

FILED

FEB 14 2022

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *[Signature]*
DEPUTY CLERK

1 Ali Shahrokhi
2 10695 Dean Martin Dr. #1214
3 Las Vegas, Nev. 89141
4 Tel: (702)835-3558

5 *Appellant in Propria Persona*

6
7 **IN THE SUPREME COURT OF THE STATE OF NEVADA**
8
9

10
11 **ALI SHAHROKH**

12 *Appellant,*

13 vs.

14
15
16 **KIZZY BURROW**

17 *Respondent.*
18

) **Case No: 81978,82245**
)
)

) **APPELLANT'S**
) **REQUEST for JUDICIAL NOTICE**
) **PURSUANT TO NRS 47.140**
)
)
)

19
20 **Notice to Respondent:** *You are required to file a written response to this*
21 *motion with the Clerk of the Court and to provide the undersigned with a copy*
22 *of the response within fourteen (14) day of your receipt of this motion. Failure*
23 *to file a written response with the clerk of the court within fourteen (14) days of*
24 *your receipt of this motion may result in the request relief being granted by the*
25 *court without hearing prior to the scheduled hearing date.*
26
27
28

FEB 14 2022

22-049602

vs NOTICE of MOTION vs

PLEASE TAKE NOTICE: Respondent asks the Court to take judicial notice of the following:

1) **NRS 199.120** Definition; penalties. A person, having taken a lawful oath or made affirmation in a judicial proceeding or in any other matter where, by law, an oath or affirmation is required and no other penalty is prescribed, who: 1. **Willfully makes an unqualified statement of that which the person does not know to be true;** 2. **Swears or affirms willfully and falsely in a matter material to the issue or point in question;** 3. Suborns any other person to make such an unqualified statement or to swear or affirm in such a manner; 4. **Executes an affidavit pursuant to NRS 15.010 which contains a false statement, or suborns any other person to do so; or 5. Executes an affidavit or other instrument which contains a false statement before a person authorized to administer oaths or suborns any other person to do so, is guilty of perjury or subornation of perjury, as the case may be, which is a category D felony** and shall be punished as provided in NRS 193.130.

2) **NRS 193.130** Categories and punishment of felonies. [Effective July 1, 2020.] (2)(d) (d) **A category D felony is a felony** for which a court shall sentence a convicted person to imprisonment in the state prison for a

1 minimum term of **not less than 1 year and a maximum term of not**
2 **more than 4 years.** In addition to any other penalty, the court may
3 impose a fine of not more than \$5,000, unless a greater fine is authorized
4 or required by statute.
5

6 3) Signed Affidavit, under penalty of perjury, executed by Dawn R. Thorne,
7
8 On September 10, 2021, Page 2, line 1 stating: I HAVE NOT
9
10 **PERSIDED OVER ANY HEARING IN THIS MATTER YET AND I**
11 **HAVE NOT ISSUED ANY WRITTEN DECISION OR ORDERS.**

12 (See Exhibit 1)

13 4) Signed Ex-Parte Order to Show Cause by Dawn Thorne, signed on
14
15 August 18, 2021 where Thorne has signed a written order completely
16
17 false of what she stated in her signed affidavit under penalty of perjury
18
19 executed on Sepetmber 10,2021. (See Exhibit B)

20 Scope of Motion: This motion is based on this notice of motion, the within
21 points & authorities, affidavits, exhibits, requests for judicial notice, oral
22 arguments, *etc.*, and other evidence as the Court may allow.
23

24 Dated: **Febuary 14, 2022**

DocuSigned by:
Ali Shahrokhi
ED43B0CA76FC4D6

25
26
27 **ALI SHAHROKHI**

28 *Petitioner, in Propria Persona*

1 **REQUEST FOR JUDICIAL NOTICE—**

2 Request for Judicial Notice: In this case, grave injustice stems from the
3 perjury under penalty of perjury committed by a corrupt bottom feeder so called fat
4 fuck judge, Dawn Throne.

5 **GOVERNING LAW—**

6 Judicial Notice: NRS 47.140 governs requests for judicial notice as to
7 “matters of law.” NRS 47.140 provides the governing law—

8 NRS 47.140 MATTERS OF LAW—

9 “The laws subject to judicial notice are:

- 10 1. [...]
11 2. The Constitution of United States.
12 3. Any other statute of this State if brought to the attention of the
13 court by its title and the day of its passage.”

14 [See NRS 47.140; underscores added.]

15 Nevada Revised Statutes: Pursuant to NRS 47.140(2), courts may properly
16 take judicial notice of *Nevada Revised Statutes*, including, of course, NRS
17 126.036, [see NRS 47.140(2)].

18 **CONCLUSION—**

19 Conclusion: Shahrokhi respectfully requests that this Court *GRANT* this Request
20 for Judicial Notice. The facts sought to be noticed are not subject to reasonable
21 dispute, and further, such facts are capable of accurate verification from sources
22 whose accuracy cannot reasonably be questioned.
23

24
25 **NRS 199.120** is the Nevada law that prohibits **perjury**, the legal term for lying
26 under oath. It is a *category D felony* to commit either perjury or **subornation of**
27 **perjury** — which is *inducing another person* to lie under oath. **Penalties** include 1
28 to 4 years in prison and a possible fine of up to \$5,000.

Dated: February 14th, 2022

Respectfully Submitted,

DocuSigned by:
Ali Shahrokhi
ED43B0CA76FC4D6..

Ali Shahrokhi

Respondent, in Propria Persona

AFFIDAVIT of Ali Shahrokhi

My name is Ali Shahrokhi. I am a litigant before the court. All of the allegations herein are true and correct of my own personal knowledge. If called upon to testify, I could and would give competent and truthful evidence.

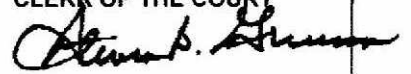
I hereby declare under penalty of perjury under the laws of the State of Nevada the foregoing is both true and correct.

Dated: February 14, 2022

DocuSigned by:
Ali Shahrokhi
ED43B0CA76FC4D6..

Ali Shahrokhi

Declarant.



1 AFFT

EXHIBIT 1 EXHIBIT 1

PAGE 2

3 DISTRICT COURT, FAMILY DIVISION

4 CLARK COUNTY, NEVADA

7 KIZZY BURROW, Plaintiff,

8 vs.

9 ALI SHAHROKHI, Defendant.

Case No: D-18-581208-P
Department U

10
11 **AFFIDAVIT OF THE HONORABLE DAWN R. THRONE**
12 **IN RESPONSE TO DEFENDANT'S "MOTION TO DISQUALIFY**
JUDGE DAWN R. THRONE PURSUANT TO NCJC RULE 2.11(3)"

13 STATE OF NEVADA)

) ss:

14 COUNTY OF CLARK)

15 I, Dawn R. Throne, having been duly sworn, depose and say:

16 1. I am the Judge in Department U, Family Division, Eighth Judicial
17 District, Clark County, Nevada. This Affidavit in Response is filed pursuant to
18 NRS 1.235(6). This matter was randomly reassigned to Department U on July 29,
19 2021 after the recusal by the Honorable Vincent Ochoa on July 28, 2021.
20 Respondent was served with the Notice of Department Reassignment
21

THRONE'S LIE UNDER PERJURY

electronically on July 29, 2021. I have not presided over any hearings in this matter yet and I have not issued any written decisions or orders.

2. Ali Shahrokhi, Respondent, Self-Represented, in Case No. D-18-581208-P, filed a "Motion to Disqualify Judge Throne due to Appearance of Impropriety pursuant to NCJC RULE 2.11(3)" on September 4, 2021. Pursuant to NRS 1.235(3), Respondent only had until August 9, 2021 to file his Motion to Disqualify and his Motion is untimely.

3. Respondent also failed to serve his Motion as required by NRS 1.235(4).

4. I do not know either party to this case. I have no knowledge about this case outside of the papers and pleadings on file in this court and in the Supreme Court of the State of Nevada. I have no bias or prejudice for or against Petitioner, Kizzy Burrow. I have no bias or prejudice for or against Respondent, Ali Shahrokhi.

5. I am not related to either party, current counsel for Petitioner or former counsel by consanguinity or affinity within the third degree.

6. I have had no extra-judicial contact with the parties.

7. I have no personal or economic interest in this case. No one in my family or household has an economic interest in this case.

8. I have not served as a lawyer to either party. Respondent complains that I have not made any disclosures in this case pursuant to the Revised Nevada Code

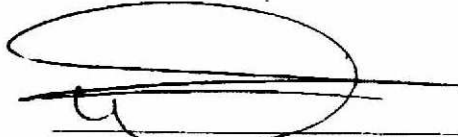
1 of Judicial Conduct ("NCJC"). There are no disclosures required to be made by
2 me pursuant to Rule 2.11 of the NCJC. Respondent alleges, without any evidence,
3 that I have a "close and very personal relationship" with Thomas Standish, Esq.
4 First of all, Mr. Standish is no longer counsel for Petitioner in this case. Yvonne
5 Ruiz, Esq. of the Marzola & Ruiz Law Group PLLC substituted in as counsel for
6 Petitioner on February 2, 2021. I do not know Ms. Ruiz or any other attorney at
7 that firm. I also do not know Mr. Spralding, who appears to have previously
8 represented Petitioner in this case when he was employed at the Standish Law
9 Group. With regard to Mr. Standish, Respondent is mistaken in his allegation that
10 I "worked for Standish law firm for 5 years between 2000 to 2005." In 2000, over
11 20 years ago, I was hired by the law firm of Jolley, Urga, Wirth and Woodbury.
12 During my almost 5 years working for this firm, I mainly worked under the
13 supervision of two specific partners in the firm, R. Gardner Jolley, Esq. and
14 Kathryn Stryker Wirth, Esq. Sometime in approximately 2004, Mr. Standish
15 joined the firm and the name changed to Jolley, Urga, Wirth, Woodbury and
16 Standish. By that time, I had been practicing law for almost 8 years and had my
17 own case load, so I was not supervised by Mr. Standish. I estimate that Mr.
18 Standish and I worked together at that law firm for about 1 year by the time I left
19 in March 2005. As attorneys who have practiced family law in the same
20 community for decades now, I know Mr. Standish. Over the years, we have
21

1 interacted when representing clients on opposite sides of a case or when working
2 on matters related to the general practice of family law in Nevada. I consider Mr.
3 Standish a colleague in this profession, but I do not have a "close and very
4 personal relationship" with him. Respondent's allegation that I worked with Mr.
5 Standish during his representation of Petitioner in this case is also not accurate.
6 This case did not begin until December 10, 2018, over 13 years after Mr. Standish
7 and I worked together at Jolley, Urga, Wirth, Woodbury and Standish. No party or
8 attorney would reasonably consider my working at the same law firm with Mr.
9 Standish over 16 years ago relevant to a possible motion for disqualification such
10 that disclosure on the record would be required, especially since Mr. Standish is no
11 longer counsel for Petitioner. Lastly, with regard to the campaign contributions by
12 Standish Law Group, those are public record and total only about \$1,000, which is
13 substantially under the limit for such contributions. The Nevada Supreme Court
14 has made it clear that such campaign contributions are not a basis to disqualify a
15 judge. *See, Ivey v Eighth Judicial District Court*, 129 Nev.Adv.Op. 16 (2013)
16 (citing *In re Petition to Recall Dunleavy*, 104 Nev. 784, 790, 769 P.2d 1271, 1275
17 (1988)).

18 9. I have made no public comments on this case or taken any position
19 publicly that may involve the matters of this case.
20
21

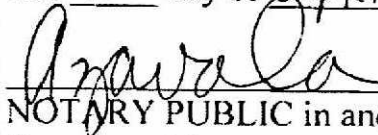
1 10. I deny any and all allegations of bias or prejudice set forth in
2 Defendant's Motion to Disqualify Judge Throne Due to Appearance of
3 Impropriety.

4 DATED 9/10/2021

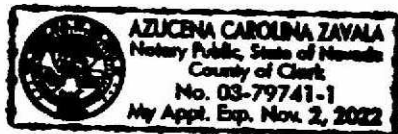
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6 

7 DAWN R. THRONE
8 DISTRICT COURT JUDGE
9 DEPARTMENT U

10 SUBSCRIBED AND SWORN to before me
11 this 10 day of September, 2021.

12 

13 NOTARY PUBLIC in and for said
14 County and State.



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8/18/2021

Electronically Filed
08/18/2021 1:10 PM

Steven B. Wolfson
CLERK OF THE COURT

EXHIBIT B

OSC
Steven B. Wolfson, District Attorney
Nevada Bar No. 001565
Family Support Division
1900 East Flamingo Road, Suite 100
Las Vegas, Nevada 89119-5168
(702) 671-9200 - TTY and/or other relay services: 711
891079300A

**DISTRICT COURT
CLARK COUNTY, NEVADA**

KIZZY BURROW

Petitioner,) Case no. R-21-218156-R

vs.

Dept. no. CHILD SUPPORT

ALI SHAHROKHI

Respondent.)

**ORDER TO SHOW CAUSE WHY RESPONDENT SHOULD NOT BE FOUND
IN CONTEMPT AND ORDER APPOINTING CHILD SUPPORT MASTER**

To: ALI SHAHROKHI, Respondent above named:

You are hereby ordered to appear before the above-entitled court, (UIFSA Child Support Courtroom in the Child Support Center of Southern Nevada, 1900 East Flamingo Road, Las Vegas, Nevada) to show cause, if any, why you should not be found in contempt for willfully disobeying a Court Order, filed and registered, if applicable; the alleged disobedience is more fully described in the Declaration in Support of Order to Show Cause Re: Contempt filed herein, a copy of which is being concurrently served upon you with a copy of this order. You are Ordered to appear in Court at the date and time stated in the Notice of Hearing. A copy of the Notice of Hearing will be served with this Order.

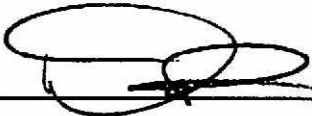
1 The court hereby finds that the nature of the matter set forth herein is such that it
2 should be referred to a Child Support Master, and good cause appearing therefore:

3 It is further ordered that all of the issues, both factual and legal, are referred to a
4 Child Support Master who will hear the evidence and report the findings of fact,
5 conclusions of law, and recommendations to the District Court in the manner provided in
6 **Eighth Judicial District Court Rule 1.40.**

7 **The focus of the hearing will be your ability to pay. If you are looking for**
8 **work, bring a list of places where you have applied for work within the last 30 days.**
9 **If you are unable to work due to a physical or mental disability, bring a doctor's**
10 **letter that describes your condition and its impact on your ability to work.**

11 **Pursuant to Chapter 22 of the Nevada Revised Statutes, a finding of contempt**
12 **may result in a jail sentence being stayed or imposed (25 days) to be served by you**
13 **in the Clark County Detention Center. Your failure to appear at the Order to Show**
14 **Cause hearing may result in the issuance of a Bench warrant for your arrest and for**
15 **such other and further relief as the District Court deems justified in the premises.**

16 Dated this 18th day of August, 2021

17 

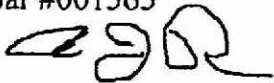
18 C5A 02C 098C BC09
19 Dawn R. Throne
20 District Court Judge

21 Submitted by:

22 Steven B. Wolfson

23 Clark County District Attorney

24 Nevada Bar #001565

25 

26 Deputy District Attorney

27 Family Support Division

28 Dated this 8/13/2021 1:43 PM

**THORNES SIGNATURE
BEFORE HER AFFIDAVIT
SAYING SHE HAS NEVER SIGNED
WRITTEN ORDER. FUCKING LIAR**

-CERTIFICATE-OF-SERVICE-

I am an individual over the age of eighteen and not a party to the within action. My home address is 10695 Dean Martin Dr. #1214, Las Vegas, Nev. 89141. My phone number is (702)835-3558.

On **February 14, 2022**, I served the following:

Respondent's Request for Judicial Notice

on an interested party in the above-entitled action by

 X via e-mail transmission,

 personal service on the person below listed,

 X depositing it in the U.S. Mail, postage prepaid,

and addressed to the person below listed,

 overnight delivery, addressed as follows:

**Kizzy Burrow
16408 SW Timberland Dr.
Beaverton, Oregon 97007**

I declare under penalty of perjury under Nevada law the foregoing is true and correct.

Dated: **February 14, 2022**

/s/ Ali Shahrokhi
Declarant.