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7 *Appellant in Pro Se*

8 NEVADA SUPREME COURT

9 STATE of NEVADA

11  
12 ALI SHAHROKHI ) Appeals Ct: 81978, 82245  
13 ) District Ct: D-18-581208-P  
14 )  
15 *Appellant* )  
16 ) APPELLANT'S  
17 vs. ) NOTICE of RELATED CASES  
18 )  
19 KIZZY BURROW )  
20 )  
21 *Respondont* )  
22 )  
23 )  
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22-20707

Comes now, Appellant, ALI SHAHROKHI, (“SHAHROKHI”), appearing in *pro se*. SHAHROKHI respectfully submits this *Notice of Related Cases* to inform this Court about two (2) related cases now pending awaiting final decision by Nevada Supreme Court.

Related Case No. 1: SHAHROKHI submits the following as a related case, *i.e.*, the matter of HALL VS. MARTIN, [COA No. 83979; (child custody); (Clark County, Eighth Judicial District, No. D600476)].

HALL VS. MARTIN raises the same legal issues and arguments that SHAHROKHI’S case raises in his appeal. Both cases feature the same due process argument, *i.e.*, that family courts may not try parents for crimes or otherwise make “criminal” findings. Both cases argue that the parents’ due process rights are violated—where judges make *criminal* findings of domestic violence.

NRS 125C.0035.5—Unconstitutional: Remarkably, both DIAMOND HALL and SHAHROKHI argue that Nevada’s “best interest” statute, NRS 125C.0035.5, which contains the domestic violence (“D.V.”) presumption—is *unconstitutional*. The case of HALL VS. MARTIN, features a very capable attorney, Amy Porray, Esq. (McFARLING LAW GROUP), who represents DIAMOND HALL. Amy Porray, Esq. makes the following argument—

“NRS 125C.0035(5) necessarily conflicts with the constitutional due process mandate that all persons charged with a crime are innocent until the government proves that they are guilty beyond a reasonable doubt. Persons charged with a crime have no burden to prove, testify, or otherwise introduce evidence supporting that they are not guilty.”

*Notice of Related Cases*, p. 2

1        Related Case No. 2: SHAHROKHI submits the following as a related case,  
2        *i.e.*, the matter of BELLISARIO VS. BELLISARIO, [COA No. 84128; (child custody;  
3        Clark Co., Eighth Judicial District, No. D-20-605263-D)].

4        In this second related case, BELLISARIO VS. BELLISARIO, we again see the  
5        same legal issues and arguments that SHAHROKHI makes in his appeal. This case  
6        also features Amy Porray, Esq. (MCFARLING LAW GROUP). Both cases feature the  
7        same due process argument, *i.e.*, that family courts may not try parents for crimes  
8        or otherwise make “criminal” findings. Both cases argue that due process is  
9        violated—in instances where family court judges make *criminal* findings of  
10       domestic violence in *civil* litigations.

11       Nevada Constitution, Article 1, Section 8: SHAHROKHI argues that all three  
12       related cases may be dispo’d by simply application of Nevada Constitution, Art. 1,  
13       Section 8, which provides that, “*No person shall be tried*” ... “*for an infamous*  
14       *crime*” ... “*except on indictment*,” [Nev. Const., Art. 1, Sec. 8].

15       Prosecution of Public Offenses: State law provides that, “[e]very public  
16       offense must be prosecuted by indictment or information,” [NRS 172.015]. There  
17       is no private right of action to allege crimes in a civil case. No district judge may  
18       conclude that a parent committed a crime—unless or until The People bring a  
19       criminal complaint, [NRS 172.015; (“[e]very public offense must be prosecuted by  
20       indictment or information”)].

21       The criminal complaint is what confers subject-matter jurisdiction for the  
22       judge to make criminal findings and conclusions. And, the fact remains, with no  
23       criminal complaint (or indictment) in the family court, the family court judge  
24       necessarily lacks subject-matter jurisdiction to make criminal findings. The People  
25       are the only entity who may bring criminal complaints—not parties to child  
26       custody cases.

27       /////

28       /////

**CONCLUSION AND RELIEF REQUESTED—**

SHAHROKHI respectfully requests for the following relief:

- 1- An Order staying the remittance pending the outcome of case # 83979 and case # 84128;
- 2- An Order relating the final decision on case # 81978, #82245 once cases # 83979 and 84128 have been decided;
- 3- Any other relief this court sees fit.

Dated: **June 30, 2022**

DocuSigned by:  
*Ali Shahrokhi*  
ED43B0CA76FC4D6...

**Ali Shahrokhi**

Ali Shahrokhi,  
*Self-Represented*

**CERTIFICATE-OF-SERVICE**

I am an individual over the age of eighteen and not a party to the within action. My address is 9620 S Las Vegas Blvd, Suite 4, #152 Las Vegas, Nev. 89123. My phone number is (702)835-3558.

On **June 30, 2022**, I served the following:

**Notice of Related Cases;**

on an interested party in the above-entitled action by

  X   via e-mail transmission, (Tyler Host)

       personal service on the person below listed,

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

       and addressed to the person below listed,

       overnight delivery, addressed as follows:

**KIZZY BURROW, Respondent**

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

Dated: **June 30, 2022**

DocuSigned by:

*Ali Shahrokhi*  
ED43B0CA76FC4D6...

/s/ Ali Shahrokhi .  
Declarant.