Justin Pelkola (11), and Daniel Pelkola (7). Heidi has primary physical custody of the parties' minor children subject to Greg's specific visitations.

Heidi was previously allowed to relocate from Nevada to Arizona, where she currently resides with the children. On October 1, 2019, out of an abundance of caution, Heidi filed her Motion to Relocate to Ohio.

In his Countermotion, Greg moves for Primary Physical Custody. Greg, however, does not provide sufficient evidence to support his request. Greg previously moved for primary physical custody, which is scheduled for an evidentiary hearing on November 20, 2019 at 9:00 a.m.

Heidi previously addressed his request for primary physical custody in her pleadings before the court. She has also addressed this request in her Pre-Trial Memorandum. As of the date of this Motion, Defendant has failed to file a Pre-Trial Memorandum.

. . .

. . .

. . .

II.

DEFENDANT'S MOTION TO MODIFY CUSTODY DOES NOT IDENTIFY ADEQUATE CAUSE FOR HEARING ON THE ISSUE OF CUSTODY, AND IS FRIVILOUS

In Greg's countermotion, he ostensibly claims that if Heidi's request to relocate is denied, then he should be awarded primary physical custody. This position is not supported by Nevada law, and Greg sites no case in which a Nevada court has found that a denial of a request to relocate should change the current custodial arrangement.

It is important to note that the current arrangement is working well. The children are thriving in Heidi's care. Moreover, Greg has failed to provide any evidence to support his request for primary physical custody, including a failure to provide trial exhibits or a pre-trial memorandum, discussed in Heidi's Motion in Limine and discussed in more detail in her Reply to Greg's Opposition.

NRS 125C.006 states in relevant part that –

> 1. If primary physical custody has been established pursuant to an order, judgment or decree of a court and the custodial parent intends to relocate his or her residence to a place outside of this State or to a place within this State that is at such a distance that would substantially impair the ability of the other parent to maintain a meaningful relationship with the child, and the custodial parent desires to take the child with him or her, the custodial parent shall, before relocating:
>
> (a) Attempt to obtain the written consent of the noncustodial parent to relocate with the child; and
>
> (b) If the noncustodial parent refuses to give that consent, petition the court for permission to relocate with the child.
>
> 2. The court may award reasonable attorney's fees and costs to the custodial parent if the court finds that the noncustodial parent refused to consent to the custodial parent's relocation with the child:

(a) Without having reasonable grounds for such refusal; or
(b) For the purpose of harassing the custodial parent.

Here, under the plain language of the statute, Heidi's request to Relocate does not require a separate motion, but out of an abundance of caution and because custody is currently at issue and scheduled to be heard at the November 20, 2019 Evidentiary Hearing, Heidi believed it would be prudent to bring this issue before the court. Additionally, the Motion to Relocate effects Greg's timeshare only as it relates to the increased travel costs and time. His visitation, however, would essentially remain the same. Therefore, Heidi brought her motion so that the court and the parties can address the relevant facts related to custody and the relocation at the same time.

Heidi is the primary physical custodian of the minor children. The criteria for addressing Greg's motion for modification of that current custodial schedule is contained in *Rivero v. Rivero,* 125 Nev. 410, 216 P.3d 213 (2009), and *Ellis v. Carucci*, 123 Nev. 145, 161 P.3d 239 (2007). While Greg provides bare-bone cites to NRS 125C.006, NRS 125C.-0065, and NRS 125C.007 in his motion, he ignores those portions of the statutory law, and the law interpreting it, that are relevant to the facts of this case.

NRS 125C.0045 mirrors its predecessor statute, NRS 125.510, which was interpreted by the Nevada Supreme Court in *Ellis v. Carucci*, 123 Nev. 145, 151, 161 P.3d 239, 243 (2007). In *Ellis,* the court held:

> [A] modification of primary physical custody is warranted only when (1) there has been a substantial change in circumstances affecting the welfare of the child, and (2) the child's best interest is served by the modification. [. . .] [T]he

> party seeking a modification of custody bears the burden of satisfying both prongs.

Id. at 145, 150-51, 161 P.3d 239, 242-43 (2007). The *Ellis* criteria modified the longstanding *"Murphy"* standard that focused on the circumstances of the parents, rather than those of the child.

> In reaching our conclusion, we overrule *Murphy* to the extent that it required a change in "the circumstances of the parents" alone, without regard to a change in the circumstances of the child or the family unit as a whole. We note, however, that under the revised test, there must still be a finding of a *substantial* change in circumstances. While the *Murphy* test is too restrictive because it improperly focuses on the circumstances of the parents and not the child, custodial stability is still of significant concern when considering a child's best interest. The "changed circumstances" prong of the revised test serves the important purpose of guaranteeing stability unless circumstances have changed to such an extent that a modification is appropriate. In determining whether the facts warrant a custody modification, courts should not take the "changed circumstances" prong lightly.

Ellis, 123 Nev. at 151, 161 P.3d at 243.

Here, Greg's motion asks this court to base its order solely on whether Heidi's request for relocation is granted, and if not, then he should be granted *de facto* Primary Physical Custody. In other words, he wants the court to focus on Heidi's relocation circumstances, not the circumstances of the children.

As discussed above, Greg has not shown adequate cause for hearing on his motion for modification of custody.

The court has the discretion to deny Greg's motion without hearing for lack of a showing of "adequate cause."

> A district court has the discretion to deny a motion to modify custody without holding a hearing unless the moving party demonstrates adequate cause for holding a hearing. "Adequate cause" requires something more than allegations which, if proven, might permit inferences sufficient to establish grounds for a custody change. "Adequate cause" arises where the moving party presents a prima facie case for modification. To constitute a prima facie case it must be shown that: (1) the facts alleged in the affidavits are relevant to the grounds for modification; and (2) the evidence is not merely cumulative or impeaching.

Rooney v. Rooney, 109 Nev. 540, 542-43, 853 P.2d 123, 124-25 (1993)(citations omitted). Here, Greg has not provided any evidence or statement in the form of an affidavit that meets the standard of a prima facie change of custody. He has not addressed the relevant criteria under law and has failed to state any facts that even remotely justify a change in custody.

III.

ATTORNEY'S FEES AND SANCTIONS

A request for an order directing another party to pay attorney's fees must be based upon statute, rule or contractual provision. *See, e.g, Rowland v. Lepire*, 99 Nev. 308, 662 P.2d 1332 (1983).

The court has jurisdiction to award attorney's fees in post-trial matters. *Halbrook v. Halbrook*, 114 Nev. 1455, 971 P.2d 1262 (1998) (recognizing that a district court has the authority to award attorney fees in post-divorce proceedings involving child custody).

Heidi has incurred significant attorney's fees and costs in this matter. As discussed above, Greg has not complied with the relevant authority, and Heidi submits that he will be

unable to present a prima facie case. As a result, Heidi was left with no choice but to file her opposition to his Countermotion.

EDCR 7.60 reads in pertinent part –

> (b) The court may, after notice and an opportunity to be heard, impose upon an attorney or a party any and all sanctions which may, under the facts of the case, be reasonable, including the imposition of fines, costs or attorney's fees when an attorney or a party without just cause:
>
> (1) Presents to the court a motion or an opposition to a motion which is obviously frivolous, unnecessary or unwarranted.
>
> (2) Fails to prepare for a presentation.
>
> (3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.
>
> (4) Fails or refuses to comply with these rules.
>
> (5) Fails or refuses to comply with any order of a judge of the court.

EDCR 7.60 permits a district court to assess sanctions against a party that files a frivolous motion, or unnecessarily multiplies the proceedings in a case. In *Rivero,* the court addressed the criteria for awarding attorney's fees as a sanction for the filing of one of those prongs, a frivolous motion:

> The district court may award attorney fees as a sanction under NRS 18.010(2)(b), NRCP 11, and EDCR 7.60(b) if it concludes that a party brought a frivolous claim. The district court must determine if there was any credible evidence or reasonable basis for the claim at the time of filing. Although a district court has discretion to award attorney fees as a sanction, there must be evidence supporting the district court's finding that the claim or defense was unreasonable or brought to harass.

Rivero v. Rivero, 125 Nev. 410, 440-41, 216 P.3d 213, 234 (2009). Here, Heidi submits that Greg's request to modify custody should be denied. Heidi requests that the court require Greg to pay the attorney's fees and costs Heidi has incurred to respond to this litigation.

Even in the absence of either sanction under EDCR 7.60, the court may exercise its discretion under NRS 125.150 and its continuing jurisdiction in divorce matters to award fees to Heidi based solely upon the parties' substantial disparity in income regardless of the outcome of the motions and countermotion. The Nevada Supreme Court has recognized the jurisdiction of a district court to grant attorney's fees to a party in a post-divorce child custody action under NRS 125.040. *Leeming v. Leeming*, 87 Nev. 530, 532, 490 P.2d 342, 343 (1971)("NRS 125.040 empowers our courts to grant "allowances and suit money" in divorce actions, including sums to enable a wife to employ counsel; and if the wife files an appropriate post-judgment motion relating to support or custody of minor children, that power remains as part of the continuing jurisdiction of the court.")

NRS 18.010 states in relevant part –

> 1. The compensation of an attorney and counselor for his or her services is governed by agreement, express or implied, which is not restrained by law.
> 2. In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:
>
> (a) When the prevailing party has not recovered more than $20,000; or
> (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim or third-party complaint or defense of the opposing party was brought or maintained without reasonable ground or to harass the prevailing party. The court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious

claims and increase the costs of engaging in business and providing professional services to the public.

3. In awarding attorney's fees, the court may pronounce its decision on the fees at the conclusion of the trial or special proceeding without written motion and with or without presentation of additional evidence.

4. Subsections 2 and 3 do not apply to any action arising out of a written instrument or agreement which entitles the prevailing party to an award of reasonable attorney's fees.

In the instant matter, should Heidi prevail, then she should be awarded her fees and costs. A memorandum of attorney's fees and costs will be submitted after completion of the trial.

IV.

CONCLUSION

For the above-mentioned reasons, Heidi requests that the court enter its orders as follows:

1. Finding that Defendant's Countermotion to Modify Child Custody fails to set forth adequate cause for hearing on the issue of custody;

2. Finding that Defendant's Countermotion has not identified grounds to modify the current Order regarding Custody;

3. For attorney's fees and costs; and,

. . .

. . .

. . .

4. For such other and further relief as to the Court may deem proper in the premises.

Dated this 8th day of November 2019.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

RADFORD J. SMITH, ESQ.
Nevada State Bar No. 002791
KIMBERLY A. STUTZMAN, ESQ.
Nevada State Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Attorneys for Defendant

UNSWORN DECLARATION OF KIMBERLY A. STUTZMAN, ESQ.

COUNTY OF CLARK)
) ss:
STATE OF NEVADA)

KIMBERLY A. STUTZMAN, ESQ., declares as follows:

1. I am an attorney for the Defendant, Julie Allen, in the above-entitled matter.

2. I make this Declaration based upon facts within my own knowledge, save and except as to matters alleged upon information and belief and, as to those matters, I believe them to be true.

3. I have personal knowledge of the facts contained herein, and I am competent to testify thereto. I have reviewed the PLAINTIFF'S OPPOSITION TO DEFENDANT'S COUNTERMOTION FOR PRIMARY PHYSICAL CUSTODY and can testify that the facts contained therein are true and correct to the best of my knowledge. I hereby reaffirm and restate said facts as if set forth fully herein.

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

/s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.
DATE: November 8, 2019

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice. I served the foregoing document described as **PLAINTIFF'S OPPOSITION TO DEFENDANT'S COUNTERMOTION FOR PRIMARY PHYSICAL CUSTODY**[2] 8th day of November 2019, to all interested parties by way of the Eighth Judicial District Court Electronic filing system as follows:

Melvin Grimes, Esq.
THE GRIMES LAW OFFICE
8540 South Eastern Avenue, Ste. 100
Las Vegas, Nevada 89123
Melg@grimes-law.com

/s/ Kimberly A. Stutzman

An Employee of Radford J. Smith, Chartered

[2] Plaintiff's Reply to Defendant's Opposition of her Motion to Relocate shall be filed within the timeframe allowed prior to the hearing on November 20, 2019. Her Opposition, however, was due prior to the Reply deadline and is thus filed separately.

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

HEIDI PELKOLA, Plaintiff/Petitioner, vs. GREG PELKOLA, Defendant/Respondent.	CASE NO.: D-13-488682-D DEPT. NO.: L **MOTION/OPPOSITION FEE INFORMATION SHEET**

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

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

☐ **$25** The Motion/Opposition being filed with this form is subject to the $25 reopen fee.

-OR-

■ **$0** The Motion/Opposition being filed with this form is not subject to the $25 reopen fee because:

☐ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.

☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.

☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.

☐ Other Excluded Motion (must specify) The Re-Open fee has been paid by both parties.

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

■ **$0** The Motion/Opposition being filed with this form is not subject to the $129 or the $57 fee because:

■ The Motion/Opposition is being filed in a case that was not initiated by joint petition.

☐ The party filing the Motion/Opposition previously paid a fee of $129 or $57.

-OR-

☐ **$129** The Motion being filed with this form is subject to the $129 fee because it is a motion to modify, adjust or enforce a final order.

-OR-

☐ **$57** The Motion/Opposition being filed with this form is subject to the $57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of $129.

Step 3. Select the $0, $129 or $57 filing fee in the box below.

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

■ **$0** ☐ **$25** ☐ **$57** ☐ **$82** ☐ **$129** ☐ **$154**

Party filing Motion/Opposition: Heidi Pelkola Date: November 8, 2019

Signature of Party or Preparer /s/ Kimberly A. Stutzman

Electronically Filed
11/14/2019 10:46 AM
Steven D. Grierson
CLERK OF THE COURT

ROPP
RADFORD J. SMITH, CHARTERED
RADFORD J. SMITH, ESQ.
Nevada Bar No. 002791
KIMBERLY A. STUTZMAN, ESQ.
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Telephone: (702) 990-6448
Facsimile: 1 (702) 990-6456
rsmith@radfordsmith.com
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

HEIDI MARIE PELKOLA, Plaintiff, v. GREG ELLIOT PELKOLA, Defendant.	CASE NO.: D-13-488682-D DEPT. NO.: L **FAMILY DIVISION**

PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HER MOTION TO RELOCATE

DATE OF HEARING: November 20, 2019
TIME OF HEARING: 9:00 a.m.

COMES NOW Plaintiff, HEIDI MARIE PELKOLA ("Heidi"), by and through her attorneys Radford J. Smith, Esq. and Kimberly Stutzman, Esq. of the firm Radford J. Smith, Chartered, moves this Court for the following orders:

1. For an Order denying Defendant, GREG PELKOLA ("Greg")'s Opposition its entirety;

2. For an Order Granting Plaintiff's Motions, her Opposition to his Countermotion (previously filed), and her Reply to his Opposition; and,

3. For such other and further relief as to the Court may deem proper.

This pleading is made and based upon all pleadings and papers on file in this action, the points and authorities attached hereto, the evidence submitted with these motions, and any oral argument or evidence adduced at the time of the hearing of this matter.

Dated this 14th day of November 2019.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Telephone: (702) 990-6448
Facsimile: 1 (702) 990-6456
rsmith@radfordsmith.com
Attorneys for Plaintiff

I.

HEIDI'S MOTION TO RELOCATE SHOULD BE GRANTED

In her Opposition to Greg's Countermotion, Heidi addressed that though she does not believe that she is required to seek additional permission to move from Arizona to Ohio, she filed the motion out of an abundance of caution. She includes her Opposition to

Defendant's Countermotion by reference as if fully restated herein. She also incorporates by reference her Pre-Trial Memorandum filed October 1, 2019.

Furthermore, the facts and circumstances of this case are set forth in Heidi's Unsworn Declaration which is included herein for convenience:

I, HEIDI PELKOLA, being duly sworn, deposes and says as follows:

1. I make this Declaration based upon facts within my own knowledge, save and except as to matters alleged upon information and belief and, as to those matters, I believe them to be true. I have personal knowledge of the facts contained herein, and I am competent to testify thereto.

2. The Defendant in this action is my former husband Greg Pelkola ("Greg"). I have reviewed DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION TO RELOCATE filed October 22, 2019 ("Opposition"), and I submit this Declaration in support of my Reply to that Opposition.

3. Greg commences his Opposition with an incomplete, misleading and outright false recitation of the history of this case. Though I am advised that no facts preceding that most recent custodial order are admissible for the purposes of the change of custody, Greg apparently seeks by his Opposition, I will address a few of the false statements in Greg's motion that pertain to the custodial order.

4. Greg states in his Opposition that the party attended the settlement conference that was set for March 6, 2014. That statement is false. The Court directed us to attend the

conference, and on the scheduled date I was present; ***Greg never showed up***. I even called Greg from the court area to try to get him to attend. There ultimately was no conference because Greg failed to follow the Court's order. His claim that he was sick or that he believed we were going to reconcile is false – he simply refused to attend. Greg further suggests that Judge Elliott was unfair to him and refused to accept his filing of an Answer to the Complaint. That statement is misleading at best.

5. Greg had multiple chances and substantial time to file an Answer. At a hearing before the trial, Judge Elliot specifically told him that he had to file an Answer. Greg refused to follow the direction of the Judge. Greg never timely appealed or otherwise challenged the Decree even though he had knowledge of the Decree and had the financial resources to do so.

6. Greg's claim that I "absconded with the children" is false; Greg always knew where we were. I returned to Nevada and properly filed a Motion to relocate in January 2014. I had limited funds, and no family in Nevada, so I had no other option at the time other than residing in the marital home until court approved my Motion to Relocate.

7. The court granted my motion to relocate, and I moved to Florida. I could not remain in Florida because I did not have sufficient funds to do so. At that time, I was not receiving any child support yet because it took longer than expected to process. I relocated to Arizona in part because it would reduce the travel costs, so I would have more child support

to meet the expenses of the children. That fact is evidenced by the motion I filed on March 3, 2015.

8. The December 2017 hearing referenced by Greg was heard by Senior Judge Kathy Hardcastle, who sat in for Judge Elliott. The issues addressed at the hearing included Greg's alcohol abuse, allowing the children to use firearms, and a serious bite my son suffered at the hands of the dog that Greg still owned. I raised these concerns as part of a motion before Judge Elliott.

9. As a result of the evidence presented in that Motion, Judge Elliott limited Greg to supervised visitation with the children. During those proceedings, I made it clear to the Court that I believed that Sara, who was repeatedly reluctant to have visitation with Greg, suffered from a form of autism.

10. Judge Hardcastle was a substitute for Judge Elliott on the date of the hearing. I did not have enough money to hire counsel in part because Greg had violated the court's Decree by failing to pay me a portion of his military retirement required under the decree, and had taken active steps to prevent me from recovering anything (facts that were later proven and found through later evidentiary hearings. Because I missed a deadline on filing exhibits that I did not fully understand, the court struck all of my exhibits. Thus, I was without the evidence that had caused Judge Elliott to limit Greg to supervised visitation.

11. Judge Hardcastle dismissed any discussion of Sara's autism, a diagnosis which has now been confirmed by counselors. While the findings written by Mr. Grimes and signed by Judge Elliott, ***not*** Judge Hardcastle, included a quote from Judge Hardcastle admonishing me regarding the expression of my concerns in the evidentiary hearing, there is no reference anywhere in the "findings" to any specific behavior or facts that support any allegation that I have alienated the children.

12. In fact, the only child who has regularly refused to go with Greg is Sara, and I believe this has to do with Greg's ill treatment of her caused by his failure to recognize her condition, or give any consideration that he should treat her differently that he treats our other two children.

13. Greg has been involved in conferences via phone and only attended 1 IEP in person. Although Greg was allowed extra time to come at the end of every month, but he has only come 1 time since the last hearing approximately 7 months ago.

14. Next, I never claimed Justin Ritter lived in Hudson, Ohio. I stated Ohio. My motion stated: "Heidi's fiancé, Justin Ritter, currently lives in Ohio and has lived there since 2014." *See* Motion, page 3, line 22. Justin and I plan to each sell our respective houses and purchase a new home in the Hudson, Ohio area.

15. In his Opposition, Greg used school statistics from Akron, Ohio, not Hudson Ohio school district. This is in the Akron Public Schools district. Hudson is in the Hudson City School District. He also claims that the court will need to evaluate Moon Valley in

Arizona, Garfield in Akron, and Cheyenne in Las Vegas. This is nonsensical. Again, I am not moving to Akron, and the schools in Akron are in a separate school district with different statistics, requirements, testing results, etc. If the court is inclined to review the relocation, but denies the request, then I will continue to maintain primary custody in Arizona. The court does not need to review schools in Las Vegas.

16. In his Opposition, Greg incorrectly claims that there are no Hopebridge locations in Akron, Ohio. *See* Defendant's Opposition, page 6, line 14. Hopebridge, an autism therapy center, has several locations. Though there is a location in Akron, Ohio, located at 490 White Pond Dr, Akron, Ohio 44320, there is another location closer to Hudson located in Cleveland, Ohio, which is approximately 30 minutes from Hudson. Also, I do not intend to move to Akron, Ohio. I am confused as to why Greg continues to reference Akron rather than Hudson.

17. Additionally, if I move, I have looked at jobs that would provide me with a sign on bonus as a Licensed Practicing Nurse ("LPN"). I would also be able to help Justin take care of all of our children.

18. If it is necessary to wait for the Court's approval to relocate to Hudson, Ohio, (see my Opposition to Countermotion) Justin will take immediate steps to find a home and start the purchasing process. There is currently a home that has been dropping in price that both Justin and I want. *See* Photograph of 7897 Winterberry Drive, Hudson, Ohio, filed with Exhibit "1." Also, as addressed in my motion, the cost of living in Ohio is

significantly less than the cost of living in Arizona. As a result, I will earn more, plus Greg fails to acknowledge the additional sign on bonus.

19. In his Opposition, Greg claims that I am attempting to alienate or isolate him from the children. This is false. He would have the same custodial time whether we reside in Arizona or Ohio. I have even purchased gifts for the children to give to Greg at Father's Day and other occasions. *See* Miscellaneous Photographs, including photographs Father's Day Cards, gifts, filed as Exhibit "1."

20. Upon information and belief, Greg informed the children that he purchased a home in Michigan, near Ontonagon, Michigan, where Greg was raised.

21. I, however, believe that Greg suffers from PTSD. Contrary to his opposition, the Court did not find that the claims regarding his PTSD were untrue. This is also nonsensical as the court cannot diagnose someone of PTSD. It is my understanding that Greg was previously on medication such as "Celexa," which is used for mental health issues, such as depression and anxiety. I, however, am not certain if he is still on Celexa.

22. Justin and I met in 6th grade. *See* Sixth Grade class photograph, filed with Exhibit "1." We were friends throughout middle school and for the one-year in high school until he moved. Justin and I will make more money in Hudson, Ohio. Justin makes approximately $72,000 per year in Ohio compared to the $48,000 per year that he would make in Arizona. Also, he will be unable to secure as much monthly overtime in Arizona (4 hours) as he is able to secure in Ohio (20 hours).

23. Justin is in good health, has excellent health insurance through his current employer with Blue Cross Blue Shield, and also is with the Union. As I mentioned in my Motion, he would lose approximately $20,000.00 per year if he moved to Arizona.

24. In his Opposition, Greg includes some "criminal records" for Justin. These are two (2) speeding tickets in Riverside, California from a speed trap coming down a hill, years ago. Justin does not have any criminal activity.

25. In his Opposition, Greg ostensibly claims that I broke into Mr. Martin Brown's home. This is false. Martin had given me a key, and I attempted to use the key to retrieve the children's gaming systems left there after Martin did not timely return them. The key, however, stuck in the lock, and my son jumped the fence over my objections to try the key on the backdoor.

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

End of Declaration.

II.

GREG'S REQUESTS FOR ATTORNEY'S FEES MUST BE DENIED

In his Countermotion, Greg requests Attorney's fees and costs. Greg, however, has failed to file in compliance with EDCR 5.506, which states in relevant part:

> Unless otherwise ordered by the court, or otherwise required by another rule or statute:
> [. . .]

> (b) A GFDF ***must*** be filed in ***support*** of any opposition to a motion or countermotion described in section (a).
> [. . .]
> (d) A financial disclosure ***must be filed within 2 judicial days*** of the filing of the motion, ***countermotion, or opposition it supports***, and may only be filed in open court with leave of the judge upon a showing of excusable delay.
> [. . .]
> (f) An assertion within a motion, opposition, or countermotion that there has been no change in a financial disclosure ***filed within the preceding 6 months*** satisfies this rule.
> (g) The court may construe any motion, opposition, or countermotion ***not*** supported by a timely, complete, and accurate financial disclosure as ***admitting that the positions asserted are not meritorious and cause for entry of orders adverse to those positions, and as a basis for imposing sanctions***.

[Emphasis added.]

Here, Greg filed his Opposition on October 22, 2019 (which was 21 days after Heidi filed her Motion and therefore, untimely). Thus, his FDF should have been filed on October 24, 2019. As of the date of this Reply, Greg has not filed an updated FDF since

. . .

. . .

. . .

. . .

. . .

. . .

. . .

. . .

June 29, 2018. For these reasons, Greg's request for attorney's fees and costs must be denied.

III.

CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that the Court grant HER motion to relocate in its entirety.

DATED this 14th day of November 2019.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Telephone: (702) 990-6448
Attorney for Plaintiff

UNSWORN DECLARATION OF HEIDI PELKOLA

COUNTY OF CLARK)
) ss:
STATE OF NEVADA)

I, HEIDI PELKOLA, being duly sworn, deposes and says as follows:

1. I am the Plaintiff in the above-entitled case. I make this Declaration based upon facts within my own knowledge, save and except as to matters alleged upon information and belief and, as to those matters, I believe them to be true. I am competent to testify to the facts contained herein.

2. I have personal knowledge of the facts contained herein, and I am competent to testify thereto. I have reviewed the foregoing Reply, the statement I made therein, and can testify that the facts contained therein are true and correct to the best of my knowledge. I hereby reaffirm and restate said facts as if set forth fully herein.

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

To be supplemented

_____
HEIDI PELKOLA
DATED: _____

CERTIFICATE OF SERVICE

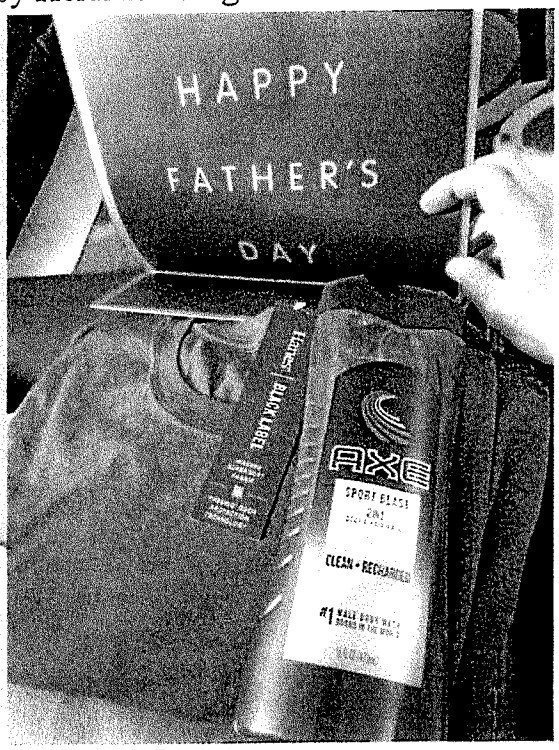
I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

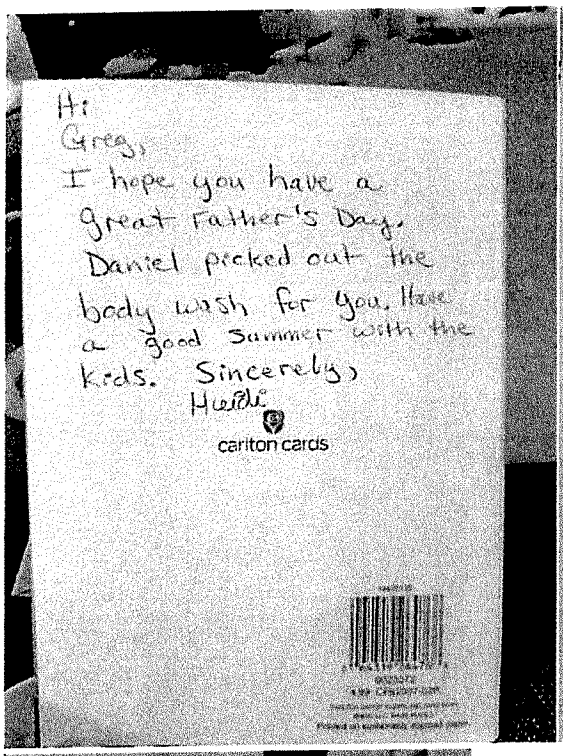
I served the foregoing documents described as **PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HER MOTION TO RELOCATE** on this 14th day of November 2019, to all interested parties by way of the Eighth Judicial District Court Electronic filing system as follows:

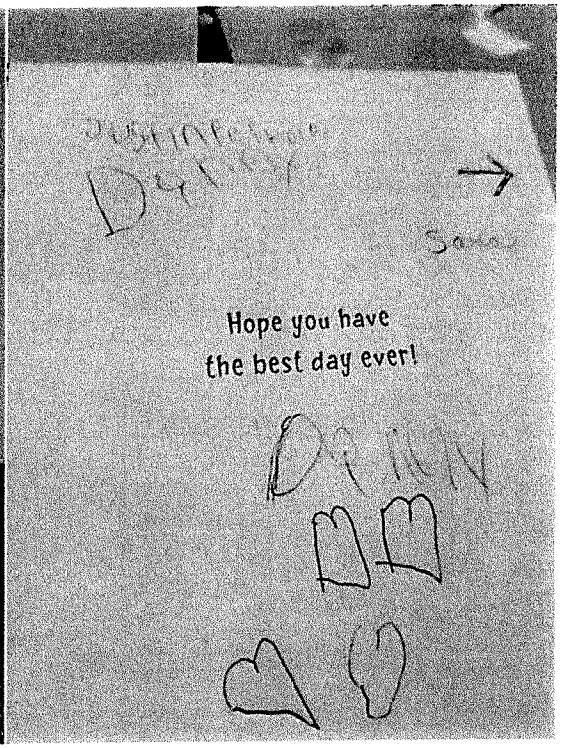
Melvin Grimes, Esq.
Attorney for Defendant

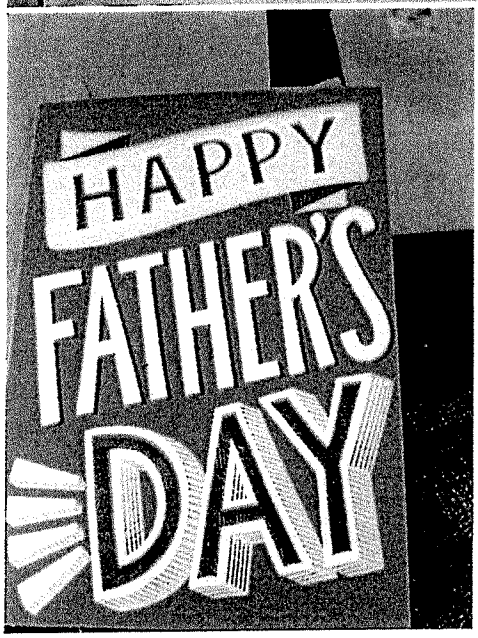
An employee of Radford J. Smith, Chartered

Father's Day card and gifts purchased by Heidi for Greg from kids:




Hi
Greg,
I hope you have a
Great Father's Day.
Daniel picked out the
body wash for you. Have
a good summer with the
kids. Sincerely,
Heidi
carlton cards

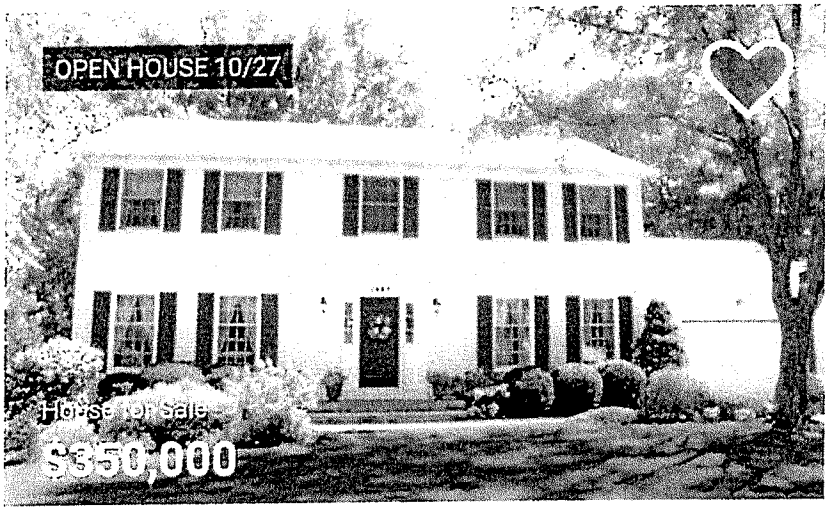

Hope you have
the best day ever!


HAPPY
FATHER'S
DAY

Here is 6th grade pic, Justin Ritter and my maiden name, Heidi Brown:

Here is a picture of the house we want if relocation is approved and if it would still be available by the time court is over:

Brokered by Howard Hanna - Hudson



5 bed **2.5** bath **2,352** sqft **0.74** acres lot

7897 Winterberry Dr
Hudson, OH 44236

Email Agent

Electronically Filed
11/14/2019 10:46 AM
Steven D. Grierson
CLERK OF THE COURT

ROPP
RADFORD J. SMITH, CHARTERED
RADFORD J. SMITH, ESQ.
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Facsimile: 1 (702) 990-6456
rsmith@radfordsmith.com
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

HEIDI MARIE PELKOLA, Plaintiff, v. GREG ELLIOT PELKOLA, Defendant.	CASE NO.: D-13-488682-D DEPT. NO.: L **FAMILY DIVISION**

PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HER MOTION TO RELOCATE

DATE OF HEARING: November 20, 2019
TIME OF HEARING: 9:00 a.m.

COMES NOW Plaintiff, HEIDI MARIE PELKOLA ("Heidi"), by and through her attorneys Radford J. Smith, Esq. and Kimberly Stutzman, Esq. of the firm Radford J. Smith, Chartered, moves this Court for the following orders:

1. For an Order denying Defendant, GREG PELKOLA ("Greg")'s Opposition its entirety;

2. For an Order Granting Plaintiff's Motions, her Opposition to his Countermotion (previously filed), and her Reply to his Opposition; and,

3. For such other and further relief as to the Court may deem proper.

This pleading is made and based upon all pleadings and papers on file in this action, the points and authorities attached hereto, the evidence submitted with these motions, and any oral argument or evidence adduced at the time of the hearing of this matter.

Dated this 14th day of November 2019.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
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Attorneys for Plaintiff

I.

HEIDI'S MOTION TO RELOCATE SHOULD BE GRANTED

In her Opposition to Greg's Countermotion, Heidi addressed that though she does not believe that she is required to seek additional permission to move from Arizona to Ohio, she filed the motion out of an abundance of caution. She includes her Opposition to

Defendant's Countermotion by reference as if fully restated herein. She also incorporates by reference her Pre-Trial Memorandum filed October 1, 2019.

Furthermore, the facts and circumstances of this case are set forth in Heidi's Unsworn Declaration which is included herein for convenience:

I, HEIDI PELKOLA, being duly sworn, deposes and says as follows:

1. I make this Declaration based upon facts within my own knowledge, save and except as to matters alleged upon information and belief and, as to those matters, I believe them to be true. I have personal knowledge of the facts contained herein, and I am competent to testify thereto.

2. The Defendant in this action is my former husband Greg Pelkola ("Greg"). I have reviewed DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION TO RELOCATE filed October 22, 2019 ("Opposition"), and I submit this Declaration in support of my Reply to that Opposition.

3. Greg commences his Opposition with an incomplete, misleading and outright false recitation of the history of this case. Though I am advised that no facts preceding that most recent custodial order are admissible for the purposes of the change of custody, Greg apparently seeks by his Opposition, I will address a few of the false statements in Greg's motion that pertain to the custodial order.

4. Greg states in his Opposition that the party attended the settlement conference that was set for March 6, 2014. That statement is false. The Court directed us to attend the

conference, and on the scheduled date I was present; ***Greg never showed up***. I even called Greg from the court area to try to get him to attend. There ultimately was no conference because Greg failed to follow the Court's order. His claim that he was sick or that he believed we were going to reconcile is false – he simply refused to attend. Greg further suggests that Judge Elliott was unfair to him and refused to accept his filing of an Answer to the Complaint. That statement is misleading at best.

5. Greg had multiple chances and substantial time to file an Answer. At a hearing before the trial, Judge Elliot specifically told him that he had to file an Answer. Greg refused to follow the direction of the Judge. Greg never timely appealed or otherwise challenged the Decree even though he had knowledge of the Decree and had the financial resources to do so.

6. Greg's claim that I "absconded with the children" is false; Greg always knew where we were. I returned to Nevada and properly filed a Motion to relocate in January 2014. I had limited funds, and no family in Nevada, so I had no other option at the time other than residing in the marital home until court approved my Motion to Relocate.

7. The court granted my motion to relocate, and I moved to Florida. I could not remain in Florida because I did not have sufficient funds to do so. At that time, I was not receiving any child support yet because it took longer than expected to process. I relocated to Arizona in part because it would reduce the travel costs, so I would have more child support

to meet the expenses of the children. That fact is evidenced by the motion I filed on March 3, 2015.

8. The December 2017 hearing referenced by Greg was heard by Senior Judge Kathy Hardcastle, who sat in for Judge Elliott. The issues addressed at the hearing included Greg's alcohol abuse, allowing the children to use firearms, and a serious bite my son suffered at the hands of the dog that Greg still owned. I raised these concerns as part of a motion before Judge Elliott.

9. As a result of the evidence presented in that Motion, Judge Elliott limited Greg to supervised visitation with the children. During those proceedings, I made it clear to the Court that I believed that Sara, who was repeatedly reluctant to have visitation with Greg, suffered from a form of autism.

10. Judge Hardcastle was a substitute for Judge Elliott on the date of the hearing. I did not have enough money to hire counsel in part because Greg had violated the court's Decree by failing to pay me a portion of his military retirement required under the decree, and had taken active steps to prevent me from recovering anything (facts that were later proven and found through later evidentiary hearings. Because I missed a deadline on filing exhibits that I did not fully understand, the court struck all of my exhibits. Thus, I was without the evidence that had caused Judge Elliott to limit Greg to supervised visitation.

11. Judge Hardcastle dismissed any discussion of Sara's autism, a diagnosis which has now been confirmed by counselors. While the findings written by Mr. Grimes and signed by Judge Elliott, ***not*** Judge Hardcastle, included a quote from Judge Hardcastle admonishing me regarding the expression of my concerns in the evidentiary hearing, there is no reference anywhere in the "findings" to any specific behavior or facts that support any allegation that I have alienated the children.

12. In fact, the only child who has regularly refused to go with Greg is Sara, and I believe this has to do with Greg's ill treatment of her caused by his failure to recognize her condition, or give any consideration that he should treat her differently that he treats our other two children.

13. Greg has been involved in conferences via phone and only attended 1 IEP in person. Although Greg was allowed extra time to come at the end of every month, but he has only come 1 time since the last hearing approximately 7 months ago.

14. Next, I never claimed Justin Ritter lived in Hudson, Ohio. I stated Ohio. My motion stated: "Heidi's fiancé, Justin Ritter, currently lives in Ohio and has lived there since 2014." *See* Motion, page 3, line 22. Justin and I plan to each sell our respective houses and purchase a new home in the Hudson, Ohio area.

15. In his Opposition, Greg used school statistics from Akron, Ohio, not Hudson Ohio school district. This is in the Akron Public Schools district. Hudson is in the Hudson City School District. He also claims that the court will need to evaluate Moon Valley in

Arizona, Garfield in Akron, and Cheyenne in Las Vegas. This is nonsensical. Again, I am not moving to Akron, and the schools in Akron are in a separate school district with different statistics, requirements, testing results, etc. If the court is inclined to review the relocation, but denies the request, then I will continue to maintain primary custody in Arizona. The court does not need to review schools in Las Vegas.

16. In his Opposition, Greg incorrectly claims that there are no Hopebridge locations in Akron, Ohio. *See* Defendant's Opposition, page 6, line 14. Hopebridge, an autism therapy center, has several locations. Though there is a location in Akron, Ohio, located at 490 White Pond Dr, Akron, Ohio 44320, there is another location closer to Hudson located in Cleveland, Ohio, which is approximately 30 minutes from Hudson. Also, I do not intend to move to Akron, Ohio. I am confused as to why Greg continues to reference Akron rather than Hudson.

17. Additionally, if I move, I have looked at jobs that would provide me with a sign on bonus as a Licensed Practicing Nurse ("LPN"). I would also be able to help Justin take care of all of our children.

18. If it is necessary to wait for the Court's approval to relocate to Hudson, Ohio, (see my Opposition to Countermotion) Justin will take immediate steps to find a home and start the purchasing process. There is currently a home that has been dropping in price that both Justin and I want. *See* Photograph of 7897 Winterberry Drive, Hudson, Ohio, filed with Exhibit "1." Also, as addressed in my motion, the cost of living in Ohio is

significantly less than the cost of living in Arizona. As a result, I will earn more, plus Greg fails to acknowledge the additional sign on bonus.

19. In his Opposition, Greg claims that I am attempting to alienate or isolate him from the children. This is false. He would have the same custodial time whether we reside in Arizona or Ohio. I have even purchased gifts for the children to give to Greg at Father's Day and other occasions. *See* Miscellaneous Photographs, including photographs Father's Day Cards, gifts, filed as Exhibit "1."

20. Upon information and belief, Greg informed the children that he purchased a home in Michigan, near Ontonagon, Michigan, where Greg was raised.

21. I, however, believe that Greg suffers from PTSD. Contrary to his opposition, the Court did not find that the claims regarding his PTSD were untrue. This is also nonsensical as the court cannot diagnose someone of PTSD. It is my understanding that Greg was previously on medication such as "Celexa," which is used for mental health issues, such as depression and anxiety. I, however, am not certain if he is still on Celexa.

22. Justin and I met in 6th grade. *See* Sixth Grade class photograph, filed with Exhibit "1." We were friends throughout middle school and for the one-year in high school until he moved. Justin and I will make more money in Hudson, Ohio. Justin makes approximately $72,000 per year in Ohio compared to the $48,000 per year that he would make in Arizona. Also, he will be unable to secure as much monthly overtime in Arizona (4 hours) as he is able to secure in Ohio (20 hours).

23. Justin is in good health, has excellent health insurance through his current employer with Blue Cross Blue Shield, and also is with the Union. As I mentioned in my Motion, he would lose approximately $20,000.00 per year if he moved to Arizona.

24. In his Opposition, Greg includes some "criminal records" for Justin. These are two (2) speeding tickets in Riverside, California from a speed trap coming down a hill, years ago. Justin does not have any criminal activity.

25. In his Opposition, Greg ostensibly claims that I broke into Mr. Martin Brown's home. This is false. Martin had given me a key, and I attempted to use the key to retrieve the children's gaming systems left there after Martin did not timely return them. The key, however, stuck in the lock, and my son jumped the fence over my objections to try the key on the backdoor.

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

End of Declaration.

II.

GREG'S REQUESTS FOR ATTORNEY'S FEES MUST BE DENIED

In his Countermotion, Greg requests Attorney's fees and costs. Greg, however, has failed to file in compliance with EDCR 5.506, which states in relevant part:

> Unless otherwise ordered by the court, or otherwise required by another rule or statute:
> [. . .]

> (b) A GFDF ***must*** be filed in ***support*** of any opposition to a motion or countermotion described in section (a).
> [. . .]
> (d) A financial disclosure ***must be filed within 2 judicial days*** of the filing of the motion, ***countermotion, or opposition it supports***, and may only be filed in open court with leave of the judge upon a showing of excusable delay.
> [. . .]
> (f) An assertion within a motion, opposition, or countermotion that there has been no change in a financial disclosure ***filed within the preceding 6 months*** satisfies this rule.
> (g) The court may construe any motion, opposition, or countermotion ***not*** supported by a timely, complete, and accurate financial disclosure as ***admitting that the positions asserted are not meritorious and cause for entry of orders adverse to those positions, and as a basis for imposing sanctions***.

[Emphasis added.]

Here, Greg filed his Opposition on October 22, 2019 (which was 21 days after Heidi filed her Motion and therefore, untimely). Thus, his FDF should have been filed on October 24, 2019. As of the date of this Reply, Greg has not filed an updated FDF since

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June 29, 2018. For these reasons, Greg's request for attorney's fees and costs must be denied.

III.

CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that the Court grant HER motion to relocate in its entirety.

DATED this 14th day of November 2019.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Telephone: (702) 990-6448
Attorney for Plaintiff

UNSWORN DECLARATION OF HEIDI PELKOLA

COUNTY OF CLARK)
) ss:
STATE OF NEVADA)

I, HEIDI PELKOLA, being duly sworn, deposes and says as follows:

1. I am the Plaintiff in the above-entitled case. I make this Declaration based upon facts within my own knowledge, save and except as to matters alleged upon information and belief and, as to those matters, I believe them to be true. I am competent to testify to the facts contained herein.

2. I have personal knowledge of the facts contained herein, and I am competent to testify thereto. I have reviewed the foregoing Reply, the statement I made therein, and can testify that the facts contained therein are true and correct to the best of my knowledge. I hereby reaffirm and restate said facts as if set forth fully herein.

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

To be supplemented

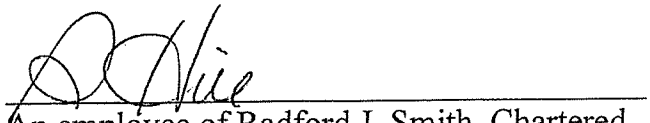
_____
HEIDI PELKOLA
DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

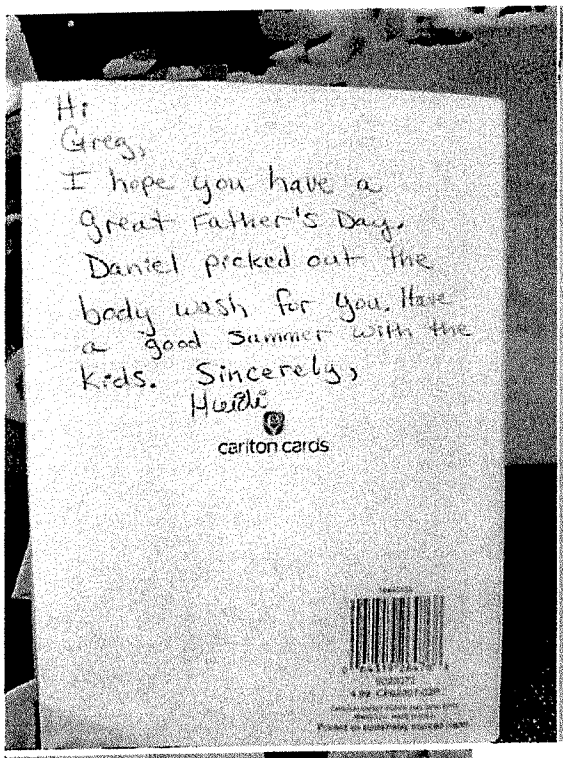
I served the foregoing documents described as **PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HER MOTION TO RELOCATE** on this 14th day of November 2019, to all interested parties by way of the Eighth Judicial District Court Electronic filing system as follows:

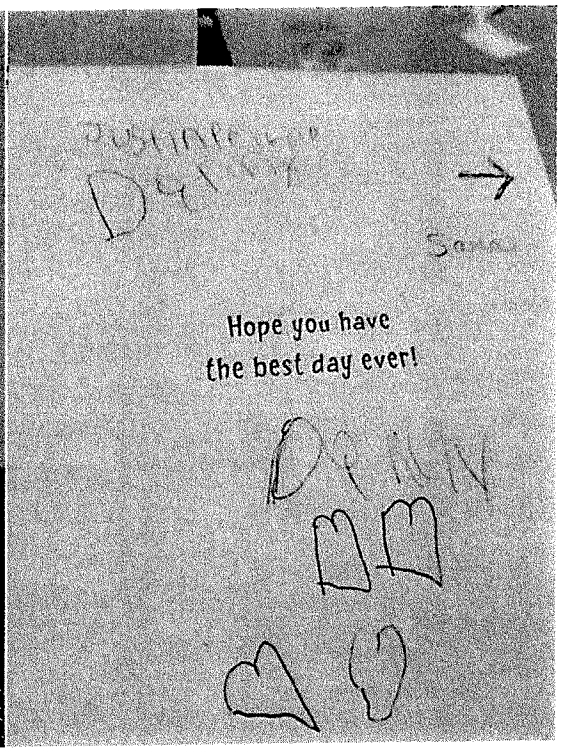
Melvin Grimes, Esq.
Attorney for Defendant

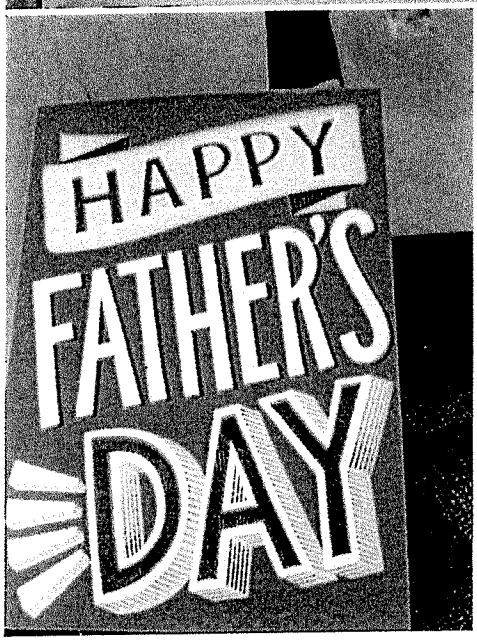


An employee of Radford J. Smith, Chartered

Father's Day card and gifts purchased by Heidi for Greg from kids:


Hi
Greg,
I hope you have a
great Father's Day.
Daniel picked out the
body wash for you. Have
a good summer with the
kids. Sincerely,
Heidi
cariton cards

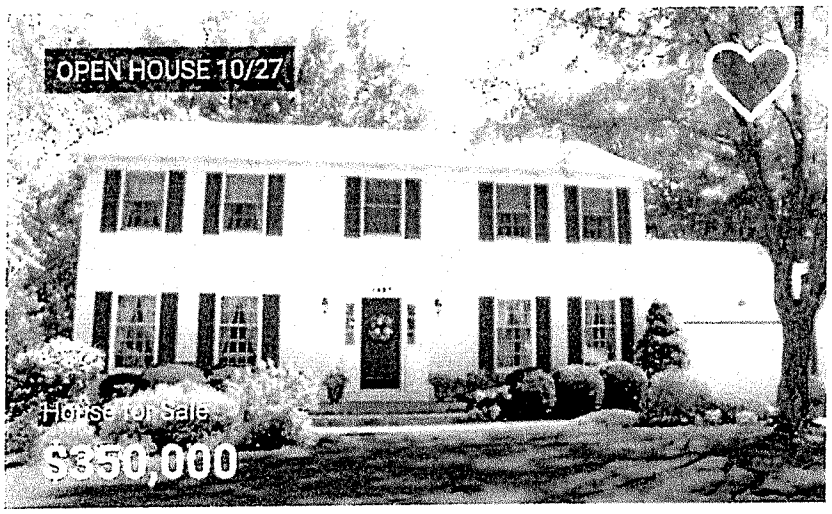

Hope you have
the best day ever!


HAPPY
FATHER'S
DAY

Here is 6th grade pic, Justin Ritter and my maiden name, Heidi Brown:

Here is a picture of the house we want if relocation is approved and if it would still be available by the time court is over:

Brokered by Howard Hanna - Hudson



5 bed **2.5** bath **2,352** sqft **0.74** acres lot

7897 Winterberry Dr
Hudson, OH 44236

Email Agent

D-13-488682-D Heidi Marie Pelkola, Plaintiff
vs.
Greg Elliott Pelkola, Defendant.

November 20, 2019 09:00 AM All Pending Motions

HEARD BY: Gibson, David, Jr. COURTROOM: Courtroom 06

COURT CLERK: Graham, April

PARTIES PRESENT:

Heidi Marie Pelkola, Plaintiff, Present

Radford J Smith, ESQ, Attorney, Present

Greg Elliott Pelkola, Defendant, Present

Melvin Grimes, Attorney, Present

Sara Michelle Pelkola, Subject Minor, Not Present

Justin Ryan Pelkola, Subject Minor, Not Present

Daniel Jordan Pelkola, Subject Minor, Not Present

JOURNAL ENTRIES

PLAINTIFF'S MOTION FOR RELOCATION TO OHIO AND FOR ATTORNEY'S FEES... DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR RELOCATION TO OHIO AND FOR ATTORNEY'S FEES... PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO HER MOTION TO RELOCATE... PLAINTIFF'S MOTION IN LIMINE PRECLUDING DEFENDANT FOR FILING AN UNTIMELY PRE-TRIAL MEMORANDUM, PRECLUDING DEFENDANT'S TRIAL EXHIBITS, PRECLUDING DEFENDANT FOR INTRODUCING ANY WITNESSES AND/OR DOCUMENT NOT PRODUCED OR IDENTIFIED DURING DISCOVER, AND FOR ATTORNEY'S FEES AND COSTS...PLAINTIFF'S OPPOSITION TO DEFENDANT'S COUNTERMOTION FOR PRIMARY PHYSICAL CUSTODY... EVIDENTIARY HEARING

Attorney Kimberly Stutzman, Nevada Bar #14085, present with Plaintiff (Mom) and Attorney Radford Smith.

Upon inquiry, Mr. Grimes confirmed Defendant (Dad) is WITHDRAWING his underlying Motion to Change Custody that is currently set for Evidentiary Hearing today. Mr. Smith advised he received communication from Mr. Grimes indicating a Notice to Withdraw the Motion to Change Custody was forthcoming; however, it was never received or filed. Mr. Smith requested attorney's fees and costs for preparing for today's Evidentiary Hearing under Rule 54. Court informed the parties the written findings from the 3/18/19 hearing were completed on 3/20/19; however, due to an error, a Minute Order was never completed and the findings were not sent out to the parties and therefore, Mr. Grimes was not able to complete the Order from that hearing. Court read the findings from the 3/18/19 hearing into the record and advised a Minute Order would be completed and sent out the parties. Court acknowledged it is partially at fault and indicated that will be a factor when determining attorney's fees and costs. Discussion regarding Dad's military retirement and cost of living adjustments associated therewith.

Notice: Journal Entries are prepared by the courtroom clerk and are not the official record of the Court.

Following argument and discussion regarding Mom's Motion to Relocate to Ohio, Mr. Grimes stated his agreement that an Evidentiary Hearing is not needed; however, he argued the move would substantially impede Dad's ability to maintain a relationship with the children and Mom did not meet the prima facie case.

COURT ORDERED as follows:

The Evidentiary Hearing set for today is MOOT as Dad WITHDREW his Motion to Change Custody. As to Mr. Smith's request for ATTORNEY'S FEES and COSTS for preparing for today's Evidentiary Hearing, he shall submit a Memorandum of Fees and Costs. Mr. Grimes shall then have ten (10) days to file an objection.

Pursuant to NRS 125C.006, Mom does not need permission to relocate to the State of Ohio as she already had an Order granting her permission to relocate to the State of Arizona and the statute refers to this State, meaning the State of Nevada. Therefore, Mom may relocate from the State of Arizona to the State of Ohio; however, she shall ensure Dad's VISITATION remains as currently Ordered as the Court believes Dad can still exercise his current timeshare.

The temporary Order regarding Dad's once per month VISITATION with Sara shall STAND and the downward deviation of CHILD SUPPORT for his travel expenses associated therewith shall STAND. Parties shall meet and confer if there is a significant change in travel costs.

Plaintiff's Motion in Limine is MOOT and the proposed Order was returned to Mr. Smith IN OPEN COURT.

With regards to Dad's pension payments, he shall inform Mom when he receives a cost of living adjustment. Mr. Grimes shall prepare the Order from the 3/18/19 hearing and include language regarding cost of living adjustments to Dad's pension payments.

Mr. Smith shall prepare the Order from today's hearing; Mr. Grimes shall review and countersign.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Notice: Journal Entries are prepared by the courtroom clerk and are not the official record of the Court.