

# IN THE SUPREME COURT OF THE STATE OF NEVADA

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Feb 24 2021 01:54 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

AIMEE O'NEIL,  
Appellant(s),

vs.

CHARLENE O'NEIL; AND GLORIA  
MAZZOLI,  
Respondent(s),

Case No: A-20-815618-C

Docket No: 82418

# RECORD ON APPEAL VOLUME 1

**ATTORNEY FOR APPELLANT**  
**AIMEE O'NEIL, PROPER PERSON**  
**6456 BUTTERFLY SKY ST.**  
**NORTH LAS VEGAS, NV 89084**

**ATTORNEY FOR RESPONDENT**  
**KEVIN E. BECK**  
**3137 E. WARM SPRINGS RD., STE. 100**  
**LAS VEGAS, NV 89120**

**I N D E X**

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A-20-815618-C

Aimee O'Neil, Plaintiff(s)

vs.

Gloria Mazzoli, Defendant(s)

I N D E X

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*Steven D. Grierson*

Aimee O'Neil  
6500 W. Charleston Blvd # 268  
Las Vegas, NV 89146  
702-302-0481  
whereintheworldisaimee@gmail.com  
Plaintiff, in proper person

CASE NO: A-20-815618-C  
Department 26

Eighth Judicial District  
Clark County, Nevada

Aimee O'Neil

vs. Plaintiff

Charlene O'Neil  
Gloria Mazzoli

Defendants

### Complaint

Plaintiff, Aimee O'Neil, in proper person complains against defendants, Charlene O'Neil, and Gloria Mazzoli as follows:

## Parties

1. Plaintiff, Aimee O'Neil, is an individual who is currently, and was at all relevant times herein, a resident of the state of Nevada, County of Clark, City of Las Vegas.
2. Defendant, Charlene O'Neil, who resides in the State of Florida, County of Pinellas, city of Palm Harbor.
3. Defendant, Gloria Mazzoli, who resides in the State of New York, County of Oswego, city of Oswego.
4. It is alleged and realleged that the defendants who are nonresidents have

Substantial contacts here to continuously harass, stalk, intimidate, and cause emotional distress to the plaintiff by using or influencing others to harass the disabled plaintiff, Aimee O'Neil.

The plaintiff, Aimee O'Neil alleges that the State of Nevada holds jurisdiction over this

case because the defendants whether acting separately or together are harassing her in the city of Las Vegas.

5. On Friday, April 17, 2020, the plaintiff Aimee O'Neil, was told by fiance, Mark Morrison that there was a RFID chip in her leg. A bug transmitting back to one or both defendants.

## Facts

The disabled plaintiff, Aimee O'Neil, alleges and realleges that the one or both of the defendants inserted this RFID chip illegally without a court order or without an authorization of a surgeon, so they could track the plaintiff and stalk and harass her.

6. The plaintiff, Aimee O'Neil, retained Mr. Leigh Hunt, retired head of the NYS Police as her private investigator to investigate this ongoing Stalking.

7. The plaintiff alleges and realleges that the defendants are intruding deliberately and intentionally on her privacy to stalk, harass, intimidate, and intrude in the plaintiff's life. The plaintiff alleges that their conduct would highly offend a reasonable person.

8. It is alleged that on April 19, 2020 the defendants Charlene O'Neil and Gloria Mazzoli sent second party people to FedEx on paradise at 8:45 am to harass, intimidate, embarrass, Aimee O'Neil alleges the

3. revealing of Confidential parts of a conversation the plaintiff had with her fiancé, Mark Morrison, the evening before about her cell phone bill. The plaintiff alleges that two people asked her if she would sell her car for \$60 or \$70 because the plaintiff Aimee O'Neil had asked her fiancé Mark Morrison to pay her cell phone bill the night before. The plaintiff alleges an unwarranted invasion of privacy of confidential facts and harassment.

9. Than the plaintiff  
Aimee O'Neil went to  
Cricket Wireless on  
Charleston and a man  
was outside waiting  
and sexually harassed  
the plaintiff, Aimee  
O'Neil.

10. At 2:00 pm, Aimee  
O'Neil went to the  
US District Court house  
on Las Vegas Blvd and  
was followed. A vehicle  
with Nevada tags  
saying Msorita cut  
her off, parked in front  
of her and never exited  
the vehicle. Than an  
unidentified man in a  
Greenbay Packers Jersey



10. was attempting to block the plaintiffs way to get into the federal Courthouse because the plaintiff Anne O'Neil was filing a federal motion against both defendants.

11. All of these acts are caused by the defendants, individually and or acting through agents.

## Claims for Relief

A. violation of Privacy

13. As a result of the defendants conduct the plaintiff sustains damages in the amount of \$50,000

## B. Harrassment

14. The defendants intentionally and willfully harassed the plaintiff
15. This harassment caused the defendant proximate injury to her.
16. The plaintiffs injuries are
17. The plaintiff alleges that the defendants inserted a RFID device inside the plaintiffs leg to track and follow her.
18. The plaintiffs injuries are \$250,000

Wherefore, Plaintiff prays  
for the following relief:

1. Compensatory damages  
for medical, past, present  
and future of \$250,000
2. General Damages for  
past, present, and future  
in excess of \$250,000
3. For Interest at the  
Statutory rate
4. For such other relief  
as the court deems  
appropriate and  
equitable

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

Dated 20<sup>th</sup> day of April, 2020

---

Aimee C. Neil  
6500 W. Charleston  
# 268  
Las Vegas, NV  
89146  
702-302-0481  
Wherein the world is  
aimee@gmail.com  
Plaintiff, in proper  
person

The plaintiff, Aimee O'Neil requests an immediate injunctive order be issued against defendants Charlene O'Neil and Gloria Mazzoli to prevent ongoing further harassment and violation of privacy for Aimee O'Neil and her fiance Mark Morrison.

The plaintiff, Aimee O'Neil requests restraining orders against both Charlene O'Neil and Gloria Mazzoli for exploiting her privacy with Mark Morrison via harassment intimidation.

The plaintiff, Aimee O'Neil request an order to remove this unidentified RFID device in her body that was not legally placed there by the order of a judge or surgeon. The plaintiff's Surgeon will remove this RFID chip with the order of a judge and it will be immediately turned over to the FBI in Las Vegas for full prosecution. The plaintiff prays for this order as this could impose cancer on the plaintiff.

The plaintiff, Aimee O'Neil request an order demanding the defendants Gloria Mazzoli and Charlene O'Neil answer the Courts immediately as to who did this, when it was done, how it was done as the Nevada State Court has full jurisdiction over this.

Aimee O'Neil



**Leigh F. Hunt**  
**Security Services**  
**200 Summit Avenue, Syracuse**  
**New York 13207**

[leighfhunt@AOL.Com](mailto:leighfhunt@AOL.Com)

**(315) 263-5044**

**To whom it may concern in the Matter of Amiee O'Neil v. various parties**

**I am a licensed Private Investigator licensed by the State of New York and have been retained on various occasions by Ms. Aimee O'Neil since the beginning of 2004**

**During the last eighteen months Ms. O'Neil has reported to me that she is being continually harassed, followed, spied upon, her numerous phones being tapped and numerous other harassment tactics. She has reported that on several occasions, men unknown to her have come up to her tried to engage her in conversations indicating that they knew all about her and made comments that frightened and alarmed her.**

**At one point early on in one of the previous investigations on behalf of Ms. O'Neil and in conversation with Mr. John Mazzoli he related to me the bad blood between his ex-wife Dawn that his ex-wife told him she would follow Ms. O'Neil forever.**

**During the time that Ms. O'Neil was in Colorado I maintained constant contact with her by phone and text messages. Ms. O'Neil was concerned that people she had known for an exceptionally long time were now acting different toward her. I advised her that often it was because other individuals had made comments about her and unfortunately, they were believed and influenced.**

**I made several attempts to locate and interview John Mazzoli with negative results. I was however able to interview John Mazzoli's father who stated that he knew nothing about Amiee O'Neil and had not seen or heard from her since before she left New York State. At the time that I spoke with Mr. Mazzoli I tried to speak with his wife Gloria Mazzoli however she refused to speak with me and asked me to leave the property which I did.**

**In furtherance of this investigation and in an attempt to get the reported harassment of Ms. O'Neil to cease and desist I contacted her mother by phone which consisted of a very short conversation in which she stated she had no interest in her daughter Amiee whatsoever and didn't even know where she was living at that time, however it had been reported that Aimee's Mother had a young woman threaten to kill Amiee out of hate and jealousy, verified by Ms. O'Neil. Most recently I again attempted to contact Aimee's mother by phone with**

negative results. Ms. O'Neil is fortunate to have enlisted the aid of her aunt who has reportedly connections in government through which she is working on getting information for her niece Amiee.

John Mazzoli has been a person of interest as Mr. Mazzoli and Ms. O'Neil were close friends at one time and Ms. O'Neil believes that with the aid of his mother Gloria Mazzoli, he is influencing individuals to keep track of and harass her.

Of utmost importance currently is the belief by Ms. O'Neil that somewhere on her person is a microchip or some other type of sophisticated device allowing for the monitoring of not only her location but also possibly monitoring her conversations.

I have strongly advised Ms. O'Neil to get this thoroughly checked out as soon as possible keeping in mind current conditions.

Most recently Ms. O'Neil has advised me that remembering her time in New York State and the fact that Mr. Mazzoli had reportedly obtained many jobs for individuals with Alcan Aluminum Company that there is a possibility, according to Ms. O'Neil, that this company might be assisting Mr. John Mazzoli .

**Leigh F. Hunt**

Leigh F. Hunt Security Services is licensed by New York State, Department of State, Division of Licensing Services

Amiee O'Neil  
6500 W. Charleston Blvd.  
#268  
Las Vegas, NV 89146

Eighth Judicial District  
200 Lewis Ave.  
Las Vegas, NV 89155



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89155

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SUMM

1 Aimee O. Neil

2 (Your Name)

3 6500 W. Charleston Blvd.

4 (Your Mailing Address)

5 Las Vegas, NV 89146 #268

6 (Your City, State, Zip Code)

7 702-302-0481

8 (Your Telephone Number)

9 (Your Fax Number)

10 whereintheworldisaimee@gmail.com

11 (Your E-mail Address)

12 Plaintiff, Self-Represented

13 EIGHTH JUDICIAL DISTRICT COURT

14 CLARK COUNTY, NEVADA

15 Plaintiff's

16 Name:

17 Aimee O. Neil

18 Plaintiff,

19 vs.

20 Defendant's

21 Name:

22 Charlene O. Neil

23 Defendant.

Case No.: \_\_\_\_\_

Dept. No.: \_\_\_\_\_

24 SUMMONS

25 NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT  
26 YOUR BEING HEARD UNLESS YOU FILE A RESPONSE WITH THE COURT  
27 WITHIN 21 DAYS. READ THE INFORMATION BELOW CAREFULLY.

28 To the Defendant named above: Gloria Mazzoli

A civil complaint has been filed by the Plaintiff against you. Plaintiff is seeking to recover the relief requested in the complaint, which could include a money judgment against you or some other form of relief.

If you intend to defend this lawsuit, within 21 calendar days<sup>1</sup> after this Summons is served on you (not counting the day of service), you must:

1. File with the Clerk of the Court, whose address is shown below, a formal written response (typically a legal document called an "answer," but potentially some other

<sup>1</sup> The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members, and legislators each have 45 days after service of this Summons within which to file a response to Plaintiff's complaint.

response) to Plaintiff's complaint.

2. Pay the required filing fee to the court, or file an Application to Proceed *In Forma Pauperis* and request a waiver of the filing fee.
3. Serve (by mail or hand delivery) a copy of your response upon the Plaintiff whose name and address is shown below.

Information and forms to assist you are available, free of charge, at the Civil Law Self-Help Center at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, and on the center's website at [www.civilawselfhelpcenter.org](http://www.civilawselfhelpcenter.org).

If you fail to respond, the Plaintiff can request your default. The court can then enter judgment against you for the relief demanded by the Plaintiff in the complaint, which could result in money or property being taken from you or some other relief requested in Plaintiff's complaint.

If you intend to seek an attorney's advice, do it quickly so that your response can be filed on time.

STEVEN D. GREENSON, CLERK OF COURT

By: Aissa-Mae Chapman  
Deputy Clerk  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

6/1/2020

Date:

Issued at the request of:

Aimee O'Neil  
(Signature)

Aimee O'Neil  
(Your Name)

6500 W. Charleston Blvd #268  
(Your Street Address)

Las Vegas, NV 89146  
(Your City, State, and Zip Code)

Plaintiff, Self-Represented

*Note: When service is by publication, add a brief summary of the claims asserted, the relief sought, and include any special statutory requirements. This summary should have been proposed through a Motion Seeking Publication and approved through an Order for Service by Publication. See Nevada Rule of Civil Procedure 4-4(c).*

# DR

DESERT RADIOLOGY

702-759-8600

Patient ID: 503335555  
Patient Name: AIMEE O'NEIL  
DOB: 11/26/1970 Date of Exam: 5/7/2020  
Exam : XR C SPINE  
XR RIBS UNI W PA CHEST  
XR SHOULDER

# #WeAreDR





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*Heather S. Hemin*  
CLERK OF THE COURT

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK, NEVADA**

Plaintiff's

Name: Aimee O'Neil

Case No.: A-20-815618-C

Dept. No.: XXVI

Plaintiff,

vs.

Defendants

Name: Gloria Mazzoli

Defendant.

**ANSWER**

To the Plaintiff, Aimee O'Neill:

1. Defendant denies each and every allegation of Plaintiff's complaint.
2. Defendant requests that this action should be dismissed in its entirety for failure to state a cause of action.
3. Defendant requests that this action be dismissed for lack of jurisdiction over the Defendant.
4. Defendant requests that this action be dismissed without prejudice.

*Gloria Mazzoli*  
\_\_\_\_\_  
**GLORIA MAZZOLI**  
19 East Utica Street  
Oswego, New York 13126

To: Aimee O'Neill  
6500 W. Charleston Blvd. #268  
Las Vegas, Nevada 89146

**RECEIVED**

**JUL 13 2020**

CLERK OF THE COURT

**GLORIA MAZZOLI**  
**19 East Utica Street**  
**Oswego, New York 13126**

July 7, 2020

Steven D. Grierson, Clerk of Court  
c/o Deputy Clerk  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

***Re: O'Neill vs. Mazzoli***  
***Case No.: A-20-815618-C***

Dear Sir/Madam:

Please be advised that I was served with a Summons and Complain for an action referred to above. As such, enclosed herewith please find my formal Answer, a copy of which has been forwarded to Plaintiff O'Neill.

Thank you.

Very truly yours,

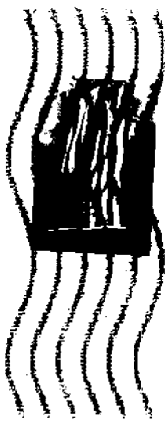
  
Gloria Mazzoli

GM  
Enc.

Gloria Mazzoli  
19 East Utica Street  
Oswego, New York 13126

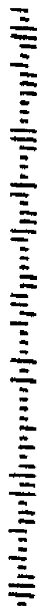
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1 ANS  
2 Kevin E. Beck, NSB #8371  
3 KEVIN E. BECK, LTD.  
4 3137 E. Warm Springs Rd., Ste. 100  
5 Las Vegas, NV 89120  
6 Telephone: (702) 641-9900  
7 Facsimile: (702) 260-8983  
8 E-mail: kevin@kevinbecklaw.com  
9 Attorney for Charlene O'Neil

6 DISTRICT COURT  
7 CLARK COUNTY, NEVADA

8 AMIEE O'NEIL,  
9 Plaintiff,

Case No. A-20-815618-C  
Dept. No. 26

10 v.

**DEFENDANT CHARLENE O'NEIL'S**  
**ANSWER TO COMPLAINT**

11 CHARLENE O'NEIL; and GLORIA  
12 MAZZOLI,  
13 Defendants.

14  
15 Defendant Charlene O'Neil ( "Defendant"), by and through her attorney, Kevin E.  
16 Beck, Esq. of Kevin E. Beck, Ltd., hereby responds to Plaintiff Amiee O'Neil's ("Plaintiff")  
17 Complaint as follows:

18 1. Answering paragraph 1 of Plaintiff's Complaint, Defendant states she is without  
19 sufficient information to form a belief as to the truth or falsity of the allegations contained  
20 therein and therefore denies the same.

21 2. Answering paragraph 2 of Plaintiff's Complaint, Defendant admits the  
22 allegations contained therein.

23 3. Answering paragraph 3 of Plaintiff's Complaint, Defendant states she is without  
24 sufficient information to form a belief as to the truth or falsity of the allegations contained  
25 therein and therefore denies the same.

26 4. Answering paragraph 4 of Plaintiff's Complaint, Defendant denies the  
27 allegations contained therein.  
28

KEVIN E. BECK, LTD.  
3137 E. WARM SPRINGS RD., STE. 100  
LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-8983

1           5.     Answering paragraph 5 of Plaintiff's Complaint, Defendant denies the  
2 allegations contained therein.

3           6.     Answering paragraph 6 of Plaintiff's Complaint, Defendant states she is without  
4 sufficient information to form a belief as to the truth or falsity of the allegations contained  
5 therein and therefore denies the same.

6           7.     Answering paragraph 7 of Plaintiff's Complaint, Defendant denies the  
7 allegations contained therein.

8           8.     Answering paragraph 8 of Plaintiff's Complaint, Defendant denies the  
9 allegations contained therein.

10          9.     Answering paragraph 9 of Plaintiff's Complaint, Defendant states she is without  
11 sufficient information to form a belief as to the truth or falsity of the allegations contained  
12 therein and therefore denies the same.

13          10.    Answering paragraph 10 of Plaintiff's Complaint, Defendant states she is  
14 without sufficient information to form a belief as to the truth or falsity of the allegations  
15 contained therein and therefore denies the same.

16          11.    Answering paragraph 11 of Plaintiff's Complaint, Defendant denies the  
17 allegations contained therein.

18          12.    Plaintiff's Complaint appears to omit Paragraph 12. Out of an abundance of  
19 caution, Defendant denies any allegations that could be construed as constituting Paragraph 12.

20          13.    Answering paragraph 13 of Plaintiff's Complaint, Defendant denies the  
21 allegations contained therein.

22          14.    Answering paragraph 14 of Plaintiff's Complaint, Defendant denies the  
23 allegations contained therein.

24          15.    Answering paragraph 15 of Plaintiff's Complaint, Defendant denies the  
25 allegations contained therein.

26          16.    Answering paragraph 16 of Plaintiff's Complaint, Defendant denies the  
27 allegations contained therein.

28

1 17. Answering paragraph 17 of Plaintiff's Complaint, Defendant denies the  
2 allegations contained therein.

3 18. Answering paragraph 18 of Plaintiff's Complaint, Defendant denies the  
4 allegations contained therein.

5 19. Except as expressly admitted herein, Defendant denies each and every allegation  
6 and claim set forth in Plaintiff's Complaint.

7 **AFFIRMATIVE DEFENSES**

8 1. Plaintiff's Complaint fails to state a claim upon which relief can be granted.

9 2. Plaintiff's Complaint fails to properly name parties who are necessary litigants  
10 for the claims made under Rule 19.

11 3. Plaintiff's claims fail by the doctrine of estoppel.

12 4. Plaintiff's claims are barred for failure of consideration.

13 5. Plaintiff's claims are barred by the statute of frauds.

14 6. Plaintiff's claims are barred by lack of personal and/or subject-matter  
15 jurisdiction.

16 7. Plaintiff has not provided the necessary notices required by law, contract, or  
17 otherwise.

18 8. Plaintiff has waived its claims.

19 9. Plaintiff's damages, if any, were proximately caused or contributed to by the  
20 acts of other person and/or other entities; those acts were an intervening and/or superseding  
21 cause of Plaintiff's damages, if any, barring any recovering against Defendant.

22 10. Any damages suffered by Plaintiff were not the direct or proximate result of  
23 Defendant's actions.

24 11. Defendants performed each and every duty, if any, owed to Plaintiff.

25 12. Plaintiff has failed to mitigate damages, if any.

26 13. Plaintiff failed to satisfy a condition(s) precedent.

27 14. Plaintiff is not entitled to attorneys' fees, costs and/or interest.

28 15. Plaintiff's claims are time barred.



KEVIN E. BECK, LTD.  
3137 E. WARM SPRINGS RD., STE. 100  
LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-3983

1 16. Plaintiff's claims are barred under the doctrine of laches.

2 17. Plaintiff's claims are barred or reduced by its own negligent acts or omissions.

3 18. Plaintiff's claims are barred due to the doctrine of unclean hands.

4 19. Defendant has been required to retain the services of an attorney to enforce the  
5 rights herein asserted and is entitled to the fees and costs heretofore paid or incurred for such  
6 as damages and is further entitled to attorneys' fees and costs to defend this action.

7 20. All possible affirmative defenses may not have been alleged herein insofar as  
8 sufficient facts were not available after reasonable inquiry upon the filing of this Answer, and  
9 therefore, Defendant reserves the right to amend this answer to allege additional affirmative  
10 defenses if subsequent investigation warrants.

11 21. Upon information and belief, Defendant may have additional affirmative  
12 defenses which may be discovered during the course of this litigation, and Defendant expressly  
13 reserves the right to seek leave of court to amend this Answer to include those additional  
14 affirmative defenses.

15 WHEREFORE, Defendant pray for judgment as follows:

- 16 1. That Plaintiff's Complaint be dismissed, with prejudice;  
17 2. That Plaintiff take nothing by way of her Complaint on file herein;  
18 3. For an award of attorneys' fees and costs incurred in defending this action; and  
19 4. For such other and further relief as the Court may deem just and proper.

20 Dated this 21 day of August, 2020.

21 KEVIN E. BECK, LTD.

22 By: Kevin E. Beck  
23 Kevin E. Beck, Esq.  
24 3137 E. Warm Springs, Rd., Ste. 100  
25 Las Vegas, NV 89120  
26 Attorney for Charlene O'Neil  
27  
28

KEVIN E. BECK, LTD.  
3137 E. WARM SPRINGS RD., STE. 100  
LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-8983

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21 day of August, 2020, a true and correct copy of the **ANSWER AND COUNTERCLAIM** was submitted to the above-entitled Court for electronic service upon the Court's Service List for the above-referenced case pursuant to Administrative Order 14-2 and NEFCR 9. The document was also served by first class mail, postage prepaid, to the following:

Aimee O'Neill  
6500 W. Charleston Blvd., Unit 268  
Las Vegas, NV 89146  
*Plaintiff*

Gloria Mazzoll  
19 East Utica Street  
Oswego, New York 13126  
*Defendant*

  
An employee of Kevin E. Beck, Ltd.



1 **IAFD**  
2 Kevin E. Beck, NSB #8371  
3 KEVIN E. BECK, LTD.  
4 3137 E. Warm Springs Rd., Ste. 100  
5 Las Vegas, NV 89120  
6 Telephone: (702) 641-9900  
7 Facsimile: (702) 260-8983  
8 E-mail: kevin@kevinbecklaw.com  
9 Attorney for Charlene O'Neil

6  
7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 AMIEE O'NEIL,  
10 Plaintiff,

Case No. A-20-815618-C  
Dept. No. 26

11 v.

12 CHARLENE O'NEIL; and GLORIA  
13 MAZZOLI,  
14 Defendants.

15 **INITIAL APPEARANCE FEE DISCLOSURE**

16 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted  
17 for parties appearing in the above entitled action as indicated below:

18 Charlene O'Neil \$ 223.00


19 **TOTAL REMITTED:** **\$223.00**

20 DATED this 21st day of August, 2020.

21  
22 **Kevin E. Beck, Ltd.**

23  
24 /s/ Kevin E. Beck  
25 Kevin E. Beck, NSB# 8371  
26 3137 E. Warm Springs Rd., Ste. 100  
27 Las Vegas, Nevada 89120  
28 Attorney for Charlene O'Neil

Electronically Filed  
08/27/2020

  
CLERK OF THE COURT

Aimee O'Neil

9717 Sandmist Avenue

Las Vegas, Nevada 89134

702-302-0481

wasereintheworld@aimeeozghum.com

Eighth Judicial District

Clark County, Nevada

Aimee O'Neil

Plaintiff,

Vs.

Case# A-20-815618-C

Charlene O'Neil

Gloria Mazzoli

Defendants,

Notice of Pleading

It appears from the evidence conclusively that these two defendants, whether

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AUG 24 2020

CLERK OF THE COURT

Working in concert or apart have the ability to conspire. These two defendants  
Are utilizing a great deal of time, energy, and money to engage in sexual exploitation  
That the courts should draw great concern as to the mental capacity of these two defendants.  
I draw great concern over such sexual exploitation being pushed upon myself, the plaintiff and my  
Children.

Witness, David Mahoney, of Oswego, New York who is John Mazzolis previous roommate,  
Confirms in his texts that Gloria Mazzoli sexually assaulted her own son, John Mazzoli, who know  
Has raped my daughter, Samantha O'Neils best friend. Samantha, the youngest of my children  
Attempted to bring a friend home to spend the night. This poor child was sexually assaulted  
By John Mazzoli. The Mazzolis, who allege such pull and live so close in proximity, absolutely  
Had the capability to obstruct and prevent this rape BUT were to focused Aimee O'Neil,  
The plaintiff and her relationship with her longtime fiancé of several years. So while they stalk  
And obsess about the plaintiff, which must consume their entire day, Aimees daughter, Morgan  
O'Neil gets raped by John Mazzoli and grandma Charlene O'Neil, the defendant, turns a blind  
Eye because Morgan O'Neil told the plaintiff that she had lunch with defendant, Charlene  
O'Neil, and Charlene O'Neil told victim Morgan O'Neil that she was conspiring to ruin  
Marriages and relationships, two years ago when Morgan O'Neil attempted to seek help  
From her grandmother, the defendant, Charlene O'Neil, who swept this situation under the  
Rug by saying, don't tell your mother, don't talk about it. They kept it hidden from me  
Because they see nothing wrong with victimizing my children, Morgan and Samantha  
O'Neil, who are both being brutally victimized by the defendants. These defendants who  
Have serious sexual mental health disorders are perpetrating and conspiring ongoing  
Sexual harassment, harassment, and countless rapes. I also see human trafficking.

My daughter, Samantha O'Neil was being raped at the age of 15, by Jason Fetterly, Who was best friends with John Mazzoli, and was 42 years of age at the time he began Trafficking my child. Gloria Mazzoli, who has all of this pull in that small town of Oswego, NY as well as defendant, Charlene O'Neil, turned a blind eye while my child Was raped repeatedly by Jason Fetterly. The entire city of Oswego knows and I am the Only one who has taken responsibility to contact the Oswego police Department to end This ongoing abuse towards myself and these children. These two woman have Crossed every logical boundary known to man. Their actions are inexcusable and we Are now in a very serious legal matter that not only requires direct judicial Intervention, the sexual exploitation of myself and my children by those defendants Is absurd.

These two woman are more concerned about my fiancé paying my cell phone bill Than both of my children being raped over and over and over. All of our defendants Are completely aware this child sexual exploitation has gone on. They continue To have me sexually harassed as they do my children. I don't believe my cellular Phone bill and relationship with Mark Morrison, is of any business when one Woman admits to conspiring plots against me and my daughter Samantha O'Neil.

To date, neither of our defendants being of such reputable pillars of society, Have contacted law enforcement over the sexual assaults on the plaintiffs Children. Its obviously all of these defendants conspiring because its continuelessly happening To the plaintiff and her children.

1 AOS

2 Aimee O'Neil

3 Your Name

4 9717 Sandmist Ave.

5 Your Mailing Address

6 Las Vegas, NV 89134

7 Your City, State, Zip Code

8 702-302-0481

9 Your Telephone Number

10 Your Fax Number

11 whereintheworldisaimee@gmail.com

12 Your E-mail Address

13 Plaintiff, Self-Represented

14 EIGHTH JUDICIAL DISTRICT COURT

15 CLARK COUNTY, NEVADA

16 Plaintiff's Name

17 Aimee O'Neil

18 Case No.:

19 A-20-815618-C

20 Dept. No.:

21 Plaintiff

22 vs. Charlene O'Neil

23 Defendant's Name

24 Gloria Mazzoli

25 Defendant

26 AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY

27 I, Lynda Johnson, being duly

28 sworn or under penalty of perjury, states that at all times relevant, I was over 18 years of age and not a party to or interested in the above-captioned case; that I served a copy of the ☐ Summons, ☐ Complaint,

29 ☒ Other (specify) Notice of Pleading on August 18, 2020 at the hour of 11 PM, on Defendant Charlene O'Neil

30 Charlene O'Neil by the

31 following method (complete appropriate paragraph below):



33 **Personal service per NRCP 4.2(a)(1):** Delivering and leaving a copy with Lynda Johnson

34 Defendant's name: Lynda Johnson at 9717 Sandmist Ave.

35 which you served: 9717 Sandmist Ave.

1 response) to Plaintiff's complaint.

- 2 2. Pay the required filing fee to the court, or file an Application to Proceed *In Forma*  
3 *Pauperis* and request a waiver of the filing fee.

- 4 3. Serve (by mail or hand delivery) a copy of your response upon the Plaintiff whose name  
5 and address is shown below: 1317 Whitebridge Apt D  
6 Las Vegas, NV 89134

7 Information and forms to assist you are available, free of charge, at the Civil Law Self-  
8 Help Center at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, and on  
9 the center's website at [www.civillawselfhelpcenter.org](http://www.civillawselfhelpcenter.org).

10 If you fail to respond, the Plaintiff can request your default. The court can then enter judgment  
11 against you for the relief demanded by the Plaintiff in the complaint, which could result in money or  
12 property being taken from you or some other relief requested in Plaintiff's complaint.

13 If you intend to seek an attorney's advice, do it quickly so that your response can be filed on time.

14 STEVEN D. GRIERSON, CLERK OF COURT

15 By: \_\_\_\_\_ Date: \_\_\_\_\_  
16 Deputy Clerk  
17 Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

18 Issued at the request of:

19 Himee C'Neil  
20 Himee C'Neil  
21 9717 Sandmist Ave  
22 Las Vegas, NV 89134  
23 (Your Street Address)  
(Your City, State and Zip Code)

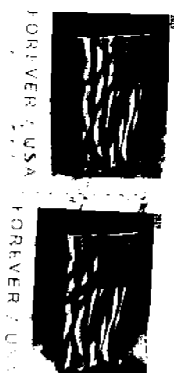
24 Plaintiff, Self-Represented

25 Note: When service is by publication, add a brief summary of the claims asserted, the relief sought, and include any special statutory  
26 requirements. This summary should have been proposed through a Motion Seeking Publication and approved through an Order  
27 for Service by Publication. See Nevada Rule of Civil Procedure 4.4(c).



Arnell D. Neil  
9717 Sandmist Ave  
Las Vegas, NV 89134

Deputy Clerk  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155



A-20-815618 C

SEP 02 2020

To: Aimee O'Neil Pro-Ses

Default (s)/ Dismissal(s) are being returned to you by the Clerk of the Court's office for the following reason(s):

- ☒ An appearance or Answer was filed on 7/28/2022 & 8/21/2020 > Both Defendants
- ☐ Dismissal must be directed for Judge to sign since defendant has filed appearance/answer in case.
- ☐ The required proof of service of the Summons and Complaint is not on file in the Clerk's office
- ☐ The date of service on the Default does not match the date of service on file.
- ☐ No date of service on the Default.
- ☐ Missing Filed Signed Order Granting Service by Publication Pursuant to NRCP 4.4 (c)(1)
- ☐ The Order for Service by Publication requires mailing of copy of summons and complaint. No proof of mailing has been file in the Clerk's office. Please file a certificate of mailing.
- ☐ Default not eligible to be issued until \_\_\_\_\_; base on Order Granting Service by Publication Pursuant to NRCP 4.4 (c)(4) (C)(ii) due to mailing completed on \_\_\_\_\_.
- ☐ Party Name(s) on Default or Dismissal do not match name(s) on the complaint.
- ☐ Court filed Order closing case on \_\_\_\_\_. Need to contact Department to find out what needs to be done to have case Re-opened.
- ☐ Default needs to also state: 1) Date answer was filed 2) Date Order striking answer was signed.
- ☐ Default /Dismissal has already been signed/filed on \_\_\_\_\_
- ☐ Default must state same documents and claim served as stated on filed proof of service.
- ☐ NRS 14.040 – Service upon Unknown Heirs/ Heirs need to have Order Granting Service by Publication and Affidavit of Publication filed

\*\*\* PLEASE BE ADVISED THAT ALL DEFAULT (S)/ DISMISSALS ISSUED BY DEPUTY CLERK CAN BE ELECTRONICALLY SUBMITTED TO BE ISSUED AND FILED ALL AT ONCE \*\*\*

☐

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN THIS DOCUMENT WHEN YOU RESUBMIT THE DEFAULT**

If you have any questions, please contact Specialty Clerk at 671-0521

Aimee O'Neil

A-20-815618-C

27

9717 Sandmist Ave

Las Vegas, NV 89134

LEFT SIDE  
OF FILE PLEASE

702-302-0481

WhereintheWorldisaimae@gmail.com

Dear Clerk of the Court,

I am enclosing copies  
default, Entry of  
default, and Affidavit  
in Support of Request  
for Entry of default.

Please file this  
in accordance to your  
normal filing procedure.  
I appreciate your  
assistance and cooperation

RECEIVED  
AUG 26 2020  
CLERK OF THE COURT

Thank you  
Aimee O'Neil

**Aimee L. O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimée@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

**Aimee O'Neil,**  
**Plaintiff**

**Vs.**

**Case # A-20-815618-C**

**Charlene O'Neil,**  
**Gloria Mazzoli,**  
**Defendant**

**Default**

**It appears from the records in the above-entitled action that a summons and complaint were filed on May 21, 2020 in the District Court of Clark County, Nevada. The defendant, Charlene O'Neil, was served a final copy of the summons and complaint, on the 23<sup>rd</sup> day of July, 2020, by Accel Process service Inc. The defendant, Gloria Mazzoli, was served a original copy of the summons and complaint.**

**On June 23, 2020, by the Oswego County Sheriffs Office. The defendants have failed to respond, plead, or otherwise defend in this action. Now therefore, on request of the plaintiff, Aimee O'Neil, the DEFAULT, as aforesaid, of each of the following defendants, Charlene O'Neil and Gloria Mazzoli in the above-entitled action is hereby entered.**

**DATED: August 23, 2020**

---

**Deputy Clerk**

**Aimee L. O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimée@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

**Aimee O'Neil,**  
**Plaintiff**

**Vs.**

**Case # A-20-815618-C**

**Charlene O'Neil,**  
**Gloria Mazzoli,**  
**Defendant**

**Default**

**It appears from the records in the above-entitled action that a summons and complaint were filed on May 21, 2020 in the District Court of Clark County, Nevada. The defendant, Charlene O'Neil, was served a final copy of the summons and complaint, on the 23<sup>rd</sup> day of July, 2020, by Accel Process service Inc. The defendant, Gloria Mazzoli, was served a original copy of the summons and complaint.**

**On June 23, 2020, by the Oswego County Sheriffs Office. The defendants have failed to respond, plead, or otherwise defend in this action. Now therefore, on request of the plaintiff, Aimee O'Neil, the DEFAULT, as aforesaid, of each of the following defendants, Charlene O'Neil and Gloria Mazzoli in the above-entitled action is hereby entered.**

**DATED: August 18, 2020**

---

**Deputy Clerk**

**Aimee L. O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimée@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

**Aimee O'Neil,**  
**Plaintiff**

**Vs.**

**Case # A-20-815618-C**

**Charlene O'Neil,**  
**Gloria Mazzoli,**  
**Defendant**

**Entry of Default**

**The plaintiff, Aimee O'Neil, requests that the clerk of the court enter Default against the defendants, Charlene O'Neil and Gloria Mazzoli Pursuant to Nevada Civil Rule 55. A summons and complaint were filed on May 21, 2020 in the District Court of Clark County, Nevada. The defendant, Charlene O'Neil, was served a original copy of the summons and complaint, on the 23<sup>rd</sup> day of July, 2020, by Accel Process service Inc. The defendant, Gloria Mazzoli, was served a original copy of the summons and complaint On June 23, 2020, by the Oswego County Sheriffs Office. The defendants have failed to respond, plead, or otherwise defend in this action and default having been entered.**

**Therefore, upon the request of the plaintiff, default is hereby entered  
Against the defendants, Charlene O'Neil and Gloria Mazzoli.**

---

**Deputy Clerk**

**Aimee L. O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimée@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

**Aimee O'Neil,**  
**Plaintiff**

**Vs.**

**Case # A-20-815618-C**

**Charlene O'Neil,**  
**Gloria Mazzoli,**  
**Defendant**

**Entry of Default**

**The plaintiff, Aimee O'Neil, requests that the clerk of the court enter Default against the defendants, Charlene O'Neil and Gloria Mazzoli Pursuant to Nevada Civil Rule 55. A summons and complaint were filed on May 21, 2020 in the District Court of Clark County, Nevada. The defendant, Charlene O'Neil, was served a original copy of the summons and complaint, on the 23<sup>rd</sup> day of July, 2020, by Accel Process service Inc. The defendant, Gloria Mazzoli, was served a original copy of the summons and complaint On June 23, 2020, by the Oswego County Sheriffs Office. The defendants have failed to respond, plead, or otherwise defend in this action and default having been entered.**



**Therefore, upon the request of the plaintiff, default is hereby entered  
Against the defendants, Charlene O'Neil and Gloria Mazzoli.**

---

**Deputy Clerk**


**Aimee O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimee@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

<b>Aimee O'Neil,</b>	)	
<b>Plaintiff</b>	)	
	)	
<b>V</b>	)	<b>Case: A-20-815618-C</b>
	)	
<b>Charlene O'Neil,</b>	)	
<b>Gloria Mazzoli,</b>	)	<b>Affidavit in Support of Request for</b>
<b>Defendant</b>	)	<b>Entry of Default</b>
	)	

**I, Aimee O'Neil, declare under the penalties of perjury that the following facts are true and correct to the best of my knowledge and belief:**

- 1. I am the plaintiff in this action**
- 2. A complaint was filed herein on May 21, 2020 and service of process was had on defendant, Charlene O'Neil on July 23, 2020, and defendant, Gloria Mazzoli on June 23, 2020.**
- 3. More than 30 days has elapsed since the defendants in this action Have been served, and the defendants have failed to plead or otherwise defend as pursuant to Nevada Civil Rule 55.**

  
**Aimee O'Neil**  
**Plaintiff**

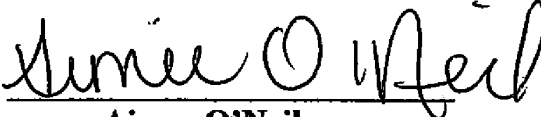
**Aimee O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimée@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

<b>Aimee O'Neil,</b>	)	
<b>Plaintiff</b>	)	
	)	
<b>V</b>	)	<b>Case: A-20-815618-C</b>
	)	
<b>Charlene O'Neil,</b>	)	
<b>Gloria Mazzoli,</b>	)	<b>Affidavit in Support of Request for</b>
<b>Defendant</b>	)	<b>Entry of Default</b>
	)	

**I, Aimee O'Neil, declare under the penalties of perjury that the following facts are true and correct to the best of my knowledge and belief:**

- 1. I am the plaintiff in this action**
- 2. A complaint was filed herein on May 21, 2020 and service of process was had on defendant, Charlene O'Neil on July 23, 2020, and defendant, Gloria Mazzoli on June 23, 2020.**
- 3. More than 30 days has elapsed since the defendants in this action Have been served, and the defendants have failed to plead or otherwise defend as pursuant to Nevada Civil Rule 55.**

  
**Aimee O'Neil**  
**Plaintiff**

1 Aimee O'Neil  
2 9717 Sandmist Ave.  
3 Las Vegas, NV 89134  
4 702-302-0481  
5 ☒ Plaintiff ☐ Defendant, Pro Se

6  
7 **EIGHTH JUDICIAL DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 Aimee O'Neil

10 Plaintiff(s)

11 vs.

12 Charlene O'Neil

13 Defendant(s)

Case No.: A-20-815618-C

Dept. No.: \_\_\_\_\_

Date of Hearing: \_\_\_\_\_

Time of Hearing: \_\_\_\_\_

15 **CERTIFICATE OF MAILING**

16 I HEREBY CERTIFY that on the 23<sup>rd</sup> day of August, 2020 I placed a true  
17 and correct copy of the following document: Default, Affidavit  
18 in support for Entry of Default, Entry of  
19 in the United States Mail, with first-class postage prepaid, addressed to the following: Default

20 Charlene O'Neil  
21 1317 Whitebridge Apt. D  
22 Las Vegas, NV 89134  
23  
24

25 Per NRS 53.045, I declare under penalty of perjury  
26 that the foregoing is true and correct.

27 Aimee O'Neil (signature)  
28 Aimee O'Neil (print name)  
☒ Plaintiff ☐ Defendant, Pro Se

1 Aimee O'Neil  
2 (Name)  
3 9717 Sandmist Ave.  
4 (Address)  
5 Las Vegas, NV 89134  
6 (City, State, Zip)  
7 702-302-0481  
8 (Telephone)  
9 ☒ Plaintiff ☐ Defendant, Pro Se

10 EIGHTH JUDICIAL DISTRICT COURT

11 CLARK COUNTY, NEVADA

12 Aimee O'Neil

13 Plaintiff(s),

14 vs.

15 Charlene O'Neil

16 Defendant(s).

Case No.: A-20-815618-C  
Dept. No.: \_\_\_\_\_

Date of Hearing: \_\_\_\_\_  
Time of Hearing: \_\_\_\_\_

17 CERTIFICATE OF MAILING

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19 and correct copy of the following document: Default Affidavit  
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21 in the United States Mail, with first-class postage prepaid, addressed to the following: Default

22 Charlene O'Neil  
23 1317 Whitebridge Apt. D  
24 Las Vegas, NV 89134

25 Per NRS 53.045, I declare under penalty of perjury  
26 that the foregoing is true and correct.

27 Aimee O'Neil (signature)  
28 Aimee O'Neil (print name)  
☒ Plaintiff ☐ Defendant, Pro Se

1 Aimee O'Neil  
2 9717 Sandmist Ave  
3 Las Vegas, NV 89134  
4 702-302-0481

5 ☒ Plaintiff ☐ Defendant, Pro Se

6 **EIGHTH JUDICIAL DISTRICT COURT**

7 **CLARK COUNTY, NEVADA**

8 Aimee O'Neil

9 Case No.: A-20-815618-C  
10 Dept. No.: \_\_\_\_\_

11 Plaintiff(s).

12 vs.

13 Gloria Mazzoli

14 Defendant(s).

Date of Hearing: \_\_\_\_\_  
Time of Hearing: \_\_\_\_\_

15 **CERTIFICATE OF MAILING**

16 I HEREBY CERTIFY that on the 23<sup>rd</sup> day of August, 2020 I placed a true  
17 and correct copy of the following document: Default, Entry of Default  
18 Affidavit in Support for Entry of Default

19 in the United States Mail, with first-class postage prepaid, addressed to the following:

20 Gloria Mazzoli  
21 119 E. Utica St  
22 Oswego, NY 13126

23  
24  
25 Per NRS 53.045, I declare under penalty of perjury  
that the foregoing is true and correct.

26 Aimee O'Neil (signature)  
27 Aimee O'Neil (print name)  
28 ☒ Plaintiff ☐ Defendant, Pro Se

1 Aimee O'Neil  
2 (Name)  
3 9717 Sandmist Ave  
4 (Address)  
5 Las Vegas, NV 89134  
6 (City, State, Zip)  
7 702-302-0481  
8 (Telephone)

9 ☒ Plaintiff ☐ Defendant, Pro Se

10 EIGHTH JUDICIAL DISTRICT COURT

11 CLARK COUNTY, NEVADA

12 Aimee O'Neil

13 Plaintiff(s),

14 vs.

15 Gloria Mazzoli

16 Defendant(s).

Case No.: A-20-815618-C  
Dept. No.:

Date of Hearing:

Time of Hearing:

17 CERTIFICATE OF MAILING

18 I HEREBY CERTIFY that on the 23<sup>rd</sup> day of August, 2020 placed a true  
19 and correct copy of the following document: Default, Entry of Default

20 Affidavit in Support for Entry of Default

21 in the United States Mail, with first-class postage prepaid, addressed to the following:

22 Gloria Mazzoli  
23 119 E. Utica St  
24 Oswego, NY 13126

25 Per NRS 53.045, I declare under penalty of perjury  
26 that the foregoing is true and correct.

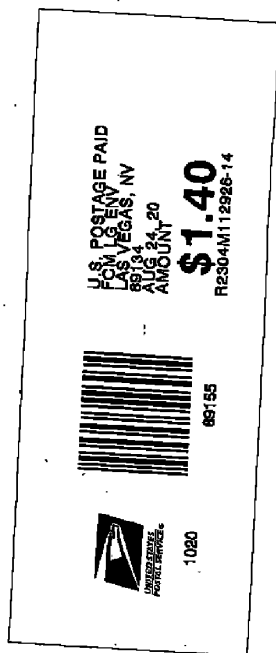
27 Aimee O'Neil

(signature)

28 ☒ Plaintiff ☐ Defendant, Pro Se

(print name)

Amiee O'Neil  
9717 Sandmist Ave.  
Las Vegas, NV 89134



Eighth Judicial District  
Deputy Clerk  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89155





*Aimee O'Neil*  
CLERK OF THE COURT

**Aimee O'Neil**  
**9717 Sandmist Avenue**  
**Las Vegas, Nevada 89134**  
**702-302-0481**  
**whereintheworldisaimee@gmail.com**

**Eighth Judicial District**  
**Clark County, Nevada**

<b>Aimee O'Neil,</b>	)	
<b>Plaintiff</b>	)	
	)	
<b>V</b>	)	<b>Case: A-20-815618-C</b>
	)	
<b>Charlene O'Neil,</b>	)	
<b>Gloria Mazzoli,</b>	)	
<b>Defendant</b>	)	<b>Affidavit in Support of Request for</b>
	)	<b>Entry of Default</b>
	)	

**I, Aimee O'Neil, declare under the penalties of perjury that the following facts are true and correct to the best of my knowledge and belief:**

- 1. I am the plaintiff in this action**
- 2. A complaint was filed herein on May 21, 2020 and service of process was had on defendant, Charlene O'Neil on July 23, 2020, and defendant, Gloria Mazzoli on June 23, 2020.**
- 3. More than 30 days has elapsed since the defendants in this action Have been served, and the defendants have failed to plead or otherwise defend as pursuant to Nevada Civil Rule 55.**

*Aimee O'Neil*  
**Aimee O'Neil**  
**Plaintiff**

Eighth Judicial District Court 27  
Clark County, Nevada

FILED

SEP 02 2020

*Cheryl L. Williams*  
CLERK OF COURT

Amiee O'Neil

Plaintiff,

v.

Case # A-20-

Charlene O'Neil

815618-C

Gloria Mazzoli

defendants,

Motion to Introduce Evidence

The plaintiff seeks to introduce text messages and materials sent to the plaintiff via text message, that the defendants both continue to use second party people from all over to harass the plaintiff continuously from June 2020 until July 2020.

page 2

Rules 47.240, Rule 48.015,  
and 48.025 allow for  
all relevant evidence  
to be introduced as  
admissible.

### Background

The plaintiff, Aimee O'Neil,  
alleges and re-alleges that  
the defendants Gloria  
Mazzoli and Charlene  
O'Neil, whether acting  
in a capacity together  
or alone have distracted

The plaintiff, Aimee O'Neil,  
directly and deliberately  
because if the plaintiff  
had direct knowledge, as these  
two concerned "grandmothers",  
"Grandmothers" by definition  
do not encourage, support, and  
endorse rape. Both woman  
knew my youngest child  
Samantha O'Neil, was being  
raped by Jason Fetterly  
in the home of John  
Mazzoli, who is a  
registered sex offender,

Page 4

In the State of New York,  
City of Oswego, in which  
the plaintiff became aware  
and contacted law  
enforcement while both  
woman distract the  
plaintiff with harassment  
while Samantha O'Neil  
who was a minor was  
raped daily in the home  
of John Mazzoli.

Morgan O'Neil, daughter  
of Amiee O'Neil, is

page 5

trafficking heroin and is  
even pronounced dead  
and both women have the  
ability and connections  
to intervene and refuse  
because they are creating  
a distraction in Colorado  
and Nevada and have  
deliberately, intentionally  
and willfully harassed  
the plaintiff and  
refuse to stop harassing  
the plaintiff.

Page 6

Gloria Mazzoli was  
Served a Summons and  
Complaint on June 18, 2020.

Charlene O'Neil was  
Served a Summons and  
Complaint on July 23, 2020.

Both defendants have  
failed to file a formal  
answer with the Court  
and the plaintiff.

Amee O'Neil  
August 12, 2020  
page 7



**suspect:**☐ Cited ☐ Arrested ☐ Unknown☐ City ☐ County☐ Misdemeanor ☐ Gross Misdemeanor☐ Felony**LAS VEGAS METROPOLITAN POLICE DEPARTMENT****VICTIM'S INFORMATION GUIDE**

Offense <i>4WB</i>	Area Command <i>SAC</i>	Event Number <i>200100125540</i>
-----------------------	----------------------------	-------------------------------------

This report is important for you to keep as it is the only reference to your particular case and event number. If you need a copy of your report, it can be obtained at your local area command or the Records and Fingerprint Bureau for a nominal fee. You can also request a copy of your report online. Please visit LVMPD.com to see if your report qualifies for this service. Please allow **FIVE WORKING DAYS** after the report has been filed. Hours of operation and locations to local Area Commands can be found at LVMPD.COM.

**ATTENTION: IT IS YOUR RESPONSIBILITY TO IMMEDIATELY NOTIFY THE LVMPD IF YOU SHOULD RECOVER YOUR STOLEN VEHICLE YOURSELF.**

The department relies on a number of factors available in any report to assign a follow-up investigator. Experience has proven that certain information must normally be determined at the time of the initial investigation before a case has the potential for being solved. Without suspects, witnesses, evidence, or other investigative leads, a case cannot be solved except under special circumstances. For example a suspect caught committing another crime is found with evidence linking him to this one, or he may confess to other crimes including this one. **If you have any questions or additional information, please contact the detective handling your case at the appropriate telephone number listed below or complete an Additional Crime Information report. (Refer to the Event Number listed above.)**

### OBLIGATIONS OF CITIZENS FILING MISDEMEANOR CRIME REPORTS WITH LVMPD

1. If an arrest was not made, or if a citation was not issued, and you wish to pursue this matter, you must contact the detective assigned to handle your case at the appropriate number listed below, **AT LEAST TEN (10) BUSINESS DAYS AFTER THE REPORT HAS BEEN FILED**, Monday through Friday, 8:00 a.m. - 4:00 p.m. You may be required to testify against the defendant (suspect) if the case is prosecuted in the courts. All felonies will be investigated.
2. You must give the Event Number at the top of this page if you call about your case.
3. If the suspect in your case is arrested or cited for a misdemeanor, **DO NOT CONTACT THE DETECTIVE ASSIGNED TO YOUR CASE**. You may get information about the status of your case by contacting either the County or City Victim Advocates (listed below). The police department does not have any court information.
4. If this is a misdemeanor crime report and is for **INSURANCE PURPOSES ONLY** or **YOU DO NOT WISH TO PROSECUTE**, and no one has been arrested, please **DO NOT** contact the detective.
5. If no arrest has been made and you need victim assistance, you may contact a Victim Advocate from the Police Department at (702) 828-2955.

### CONTACT TELEPHONE NUMBERS

Financial Crimes (Fraud/Forgery/ID Theft).....	(702) 828-3483	Bolden Area Command .....	(702) 828-3347
Abuse-Neglect.....	(702) 828-3364	Convention Center Area Command.....	(702) 828-3204
Homicide.....	(702) 828-3521	Downtown Area Command.....	(702) 828-4314
Missing Persons .....	(702) 828-2907	Enterprise Area Command .....	(702) 828-4809
Commercial Robbery.....	(702) 828-3591	Northeast Area Command .....	(702) 828-7355
Sexual Assault.....	(702) 828-3421	Northwest Area Command .....	(702) 828-8577
Records and Fingerprint Bureau .....	(702) 828-3271	Southeast Area Command .....	(702) 828-8242
		South Central Area Command.....	(702) 828-8639
		Spring Valley Area Command.....	(702) 828-2639
		Summerlin Area Command.....	(702) 828-9457

**LVMPD VICTIM ADVOCATE:** Provides crisis intervention, an assessment of the immediate needs of the victims and their families, initiates crime victim assistance paperwork, provides referrals to other agencies, and functions as a liaison with LVMPD personnel and other law enforcement agencies. For assistance, please call the LVMPD Victim Advocate at (702) 828-2955 Monday through Friday 7:00 a.m. - 4:00 p.m.

**LAS VEGAS CITY ATTORNEY VICTIM/WITNESS ASSISTANCE:** Provides specialized advocacy for victims of domestic violence or battery occurring within the City of Las Vegas. If you are a victim of domestic violence or battery and an arrest has been made or a citation has been issued, please contact the Las Vegas City Attorney's Victim Witness Advocate at (702) 229-2525.

**CLARK COUNTY DISTRICT ATTORNEY VICTIM/WITNESS ASSISTANCE CENTER:** Provides Justice Court and District Court case information and addresses any concerns you may have regarding your appearance as a witness. When you receive a subpoena to appear in a Justice Court or District Court case, please contact the Victim Witness Assistance Center at (702) 671-2525. If you move or have another address where you wish to receive a subpoena, please contact the advocates at the court.

**ASSISTANCE TO VICTIMS OF VIOLENT CRIME:** Victims of violent crime who are physically injured or victims of sexual assault may qualify for medical and counseling assistance from the State of Nevada under NRS 217. For information, contact the LVMPD Victim/Witness Advocate or the Nevada State Victims of Violent Crime Program at (702) 486-2740. Note: Applications for this service must be received within one year of the commission of the crime.

**ASSISTANCE TO VICTIMS OF SEXUAL ASSAULT:** Victims of sexual assault may be eligible for medical treatment and counseling under NRS 217. For information, call the Clark County District Attorney Victim Witness Assistance Center (702) 671-2525, or Rape Crisis Center at (702) 366-1640. Note: Applications for this service must be received within 60 days of the commission of the crime.

**THREATS AND DISSUASION TO TESTIFY:** Victims and witnesses threatened and/or asked not to testify or prosecute, should contact the detective assigned to the original case. You may also notify the prosecutor if you have already been assigned one.

Vegas Metropolitan Police Department  
400 S. Martin Luther King Blvd.  
Las Vegas, NV 89106



Case Report No.: LLV200700125540

### Administrative

Location 9717 Sandmist Ave LAS VEGAS, NV 89134  
Occurred On (Date / Time) Friday 7/24/2020 12:00:00 AM  
Reporting Officer 15835 - Cookson, D.  
Entered By 15835 - Cookson, D.  
Related Cases

Or Between (Date / Time)  
Reported On 7/29/2020  
Entered On 7/29/2020 11:53:59 AM  
Jurisdiction

Sector /Beat V2

Las Vegas, City of

Traffic Report

Place Type

Accident Involved

### Offenses:

Obscene/Threatening/Annoying Phone Call(M)-NRS 201.255  
Completed Yes Domestic Violence  
Entry Premises Entered  
Weapons  
Criminal Activities

Hate/Bias None (No Bias)  
Type Security  
Location Type Other/Unknown

Tools

### Victims:

Name: Oneil, Aimee

Victim Type Individual Written Statement Yes  
Victim of 50993 - Obscene/Threatening/Annoying Phone Call(M)-NRS 201.255

Can ID Suspect

DOB 11/26/1970 Age 49 Sex Female Race White Ethnicity Not Hispanic or Latino  
Height 5' 8" Weight 160 Hair Color Blond Eye Color Brown  
Employer/School ARIZONA CHARLIES  
Occupation/Grade SERVER Work Schedule  
Injury Injury Weapons

### Addresses

Residence 9717 Sandmist Ave Las Vegas, NV 89134 United States

### Phones

Cellular (702) 302-0481

### Offender Relationships

Notes:

### Arrestees:

### Witnesses:

### Other Entities:

### Properties: ()

### Narrative

On 7/29/20 at 1200 hours, Aimee O'Neil came into SAC to report the following:

Aimee stated that in the past week she has received random and annoying phone calls. She asks them "How did you get this phone number?" an "What did you do to me?" and they don't respond. She received 4 calls and 11 texts from 7/24/20-7/26/20 from random numbers that she did not recognize or know.

UNLAWFUL DISSEMINATION of this  
Restricted Information is PROHIBITED.  
Violation will subject the offender to  
Criminal and Civil Liability.  
Release To: Aimee Oneil  
Date: 7/29/20 By: 15835



### Administrative

Location 9717 Sandmist Ave LAS VEGAS, NV 89134  
Occurred On (Date / Time) Friday 7/24/2020 12:00:00 AM  
Reporting Officer 15835 - Cookson, D.  
Entered By 15835 - Cookson, D.  
Related Cases

Or Between (Date / Time)  
Reported On 7/29/2020  
Entered On 7/29/2020 11:53:59 AM  
Jurisdiction Las Vegas, City of  
Sector / Beat V2

Traffic Report Place Type Accident Involved

### Offenses:

Obscene/Threatening/Annoying Phone Call(M)-NRS 201.255  
Completed Yes Domestic Violence  
Entry Premises Entered  
Weapons  
Criminal Activities

Hate/Bias None (No Bias)  
Type Security  
Location Type Other/Unknown  
Tools

### Victims:

Name: Oneil, Aimee

Victim Type Individual Written Statement Yes Can ID Suspect  
Victim of 50993 - Obscene/Threatening/Annoying Phone Call(M)-NRS 201.255  
DOB 11/26/1970 Age 49 Sex Female Race White Ethnicity Not Hispanic or Latino  
Height 5' 8" Weight 160 Hair Color Blond Eye Color Brown  
Employer/School ARIZONA CHARLIES  
Occupation/Grade SERVER Work Schedule  
Injury Injury Weapons

### Addresses

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### Phones

Cellular (702) 302-0481

### Offender Relationships

Notes:

### Arrestees:

### Witnesses:

### Other Entities:

### Properties: ()

### Narrative

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UNLAWFUL DISSEMINATION of this  
Restricted Information is PROHIBITED.  
Violation will subject the offender to  
Criminal and Civil Liability.

Release To: Aimee Oneil  
Date: 7/29/20 By: 15835  
Las Vegas Metropolitan Police Department

Ly Sexually  
Harassed while  
attempting to rent  
a room. These two  
woman continually  
have me Sexually  
harassed knowing  
I have a boyfriend.  
But it is harassment  
that is embarrassing,  
extreme and undignifying.

12:53 PM

4G LTE 64%



(323) 738-5056



4 mins

I am not a lesbian. I am only  
into men



4 mins

Please

No one going to find out



2 mins

??



1 min

??

So no love



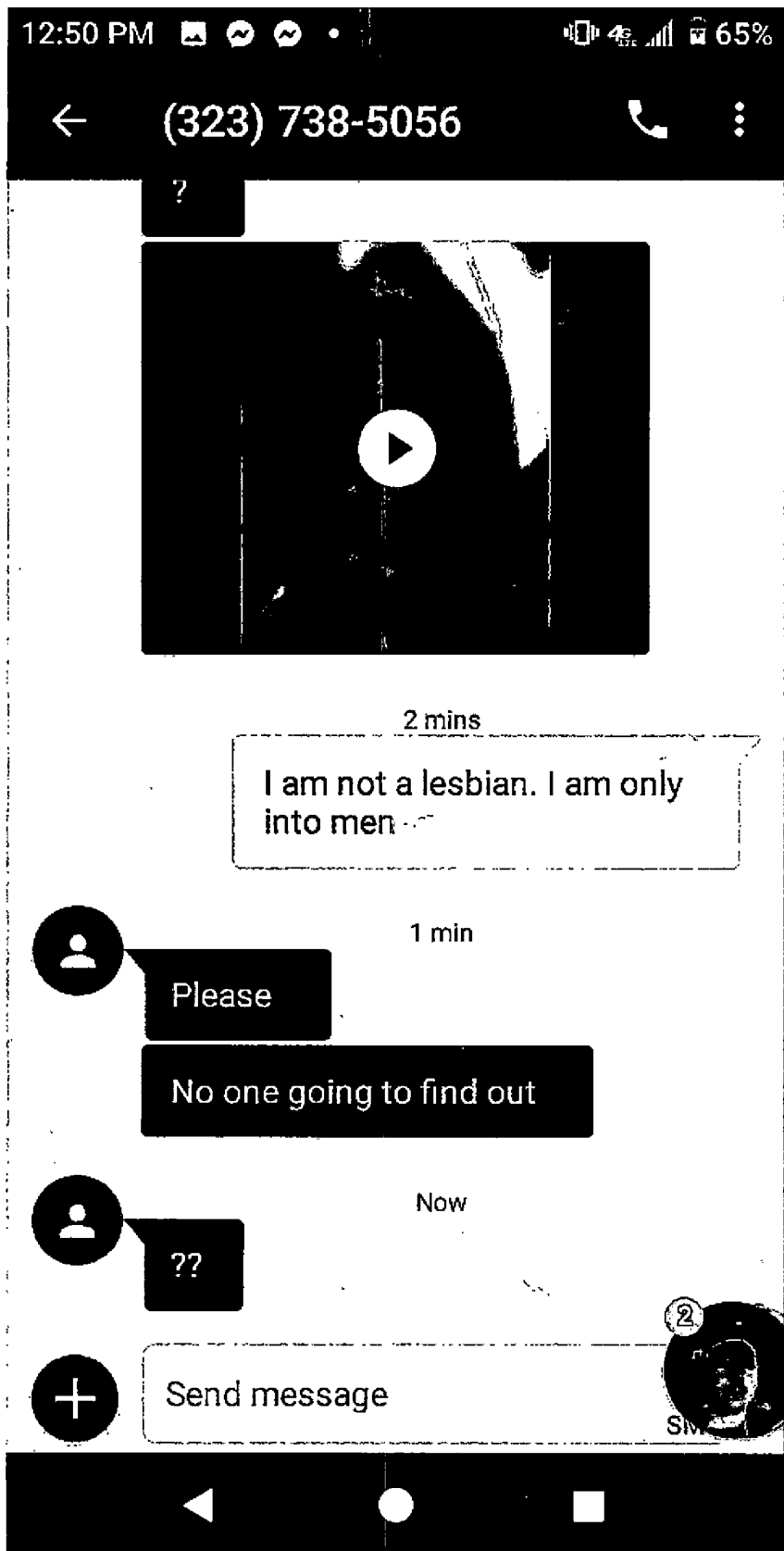
Now

?



Send message





10:30 PM

4G LTE 36%



(323) 738-5056



12:47 PM

I am not a lesbian. I am only  
into men



12:48 PM

Please

No one going to find out



12:49 PM

??



12:51 PM

??

So no love



12:52 PM

?



Send message

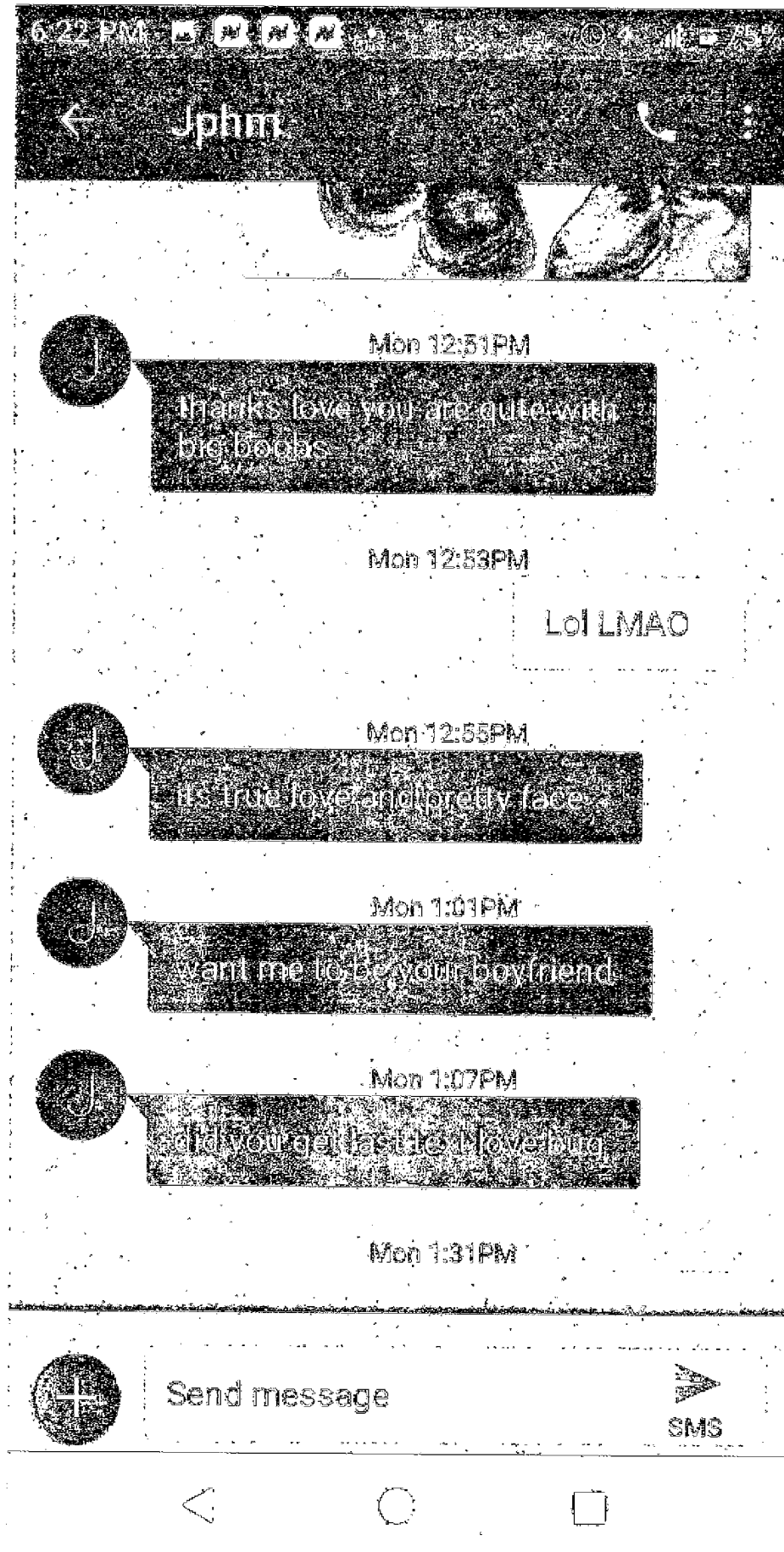


SMS

↳ Sexually Harassed  
at work.

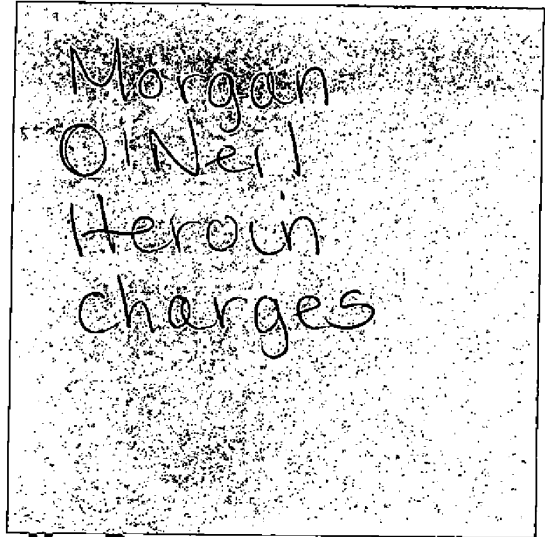
These woman  
promoted and  
encouraged Such  
behavior.







Search Site

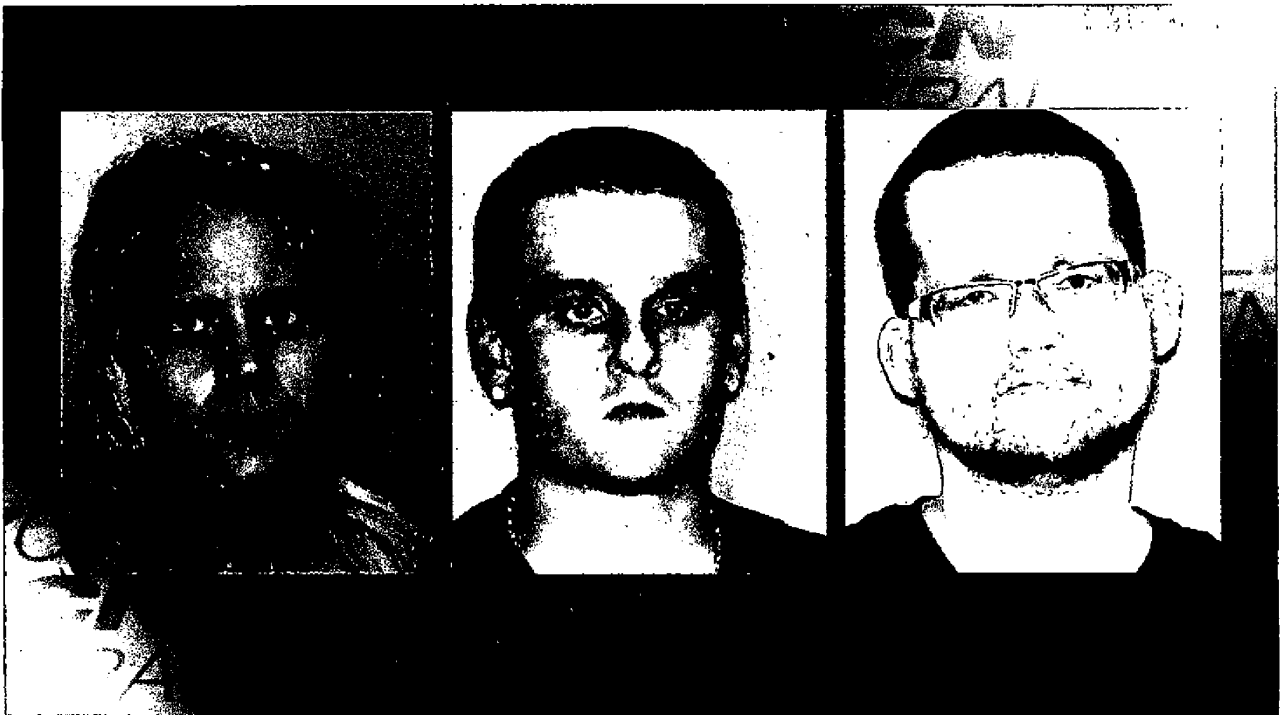


## Trio found with heroin during traffic stop in Van Buren

by Tyler Head

Wednesday, July 27th 2016

AA



Morgan A. O'Neil Zachery J. Palmitese and Marc A. Walpole/ NYS Police

VAN BUREN, N.Y. -- Three people have been charged for having heroin during a traffic stop on State Route 690 in Van Buren Tuesday morning.



a vehicle c  
wego, for o

71°

87°

85°

pers

car they found O'Neil and his two passengers, 22-year-old Zachary L. Palmite

in. In

additional, O'Neil and Walpole were found to also be in possession of marijuana, according to State Police.

All three were charged with criminal possession of a controlled substance, while O'Neil and Walpole were also charged with unlawful possession of marijuana. O'Neil was also charged with multiple vehicle and traffic law violations.

All three are due in Van Buren Court on Aug. 2.

#### MORE TO EXPLORE

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Thursday, May 4, 2017

## **Thirteen Defendants Charged in Connection with Heroin Distribution Ring Allegedly Led by Former Basketball Standout James "Fly" Williams**

***Operation Distributed 2 Million Glassines in a Three-Month Period;  
Four Charged as Major Traffickers under State Kingpin Statute***

Acting Brooklyn District Attorney Eric Gonzalez, together with New York City Police Commissioner James P. O'Neill, today announced that 13 people have been charged by felony complaints in connection with the operation of a major heroin distribution ring. Former NCAA and ABA basketball player James "Fly" Williams allegedly directed the operation as it purchased narcotics from suppliers in the Bronx and re-sold them, in bulk and retail quantities, in various Brooklyn neighborhoods, including Brownsville, Bushwick, Flatbush and Fort Greene.

Acting District Attorney Gonzalez said, "These defendants had no consideration of the harm suffered by so many from

the dangerous narcotics they allegedly peddled. They just cared about making money, exploiting addicts and the heroin epidemic that is spreading throughout our communities with devastating results. This is the second takedown of a major opioids ring by the NYPD and my Office in as many months, showing our resolve to tackle this problem head on with all of our resources. I am determined to continue targeting narcotic distribution rings while introducing innovative strategies to stem the demand by providing opportunities for eligible defendants to get help with their addiction and hopefully turn their lives around."

Commissioner O'Neill said, "As alleged, the quantity of heroin trafficked by the defendants speaks to the seriousness of the epidemic we are facing. The NYPD will continue to arrest people who profit on those addicted to opioids. I want to commend the NYPD detectives and the Brooklyn District Attorney's office for the work that led to today's charges."

The Acting District Attorney said that the defendants were arrested yesterday and are being arraigned on criminal complaints. James ("Fly") Williams, Jeffrey Britt ("Doobie"), Hanzel Martinez Cintron ("Johnny"), and Richard Rivera ("Cristiano") were each charged with operating as a major trafficker in violation of the state's drug kingpin statute, which carries a maximum sentence of up to 25 years to life in prison, as well as with first- and third degree criminal sale of a controlled substance and related counts. Other alleged members of the operation were variously charged with third-degree criminal sale of a controlled substance, third- and fourth-degree criminal possession of a controlled substance, fourth-degree conspiracy and related counts. [See addendum for full list of defendants.] Additional arrests are expected as part of the investigation.

The Acting District Attorney said that the investigation was conducted between September 2016 and May 2017, and relied on undercover buys, physical surveillance, and court-ordered electronic intercepts. As alleged, between late January and late April, the ring circulated about 2 million glassines of heroin. A glassine typically has a street value of between \$6 and \$10.

It is alleged that Rivera supplied the narcotics to Cintron, who cut and packaged them under a single "brand," distinguished by a logo on the glassines. Cintron allegedly sold the heroin to Britt either in the Bronx or in Brooklyn. According to the complaints, Britt then distributed the drugs at Williams's direction, using a network of street dealers under their control, as well as a number of redistributors operating in upstate counties and other locations in the metropolitan area. The street dealers are accused of selling the heroin to customers in several Brooklyn neighborhoods, including Brownsville, Bushwick, Flatbush, Fort Greene, and East New York. Many of the transactions took place in the vicinity of the Brownsville Recreation Center on Linden Boulevard.

Britt and Tyrone Munford allegedly collected proceeds from the ring's sales on a regular basis and transferred them to Williams. Leezet Kelley is accused of assisting Williams with the subsequent management of the funds and other administrative tasks the operation required.

Search warrants that were executed yesterday led to the recovery of six firearms, over \$185,000 in cash, approximately two kilos of heroin and additional 13,667 glassines. Five additional individuals were arrested during the execution of the search warrants.

The investigation was conducted by Detective Brian Depalo of the New York City Police Department's Brooklyn North Narcotics, under the supervision of Lieutenant Cassandra Whitaker and Sergeant Claudio Ramirez, and the overall supervision of Inspector Miguel Iglesias, Commanding Officer of Brooklyn North Narcotics and Deputy Chief Michael Kemper, Commanding Officer of Detective Borough Brooklyn North.

KCDA staff from the District Attorney's Crime Strategies Unit and the District Attorney's Asset Forfeiture and Crimes Against Revenue Bureau assisted in the investigation.

The case is being prosecuted by Senior Assistant District Attorney Nicholas Batsidis and Assistant District Attorney Robert Basso, of the District Attorney's Organized Crime and Racketeering Bureau, under the supervision of Assistant District Attorney Christopher Blank, Bureau Chief, and the overall supervision of Assistant District Attorney Patricia McNeill, Deputy Chief of the District Attorney's Investigations Division.

#

**A criminal complaint is merely an accusation and not proof of a defendant's guilt.**

#### Defendant Addendum

1. James "Fly" Williams, 65, of Jamaica Estates, Queens
2. Jeffrey Britt ("Doobie"), 34, of Flatlands, Brooklyn
3. Richard Rivera ("Cristiano"), 45, of Tremont, Bronx
4. Hanzel Martinez Cintron ("Johnny"), 39, of Belmont, Bronx
5. Marlon Campbell ("M"), 58, of East New York, Brooklyn
6. Leezet ("Baby Girl") Kelley, 45, of Crown Heights, Brooklyn
7. LaToya Mark, 37, of Flatlands, Brooklyn
8. Maurice McGhee ("MoJo"), 49, of Bedford-Stuyvesant, Brooklyn
9. Charles Moore ("Light"), 57, of Bushwick, Brooklyn
10. Charles Morgan ("Rav"), 61, of Bedford-Stuyvesant, Brooklyn
11. Tyrone Munford ("Mo"), 55, of East New York, Brooklyn
12. Michael Rosoboro ("Mike Mike"), 61, of East New York, Brooklyn
13. James Williams, 36, of East Flatbush, Brooklyn



## THE BROOKLYN DISTRICT ATTORNEY'S OFFICE

350 Jay Street  
Brooklyn, NY 11201  
DA's Action Center  
718-250-2340

**Leadership**  
Meet The DA  
Executive Team

#### **Bureaus & Units**

**Special Programs**  
Justice 2020  
Begin Again  
Post-Conviction Bureau  
Re-Entry Bureau  
Youth Diversion &

**Victim Services**  
Action Center  
Immigrant Affairs  
Labor Fraud  
Human Trafficking  
Community

L7 This man is from Florida, swears that he is not hitting on me and than calls me and says, "what would you like the judge to do to your mother?" I responded, I am not qualified to make that decision but this is unacceptable when I am getting ready to be married.

**Gerald**

Active 5 hours ago



I see that your looking for a new 1 bedroom place in Nevada and was having some trouble. Ive been looking for single bedroom places and apartments but have also struggled to find something nice and or reasonably priced. This world is very cruel to those by themselves. Rather we like it or not life pushes us to need other people. Im looking to move out to vegas at the end of August and was wondering if you wanted to look for a 2 or 3 bedroom places that we could split? Theres alot of nice houses ive found with pools that are just as affordable as a one bedroom place when split by 2 people. I currently work at a poker room in Florida so itll be easy to find work at a casino out there. I also have a few months of rent saved up, Excellent credit, and great rental history. Im very financially secure and als ↓ y respectful/ responsible, es, ally for someone my age. Im very clean



Aa





**Gerald**

Active 5 hours ago



roommate always trying to hit on you or anything like that. Im honestly all to focused on making money and a life for myself to be focused on dating or women. Im just a young man with some goals that needs a little help to make them happen. Im sure i could help you out just as much in return too, i dont ever take without giving back. I honestly just need someone to room with who can understand my needs and be as chill and relaxed as i am. I dont plan on staying long i just need a short term place to help me plant my feet more firmly out there, but if your cool and wanted to do a shorter lease id be fine with that too. Is rooming with someone like me something u would consider?



11:13 AM

**Yes it would be**

You can now call each other and see



Aa



**Gerald**

Active 5 hours ago



Excellent credit, and great rental history. Im very financially secure and also very respectful/responsible, especially for someone my age. Im very clean and like to mind my own business so i wouldn't be bothering you at all, im honestly the ideal roommate. Im a college grad with ambitions and plans to start a business once out in Nevada. Im not very social so im not a big partier but i dont mind other people drinking or smoking so long as they can handle themselves. I dont have a pet or partner that im trying to bring, so itll be just me. above all else i understand respecting ones boundaries. I give the same respect i demand in return, so im wont be the male roommate always trying to hit on you or anything like that. Im honestly all to focused on making money and a life for myself to be focused on dating or women. Im just a young man with some goals that needs a little help to make them happen.



Aa



8:40 PM



77%



Dave



soon. Apparently I need to  
take care of this

Aug 3, 10:59PM

I have a permanent  
restraining order on Morgan  
and I will never go near her  
after she smashed a mirror  
over fuzz lol but I forgot to tell  
you she faked a fund raiser  
saying fuzz was going to die  
and raised all of this money  
and blew it on heroin

D

Aug 3, 11:01PM

That's old new

Aug 3, 11:01PM

I'm digging up all the dirt on  
her lol

Aug 3, 11:02PM

She is a national fucking  
~~disaster that intentionally lies~~



Send message



SMS



**From:** CRM, CRT (CRT)  
**Sent:** Wednesday, August 5, 2020 8:09 AM  
**To:** whereintheworldisaimee@gmail.com  
**Subject:** ID: 4956-WVQ

Dear Sir/Madam:

Thank you for your correspondence. The Civil Rights Division relies on information from community members to identify potential civil rights violations. The Federal Bureau of Investigation and other law enforcement agencies conduct investigations for the Division. Therefore, you may want to contact your local FBI office or visit [www.FBI.gov](http://www.FBI.gov).

The Criminal Section is one of several Sections in the Civil Rights Division of the U.S. Department of Justice. We are responsible for enforcing federal criminal civil rights statutes. The Criminal Section prosecutes criminal cases involving:

- Civil rights violations by persons acting under color of law, such as federal, state, or other police officers or corrections officers;
- Hate crimes;
- Force or threats intended to interfere with religious activities because of their religious nature;
- Force or threats intended to interfere with providing or obtaining reproductive health services and
- Human trafficking in the form of coerced labor or commercial sex.

We cannot help you recover damages or seek any other personal relief. We also cannot assist you in ongoing criminal cases, including wrongful convictions, appeals, or sentencing. For more detailed information about the Criminal Section or the work we do, please visit our web page: [www.justice.gov/crt/about/crm/](http://www.justice.gov/crt/about/crm/).

We will review your letter to decide whether it is necessary to contact you for additional information. We do not have the resources to follow-up on or reply to every letter. If your concern is not within this Section's area of work, you may wish to consult the Civil Rights Division web page to determine whether another Section of the Division may be able to address your concerns: [www.justice.gov/crt](http://www.justice.gov/crt). Again, if you are writing to report a crime, please contact the federal and/or state law enforcement agencies in your local area, such as the Federal Bureau of Investigation or your local police department or sheriff's office.

Sincerely,  
/s/  
The Criminal Section

8:43 PM [notification icons] [alarm icon] [Wi-Fi icon] [cellular signal icon] [battery icon] 76%



Dave



There going to make a movie  
about that place

D

Jul 25, 8:01PM

B Brandon use the narcan on  
Morgan so they didn't have  
enough for a fran

Jul 25, 8:02PM

Yep that's what it was

And he got Charged with  
attempted murder

D

Jul 25, 8:02PM

He took off down to Florida

Jul 25, 8:02PM

Brandon?

Maybe he hooked up with  
char lol



Send message



SMS





D Jul 25, 7:58PM  
Yeahshe did it for that tattoo  
buzzer bought and then her  
and falls are called Joe and  
said hey when are you going  
to pay me back for that tattoo  
that I bought for Morgan lol

Jul 25, 7:58PM  
Yes that's right the tatoo

D Jul 25, 7:59PM  
Fuzzer was at the gas station  
with her and he was like  
telling me I didn't buy her  
tattoo Joe by her tattoo they  
were driving around together  
like they were a couple f\*\*\*\*\*  
creeps

Jul 25, 7:59PM  
She called me one night



8:41 PM



77%



Dave



and they won't help me. I  
said put Morgan to work and  
she won't be stealing cars  
anymore

D

Jul 25, 8:20PM

Yeah she a theif nobody will  
hire her

Jul 25, 8:22PM

I know

She was robbing my family's  
bar

And didn't you tell me all her  
veins collapsed and she was  
using her toes

Or was it Sam who told me

D

Jul 25, 8:23PM

She wants to be f\*\*\*\*\* like an  
inmate being raped



Send message



SMS



8:43 PM



76%



Dave



There going to make a movie  
about that place

D

Jul 25, 8:01PM

B Brandon use the narcan on  
Morgan so they didn't have  
enough for a fran

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attempted murder

D

Jul 25, 8:02PM

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Jul 25, 8:02PM

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char lol



Send message



SMS







and beat her ass

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buzzer bought and then her  
and falls are called Joe and  
said hey when are you going  
to pay me back for that tattoo  
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with her and he was like  
telling me I didn't buy her  
tattoo Joe by her tattoo they  
were driving around together  
like they were a couple f\*\*\*\*\*  
creeps

Jul 25, 7:59PM

She called me one night

+ Send message > SMS



8:43 PM



77%



Dave



Jul 25, 8:11PM

He always peeking out his window on bridge Street with a fan blowing out can't afford the electrics

I think when he gets off probation he's probably going to move back in with his mother

He said you went out to welfare for help because he needs to survive and they said because he was a sex offender they couldn't help them LOL

He

Jul 25, 8:12PM

I thought he would have already done that

Yes he did the night Morgan



Send message



SMS





Well Margaret told fuzz  
Morgan wasn't allowed vther  
unless she took a drug test



Jul 25, 8:00PM

Yeah Morgan died two hours  
before that and Brandon  
brought her back to life and  
then went over and saw the  
same s\*\*\* to this old f\*\*\*\*\*  
dude friend at the forks of  
the road and he didn't come  
back to life they didn't have  
enough narkan because they  
use it all on Morgan

Jul 25, 8:00PM

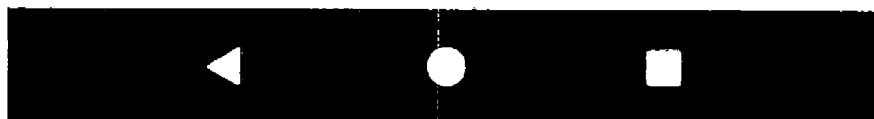
I called Margaret and said I  
don't want her there he lets  
her use heroin

Yes that's it. They couldn't  
save him because she was  
dying too



Send message

SMS





D Jul 25, 7:56PM  
Fuzzer will hook her up

Jul 25, 7:57PM

He already did. He pulled a  
needle out of her arm and  
was fucking her while she  
was all high on heroin

Sam told me she broke in to  
her place and Sam found her  
on a toilet dead

She was fucking Jason

Sam took her out in the road  
and beat her ass

D Jul 25, 7:58PM  
Yeahshe did it for that tattoo  
buzzer bought and then her  
and falls are called Joe and  
said hey when are you going  
to pay me back for that tattoo

+ Send message [send icon] SMS





D Jul 25, 7:56PM  
Fuzzer will hook her up

Jul 25, 7:57PM


He already did. He pulled a  
needle out of her arm and  
was fucking her while she  
was all high on heroin

Sam told me she broke in to  
her place and Sam found her  
on a toilet dead

She was fucking Jason

Sam took her out in the road  
and beat her ass

D Jul 25, 7:58PM  
Yeahshe did it for that tattoo  
buzzer bought and then her  
and falls are called Joe and  
said hey when are you going  
to pay me back for that tattoo

+ Send message  SMS





one go with the body

Well Margaret told fuzz  
Morgan wasn't allowed vther  
unless she took a drug test



Jul 25, 8:00PM

Yeah Morgan died two hours  
before that and Brandon  
brought her back to life and  
then went over and saw the  
same s\*\*\* to this old f\*\*\*\*\*  
dude friend at the forks of  
the road and he didn't come  
back to life they didn't have  
enough narkan because they  
use it all on Morgan

Jul 25, 8:00PM

I called Margaret and said I  
don't want her there he lets  
her use heroin

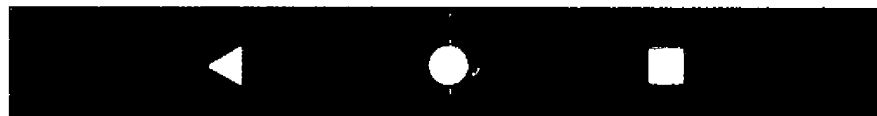
Yes that's it. They couldn't  
save him because she was  
dying too

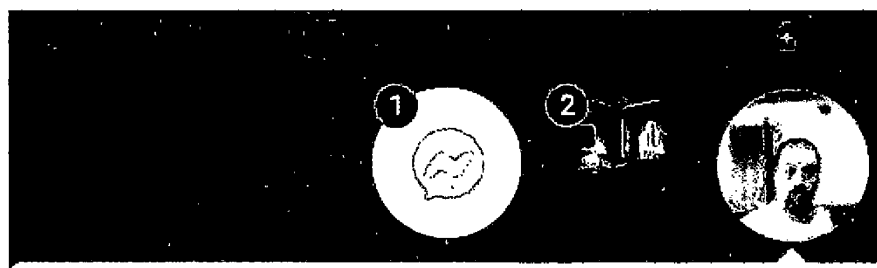


Send message



SMS





**Steve**

Active Now



I'm just looking for friends is  
that a crime

You have no reason to  
contact me. I don't know you  
but I know people who  
workday and night to ruin my  
life. I wouldn't ever go out  
with you. Your not my type

I don't trust anyone

Ok please forgive me

You can block me if you want

I'm just looking for love to be  
honest



From me



Aa



Lite



Lyft



Maps Go



Match

5:41 PM

37%



(215) 917-6883



6 mins

Hey gorgeous, I'll be in Las Vegas in September, I'd pay \$25,000 for a chance to take you out to dinner

5 mins

Well your pretty funny lol  
LMAO



5 mins

I'm serious!! Lol how have you been? So time no talk

4 mins

I'm alright



4 mins

New message

VIEW



Send message



SMS







There going to make a movie  
about that place



Jul 25, 8:01PM

B Brandon use the narcan on  
Morgan so they didn't have  
enough for a fran

Jul 25, 8:02PM

Yep that's what it was

And he got Charged with  
attempted murder



Jul 25, 8:02PM

He took off down to Florida

Jul 25, 8:02PM

Brandon?

Maybe he hooked up with  
char lol



Send message



L7 I was sexually  
harassed again by  
a female (unknown)  
trying to rent a  
room in a home

← Elizabeth



JUL 19 AT 8:06 AM



Good morning gorgeous



JUL 19 AT 9:28 AM

I am not a lesbian and this is sexual harassment



**You've Blocked Elizabeth**  
You can't message or call them in this chat, and you won't receive their messages or calls.

**UNBLOCK**

**SOMETHING'S WRONG**





Elizabeth



Yes I work here



So it's 17 minutes from here

Ok

I am available tomorrow to  
come see the room

I'm going to work

Wednesday I'm not working

It works for you



Or Monday in the morning

Monday morning. I have a  
couple to look at tomorrow

You've Blocked Elizabeth

You can't message or call them in this chat, and you won't  
receive their messages or calls.

UNBLOCK

SOMETHING'S WRONG





Elizabeth



couple to look at tomorrow  
but whenever you are free

Wednesday



It's okay with you

I'll be working Wednesday  
but I can make the time

Ok



Prefect

JUL 19 AT 12:53 AM



Btw you're pretty

JUL 15 .14 AM

You've Blocked Elizabeth

You can't message or call them in this chat, and you won't  
receive their messages or calls.

UNBLOCK

SOMETHING'S WRONG



System

4G

65%

Screenshot saved

Tap to view your screenshot

SHARE

EDIT

DELETE

2 mins

Ask

2 mins

Are you into girls lol

I'm Bi lol

Lol

2 mins

No. I have a boyfriend and I  
am getting married soon

1 min

Is it going to be for you the  
room

+

Send message

>

SMS

5:38 PM

36%



(215) 917-6883



Joe from New Jersey

Awwww I'm still going and  
yes I'd pay \$25,000

Now

How do I know you



Send message



SMS





4 mins

I am not a lesbian. I am only  
into men



4 mins

Please

No one going to find out



2 mins

??



1 min

??

So no love



Now

?



Send message







**Steve**  
Active Now



**Nobody**

What did you do to me

Because random people  
don't text me apologizing so I  
can only imagine what is  
about to happen to me

You are really mad at me I'm  
sorry ok



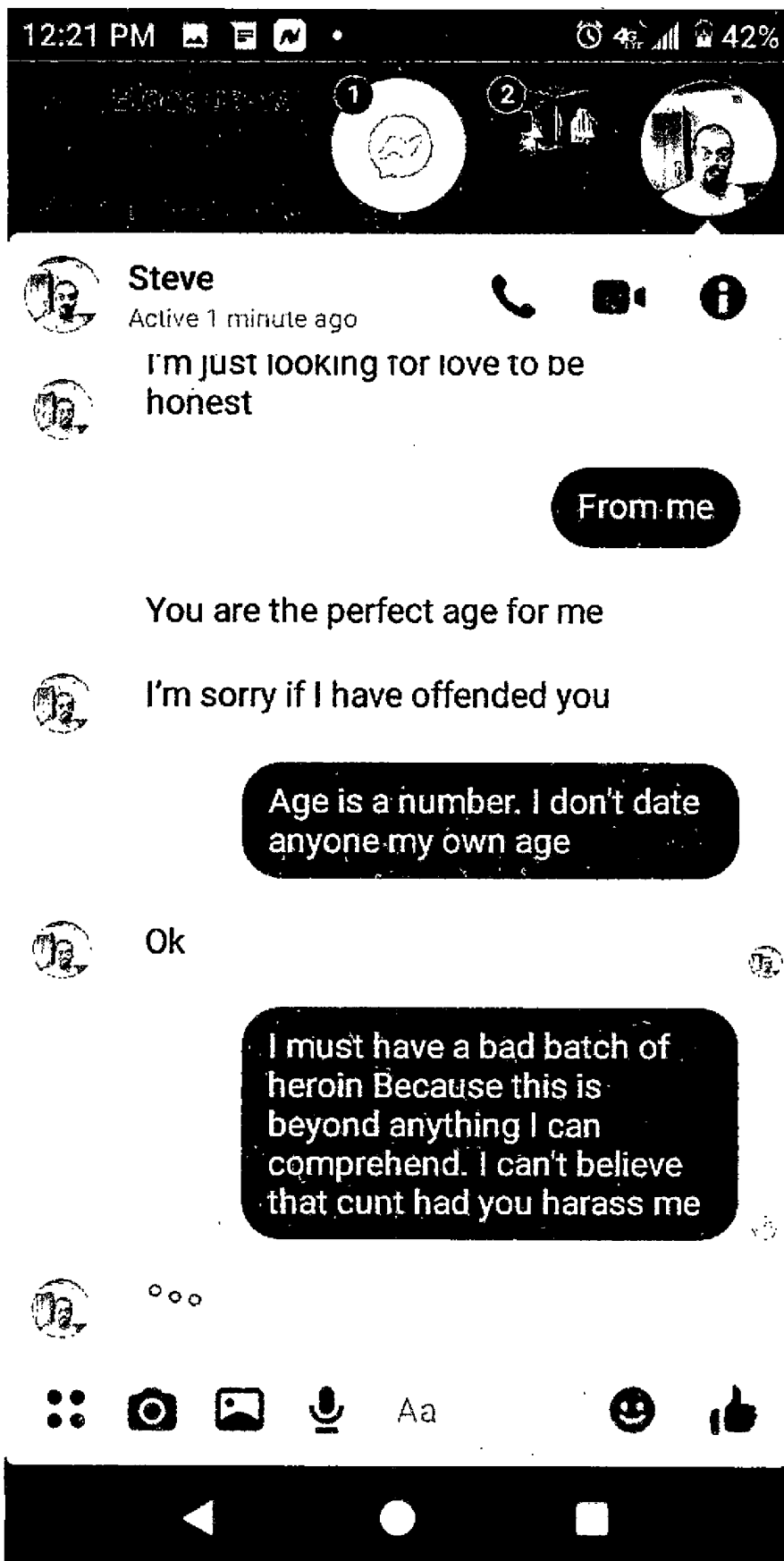
I'm not a bad man

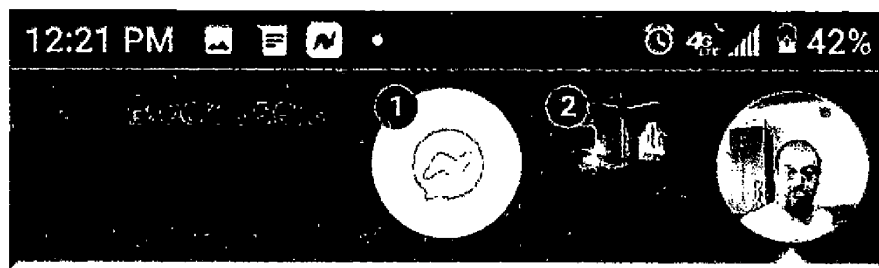
That's a lie. I don't talk to  
people on here but if your  
apologizing that means  
someone is about to do  
something me. I don't know  
you. I have never even  
spoken to you



Aa







Steve

Active 1 minute ago



I'm just looking for love to be honest

From me

You are the perfect age for me



I'm sorry if I have offended you

Age is a number. I don't date anyone my own age



Ok



I must have a bad batch of heroin Because this is beyond anything I can comprehend. I can't believe that cunt had you harass me



...



Aa



Home (<https://www.homefacts.com>) » Offenders (</offenders.html>) » New York (</offenders/New-York.html>)

» Oswego County (</offenders/New-York/Oswego-County.html>)

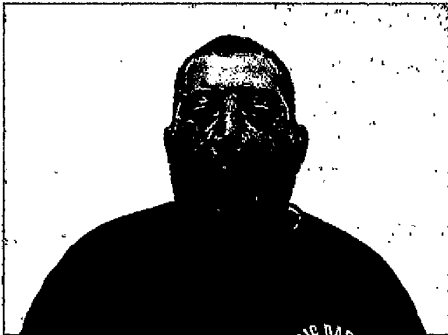
» Oswego (</offenders/New-York/Oswego-County/Oswego.html>) » John Mazzoli

## John Mazzoli Registered Sex Offender

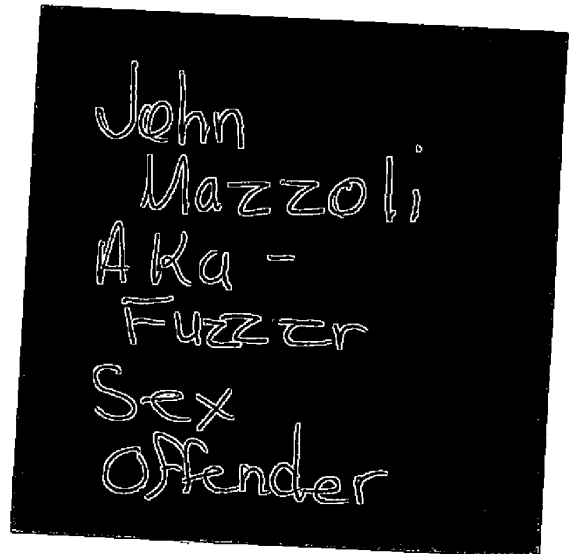
### John Mazzoli Registration Details

#### Last Known Address:

147 1/2 E BRIDGE ST, OSWEGO, NY 13126



DOB:  
1965-01-27  
Race:  
White  
Sex:  
Male  
Eyes:  
Blue  
Height:  
5 ft 0 in  
Hair:  
Brown  
Weight:  
180 lbs.



### John Mazzoli - Registered Sex Offender

Criminal Record of John Mazzoli (</ads.html?firstName=John&lastName=Mazzoli&city=Oswego&state=New York&type=offender-details1>)

#### Offense or Statute

Offense/Statute:

Sexual Misconduct: person Has Intercourse With Another Without Consent

Date Convicted:

23 September 2014

Offense/Statute:

Sexual Misconduct: person Has Intercourse With Another Without Consent

Date Convicted:

23 September 2014

View John Mazzoli's Criminal Record ([/ads.html?firstName=John&lastName=Mazzoli&city=Oswego&state=New York&type=OffenderD\\_Text](/ads.html?firstName=John&lastName=Mazzoli&city=Oswego&state=New York&type=OffenderD_Text))

#### Alias(es)

Fuzz

#### Scars, Marks, and Tattoos

Scar-Back;Tattoo-Arm, right;Tattoo-Arm, left

Collected from this official state registry website or page: <https://www.criminaljustice.ny.gov/SomsSUBDirectory/offenderDetails.jsp?offenderid=42063>

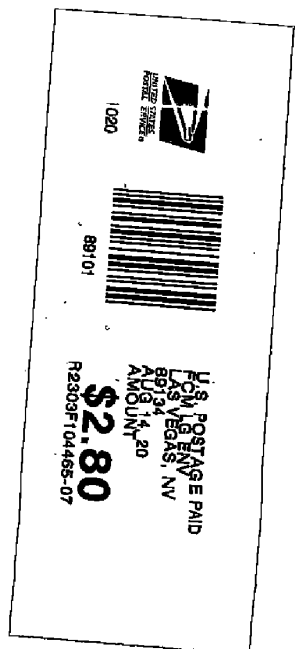
Report An Error » ([hf\\_pro/offenders\\_help\\_box.php](/hf_pro/offenders_help_box.php))

\*No representation is made that John Mazzoli is currently on the state's offenders registry. All names presented here were gathered at a past date. Some persons listed might no longer be registered offenders and others might have been added. Some addresses or other data might no longer be current. Owners of Homefacts.com assume no responsibility (and expressly disclaim responsibility) for updating this site to keep information current or to ensure the accuracy or completeness of information. Homefacts.com makes no representation or warranty, and expressly disclaims any liability, for any errors or omissions in the information presented on this site. Homefacts.com does not use this information to make any decision related to : information to com

#### Related Lir

Amiee O'Neil  
9717 Sandmist Ave.  
Las Vegas, NV 89146

Eighth Judicial District  
2000 Lewis Ave.  
Las Vegas, NV 89101



FILED

SEP 02 2020

CLERK OF COURT

28

# Affidavit of Service

County of Clark

Case# A-20-815618-C

Plaintiff

Amee O'Neil

v.

defendants

Gloria Mazzoli

Charlene O'Neil

That I served a  
motion to introduce  
evidence to the  
defendant

Gloria Mazzoli

119 E. Utica St  
Oswego, NY 13126

and

defendant  
Charlene O'Neil  
1317 Whitebridge Dr  
Apt. D  
Palm Harbor, FL  
34684

On this 14<sup>th</sup> day  
of August 2020 by  
first class mail, Sumee O'Neil

THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
119 - 121  
WILL FOLLOW VIA  
U.S. MAIL





1 APPA

2 DISTRICT COURT

3 CLARK COUNTY, NEVADA

4 Aimee O'Neil, Plaintiff(s)

5 vs.

CASE NO: A-20-815618-C

DEPT. NO: XXVI

6 Gloria Mazzoli, Defendant(s)

7  
8 **APPOINTMENT OF ARBITRATOR**

9 **TO:** Aimee O'Neil, Plaintiff in Proper Person; and

10 **TO:** Kevin E. Beck, Esq., KEVIN E. BECK, LTD, attorney for Defendant, Charlene  
11 O'Neil.

12 Eva Garcia-Mendoza has been appointed as arbitrator in the above entitled matter.

13 If for any reason the arbitrator cannot act in this case, you must file a Notice of  
14 Recusal with the Clerk of the Court within ten (10) days so a new arbitrator can be selected  
15 without prejudice to the parties.

16 Within thirty (30) days after the appointment of the arbitrator the parties must meet  
17 with the arbitrator to confer, exchange documents, identify witnesses known to the parties  
18 which would otherwise be required pursuant to N.R.C.P. 16.1, and to formulate a discovery  
19 plan, if necessary.

20 All arbitrations shall take place and awards filed no later than six (6) months from  
21 the date of the arbitrator's appointment, unless otherwise provided by the rules.  
22



1 **NOTICE**

2 A copy of the foregoing Appointment of Arbitrator was:

3 Electronically served, pursuant to N.E.F.C.R. Rule 9, to all registered parties in the Eighth  
4 Judicial District Court Electronic Filing Program on the 14th day of September, 2020.  
AND e-mailed to the Arbitrator on the 14th day of September, 2020.

5 Eva Garcia-Mendoza  
6 10001 Park Run Dr.  
Las Vegas, NV 89145-8857

7 *If indicated below*, a copy of the foregoing Appointment of Arbitrator was also:

8 ☐ Placed in the folder of counsel maintained in the Office of the Clerk of Court on the  
9 \_\_\_\_\_ day of September, 2020.

10 ☐ Mailed to Plaintiff's/Defendant's counsel at their last known address(es) on the  
\_\_\_\_\_ day of September, 2020.

11 ☒ Mailed to Plaintiff/Defendant at the following address(es) on the 15<sup>th</sup> day of  
12 September, 2020.

13 Aimee O'Neil  
14 9717 Sandmist Avenue  
Las Vegas, NV 89134  
(702) 302-0481  
(Plaintiff in Proper Person)

15  
16  
17 /S/ Sandy Gerety

18 ADR COMMISSIONER'S DESIGNEE

19  
20 **NOTE: THE ARBITRATOR'S APPOINTMENT DATE IS THE DATE OF**  
21 **FILING OF THE APPOINTMENT OF ARBITRATOR.**

22 <http://www.clarkcountycourts.us/departments/adr/>



1 **NOTC**  
2 LAW OFFICES OF EVA GARCIA-MENDOZA  
3 **EVA GARCIA-MENDOZA, ESQ.**  
4 NEVADA BAR NO.: 1779  
5 10001 PARK RUN DRIVE  
6 LAS VEGAS, NEVADA 89145  
7 P: (702) 384-8484  
8 F: (702) 384-0207  
9 evagm@gms4law.com  
10 **ARBITRATOR**

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DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*\*

AIMEE O'NEIL,

Plaintiff(s),

V.

GLORIA MAZZOLI and CHARLENE O'NEIL,

Defendant(s).

CASE NO. A-20-815618-C  
DEPT. NO XXVI

**ARBITRATION**

**Date: 10/5/20**  
**Time: 11:00 AM**

**NOTICE OF TELEPHONIC EARLY**  
**ARBITRATION CONFERENCE**

TO: AIMEE O'NEIL, Plaintiff in Proper Person; and

TO: GLORIA MAZZOLI, Defendant in Proper Person; and

TO: KEVIN E. BECK, ESQ., Attorney for Defendant, Charlene O'Neil.

///

///

1 Pursuant to Nevada Arbitration Rule 11, YOU WILL HEREBY TAKE NOTICE  
2 that a **TELEPHONIC** conference has been set for the **5th day of October, 2020, at**  
3 **the hour of 11:00 a.m. The Plaintiff is to initiate the conference call.** The parties  
4 are to **provide to the Arbitrator's Office, their Production of Documents** on or  
5 before the date of the telephonic Early Arbitration Conference.  
6

7 Each party must be prepared to confer, exchange documents, identify witnesses  
8 known to the parties which would otherwise be required pursuant to NRCP 16.1, and to  
9 formulate a discovery plan, including types of discovery to be permitted and a time to  
10 accomplish the discovery pursuant to Nevada Arbitration Rule 12.

11 Finally, an arbitrator is entitled to payment for (1) his/her fees, billed at \$100 per  
12 hour up to a maximum of \$1,000 and (2) a reasonable fee for photocopies, telecopies,  
13 long distance expense, postage, secretarial services, etc., in an amount not to exceed  
14 \$250. I request that a total of \$500 be deposited into my account to ensure payment of  
15 my fees and costs. **It is required that the parties send prior to the Early**  
16 **Arbitration Conference, a check in the amount of \$250 payable to "LAW OFFICES**  
17 **OF EVA GARCIA-MENDOZA".** Any excess funds remaining in my account after my  
18 disposition of this case will be refunded pro rata. My Tax Payer Identification Number  
19 is **88-0384574**.  
20  
21

22 DATED this 21 day of September, 2020.

23 LAW OFFICES OF EVA GARCIA-MENDOZA

24 BY: 

25 EVA GARCIA-MENDOZA, ESQ.  
26 NEVADA BAR NO.: 1779  
27 10001 PARK RUN DRIVE  
28 LAS VEGAS, NEVADA 89145  
(702) 384-8484  
ARBITRATOR

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) I certify that I am an employee of Eva Garcia-Mendoza, and that on the 21<sup>st</sup> day of September, 2020, I caused the foregoing **NOTICE OF TELEPHONIC EARLY ARBITRATION CONFERENCE**, to be served on all parties to this action by:

\_\_\_\_\_ Placing an original or true copy thereof in a sealed, postage prepaid envelope in the United States mail at Las Vegas, Nevada.

\_\_\_\_\_ Personal delivery

\_\_\_\_\_ Facsimile (fax)

\_\_\_\_\_ Federal Express/UPS or other overnight delivery

\_\_\_\_\_ Electronic Service


XXX the Court's Electronic/Service Filing thru Wiznet/Odyssey

Fully addressed as follows:

Aimee O'Neil  
6500 W. Charleston Blvd #268  
Las Vegas, Nevada 89146  
Plaintiff in Proper Person  
VIA EMAIL: whereintheworldisaimée@gmail.com

Gloria Mazzoli  
119 E. Utica St.  
Oswego, New York 12126  
Defendant in Proper Person  
VIA EMAIL: mylady2125@yahoo.com

Kevin E. Beck, Esq.  
3137 E. Warm Springs Rd. Ste 100  
Las Vegas, Nevada 89120  
Attorney for Defendant Charlene O'Neil

  
An employee of Eva Garcia-Mendoza

*Steven D. Grierson*

COA

Aimee O'Neil

(Name)

9717 Sandmist Ave

(Mailing address)

Las Vegas, NV 89134

(City, state, zip code)

702-302-0481

(Telephone number)

(Fax number)

whereintheworldisaimae@gmail.com

(E-mail address)

☒ Plaintiff/ ☐ Defendant/ ☐ Other (specify) \_\_\_\_\_

In Proper Person

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

Aimee O'Neil

Plaintiff(s),

vs.

Charlene O'Neil

Defendant(s).

Gloria Mazzoli

Case No.: A-20-815618-C

Dept. No.: \_\_\_\_\_

Date of Hearing: N/A

Time of Hearing: N/A

**NOTICE OF CHANGE OF ADDRESS**

TO: Clerk of the Court; and

TO: Counsel for Opposing Party or Opposing Party

PLEASE TAKE NOTICE that I, (insert your name) Aimee O'Neil

\_\_\_\_\_, the (check one box) ☒ Plaintiff/ ☐ Defendant/

☐ Other (specify) \_\_\_\_\_ in this case, have changed my contact information as follows:

☒ My mailing address has changed as follows (insert new mailing address):

9717 Sandmist Ave

Las Vegas, NV 89134

RECEIVED

SEP 24 2020

CLERK OF THE COURT

1 ☐ My telephone number has changed as follows (insert new number):

2 \_\_\_\_\_  
3 ☐ My fax number has changed as follows (insert new number):

4 \_\_\_\_\_  
5 ☐ My e-mail address has changed as follows (insert new address):

6 \_\_\_\_\_  
7 This change is effective immediately.

8 DATED this 21<sup>st</sup> day of September, 2020

9 Submitted by:

10 Aimee O'Neil  
(Signature)

11 Aimee O'Neil  
(Name)

12 9717 Sandmist Ave  
(Mailing Address)

13 Las Vegas, NV 89134  
(City, State, Zip Code)

14 702-302-0481  
(Telephone Number)

15 \_\_\_\_\_  
(Fax Number)

16 whereintheworldisaimae@gmail.com  
(E-mail Address)

17 ☒ Plaintiff / ☐ Defendant / ☐ Other (specify) \_\_\_\_\_

18 In Proper Person  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on (insert date document was served)

Sept, 21, 2020

I served the above NOTICE OF CHANGE OF ADDRESS, pursuant to NRCP 5(b), by depositing a copy of the same in the United States Mail in Las Vegas, Nevada, postage prepaid, to the address listed below (insert names and mailing addresses of opposing parties' attorneys, or opposing parties directly if no attorneys):

Charlene O'Neil  
Attorney Kevin Beck  
3137 E. Warm Springs Rd.  
Suite 200  
Las Vegas, NV 89120

Gloria Mazzoli  
119 E. Utica St  
Oswego, NY 13126

(Insert date, signature, and name of person mailing document:)

DATED this 21<sup>st</sup> day of September, 2020

Certified by:

Amiee O'Neil

(Signature)

Amiee O'Neil

(Print name)



1 **NOA**  
2 Kevin E. Beck, NSB #8371  
3 KEVIN E. BECK, LTD.  
4 3137 E. Warm Springs Rd., Ste. 100  
5 Las Vegas, NV 89120  
6 Telephone: (702) 641-9900  
7 Facsimile: (702) 260-8983  
8 E-mail: kevin@kevinbecklaw.com  
9 Attorney for Charlene O'Neil and Gloria Mazzoli

6  
7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 AMIEE O'NEIL,  
10 Plaintiff,

Case No. A-20-815618-C  
Dept. No. 26

11 v.


12 CHARLENE O'NEIL; and GLORIA  
13 MAZZOLI,  
14 Defendants.

15 **NOTICE OF APPEARANCE**

16  
17 Kevin E. Beck, Esq., of Kevin E. Beck, Ltd., hereby files his Notice of Appearance herein  
18 as counsel for Defendant Gloria Mazzoli, and demands that all copies of notices, pleadings, and  
19 documents herein be served upon him at the law offices of KEVIN E. BECK, LTD., 3137 E.  
20 Warm Springs Road, Suite 100, Las Vegas, Nevada 89120.

21 Dated this 2 day of October, 2020.

22  
23 KEVIN E. BECK, LTD.

24   
25 KEVIN E. BECK, ESQ. (Bar #8371)  
26 3137 E. Warm Springs Road, Suite 100  
27 Las Vegas, NV 89120  
28 Attorney for Charlene O'Neil and Gloria Mazzoli


KEVIN E. BECK, LTD.  
3137 E. WARM SPRINGS RD., STE. 100  
LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-8983

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2 day of October, 2020, a true and correct copy of the **Notice of Appearance** was submitted to the above-entitled Court for electronic service upon the Court's Service List for the above-referenced case pursuant to Administrative Order 14-2 and NEFCR 9. The document was also served by first class mail, postage prepaid, to the following:

Aimee O'Neill  
6500 W. Charleston Blvd., Unit 268  
Las Vegas, NV 89146  
*Plaintiff*

Eva Garcia-Mendoza  
Law Offices of Eva Garcia-Mendoza  
10001 Park Run Dr.,  
Las Vegas, NV 89145  
*Arbitrator*

  
An employee of Kevin E. Beck, Ltd.



1 **NOTC**  
2 **LAW OFFICES OF EVA GARCIA-MENDOZA**  
3 **EVA GARCIA-MENDOZA, ESQ.**  
4 **NEVADA BAR NO.: 1779**  
5 **10001 PARK RUN DRIVE**  
6 **LAS VEGAS, NEVADA 89145**  
7 **P: (702) 384-8484**  
8 **F: (702) 384-0207**  
9 **evagm@gms4law.com**  
10 **ARBITRATOR**

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DISTRICT COURT  
CLARK COUNTY, NEVADA

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12 AIMEE O'NEIL,

15 Plaintiff(s),

17 V.

18 GLORIA MAZZOLI and CHARLENE O'NEIL,

20 Defendant(s).

CASE NO. A-20-815618-C  
DEPT. NO XXVI

ARBITRATION

Date: 3/3/21  
Time: 2:00 PM

**NOTICE TO APPEAR FOR ARBITRATION HEARING**

23 TO: AIMEE O'NEIL, Plaintiff in Proper Person; and

24 TO: KEVIN E. BECK, ESQ., Attorney for Defendants.


26 **YOU WILL HEREBY TAKE NOTICE** that the Arbitration Hearing in the above  
27 entitled matter has been set for the **3rd day of March, 2021 at the hour of 2:00 P.M.**  
28

1 via Zoom video conferencing. Instructions to access the Zoom meeting will be  
2 provided to the parties prior to the scheduled hearing.

3 **YOU ARE HEREBY FURTHER NOTICED** that all pre-hearing statements must  
4 be furnished to the Arbitrator at least ten (10) days prior to the date of the hearing  
5 pursuant to N.A.R. 12 (A)  
6

7  
8 DATED this 5 day of October, 2020.  
9

10 LAW OFFICES OF EVA GARCIA-MENDOZA

11  
12 BY:   
13 EVA GARCIA-MENDOZA, ESQ.  
14 NEVADA BAR NO.: 1779  
15 10001 PARK RUN DRIVE  
16 LAS VEGAS, NEVADA 89145  
17 (702) 384-8484  
18 **ARBITRATOR**  
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**CERTIFICATE OF SERVICE**


Pursuant to NRCP 5(b) I certify that I am an employee of Eva Garcia-Mendoza, and that on the 6<sup>th</sup> day of October, 2020, I caused the foregoing **NOTICE TO APPEAR FOR ARBITRATION HEARING**, to be served on all parties to this action by:

- ☐ Placing an original or true copy thereof in a sealed, postage prepaid envelope in the United States mail at Las Vegas, Nevada.
- ☐ Personal delivery
- ☐ Facsimile (fax)
- ☐ Federal Express/UPS or other overnight delivery
- ☐ Electronic Service
- ☒ XXX the Court's Electronic/Service Filing thru Wiznet/Odyssey

Fully addressed as follows:

Aimee O'Neil  
6500 W. Charleston Blvd #268  
Las Vegas, Nevada 89146  
Plaintiff in Proper Person

Kevin E. Beck, Esq.  
3137 E. Warm Springs Rd. Ste 100  
Las Vegas, Nevada 89120  
Attorney for Defendants

  
An employee of Eva Garcia-Mendoza



1 **NOTC**  
2 **LAW OFFICES OF EVA GARCIA-MENDOZA**  
3 **EVA GARCIA-MENDOZA, ESQ.**  
4 **NEVADA BAR NO.: 1779**  
5 **10001 PARK RUN DRIVE**  
6 **LAS VEGAS, NEVADA 89145**  
7 **P: (702) 384-8484**  
8 **F: (702) 384-0207**  
9 **evagm@gms4law.com**  
10 **ARBITRATOR**

11 **DISTRICT COURT**  
12 **CLARK COUNTY, NEVADA**

13 \*\*\*\*\*

14 AIMEE O'NEIL,

15 Plaintiff(s),

16 V.

17 GLORIA MAZZOLI and CHARLENE O'NEIL,

18 Defendant(s).

19 )  
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28 )  
CASE NO. A-20-815618-C  
DEPT. NO XXVI

ARBITRATION

Date: 3/3/21  
Time: 2:00 PM

21 **ARBITRATION DISCOVERY ORDER**

22 Pursuant to N.A.R. 11, an Early Arbitration Conference was held telephonically  
23 on the 5th day of October, 2020. Present telephonically at the meeting were AIMEE  
24 O'NEIL, in Proper Person and KEVIN E. BECK, ESQ., attorney for Defendants. Having  
25 exchanged documents and the names of the witnesses, and having discussed the  
26 proposed discovery as required by Rule 11, and good cause appearing therefore,  
27  
28

1       **IT IS HEREBY ORDERED** that the discovery shall be completed by **February**  
2 **17, 2021.**

3       **IT IS FURTHER ORDERED** that the discovery shall be limited to the following:

- 4               1)     Each party may serve not more than twenty interrogatories,  
5                       twenty requests for production of documents, and  
6                       twenty requests for admissions.  
7               2)     Plaintiff may take the depositions of each defendant, Lee  
8                       Hunt, Mark Morrison, and Tim O'Neil. Depositions are  
9                       not to exceed two (2) hours.  
10              3)     Defendants may take the deposition of Plaintiff. The  
11                      deposition is not to exceed four (4) hours.  
12              4)     Depositions must be conducted remotely by any video  
13                      conferencing program the parties see fit, but must  
14                      confer and cooperate in advance to ensure appropriate  
15                      participation.  
16                      participation.

17  
18       **IT IS FURTHER ORDERED** that the parties shall serve and file their pre-hearing  
19 statements pursuant to N.A.R. 13(A) no later than **Monday, February 22, 2021.** The  
20 Arbitration Hearing shall be held on **Wednesday, March 3, 2021 at 2:00 P.M.,** via  
21 Zoom video conferencing.  
22

23 DATED this 6 day of October, 2020.

24                               LAW OFFICES OF EVA GARCIA-MENDOZA

25  
26 BY: 

27       EVA GARCIA-MENDOZA, ESQ.  
28       NEVADA BAR NO.: 1779  
      10001 PARK RUN DRIVE  
      LAS VEGAS, NEVADA 89145



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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) I certify that I am an employee of Eva Garcia-Mendoza, and that on the 6<sup>th</sup> day of October, 2020, I caused the foregoing

**ARBITRATION DISCOVERY ORDER**, to be served on all parties to this action by:

- ☐ Placing an original or true copy thereof in a sealed, postage prepaid envelope in the United States mail at Las Vegas, Nevada.
- ☐ Personal delivery
- ☐ Facsimile (fax)
- ☐ Federal Express/UPS or other overnight delivery
- ☐ Electronic Service
- ☒ XXX the Court's Electronic/Service Filing thru Wiznet/Odyssey

Fully addressed as follows:

Aimee O'Neil  
6500 W. Charleston Blvd #268  
Las Vegas, Nevada 89146  
Plaintiff in Proper Person

Kevin E. Beck, Esq.  
3137 E. Warm Springs Rd. Ste 100  
Las Vegas, Nevada 89120  
Attorney for Defendants

  
\_\_\_\_\_  
An employee of Eva Garcia-Mendoza

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LEFT SIDE FILE

Aimee O'Neil,  
Plaintiff,

V.

Case No: A - 20 - 815618 - C

Charlene O'Neil  
Gloria Mazzoli  
Defendants,

**NOTICE OF EMERGENCY MOTION**

1. On the 6<sup>th</sup> day of October, 2020, an emergency TPO was granted  
Against Charlene O'Neil on behalf of Aimee O'Neil.
2. The plaintiff, Aimee O'Neil, submitted a restraining order to the  
Courts against Gloria Mazzoli.
3. On Friday, October 9, 2020, the defendants, Charlene O'Neil  
Violated this order of protection five times in one day, for no  
Legitimate purpose.
4. The plaintiff is requesting both defendants retain separate

Attorneys as this is a conflict of interest as they are co-defendants,  
There are criminal charges and I am requesting an injunctive order  
Restraining both defendants from further contact as there are multiple  
Criminal charge

5. The plaintiff filed an extensive report with the Las Vegas Metropolitan  
Police Department that includes “ 5 violations of the restraining order.”

6. Intimidation of a victim, to Charlene O’Neil, case 1994-126 NYS v.  
Janes, the plaintiff is a protected victim who testified for a grand jury  
Indictment when O’Neil ran Janes to Virginia, July 3. 1994, from  
Vehicular Manslaughter charges. O’Neil is not to ever contact me,  
This case is pending.

7. Interfering with medical treatment

8. A motor vehicle directly aimed and attempted to secure a fast  
Rate of speed to kill the plaintiff, and on film, and these defendants  
Have people, say “sorry” “sorry” and its these females intimidating  
Me by the use of 2<sup>nd</sup> party people. This violates a restraining order

9. A note from the metal specialist surgeon, see attached, has  
Federal protocols that instruct any intimidation or medical treatment  
Interfering is a mandatory sentence for federal medical research.

10. Multiple reports of medical interference were made

11. Interfering with the disabled plaintiff's right to maintain

Gainful employment. Multiple violations of the law were made to

The Las Vegas Police, LV201000071305

12. The complaint identifies audio/video of a body wire worn by the

Physically disabled plaintiff showing intimidation at her place of employment,

Golden Entertainment, Arizona Charlies, on Decatur, and intimidation by

Roommates who are being influenced by the defendants.

13. The plaintiff, in proper person requests an order mooting the defendants

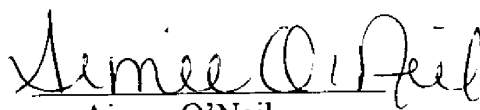
From any further association, as they have no lawful legitimate reason to

Associate, as this association is to violate the law

14. The plaintiff requests that the defendants seek separate counsel, as after

This latest attempted violent attack the defendants should be separated

Permanately due to ongoing conspiring

A handwritten signature in cursive script, reading "Aimee O'Neil".

Aimee O'Neil  
9717 Sandmist Avenue  
Las Vegas, 89134  
702-302-0481  
October 20, 2020

A.20-815618-C

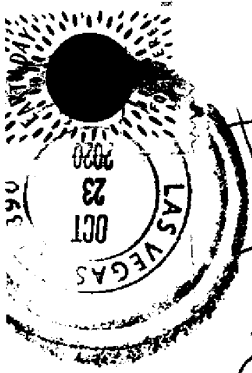
**CERTIFICATE OF SERVICE**

**I DO HEREBY CERTIFY THAT I HAVE ON THIS 20<sup>th</sup> DAY  
OF OCTOBER, 2020, THAT I HAVE ON THIS DAY OF THE  
EMERGENCY MOTION, KEVIN BECK, ATTORNEY FOR  
GLORIA MAZZOLI AND CHARLENE O'NEIL, 3137 E.  
WARM SPRINGS ROAD, SUITE 200, LAS VEGAS, NEVADA 89120**



**AIMEE O'NEIL  
9717 SANDMIST AVENUE  
LAS VEGAS, NEVADA 89134**

Amie O'Neill  
9717 Sandmust Ave  
Las Vegas, N.V. 89134



Eighth Judicial District

ADIR

200 Lewis Ave  
Las Vegas, NV 89155

8910135300 0075

EIGHTH JUDICIAL DISTRICT  
LAS VEGAS NEVADA

22  
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NOV - 4 2020  
Clerk of Court  
CLERK OF COURT

Aimee O'Neil,  
Plaintiff,

V.

Case No:A-20-815618-C

Charlene O'Neil

Gloria Mazzoli

Defendants,

NOTICE OF MOTION

1. The plaintiff alleges that her roommate "Aaron" who is influenced  
By one or both of the defendants, stated yesterday, October 27, 2020,  
"they" are plotting retaliation.

2. The plaintiff alleges that yesterday was her scheduled day off  
from work and her employer called multiple times to bring her in,  
his is known as an ongoing "plot".

3. The plaintiff who is about to go in for emergency surgery  
Has suspended all unnecessary travel, contact, ect. As she cannot

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CLERK OF THE COURT

Leave the house.

4. Today, October 28, 2020, at 11:10 am at Starbucks in Summerlin, Town Center, a "PLOT" was planned.

5. The plaintiff was waiting for her order when from behind Her an older Hispanic woman came up from behind her saying "SORRY" "SORRY". This is Charlene O'Neil, who usually Appears as the "gay" mentally impaired individual.

6. The plaintiff, who has been counseled by her Dr. at Harvard University as how to handle this behavior, turned and Said, " YOUR NOT GOING TO SPEAK TO ME LIKE THIS, IT IS ABUSE AND IT ISNT ACCEPTABLE."

7. Obviously, these are not brilliant people. They do this To stalk and intimidate me by means of influencing everyone Around me.

8. The "plot" was about Charlene O'Neil, chasing me to Arizona. I have the evidence. So they sent a female that looks like Eric Dusts wife in Starbucks, while two actors, young white males, Were placed to sit and defend the actions of the terrorist, as I Continued to say, You are intimidating me, do not walk up from Behind me and say, "Sorry" "Sorry". If they cant do these plots



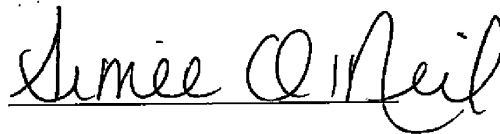
At my job they find other places to mass organize and plot Attacks, influencing, "young, ignorant, people" to engage. So they had two young white males sitting there saying this Person didn't do anything.

9. Everyone knows now, that Charlene O'Neil is running Around the United States saying "sorry".

10. In Loveland Colorado, October 15, 2019, Charlene O'Neil, influenced my roommate, Karissa Ernest, to say, "I can't be friends with you until you sue your mother." "Your mother said you can't date." For the record it is established That the defendant is mentally ill

11. They influence co-workers, supervisors, roommates.

11. They are influencing this young "gay" roommate Aaron in my home by means of intimidation, getting in my Way, blocking me, "sorry" stuff.



Aimee O'Neil  
9717 Sandmist Avenue  
Las Vegas, Nevada 89134

Dated: October 28, 2020

**CERTIFICATE OF SERVICE**

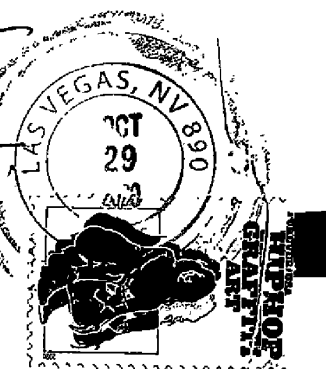
**I DO HEREBY CERTIFY THAT I HAVE ON THIS 28th DAY  
OF OCTOBER, 2020, THAT I HAVE ON THIS DAY OF THE  
FOREGOING NOTICE OF MOTION IN A POSTAGE  
PAID ENVELOPE ADDRESSED TO KEVIN BECK,  
3137 E WARM SPRING RD. STE 100, LAS VEGAS,  
NEVADA 89120**

A handwritten signature in black ink, appearing to read "Aimee O'Neil", written over a horizontal line.

**AIMEE O'NEIL  
9717 SANDMIST AVENUE  
LAS VEGAS, NEVADA 89134**

Ximica Oval  
9717 Sandmist Ave  
Las Vegas, NV 89134

Las Vegas Regional Justice  
Eighth Judicial District  
200 Lewis Ave  
Las Vegas, NV 89101



**EIGHTH JUDICIAL DISTRICT**

**CLARK COUNTY, NEVADA**

28  
**FILED**  
NOV - 9 2020  
*Ok. Hill*  
CLERK OF COURT

Aimee O'Neil,  
Plaintiff,

v.

Case No: A-20-815618-C

Gloria Mazzoli,  
Charlene O'Neil,  
Defendants,

**MOTION FOR SUMMARY JUDGMENT**

1. The plaintiff, Aimee O'Neil, in proper person, moves this Court into an order of judgment against both defendants.

2. The plaintiff, alleges that John Mazzoli Jr. is a serial Rapist and registered sex offender.

3. The plaintiff alleges that Gloria Mazzoli's former daughter In law, Dawn Mulchaey, with defendant Mazzoli present, said,

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“she is going to follow you forever.” Gloria Mazzoli also Made the threat of, “get away from my son or I will destroy Your life back in 1999, here we are, decades later, in New York State.

4. The plaintiff retained Mr. Leigh Hunt, retired head of the New York State Police, retired Syracuse Police Chief for Investigative services as someone was “following” the Plaintiff and depriving civil rights and perpetrating major Criminal activity nationwide.

5. Mr. Hunt investigated by interviewing dozens of Witnesses and investigating documentation, and made A conclusive determination that the MAZZOLIS are Stalking the plaintiff.

6. The plaintiff submitted an application for a permanent Restraining order against Gloria Mazzoli.

7. The plaintiff is physically disabled with permanent Physical injuries.

8. The plaintiff is employed as a restaurant server at a Local casino. This is a federally protected zone, Public Accommodation, and the plaintiff is federally protected.

9. The plaintiff retained Mr. Hunt in 2019 because Gloria Mazzoli was stalking, harassing, intimidating, and interfering With tip and hourly wage earnings.

10. The plaintiff recalls September 24, 2019, in the State of Colorado,

City of Loveland, at her job at The Sports Station as a restaurant Server. Mazzoli sent a customer into ask the plaintiff, "if her Dr.had told her yet, that she had a diagnosis of cancer." The Following week the plaintiff's medical records were reported Stolen to the Loveland Police.

11. These records contained sensitive questionable health Concerns, not of cancer, but metal poisoning, and suspicious Toxicology reports as investigated by top surgeons.

12. A hematologist issued multiple blood reports finding Some sort of allergic metal reaction. That metal was showing Up in her blood. Multiple surgeries performed to extract and Remove metal were performed.

13. The Doctors ruled out many and multiple causes, as is Documented.

14. The plaintiff was tested for titanium in her blood as metal Hardware in her foot was removed. It was confirmed negative. Doctors said multiple compounds of moderate findings of Metals such as copper, chromium, cobalt, nickle were somewhere Directly in her bloodstream.

15. The plaintiff who had been friends with John Mazzoli Jr., Was told many times that a transmitter was in her neck. The Plaintiff disregarded that statement in its entirety until a few Months ago.

16. The plaintiff also remembers a period of time consisting of A month in proximatey of coworkers of John Mazzoli, who

Visited the plaintiff's home with John and she watched John Mazzoli take a sip out of something and fall over. The plaintiff Watched this happen to approximately four people in her home In Fulton, NY. The plaintiff believes and has been factually known To believe that Ryphenol was being misused at her home.

17. An x-ray was taken in approximately, May 2020 of the Plaintiff's neck. The finding of the xray identifies a picture Of a 2 inch piece of metal in her throat.

18. The plaintiff confirms that Gloria Mazzoli's deceased husband Was employed as vice president of a metal manufacturing factory Called Novelis.

19. The plaintiff alleges that for the past six months she has endured Medical intimidation, harassment about this medical resolution by "plots" that say sorry your not getting medical treatment.

20. Approximately two weeks ago an health insurance from New Jersey contacted the plaintiff who was attempting to purchase health Insurance to have the suspicious metal removed from her throat, And told insurance agent that she only needed the policy for the Purpose of removing metal surgically. The agent on a recorded Line sold her a policy that she couldn't use for 30 days and Did not cover surgeries. The plaintiff alleges and re-alleges that This is an example of her "plots." It is medical interference on a Disabled person.

21. The plaintiff purchased an expensive RFID reader and when Placed in the area of the neck, the lights go 4 levels and sirens,

Like police sirens go off.

22. Remember the plaintiff is NOT supposed to have metal in Her body or blood stream.

23. The plaintiff purchased a large magnet from Home Depot And the magnet sticks to the plaintiff's neck.

### **ARGUMENT**

The plaintiff alleges that Gloria Mazzoli conspired to manufacture A transmitter illegally, by the use of metal materials at this large Factory in Oswego, New York, where Mazzoli resides. The plaintiff Alleges that Gloria Mazzoli conspired to put some illegally manufactured Hardware, not medically or surgically approved for human usage in The blood stream was put in the plaintiff's throat by John Mazzoli Jr. Who would be the only possible suspect the plaintiff was alone with For substantial substantial periods of time and had direct obtainment Of Ryphenol at that time and because John Mazzoli Jr. did actually Tell the plaintiff multiple times that there was something in her neck And the plaintiff disregarded that conversation off as ridiculous. Medical reports CONFIRM that multiple odd metals are flowing Directly in her bloodstream causing a reaction, which is obviously The intent, when sending people into the plaintiff's place of Employment asking personal medical questions. The plaintiff is Permanently physically disabled since July 3, 1994, when co-defendant Charlene O'Neil, paid a man named Paul Janes, to "drug" the plaintiff And drive her brand new Acura Integra GSR at a rate of speed in excess Of 165 mph, flipping the vehicle some 360 feet, in which the plaintiff



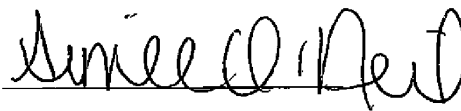
Was pinned in the trunk as she observed Paul Janes exit the car and Enter the Toyota 4 Runner owned by Charlene O'Neil who was apparently Following from behind. Janes than girlfriend, Patty Harvey had a six Month old baby. Defendant O'Neil took Janes, his girlfriend, and this Baby to the State of Virginia while multiple warrants were issued. Defendant O'Neil, now was missing with her former husband as Police are questioning him about his wife kidnapping a 6 month Old baby as reported by the father. Janes faced several dozen Charges, one being attempted vehicular manslaughter. Defendant O'Neil was officially obstructing the justice of assailant who Just attempted to murder her daughter and hide him from authorities In the State of Virginia by driving from New York State to Virginia on or about the 3<sup>rd</sup> of July, 1994. Once again this is Alleged to be the mother of the plaintiff who transported Janes To Virginia while her lay in a hospital bed in Upstate Medical Center in Syracuse and left to be confined to a wheelchair, While an investigation to locate assailant Janes who was off Being hid by defendant Charlene O'Neil. The Social Security Administration determined the plaintiff was permanently Physically disabled as a result of a plot conspired by defendant O'Neil, causing still ongoing medical issues that these woman Are interfering and they caused. Both woman working together Continue to conspire to interfere with the plaintiffs fundamental Rights.

## **SUMMARY JUDGMENT**

Nevada civil rules of Summary Judgement is determined by Evidence that is undisputable and facts that are conclusive, Based upon evidence. The plaintiff introduces multiple Medical documents that are undisputable and refer the Plaintiff to Harvard University, Brigham Woman's Hospital, In Boston, Massachusetts, because the metal poisoning has Caused serious blood complications as determined by the findings Of experts in the medical field. Mr. leigh Hunt, retired head of the New York State Police, listed John Mazzoli Jr. as a person of Police interest after another retainment was required by the plaintiff Because of "suspicious" metal poisoning to the blood. Mr. Hunt, Was employed 30 years by the New York State Police and went On to be the Chief of Syracuse Police for 20 years. Mr. Hunt Concludes, doesn't say possibly or maybe, but states John Mazzoli Jr., is a suspect. Mr. Hunt's investigative skills are impeccable. He Would be considered an expert in his field of law enforcement. The x-ray clearly shows a foreign metal object that was not placed By any treating Dr. As the plaintiff obtained all of her medical Records nationwide. She has never had neck surgery performed by Any licensed medical professional. The plaintiff alleges that she Was drugged by John Mazzoli Jr. with Ryphenol by the order of Gloria Mazzoli, who conspired to manufacturer a object that violates The Patriot Act and has gone beyond the lawful bounds of justice To obstruct getting this object removed and making sure the plaintiff

Doesn't get further medical treatment because the Doctors are pointing At The Mazzolis. The "object" in question would be manufactured by Metals that are testing positive in the plaintiff's blood and if the plaintiff Gets to Harvard further investigation would be done and even worse Daily medical interference and intimidation has been imposed directly To the physically disabled who was required to purchase a body camera. This video shows patterns of medical intimidation as the defendants Now are interfering with the plaintiffs orders for medical Treatment because "they" don't believe I should seek Treatment for the damage of physically injury they have Caused by intent, malice, and reckless disregard by violating Criminal statutes of Federal laws. The direct cause of the Plaintiff's injury is caused by both defendants. Charlene O'Neil has violated the restraining order by recently attempting To have the plaintiff ran over by a motor vehicle. Lets discuss the History of our parties. Tim O'Neil is the father of Aimee O'Neil, The plaintiff. Approximately 1974 or 1975, Defendant Charlene O'Neil can provide incriminating evidence and confirmation that The defendant and her than husband, Tim O'Neil were cultivating Marijuana in upstate New York. Tim O'Neil's Sister, Joann O'Neil, Was employed as a CIA agent in London, England, who had to Fly to Oswego, New York, because we were required to relocate Immediately to Wyoming, defendant O'Neil will testify to all of This. The Mazzolis son in law, Vince Massuica, was selling the Marijuana Charlene O'Neil harvested. The Mazzoli's found out

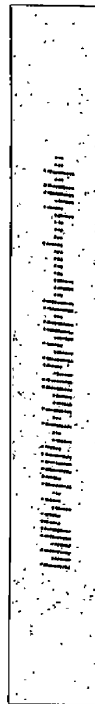
And targeted Tim O'Neil, my father. The Mazzolis so angry  
And jealous of my aunts job as furthermore became the head of  
The CiA in London, England. John Mazzoli said about a 1000  
Times, that my aunt didn't deserve that job. The Mazzolis so  
Targeted Tim O'Neil over this that revenge of the mindset,  
Targeted me. I would like to offer, defendant O'Neil, still can  
Be prosecuted and not to discriminate against Tim O'Neil,  
Because of his gender, but the CIA did NOT release Charlene  
O'Neil from cultivation in excess of 100 pounds as the Mazzolis  
Can no longer target when they are co-defendants and Charlene  
O'Neil should now face charges. The Mazzolis were jealous of  
My aunts job, Charlene O'Neil can confirm this all at trial and  
They manufactured a "bug" as revenge for my aunt being  
Employed by the United States Government as a CIA agent,  
As revenge because the plaintiff went to college to study  
Criminal Justice, the device was placed right when the plaintiff  
Graduated from college with a degree in Criminal Justice just  
Like her aunt, whom the Mazzoli family hated. The movant  
Alleges that no dispute of genuine dispute as to any material  
Fact and and the courts should grant summary judgment as a  
Matter of law.



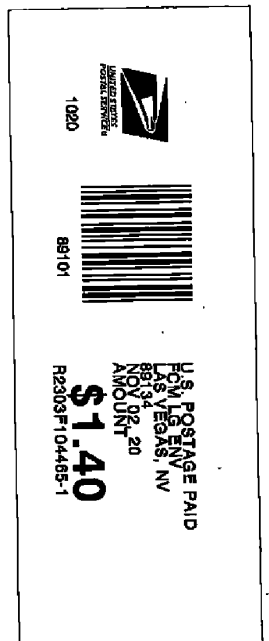
DATED: NOVEMBER 1, 2020

Aimee O'Neil  
9717 Sandmist Avenue  
Las Vegas, Nevada 89134

Turner, Neil  
9717 Sandmist Ave  
Las Vegas, NV 89134



Eighth Judicial District  
Justice Center  
200 Lewis Ave  
Las Vegas, NV 89101



**FILED**

NOV 19 2020

**CLERK OF COURT**

**EIGHTH JUDICIAL DISTRICT**

**CLARK COUNTY NEVADA**

AIMEE O'NEIL

Plaintiff,

v.

Case No: A-20-815618-C

CHARLENE O'NEIL

GLORIA MAZZOLI

Defendant,

**NOTICE OF MOTION**

1. The plaintiff in proper person, alleges that the defendants carried  
And executed plot on November 3, 2020.
2. The plaintiff attempted to use her Lyft app because the defendants  
Influenced a car dealership in Colorado to sell her a dangerous car so  
They could harass her about it, thus she is taking Lyft. Yesterday her  
Lyft app was being obstructed and her credit card with funds on it  
Was being obstructed after she went to get groceries.
3. The plaintiff got called into work at Arizona Charlies on  
Decatur.

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NOV 16 2020

CLERK OF THE COURT

4. The plaintiff had to take an Uber and the female Uber driver Was influenced by one of the defendants to obstruct, interfere, Tamper, intimidate, over once again the plaintiffs personal Relations, the ONLY person, they haven't influenced, YET, Mark Morrison, as one of the defendants, BOTH who are Working to obstruct medical emergency treatment is so Obsessed with the plaintiff's personal rights that a ENORMOUS Scheme was planned.

5. The Uber driver orders me to put my seatbelt on, talked down To me and discuss a "plot" about her leaving a man, this is always Preplanned by saying he wouldn't marry her, because they are Attempting to chase me out of jurisdiction, because they break the Law so much that they are trying to force to break the law, because They cannot stop breaking the law. This is my home, I reside here And if the defendants choose to move to arizone, they can, they are Not the petitioner in the jurisdiction and they are trying to break Jurisdiction to intentionally obstruct justice, it has nothing to do With any man, it has to do with me suing them.

6. Charlene O'Neil, I believe, its one or the other, sent customers In, one man had a SORRY shirt on and the other man had a UNLV

Maintenance shirt on. Brown vs. The Board of Education, my Rights to education are being obstructed by conspiracy of the Defendants who are both uneducated criminals and conspirators.

7. Immediately after, my female co-worker said, "Im SORRY, BUT IM REALLY NOT AND IM OBSTRUCTING YOUR MEDICAL SO YOU WILL INTENTIONALLY DIE." One of Them is doing it, we only have two choose from.

8. Charlene O'Neil is in the direct need of a judicial ordered Psychological assessment immediately for the purpose of Public Safety and prevention.

9. Defendant O'Neil, has been recommended to move from Florida because Florida has so much trafficking that "we" Know she is plotting to traffic something, marijuana, Children, heroin, we have it all with her. She refuses to stop With these organized HATE CRIMES.

10. Now my credit cards are being obstructed by organizers Out of jurisdiction, out of bounds of all lawful authority and There lawyer is NOT controlling them and he has a lawful Responsibility to control his parties or refuse service. They Are trying to obstruct justice, and that is what that plot is.



The defendants can move anywhere they want, I am  
Permanently physically disabled, Im not traveling. But  
They plot and they plot, why ?

11. The Uber driver talked about dating a pilot in Los  
Angeles, which would be interpreted to say its my  
Sister, Amy Geremia and her husband Mark, who own  
An airline in NY, and the defendants just drug Tim O'Neil  
Inti it, he hired an attorney, now bringing my sister into  
It, she is not authorizing anyone to use her in these plots,  
And this is exploitment.

12. We have two signatures on the mental commitment  
Papers and if a third is required than I will request the  
Assistance of my sister to place defendant/offender  
O'Neil into confinement as she is a risk to herself,  
To me, and the public.

13. This is a serious ongoing problem where the use of  
Unauthorized persons is going on by "speaking" on their  
Behalf to cast an opinion that involves the direct legalities  
Of court.

14. Amy Geremia and her husband Mark, live in

Syracuse Ny with Mr. Hunt and know him personally.

They do not approve or endorse any such involvement

In these schemes organized by other of the defendants,

Especially Charlene O'Neil.

15. I am prosecuting Charlene O'Neil for trafficking me

As I have made a FBI report and I want her charged.

16. The two defendants are once again exploiting my health,

At my job by using customers to exploit ADD. These defendants

Do not exploit my daughter, Morgan O'Neil, from going to a

Methadone clinic, or obstructing my daughter, Samantha

O'Neil from Harvard to have a tumor removed from her neck.

17. The exploitation of my finances with my boyfriend is what

Started this complaint and lets discuss some Facts. Nadar V. G.M.

The Circuit Court reversed a decision on financial exploitation

Violates ones privacy, the defendant's won't give it up.

18. My daughter Samantha O'Neil, a young girl with a man

My age named, Jason, John Mazzoli's friend. Jason never held

A job, my daughter, Samantha, paid for everything and was a

Minor, in a case coming up soon, and Gloria Mazzoli lived

A block away. I asked my daughter, Samantha today, how

Often did the defendants attempt to get rid of Jason, Chase  
Him out of state, obstruct your finances, and of course, no  
Response because they didn't bother her and they most  
Certainly should have especially with all of the pull,  
Gloria Mazzoli has, wouldn't she want Samantha to  
Be safe as Jason was raping her.

19. How many times did the defendants, with all this pull  
And crazy plots saying my grandmother wouldn't be happy,  
About Sam being raped? Morgan trafficking heroin, or  
Chat trafficking marijuans, upcoming case, where do we  
Start as I do not want to hear anything further with this  
Exploiment and discrimination, once again, Gloria Mazzoli,  
Is exploiting my privacy as a Hate crime because these other  
People should face obstruction, they have no right to be  
Involved exploiting my finances with my boyfriend or  
Trying to break jurisdiction, they know there breaking the law  
And I refuse to get involved in Gloria Mazzoli's personal  
Discriminatory practices.

20. The plot at work tonight first started out to exploit my  
Health, something confidential, how is Gloria Mazzoli

Obtaing my health information?

21. Did Gloria Mazzoli obstruct Samantha O'Neil from  
Emergency medical treatment at Harvard University for  
A tumor on her neck? No. Because there wasn't criminal  
Activity involved. We cant discriminate, Roe v. Wade

22. Customers came, and a man said he was waiting for his  
Wife, ok. She arrived, everything remains normal for a  
Few hours, and he asks for separate checks, because the  
PLOT here is THEY, the defendants are exploiting my finances,  
By constantly obstructing me helping my long time boyfriend,  
That I cannot even go out in Public with because I cannot have  
Witness what I go through so don't subject him to CULT activity.  
They are a CULT. Cult thinking. Cult stalking, multiple cult  
Influenced individuals forced by duress into breaking the law  
And multiple new lawsuits are about to served to stop this cult  
Activity that I do not approve of.

23. The Uber app, is a plot, these drivers are not dropping me off  
Where I am supposed to go and yes I most certainly reporting, but  
Someone is blocking my credit card so I cant take a Lyft.

24. Morgan O'Neil, has covered New York, with the greatest men

In the world, heroin junkies, who shoot up heroin, in which the defendants  
With all of this pull, can please advise the courts why she was just trafficking  
Heroin and having a new man, even married ones, every month without  
Gloria Mazzoli interfering or Charlene O'Neil trying to save her granddaughter,  
Especially when Morgan is buying all of the heroin, and these defendants pretend  
They have all this pull. I see complete miscarriages of Justice.

My daughter Samantha was dating Jason Fetterly who was 30 years her senior  
And Samantha said her livelihood was never obstructed but yet text messages  
From my daughter Morgan clearly show Jason trying to kill Samantha in an  
Automobile I purchased for Samantha. The defendants with all of this money  
And pull have failed all of these children, as public disgraces to society and  
New York State allowed, Jason Fetterly to rape my daughter, upcoming case.

25. The plaintiff, alleges that Gloria Mazzoli, who has this "pull" with a  
Dirty corrupt cop, who should lose his job immediately is misusing  
Lawful measures to tap my phone and my Health conversations and  
My finances, not for the purpose of lawfulness as I am not doing  
Anything, and because she has this pull, she has had customers come  
Into the restaurant and exploit that my phone is tapped, why would  
This woman gain any interest in my telecommunications, except  
To create CULT plots, as upstate NY, is a well known CULT area.

26. As I am typing, the defendants attempt to obstruct my Relationship, as they prompt people to text me, as they are Influenced, to treat me in some sort of way that is different Than everyone else. Prompting men to text me to upset my Boyfriend, but didn't do this with Samantha as Jason Fetterly Raped her. Case coming up, O'Neil v. Mazzoli for 5 counts of Rape in a CULT.


27. The plaintiff alleges that she just got done with supervision In the State of Colorado, O'Neil v. Colorado, O'Neil v. Poland, O'Neil v. Mazzoli, as Mazzoli is accused of obstruction of Justice in the legal system by influencing an attorney to lie To the Colorado Court of Appeals.

Mazzoli and O'Neil are running quite a criminal enterprize, With everything from influencing Uber Drivers, superviosors, Co-workers, landlords, the list goes on, but the concern is Genuine. Mazzoli is covering of justice to conceal intent or Drugging and poisoning the plaintiff deliberately and once The plaintiff discovered the crimes they had committed, the plaintiff alleges retailiation as this DID NOT OBSTRUCT my daughter, Samantha O'Neil, from emergency surgery at

Harvard, BECAUSE THEY WERE NOT COVERING UP  
A CRIME. Gloria Mazzoli is a CULT leader, and plots these  
Brainwashing CULT activities that I refuse to partake in  
That are bizaar, and I do NOT approve of my children being  
Forced to commit criminal activity in a CULT, such as  
Trafficking, O'Neil v. Mazzoli, such as constant raping of  
My entire family to subdue them so they don't leave the "CULT".  
Drugging a person to implant a tracking/locator is unconstitutional,  
In CULT behavior. Cults condition, brainwash, intimidate,  
Obstruct, interfere, and these patterns of distorted bizaar acts  
Are beyond unneccsaary , I don't approve of it around me or  
My children, as it is organizing mass brainwashing into criminal  
Activity. I have to pursue justice to stop this CULT from going my  
Near my children, O'Neil v. Maazzoli, again. Gloria Mazzoli is also  
The one who encouraged and prompted Charlene O'Neil, to "show  
Off" acting like a lunatic nationwide. Mazzoli is the ring leader of  
This CULT, and Mr. Leigh Hunt, will confirm that this an  
Organized Cult, who is plotting to constantly harm me and my  
Children, by the misuse of a corrupt cop to act in a manner so  
Outrageous in criminality, its beyond embarrassing nationwide.

Cults organize to control their victims living location to  
Chase into areas where that benefit their organization to  
Pull off crime, O'Neil v. Mazzoli, a rape in Arizona,  
Under RICO, Mazzoli is being sued for the ordering of  
Many rapes in this cult to subdue the victims into mass  
Intimidation, and the most recent plot, involves chasing me  
Into Arizona right where Mazzoli ordered the rape, as  
She doesn't deny the MASS FOLLOWING that Mr. Hunt  
Will confirm but one should question the safety of these  
Plots, as they all involve serious crimes of physical  
Safety. Dozens and dozens of cases of OUTRAGEOUS  
Conduct that cannot be swept under the rug as these CULT  
Acts of destructive behavior draw great concern about my  
Health and safety especially being physically disabled.  
Mazzoli is having a dirty corrupt cop target me, commit major  
Hate crimes, and many acts of violence. This draws a great  
Concern about the motive in Arizona and such a push to the  
Next plot that is already planned out.

DATED: November 5, 2020

  
Aimee O'Neil  
9717 Sandmist avenue  
Las Vegas, NV 89134



**CERTIFICATE OF SERVICE**

**I DO HEREBY CERTIFY THAT I HAVE ON THIS 5<sup>th</sup> DAY  
OF NOVEMBER, 2020, THAT I HAVE ON THIS DAY OF THE  
FOREGOING NOTICE OF MOTION IN A POSTAGEPAID  
ENVELOPE TO ATTORNEY KEVIN BECK 3137 WARM  
SPRINGS ROAD, STE 100, LAS VEGAS, NEVADA 89120.**



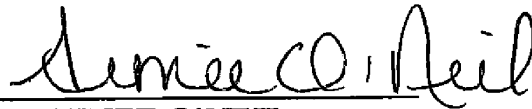
**AIMEE O'NEIL  
9717 SANDMIST AVENUE  
LAS VEGAS, NEVADA 89134**

**RECEIVED  
NOV 16 2020**

**CLERK OF THE COURT**

**CERTIFICATE OF SERVICE**

**I DO HEREBY CERTIFY THAT I HAVE ON THIS 3<sup>rd</sup> DAY  
OF NOVEMBER, 2020, THAT I HAVE ON THIS DAY OF THE  
FOREGOING NOTICE OF MOTION IN A POSTAGEPAID  
ENVELOPE TO ATTORNEY KEVIN BECK 3137 WARM  
SPRINGS ROAD, STE 100, LAS VEGAS, NEVADA 89120.**

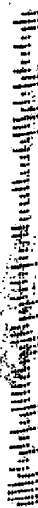
A handwritten signature in cursive script, reading "Aimee O'Neil", written over a horizontal line.

**AIMEE O'NEIL  
9717 SANDMIST AVENUE  
LAS VEGAS, NEVADA 89134**

Annice Corfield  
9717 Sandmoor Ave  
Las Vegas, NV 89134

Eighth Judicial District  
ABR  
200 Lewis Ave  
Las Vegas, NV 89101

891013300 0075





1 **OPPC**  
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E-mail: kevin@kevinbecklaw.com  
5 *Attorney for Defendants*

6  
7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 AMIEE O'NEIL,  
10 Plaintiff,

Case No. A-20-815618-C  
Dept. No. 26

11 v.

**HEARING REQUESTED:  
YES**

12 CHARLENE O'NEIL; and GLORIA  
MAZZOLI,  
13 Defendants.  
14

15 **DEFENDANTS' OPPOSITION TO MOTION FOR SUMMARY JUDGMENT AND**  
16 **COUNTERMOTION FOR SUMMARY JUDGMENT**

17 Defendants Charlene O'Neil and Gloria Mazzoli (collectively, "Defendants"), by and  
18 through their attorney of record, hereby oppose Plaintiff's Motion for Summary Judgment and  
19 request the Court enter Summary Judgment in favor of the Defendants on Plaintiff's baseless  
20 claims. The Plaintiff's motion for summary judgment is wholly unsupported, as required under  
21 NRCP 56(c) and (e). and must be denied under NRCP 56. The Plaintiff, in both her Motion for  
22 Summary Judgment and Complaint, states fantastic and delusional allegations against her mother  
23 and the mother of her former boyfriend. Within a span of five months, Plaintiff has filed six  
24 different Complaints against one of both of the Defendants, here in the District Court for Clark  
25 County, Nevada. Plaintiff has also filed two actions against Charlene O'Neil in the Federal  
26 Court for the District of Nevada. Each Complaint is based on a nonsensical and unsupportable  
27 story contrived by Plaintiff. The Federal Court has entered a judgment in favor of the defendant  
28

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1 in both of Plaintiff's cases. Pursuant to NRCP 56, Defendants request that this Court enter a  
2 judgment in favor of Defendants based on the following: (1) Plaintiff's claims have been  
3 previously considered and rejected by the Federal Court, resulting in two judgments against  
4 Plaintiff—Plaintiff's claims are barred under the doctrine of claim preclusion; (2) Plaintiff has no  
5 admissible evidence to support her stated claims for relief; and (3) Plaintiff's allegations and  
6 facially deficient and without any reasonable basis.

7 Defendants further request this Court initiate procedures to have Plaintiff declared a  
8 vexatious litigant and included on the list of vexatious litigants as provided for in Supreme Court  
9 Rule 9.5. Plaintiff should further be aware that she is subject to pay the attorney's fees she is  
10 causing Defendants to incur should they prevail. Her reckless actions in filing multiple,  
11 redundant cases against the Defendant without any actual claims must not be tolerated.

12 This opposition and counter motion are made and based upon NRCP 56, the attached  
13 Memorandum of Points and Authorities, the Declarations of Charlene O'Neil and Gloria  
14 Mazzoli, and any oral argument the Court wishes to entertain on this matter.  
15

16 DATED this 8<sup>th</sup> day of December, 2020.

17 **KEVIN E. BECK, LTD.**

18  
19 /s/ Kevin E. Beck  
20 Kevin E. Beck, Esq.  
21 Nevada State Bar No. 8371  
22 3137 E. Warm Springs Rd., Suite 100  
23 Las Vegas, Nevada 89120  
24 *Attorney for Defendants*  
25  
26  
27  
28

**MEMORANDUM OF POINTS AND AUTHORITIES**

As an initial matter, it should be noted that Plaintiff failed to properly serve her Motion for Summary Judgment. Counsel for Defendants discovered a motion had been filed when searching the Eighth Judicial District Court Portal. Because Plaintiff failed to properly serve the motion, Defendants were unable to respond to it until this time.

The Court should deny Plaintiff's Motion for Partial Summary Judgment out of hand. Plaintiff has failed to present any admissible evidence in support of her motion. She does not discuss the claims she believes she should prevail upon or present evidence of any of the necessary elements for those claims. While the Complaint and Motion for Summary Judgment are filled with wild allegations, she has failed to present the Court with a single shred of admissible evidence.

It is the Defendants, not the Plaintiff, who are entitled to summary judgment in this matter. There is not a scintilla of truth to the allegations of wrongdoing that Plaintiff has made against the Defendants. Plaintiff is estranged from the Defendants (Plaintiff's mother and the grandmother of her child) and has had no substantive interaction or communications with them for over ten years. Plaintiff has become so preoccupied with manufacturing unfounded allegations against the defendants that the allegations in the Complaint do not square with the allegations in the Motion for Summary Judgment. Defendants have supported this motion with Declarations swearing that they did not engage in the conduct Plaintiff accuses them of doing. It is anticipated that Plaintiff will not be able to present any evidence to contradict Defendant's Declarations.

Moreover, Defendants are entitled to summary judgment in this matter under the doctrine of claim preclusion or res judicata. Earlier this year, Plaintiff filed two different cases in Federal Court against Defendants alleging much of the same fabricated stories she has set forth in this case. Plaintiff could have brought all claims against the Defendants in those actions. The Federal Court entered judgment in favor of Defendants in those actions. Plaintiff has now wrongfully turned her attention to the State Court to try to rehash the same nonsensical

1 claims. The Court should find Plaintiff is precluded from bringing the same claims she  
2 brought, or could have brought, in the prior action.

3 A review of Plaintiff's Complaint and Motion reveals that her allegations are simply  
4 unbelievable, to put it kindly. The Court should enter summary judgment against Plaintiff  
5 based on the frivolous nature of this action.

6 **I. STATEMENT OF FACTS.**

7 **A. PROCEDURAL HISTORY**

8 1. On April 7, 2020 (less than two months before filing the instant action), Plaintiff filed a  
9 Complaint in the United States District Court for the District of Nevada ("Federal Court")  
10 against Charlene O'Neil and Gloria Mazzoli. *See* Case No. 2:20-cv-00652-JAD-BNW (the  
11 "First Federal Case"). A true and correct copy of the Complaint is attached as Exhibit C.

12 2. As with the current case, the Complaint in the First Federal Case contained allegations of  
13 violations of privacy and harassment—Plaintiff's two stated causes of action in this case.

14 3. On August 18, 2020 the Magistrate Judge in the First Federal Case entered an Order and  
15 Report and Recommendation finding Plaintiff's claims to be frivolous in that Plaintiff's  
16 allegations "describe fantastic and delusional scenarios and do not state a claim upon which  
17 relief can be granted." A true and correct copy of the Order and Report and Recommendation is  
18 attached as Exhibit D.

19 4. The Judge adopted the Magistrate's Report and Recommendations and entered a  
20 Judgment in favor of Defendants. A true and correct copy of the Order and Judgment are  
21 attached hereto as Exhibits E and F.

22 5. On June 17, 2020, Plaintiff filed a second case in Federal Court against Charlene O'Neil,  
23 again alleging violations of privacy and harassment. *See* Case No. 2:20-cv-01050-JAD-DJA (the  
24 "Second Federal Case"). A true and correct copy of the Complaint is attached as Exhibit G.

25 6. Similar to the First Federal Case, the Judge in the Second Federal Case dismissed the  
26 case and entered a Judgment in favor of Charlene O'Neil. A true and correct copy of the Order  
27 and Judgment are attached as Exhibits H and I.  
28

1 7. Plaintiff appealed the Judgment in the Second Federal Case to the Ninth Circuit, but the  
2 Ninth Circuit recently dismissed the Notice of Appeal.

3 8. Plaintiff filed this case on May 28, 2020, alleging violations of privacy and harassment,  
4 the same claims she stated in her Federal Court cases.

5 9. Plaintiff has filed five other cases with this Court involving one or both Defendants:

6 a. On September 29, 2020, Plaintiff filed Case No. A-20-822153-C against Charlene  
7 O'Neil;

8 b. On September 29, 2020, Plaintiff filed Case No. A-20-822159-C against Charlene  
9 O'Neil and Gloria Mazzoli;

10 c. On October 6, 2020, Plaintiff filed Case No. A-20-822562-C against Gloria  
11 Mazzoli;

12 d. On October 6, 2020, Plaintiff filed Case No. A-20-822573-C against Gloria  
13 Mazzoli;

14 e. On October 13, 2020, Plaintiff filed Case No. A-20-822965-C against Charlene  
15 O'Neil;

16 f. On the week of November 30, 2020, Plaintiff called counsel for Defendants and  
17 advised she was filing another Complaint against Gloria Mazzoli and inquired if  
18 counsel would accept service of the Complaint.  
19

20 10. The Court may review the Complaints filed in the six actions pending with this Court, but  
21 suffice it to say the Complaints are filled with similar fictitious scenarios and allegations as pled  
22 in this case.

23 11. In under a year, Plaintiff has filed at least eight different cases here in Nevada against  
24 Defendants.

25 **B. RELEVANT FACTS**

26 Plaintiff Aimee O'Neil ("Aimee") is the daughter of Defendant Charlene O'Neil  
27 ("Charlene"). See Exhibit A, Declaration of Charlene O'Neil ("O'Neil Decl."), ¶ 3. Due to  
28 Aimee's erratic thoughts and behaviors, Charlene has not had any recent contact with Aimee.



1 *Id.* at ¶ 4. Charlene believes that she has not seen Aimee for over ten years. *Id.* at ¶ 5.  
2 Similarly, Charlene has not had any conversations with Aimee in over ten years. *Id.* at ¶ 6.  
3 Aimee has sent a large amount of mail to Charlene, but Charlene does not respond to the  
4 correspondence, and sometimes does not even open the letters. *Id.* at ¶ 7. Charlene has  
5 intentionally distanced herself from Aimee over the past decade because interactions between  
6 the two of them have historically been difficult on Charlene. *Id.* at ¶ 8.

7 Defendant Gloria Mazzoli (“Gloria”) is the mother of Aimee’s former long-term  
8 boyfriend, John Mazzoli. John and Aimee have a child together. *See* Exhibit B, Declaration of  
9 Gloria Mazzoli (“Mazzoli Decl.”), ¶ 3. Due to Aimee’s erratic thoughts and behaviors and the  
10 fact that Aimee is no longer in a relationship with Gloria’s son, Gloria has not had any recent,  
11 meaningful contact with Aimee. *Id.* at ¶ 4. Gloria has not seen Aimee in over ten years. *Id.* at  
12 ¶ 5. Aside from two short phone calls (one in March of this year and another in 2017), Gloria  
13 has not had any conversations with Aimee for over ten years. *Id.* at ¶ 6. In the March phone  
14 call, Aimee made some wild accusations against Gloria and Gloria promptly ended the  
15 conversation. In the 2017 conversation, Aimee was talking with Gloria about Aimee’s children.  
16 *Id.* at ¶ 7. Although Aimee has sent a large amount of mail to Gloria, Gloria does not respond  
17 to Aimee’s correspondence. *Id.* at ¶ 8.

18 **FACTS THAT SUPPORT SUMMARY JUDGMENT IN FAVOR OF DEFENDANTS**  
19 **AND PRECLUDE SUMMARY JUDGMENT IN FAVOR OF PLAINTIFF.**

20 The following facts simultaneously support Defendants’ Countermotion for Summary  
21 Judgment and refute Plaintiff’s request for summary judgment:

22 **Facts Regarding Plaintiff’s Complaint in this Matter**

23 1. Neither Defendant has directly harassed, stalked, intimidated, intruded, or caused any  
24 harm or emotional distress to Aimee. *See* O’Neil Decl., ¶ 9; *see* Mazzoli Decl., ¶ 9. Aimee has  
25 failed to provide any admissible evidence to the contrary and she bears the burden of proof on  
26 this issue.

27 2. Neither Defendant has hired or requested that any third party harass, stalk, intimidate,  
28 intrude, or cause any harm or emotional distress to Aimee. *See* O’Neil Decl., ¶ 10; *see* Mazzoli

Decl., ¶ 10. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

3. Neither Defendant has placed or caused to be placed an “RFID chip” or any other device in Aimee’s leg and neither Defendant is tracking, or has tracked, Aimee’s location. *See* O’Neil Decl., ¶ 11; *see* Mazzoli Decl., ¶ 11. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

4. Neither Defendant sent “second party people to FedEx on Paradise at 8:45 a.m. to harass, intimidate, [or] embarrass” Aimee. *See* O’Neil Decl., ¶ 12; *see* Mazzoli Decl., ¶ 12. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

5. Neither Defendant has received or revealed confidential conversations Aimee has had with her fiancé, Mark Morrison, at any time. *See* O’Neil Decl., ¶ 13; *see* Mazzoli Decl., ¶ 13. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

6. Neither Defendant has hired or requested any third party to sexually harass Aimee, at any time. *See* O’Neil Decl., ¶ 14; *see* Mazzoli Decl., ¶ 14. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

7. Neither Defendant has hired or requested any third party to block Aimee’s access to the U.S. District Courthouse, at any time. *See* O’Neil Decl., ¶ 15; *see* Mazzoli Decl., ¶ 15. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

8. Neither Defendant has caused any damages to Aimee. *See* O’Neil Decl., ¶ 16; *see* Mazzoli Decl., ¶ 16. Aimee has failed to provide any admissible evidence of her claimed damages and she bears the burden of proof on this issue.

**Facts Regarding Plaintiff’s Motion for Summary Judgment**

1 9. Neither Defendant has threatened that they would destroy Aimee's life, at any time. *See*  
2 O'Neil Decl., ¶ 17; *see* Mazzoli Decl., ¶ 17. Aimee has failed to provide any admissible  
3 evidence to the contrary and she bears the burden of proof on this issue.

4 10. Neither Defendant has taken any actions to interfere with Aimee's current or prior  
5 employment or "tip and hourly wage earnings." *See* O'Neil Decl., ¶ 18; *see* Mazzoli Decl., ¶ 18.  
6 Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of  
7 proof on this issue.

8 11. Neither Defendant has sought or received any of Aimee's private medical records within  
9 the past ten years. Charlene may have received medical records for Aimee when she was a  
10 minor child. *See* O'Neil Decl., ¶ 19; *see* Mazzoli Decl., ¶ 19. Aimee has failed to provide any  
11 admissible evidence to the contrary and she bears the burden of proof on this issue.

12 12. Neither Defendant has placed or caused to be placed any metals or devices in Aimee's  
13 neck or anywhere else in Aimee's body. *See* O'Neil Decl., ¶ 20; *see* Mazzoli Decl., ¶ 20. Aimee  
14 has failed to provide any admissible evidence to the contrary and she bears the burden of proof  
15 on this issue.

16 13. Neither Defendant has caused (neither directly nor through a third party) any other person  
17 to ingest Ryphenol or any other substance that would cause the individual to lose consciousness.  
18 *See* O'Neil Decl., ¶ 21; *see* Mazzoli Decl., ¶ 21. Aimee has failed to provide any admissible  
19 evidence to the contrary and she bears the burden of proof on this issue.

20 14. Neither Defendant has blocked Aimee from getting insurance or any medical services, at  
21 any time. *See* O'Neil Decl., ¶ 22; *see* Mazzoli Decl., ¶ 22. Aimee has failed to provide any  
22 admissible evidence to the contrary and she bears the burden of proof on this issue.

23 15. Neither Defendant has manufactured or conspired with others to manufacture a  
24 transmitter, at any time. *See* O'Neil Decl., ¶ 23; *see* Mazzoli Decl., ¶ 23. Aimee has failed to  
25 provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

26 16. Neither Defendant has paid any person, including Paul Janes, to drug Aimee and drive  
27 recklessly with Aimee in his car and then flee to Virginia after an accident. *See* O'Neil Decl.,  
28

¶ 24; *see* Mazzoli Decl., ¶ 24. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

17. Neither Defendant has obstructed justice as it relates to Paul Janes or Aimee. *See* O’Neil Decl., ¶ 25; *see* Mazzoli Decl., ¶ 25. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

18. Neither Defendant have worked to interfere with any of Aimee’s fundamental rights. *See* O’Neil Decl., ¶ 26; *see* Mazzoli Decl., ¶ 26. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

19. Neither Defendant has attempted (neither directly nor through a third party) to have Aimee run over with a motor vehicle. *See* O’Neil Decl., ¶ 27; *see* Mazzoli Decl., ¶ 27. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

20. Neither Defendant has caused any of the damages alleged in Aimee’s Motion for Summary Judgment and Aimee has not provided any proof of damages. *See* O’Neil Decl., ¶ 28; *see* Mazzoli Decl., ¶ 28. Aimee has failed to provide any admissible evidence to the contrary and she bears the burden of proof on this issue.

## II. LEGAL ARGUMENT

Aimee’s Motion for Summary Judgment must be denied. “Summary judgment is appropriate ...when the pleadings and other evidence on file demonstrate that no ‘genuine issue as to any material fact exists and that the moving party is entitled to a judgment as a matter of law.’” *Wood v. Safeway, Inc.*, 121 Nev. 724, 731, 121 P.3d 1026, 1031 (2005). “A factual dispute is genuine when the evidence is such that a rational trier of fact could return a verdict for the nonmoving party.” *Id.* at 731, 121 P.3d at 1031. “[T]rial courts should exercise great care in granting summary judgment.” *Copeland v. Desert Inn Hotel*, 99 Nev. 823, 826, 673 P.2d 490, 492 (1983). “[W]hen reviewing a motion for summary judgment, the evidence, and any reasonable inferences drawn from it, must be viewed in a light most favorable to the nonmoving party.” *Wood*, 121 P.3d at 1029.

1 Here, viewed in the light most favorable to the Defendants, there are ample genuine  
2 disputes as to material facts precluding an award of summary judgment in favor of Aimee.

3 On the other hand, the Court should grant summary judgment in favor of Defendants on  
4 each of Aimee's claims. Aimee has failed to present and cannot present any admissible  
5 evidence of the fictitious, delusional allegations she has made. Moreover, Aimee's claims are  
6 barred by the doctrine of claim preclusion based on the fact that her claims were raised or  
7 could have been raised in either of the Federal Court actions that have been previously  
8 dismissed by the Court with Judgment entered in favor of Defendants.

9 **A. AIMEE'S MOTION FOR SUMMARY JUDGMENT MUST BE DENIED.**

10 The Court should properly deny Aimee's Motion for Summary Judgment. Aimee has  
11 failed to comply with NRCP 56. Although Aimee claims that the facts of her claims are not in  
12 dispute, a review of the Defendants declarations reveals that nearly every allegation that Aimee  
13 has made, and all allegations of wrongdoing on part of the Defendants, are disputed by  
14 Defendants. Aimee has completely failed to support her factual positions, as required under  
15 NRCP 56(c)(1). As a moving party, Aimee cannot simply make wild allegations in her motion,  
16 she "must support the assertion" by citing to admissible evidence. *See* NRCP 56(c)(1). Here,  
17 Aimee has failed to do so. She has not cited to any materials in the record, depositions,  
18 documents, affidavits, declarations, stipulations, admissions, interrogatory answers or any other  
19 evidence in her motion.

20 Moreover, Aimee cannot prevail because there are genuine disputes as to the material  
21 facts of Aimee's claims. While the allegations in her Complaint are different from those in the  
22 Motion for Summary Judgment, it appears Aimee is claiming violation of privacy and  
23 harassment as her claims for relief in her Complaint. Through their Declarations, Charlene and  
24 Gloria have disputed all of the allegations that are material to either of those claims for relief.  
25 As such facts are in dispute, the Court must deny Aimee's motion.

26 ///

27 ///

28 ///

**B. THE COURT SHOULD GRANT DEFENDANTS SUMMARY JUDGMENT  
ON EACH OF AIMEE'S CLAIMS FOR RELIEF.**

**1. Aimee's Claims are Barred Under the Doctrine of Claim Preclusion.**

The Defendants are entitled to judgment as a matter of law because Aimee's claims are barred under the doctrine of claim preclusion. The Nevada Supreme Court has held that claim preclusion is appropriately applied when "(1) the same parties or their privies are involved in both cases, (2) a valid final judgment has been entered, and (3) the subsequent action is based on the same claims or any part of them that were or could have been brought in the first case." *Alcantara ex rel. Alcantara v. Wal-Mart Stores, Inc.*, 130 Nev. 252, 257, 321 P.3d 912, 915 (2014). The issue of whether claim preclusion applies is a question of law. *G.C. Wallace, Inc. v. Eighth Judicial Dist. Court*, 127 Nev. 701, 705, 262 P.3d. 1135, 1137 (2011).

In this case, all of the elements of claim preclusion are present. On April 7, 2020, less than two months before filing this action, Aimee filed the First Federal Case (Case No. 2:20-cv-00652-JAD-BNW) with the United States District Court for the District of Nevada. The First Federal Case involved the same parties as are present in this case: Aimee, Charlene, and Gloria. The Court in the First Federal Case entered a valid final judgment on September 16, 2020 in favor of Defendants. That judgment is included as Exhibit F. More than 30 days have elapsed since the entry of the Judgment in the First Federal Case and no appeal has been filed. Accordingly, there is a final Judgment in that case that has been entered. Third, it is clear that the claims that Aimee has raised in this case were raised, or could have been raised, in the First Federal Case. Aimee complained of harassment and privacy violations in both cases. Moreover, because this case was filed less than two months after the First Federal Case, Aimee could have brought the claims she brought here in the First Federal Case. Aimee does not allege that this case is based on conduct that occurred in the two months between the filing of the First Federal Case and this action. Aimee's claims are precluded and must be dismissed.

The policy behind claim preclusion is to prevent the relitigation of claims and applies perfectly to this situation. In this year, Aimee has filed eight separate actions and intends to file more. The Court should not condone Aimee's repetitive attempts to relitigate the case or to

sneak a ruling or judgment past the Defendants by filing multiple actions on fictitious claims. Defendants urge the Court to find that Aimee is a vexatious litigant.

**2. Aimee's Claims Must be Dismissed for Lack of Evidence.**

Pursuant to NRCP 56(c)(1)(b) and (e), Defendants request summary judgment in their favor because Aimee has not, and cannot, present the Court with evidence of the material facts she alleged in her Complaint and Motion for Summary Judgment to establish her claims. As noted above, Aimee presented her motion without any supporting evidence as required under NRCP 56. Defendants have denied all of the relevant allegations of wrongdoing that Aimee has stated. Now in addition to denying such allegations, Defendants affirmatively state that Aimee has no admissible evidence to support her claims and request that the Court enter judgment in their favor.

NRCP 56(c)(1)(b) allows a defendant to show the absence of a material issue of fact by pointing to the fact that an adverse party cannot produce admissible evidence to support a fact. Aimee has made fantastic allegations, but the fact is that she has no admissible evidence to support those allegations.

Plaintiff lacks admissible evidence to support her claim for privacy violations as alleged in her Complaint. The Nevada Supreme Court explained there are four species of privacy torts: (1) unreasonable intrusion on the seclusion of another; (2) intrusion upon the name or likeness of another; (3) unreasonable publicity given to private facts; and (4) publicly unreasonably placing another in false light before the public. *PETA v. Bobby Berosini, Ltd.*, 111 Nev. 615, 895 P.2d 1269 (1995). While it is unclear which species Plaintiff has alleged, Defendants have flatly denied any and all potential invasion of Aimee's privacy in their Declarations. Unless Plaintiff can provide actual, admissible evidence to support her claim, the Court should enter judgment in favor of Defendants.

Similarly, the Court should dismiss Aimee's claim for harassment. Defendants have categorically denied they have taken any actions to harass Aimee in their Declarations. Aimee has produced no admissible evidence to the contrary. Unless she is able to produce admissible evidence in response to this motion, the Court should enter judgment in favor of Defendants.

1 **III. CONCLUSION**

2 Based on the foregoing, Defendants request that Aimee's Motion for Summary Judgment  
3 be denied, and that Defendants be granted summary judgment on each of Plaintiff's claims.

4 DATED this 8<sup>th</sup> day of December, 2020.

5 **KEVIN E. BECK, LTD.**

6  
7 /s/ Kevin E. Beck

8 Kevin E. Beck, Esq.

9 Nevada State Bar No. 8371

10 3137 E. Warm Springs Rd., Suite 100

11 Las Vegas, Nevada 89120

12 *Attorney for Defendants*

13 **CERTIFICATE OF SERVICE**

14  
15 I hereby certify that on this 8th day of December, 2020, a true and correct copy of the  
16 foregoing *DEFENDANT'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT AND*  
17 *COUNTERMOTION FOR SUMMARY JUDGMENT* was sent via electronic means in the Eighth  
18 Judicial District Court pursuant to Administrative Order 14-2 and by U.S. Mail, first class  
19 postage prepaid, to the following at their last known address:  
20

21  
22 Aimee O'Neil  
23 9717 Sandmist Ave.  
24 Las Vegas, NV 89134

25 /s/ Kevin E. Beck

26 An Employee of Kevin E. Beck, Ltd.  
27  
28



# **EXHIBIT A**

# **EXHIBIT A**

**DECLARATION OF CHARLENE O'NEIL**

STATE OF FLORIDA        )  
                                      ) ss:  
COUNTY OF PINELLAS    )

Charlene O'Neil, being first duly sworn, deposes and states as follows:

1. I am a defendant in the matter of Aimee O'Neil v. Charlene O'Neil and Gloria Mazzoli. I have personal knowledge of the statements made herein, except as to those made on information and belief, and as to those statements, I believe them to be true. I am competent to testify thereto if called.

2. I make this declaration in support of Defendants' Opposition to Motion for Summary Judgment and Countermotion for Summary Judgment. The factual averments stated within that document are true of my own knowledge, except for those matters therein stated on information and belief, and as to those matters, I believe the same to be true.

3. Plaintiff Aimee O'Neil ("Aimee") is my daughter.

4. Due to Aimee's erratic thoughts and behaviors, I have not had any recent contact with Aimee.

5. I believe that I have not seen Aimee for over ten years.

6. I have not had any conversations with Aimee in over ten years.

7. Aimee has sent a large amount of mail to me, but I do not respond to the correspondence, and sometimes do not even open the letters.

8. I have intentionally distanced myself from Aimee over the past decade because interactions between the two of us have historically been difficult on me.

9. I have not directly harassed, stalked, intimidated, intruded, or caused any harm or emotional distress to Aimee.

10. I have not hired or requested that any third party harass, stalk, intimidate, intrude, or cause any harm or emotional distress to Aimee.

11. I have not placed, or caused to be placed, an "RFID chip" or any other device in Aimee's leg and I am not tracking, and have not tracked, Aimee's location.

1           12.       I have not sent "second party people to FedEx on Paradise at 8:45 a.m. to  
2 harass, intimidate, [or] embarrass" Aimee.

3           13.       I have not received or revealed confidential conversations Aimee has had with  
4 her fiancé, Mark Morrison, at any time.

5           14.       I have not hired or requested any third party to sexually harass Aimee, at any  
6 time.

7           15.       I have not hired or requested any third party to block Aimee's access to the  
8 U.S. District Courthouse, at any time.

9           16.       I have not caused any damages to Aimee.

10          17.       I have not threatened that I would destroy Aimee's life, at any time.

11          18.       I have not taken any actions to interfere with Aimee's current or prior  
12 employment or "tip and hourly wage earnings."

13          19.       I have not sought or received any of Aimee's private medical records within at  
14 least the past ten years. I may have received medical records for Aimee when she was a minor  
15 child, but nothing since she became an adult.

16          20.       I have not placed, or caused to be placed, any metals or devices in Aimee's  
17 neck or anywhere else in Aimee's body.

18          21.       I have not caused (neither directly nor through a third party) any other person,  
19 including Aimee, to ingest Ryphenol or any other substance that would cause the individual  
20 to lose consciousness.

21          22.       I have not blocked Aimee from getting insurance or any medical services, at  
22 any time.

23          23.       I have not manufactured or conspired with others to manufacture a transmitter,  
24 at any time.

25          24.       I have not paid any person, including Paul Janes, to drug Aimee and drive  
26 recklessly with Aimee in his car and then flee to Virginia after an accident.

27          25.       I have not obstructed justice as it relates to Paul Janes or Aimee.

28          26.       I have not worked to interfere with any of Aimee's fundamental rights.

**KEVIN E. BECK, LTD.**  
3137 E. WARM SPRINGS RD., STE. 100  
LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-8983

1           27.       I have not attempted (neither directly nor through a third party) to have Aimee  
2 run over with a motor vehicle.

3           28.       I have not caused any of the damages alleged in Aimee's Motion for Summary  
4 Judgment and Aimee has not provided any proof of damages.

5           29.       I declare the foregoing to be true under penalty of perjury under the laws of the  
6 State of Nevada.

/s/ Charlene O'Neil  
Charlene O'Neil

# **EXHIBIT B**

# **EXHIBIT B**

**DECLARATION OF GLORIA MAZZOLI**

STATE OF NEW YORK     )  
  ) ss:  
COUNTY OF OSWEGO     )

Gloria Mazzoli, being first duly sworn, deposes and states as follows:

1. I am a defendant in the matter of Aimee O'Neil v. Charlene O'Neil and Gloria Mazzoli. I have personal knowledge of the statements made herein, except as to those made on information and belief, and as to those statements, I believe them to be true. I am competent to testify thereto if called.

2. I make this declaration in support of Defendants' Opposition to Motion for Summary Judgment and Countermotion for Summary Judgment. The factual averments stated within that document are true of my own knowledge, except for those matters therein stated on information and belief, and as to those matters, I believe the same to be true.

3. Plaintiff Aimee O'Neil ("Aimee") was in a long-term relationship (and had a child) with my son, John Mazzoli.

4. Due to Aimee's erratic thoughts and behaviors and the fact that Aimee is no longer in a relationship with my son, I have not had any recent, meaningful contact with Aimee.

5. I have not seen Aimee in over ten years.

6. Aside from two brief phone calls (one in March of this year and one in 2017), I have not had any conversations with Aimee for over ten years.

7. In the March phone call, Aimee made some wild accusations against me and I promptly ended the conversation. In the 2017 call, Aimee was talking to me about Aimee's children.

8. Although Aimee has sent a large amount of mail to me, I do not respond to Aimee's correspondence.

9. I have not directly harassed, stalked, intimidated, intruded, or caused any harm or emotional distress to Aimee.

1           10.       I have not hired or requested that any third party harass, stalk, intimidate,  
2 intrude, or cause any harm or emotional distress to Aimee.

3           11.       I have not placed, or caused to be placed, an "RFID chip" or any other device  
4 in Aimee's leg and I am not tracking, and have not tracked, Aimee's location.

5           12.       I have not sent "second party people to FedEx on Paradise at 8:45 a.m. to  
6 harass, intimidate, [or] embarrass" Aimee.

7           13.       I have not received or revealed confidential conversations Aimee has had with  
8 her fiancé, Mark Morrison, at any time.

9           14.       I have not hired or requested any third party to sexually harass Aimee, at any  
10 time.

11           15.       I have not hired or requested any third party to block Aimee's access to the  
12 U.S. District Courthouse, at any time.

13           16.       I have not caused any damages to Aimee.

14           17.       I have not threatened that I would destroy Aimee's life, at any time.

15           18.       I have not taken any actions to interfere with Aimee's current or prior  
16 employment or "tip and hourly wage earnings."

17           19.       I have not sought or received any of Aimee's private medical records, at any  
18 time.

19           20.       I have not placed, or caused to be placed ,any metals or devices in Aimee's  
20 neck or anywhere else in Aimee's body.

21           21.       I have not caused (neither directly nor through a third party) any other person,  
22 including Aimee, to ingest Ryphenol or any other substance that would cause the individual  
23 to lose consciousness.

24           22.       I have not blocked Aimee from getting insurance or any medical services, at  
25 any time.

26           23.       I have not manufactured or conspired with others to manufacture a transmitter,  
27 at any time.

28

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LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900 FACSIMILE: (702) 2

24. I have not paid any person, including Paul Janes, to drug Aimee and drive recklessly with Aimee in his car and then flee to Virginia after an accident.

25. I have not obstructed justice as it relates to Paul Janes or Aimee.

26. I have not worked to interfere with any of Aimee's fundamental rights.

27. I have not attempted (neither directly nor through a third party) to have Aimee run over with a motor vehicle.

28. I have not caused any of the damages alleged in Aimee's Motion for Summary Judgment and Aimee has not provided any proof of damages.

29. I declare the foregoing to be true under penalty of perjury under the laws of the State of Nevada.

/s/ Gloria Mazzoli  
Gloria Mazzoli



# **EXHIBIT C**

# **EXHIBIT C**

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT  
for the  
Las Vegas District of Nevada  
Division

FILED ENTERED	RECEIVED SERVED ON
COUNSEL/PARTIES OF RECORD	
APR - 7 2020	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

Aimee O'Neil

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Charlene O'Neil

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Gloria Mazzoli

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

2:20-cv-00652-JAD-BNW

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Aimee O'Neil  
6500 W. Charleston Blvd.  
#268 Las Vegas Clark  
Nevada 89146  
702-302-0481  
whereintheworldis aimee  
@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Charlene O'Neil  
1317 White Bridge Dr Apt 0  
Palm Harbor Pinellas  
Florida 34684

Defendant No. 2

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Gloria Mazzoli  
119 E. Utica St.  
Oswego, Oswego  
New York 13126  
315-343-1782

Defendant No. 3

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Defendant No. 4

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) Aimee O. Neil, is a citizen of the  
State of (name) Nevada.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, (name) Charlene O. Neil, is a citizen of  
the State of (name) Florida. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

2. Defendants

Gloria Mazzoli,  
State of NY

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The defendant, has acted in a manner causing loss of profits \$1,000,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- ① Conspiring against Rights
- ② Charlene O'Neil and Gloria Mazzoli lost Profits - Charlene O'Neil and Gloria Mazzoli from 10/31/19 present Sports Station Loveland, Colorado.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The plaintiff, Aimee O'Neils requests that these defendants stop all behavior. Harassment, targeting, Actual, punitive and Exemplary damages in the amount of \$1,000,000

### III. Statement of Claim

Grand Z Casino - Central City Colorado. Defendants Charlene O'Neil and Gloria Mazzoli conspired together out of hate, jealousy and revenge, interfering with employment, tip wages, profit on a daily basis. From 10/31/19 to present.

Amano's Pizza harassment, intimidation, revenge

③ Hate - intentional tort

④ The Right to Privacy  
4th Amendment - Gloria Mazzoli and Charlene O'Neil

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

4/6/20

Signature of Plaintiff

Printed Name of Plaintiff

Aimee O. Neil  
Aimee O. Neil

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address



## Relief

Compensatory and Punitive Damages. The defendants conduct was so grossly negligent and intentional that it is intended to serve as a punishment to deter others from doing this.

Compensatory damages  
\$500,000.

Punitive damages in  
the amount of \$500,000

C. Charlene O'Neil picked Paul

Janes up at the preplanned crime scene and drove Paul Janes to the State of Virginia to avoid prosecution. NYS Grand Jury Indictment 94-126.

Most recently Charlene O'Neil plotted across the United States, Charlene in Florida, plotting to have 100% physically disabled Aimee O'Neil to be threatened at Aimee's job, Sports Station, Loveland Co. Charlene influenced Angie Richardson to threaten to kill disabled Aimee O'Neil and say your mother wants you beaten. Aimee O'Neil was forced to stop working and go into hiding all over the city of Denver.

It is alleged and realleged that Charlene O'Neil has Aimee's cell phone illegally tapped. Charlene has Aimee followed and harassed from Colorado to Nevada still conspiring to harm Aimee.

It is alleged that Charlene has influenced 19 employers in 14 months against Aimee to harass her, discriminate, sexually harass, stalk, menace, intimidate.

The deprivation of any rights protected by the United States Constitution hold any party shall be liable to the party injured in an action at law in equity and or other such relief at the proper proceeding for redress.

The actions Charlene O'Neil has caused the plaintiff Aimee O'Neil to suffer beyond actual damages. Aimee is now permanently disabled from the case with Paul Jones where Charlene O'Neil conspired to kill Aimee and left her disabled. Aimee has suffered intentional infliction of emotional distress the intrusion of solitude.

Charlene O'Neil on or about the end of November 2019 had Aimee O'Neil, a physically disabled individual threatened to be killed while Aimee, an at will disabled worker worked a full time job as a server at the Sports Station

Loveland Colorado. For months the plaintiff Aimee O'Neil was tortured and terrorized by the exploitation of Aimee's text messages to long time fiance Mark Morrison. As Charlene O'Neil allegedly intercepted these text messages and repeated them to customers and co workers to torment and terrorize Aimee on a daily basis. Until Angie Richardson a coworker of Aimee O'Neils at the Sports Station in Loveland, Colorado told Aimee to get off the property or she was going to brutally kill her, that Charlene O'Neil wanted this done to Aimee. Angie Richardson said that Charlene O'Neil said Aimee was a handicapped, retarded idiot who couldn't serve food and her mother Charlene

IV

O'Neil wanted her beaten, abused, and raped. Aimee was in immediate fear of her life and was unsure what to do. Aimee O'Neil had retained Mr. Leigh Hunt, the retired head of the New York State Police to investigate these allegations. Mr. Hunt concluded that Charlene O'Neil did this out of "Hate" for her daughter Aimee and out of jealousy as Aimee has successfully graduated from college with honors and now has a Casino job.

Aimee O'Neil was under the supervision of the Colorado State Department of Parole at the time.

V.

Mr. Leigh Hunt contacted the Colorado State Dept. of Parole, Mr. Taylor Isham and said, I think Aimee is in trouble and needs your help. Mr. Hunt also contacted Mark Morrison as the situation and the direct threats of bodily harm directly against Aimee's life compromised not just Aimee but the Public Accommodation where Aimee was employed. Aimee's roommate Karissa Ernest was Angie Richardson's best friend and Charlene O'Neil had the females gang up on disabled Aimee to conspire once again.

Karissa Ernest on 11/21/19 told Aimee that she needed to sue Charlene

O'Neil because Charlene O'Neil had Aimee's cell phone tapped and was directly intercepting Aimee's text messages to Mark Morrison because Charlene O'Neil was jealous of Aimee's relationship with Mark Morrison and told these females that she was going to do everything in her power possible to split Aimee + Mark up because she was so jealous, as also concluded by Mr. Hunt.

Charlene had these females threaten, exploit, harass, intimidate Aimee 7 days a week at home and at work as Aimee would call Mark Morrison

VII

crying daily saying  
Mark they are repeating  
our text messages at work  
and harassing me with them.

Mr. Taylor Isham, from the  
Colorado Department of Parole  
deemed this situation as  
a immediate threat to Aimee's  
life and made Aimee quit  
this job and pack all her  
possessions and go into  
hiding in the city of Denver.

Aimee packed all her possessions  
and had a emergency parole  
meeting to discuss a safety  
plan. Aimee was mandated  
not to disclose ~~her~~ whereabouts  
with anyone except Mr. Hunt  
or Morrison. Aimee bounced  
around Air Bnb's from night  
to night and got a serving  
job at the Grand Z casino  
in Central City Colorado in



VII

which Aimee tried to stay employed working sometimes 90 hours a week as a disabled worker, and Charlene O'Neil, using a second party person, a customer returned saying, "You cannot hide from me, I am going to find you," "I am going to make sure you lose this job, this time you bitch." Aimee was successful. She was head Server making \$2500 a week and staying at the casino and Charlene O'Neil, jealous, refused to stop stalking Aimee and using customers to harass, intimidate, interfere with Aimee's job. Charlene began using male customers to sexually harass Aimee. On 12/6/19 a man refused to leave sexually harassing

Saying her mother doesn't want her marrying Mark Morrison and I am here to take care of this. Charlene is so mentally obsessed with Aimee's relationship with Morrison she began using tactics of sexual harassment on Aimee daily.

On 12/7/19 a strange man entered a private room where Aimee was alone rolling silverware, and began sexually harassing Aimee. On 12/8/19 until 12/19/19 12 of Aimee's serving books were stolen off Aimee's tables by customers. Security had to be alerted and the police each time Charlene O'Neil attempted to use customers to get Aimee fired. Charlene went to great lengths to harass, embarrass, intimidate and

X.

Police were called daily. Parole was called daily. Mark Morrison was called daily. Mr. Hunt was called daily. Aimee was once again in fear for her life and safety as jealous Charlene attempted to harass. Aimee once again by stealing customer books, having customers walk out without paying, not tip Aimee for Exceptional service or treat. Aimee really bad by intimidating, sexually harassing and using coworkers to be mean to Aimee. and harass Aimee to get Aimee out of that job. Because Aimee became so successful grossing \$2500.00 a week that Charlene kept plotting. On the 12<sup>th</sup> day of January 2020 in the personell elevator immediately after Aimee clocked in for work to open the entire restaurant

XI

at 5:50 am an unidentified male who we now know later as Jerimiah or Isaiah said to Aimee, I know you are leaving for Las Vegas soon but I am going to take you out and attempted to grab disabled Aimee, two weeks after Charlene threatened she was going to make sure Aimee lost this job. Aimee dropped to the ground of the elevator screaming and ran to the cage of the casino to contact the MOD and law enforcement. Aimee was once again in fear for her life and safety and expressed she wanted to resign immediately. Management and security caught assailant and were once again concerned that Charlene O'Neil was influencing coworkers and customers to harass, assault, intimidate, threaten and scare Aimee causing her

XII.

great emotional distress. Aimee was not in a financial position to resign and was not sure what to do. On 1/13/20 an unidentified female chased Aimee through the Grand Z casino Parking lot screaming, Are you going back to Las Vegas? Aimee contacted the police and security once again knowing Charlene O'Neil was having her followed.

Aimee O'Neil alleges that on 12/20/19 Charlene O'Neil had Aimee followed to Kohl's in Denver having Aimee publically harassed and embarrassed.

On 12/21/19 Aimee was ordered by Parole to obtain a restraining order on Charlene O'Neil. Aimee alleges that she was followed to the courthouse by an unidentified female and when she

XIII

returned home from court a strange man was in Aimee's driveway sexually harassing Aimee immediately after Aimee obtained a restraining order against Charlene O'Neil. Parole became concerned again. Parole made Aimee write Charlene a letter making it clear that Charlene O'Neil was directly interfering with the Colorado Dept. of Parole's conditions and she needed to stop harassing, intimidating, and scaring Aimee. Parole made it clear that they approved of the relationship between Aimee and Mark Morrison and Charlene O'Neil needed to stop interfering in her daughter's personal life. Charlene refused.

On or about the 21<sup>st</sup> day of January 2020 Mr. Taylor Asham from the Colorado Dept. of Parole contacted Aimee saying the Parole board granted Aimee an early release from parole and she could leave and return home to Nevada. With what little money Aimee had she packed her immediately and drove to Las Vegas in hopes that this would stay in Colorado. It did not. Aimee got a job immediately with Golden Entertainment as a Casino Cafe Server and a second part time job. At this time it became apparent that Charlene O'Neil was once again having Aimee followed, harassed, threatened and intimidated. On March 14, 2020 at Amano's pizza, Aimee's part time job, a man later identified as Shane said, "You are not going to marry Mark Morrison I am going to take you out!"

XVII.

Aimee contacted the EEOC immediately. On Sunday March 29<sup>th</sup> 2020 an unidentified male entered the restaurant saying, "You cannot hide from me, I am going to find you." Aimee became terrified once again. The owner Jeff came in at 9:00pm and said to Aimee I heard you had a "rough life" and laughed at Aimee. Aimee once again contacted the EEOC reporting Charlene was once again harassing Aimee harassed because she has Aimee's phone tapped and nobody knows where Aimee works.

The 4<sup>th</sup> Amendment to the United States Constitution guarantees the right to be left alone. Under the Civil Rights Act of 1871 a person who deprives one of a federal right can be sued for intrusion.



The intrusion of solitude is obvious. Appropriating Aimee's name by sharing private personal text messages to customers and coworkers is intentional as is Public disclosure of information as well as portraying Aimee as a handicapped individual who could not serve. It is obvious and apparent that the intentional interference of relationships is overwhelming. The intentional interference with the plaintiffs interest in solitude or seclusion on either her person or private affairs *Uranga v. Federated Pubs Inc.* One who intentionally intrudes upon Jackson v. Playboy 574 F Supp 10 (SD Ohio 1983) The interest of independence in making certain types of important decisions are Aimee's choices, not Charles's.

Intentionally targeting someone else with behavior meant to alarm, annoy, torment or terrorize using or influencing other actors to deliberately and intentionally annoy, alarm, and stalk where my reasonable fear has constituted a federal crime.

Wiretapping is a serious offense. Capturing another's telecommunications or oral conversations is illegal. We can correlate the motive as "HATE", Inspiring specific feelings of vulnerability of what the next hate crime against Annee was going to be affects the community as a whole. Hate crimes are acts that involve a bias against another by assault, bullying, harassment, verbal abuse and threats. It is obvious Charlene O'Neil has acted in a manner of hate against her daughter

XX

Aimee O'Neil by calling Aimee a "handicapped retard" while at her job. Intimidating. The company employed people to follow him around and conduct surveillance on his activities. The court found Gm committed an intrusion into seclusion when agents of a corporation spied on him because the conduct was designed to elicit info which was not available through normal inquiry. *Nadar v General Motors*. When an individual unlawfully intrudes into one's private affairs disclosing private information to the public, they clearly demonstrate a violation of the 4th Amendment. The unwarranted appropriation of exploitation of one's personality, publicizing private affairs with the public who has no legitimate concern whether I am marrying Mark Morrison or not is no one's business. It is such an outrage causing mental anguish, shame and humiliation to an ordinary person. *Hogin v Cottingham* 533 So 2d 525 (Ala 1988) Not only did Charlene O'Neil threaten to interfere with Aimee's employers, parole, relationships

Supervisors, customers, coworkers, roommates, landlords but she did this deliberately, intentionally and willfully in such a manner that she has isolated from society. Aimee has no friends. Aimee cannot have a social media account. Charlene has influenced Aimee's children against her. When one threatens to use force and intimidation to willfully interfere with a person's place of employment, a Public Accommodation and housing, 18 USC 247 we conclude Charlene's motive is hate. Charlene has conspired against Aimee's rights to injure, threaten and intimidate a person to enjoy any right secured to them or privilege to him/her by the Constitution; violates their civil rights. Charlene has caused economic injury. Charlene has obstructed justice by interfering with parole and preventing a state officer to perform in the official capacity of their duties.

Charlene obstructed Justice when she paid Paul Janes to drug her daughter, put her in her car and drive at a rate of Speed of over 140 mph to deliberately Kill Anne. Charlene drove the getaway car from the scene and took Janes to Virginia while he was wanted for the vehicular manslaughter of her daughter Anne O'Neil.

Your honor Charlene refuses to stop. When conduct is so overwhelming and perpetrated with hate one must wonder what is just punishment and relief. Charlene O'Neil's actions are so outrageous and extreme the courts can award treble damages to punish the defendant. Her intent was malicious. The intentional infliction of emotional distress is alarming. Charlene calculated a plan to cause Anne emotional harm. 46 cmtd (1965)

Your honor, Charlene has crossed every boundary known. She has done this in a manner of hate, jealousy, and revenge. Charlene has influenced every single person around Aimee to abuse her because Charlene O'Neil hates Aimee so much that she wants to torture her, terrorize her, humiliate her, and she refuses to stop. Intentional infliction of emotional distress is when a defendant acts recklessly and the conduct is extreme and outrageous Hyatt 943 SW2d @ 297.

Charlene was maliciously and intentionally calculating a plan to cause not only physical harm, economic harm, psychological harm but to terrorize her because it is believed that Charlene is so jealous and hateful of Aimee because she was forced to raise Aimee

we talk about a Child Protection raid in 1983 by the Oswego County Dept. of Social Services. Charlene had Aimee pad locked in her bedroom for days at a time with only a bucket to defecate and urinate in. Aimee cries for help went unanswered until Aimee smashed the bedroom window requiring emergency room care. Aimee told the hospital that she was pad locked in a room with a bucket and nothing else but her bed and bedding. Charlene O'Neil was founded and plead no contest. A permanent restraining order was issued. Charlene has violated this order. She has obstructed justice.

Aimee O'Neil has a sister Amy Fragnito Geremia. March 1969 Charlene shows up 9 months pregnant to Erie County social services

XXVI

Charlene O'Neil asked Annee to bring home wine from Paris, France. Customs agents held Annee and called Charlene demanding her to pick Annee up. Charlene refused. Charlene told federal agents do whatever you want with her. Take her to a home, I don't care, but Charlene could not only take Paul Jones to Virginia. She conspired to and paid for it. In 1973 or 1974 an unidentified body was found in our kitchen at 104 E. 3rd St Oswego, NY. The man was brutally stabbed to death. I was forced to go with my father to watch him dig a shallow grave to put the body. The body was later dug up and placed in my uncle's well. Charlene knows the details of this murder.



In 1996 Charlene came to Oswego NY from Florida. She carried several polaroid photos of myself nude, my legs spread apart and I was forced from these photos into child pornography. Charlene was showing the photos off to multiple people bragging about what she had forced me to do. I was photographed naked in front of suitcases of marijuana that Charlene was trafficking across the United States.

Your honor, lastly Mark Morrison. Because I am unable to have any type of relationship because somehow Charlene is influencing it, I have direct concerns that Mark Morrison could possibly be influenced and this poses an obvious safety provision. I beg you to allow me to put Morrison on the stand to not only testify of the

torture, terror, trauma and pain I have endured but to also allow me to question Morrison under oath as to his legitimate ties that could possibly exist to harm me. Please grant me the opportunity to be heard and question Morrison under oath in your court to ensure my health, well being, and safety and to also demonstrate the pain and terror Charlene O'Neil subjected me to.

I thank you very much for letting me be heard and I beg for this court to please make Charlene O'Neil stop. I beg you!

I would cite Cruel and inhuman torture but she is not in a government capacity. Thank you, your honor!

and indicates she was going to put my sister Amy Geremia in the dumpster. Your honor I have requested the subpoenaing of these records as they identify significant mental health issues.

Your honor, Charlene O'Neil is not discriminating against Amy Geremia as we hope for a subpoena to disclose these facts and site the mens rea.

Charlene O'Neil hates her daughter Aimee O'Neil so much that she continually perpetrates hate crimes in the community using others against Aimee. She refuses to stop.

September 1982. Aimee O'Neil was returning from a trip to London, England. When Aimee arrived at JFK she was stopped because

Mr. Leigh Hunt the retired head of the New York State Police was retained by O'Neil to investigate this situation and he has deemed that both Gloria Mazzoli and Charlene O'Neil working together in concert are creating these tactics against Aimee.

Mr. Hunt states that both Gloria Mazzoli and Charlene O'Neil, working together in concert conspired to suppress my rights as a organized Hate Crime.

The report is on its way.

# **EXHIBIT D**

# **EXHIBIT D**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\*\*\*

AIMEE LYNN O'NEIL,  
Plaintiff,

v.

CHARLENE O'NEIL,  
GLORIA MAZZOLI

Defendants.

Case No. 2:20-cv-652-JAD-BNW

**ORDER AND  
REPORT AND RECOMMENDATION**

Presently before the court is pro se Plaintiff Aimee O'Neil's application to proceed *in forma pauperis* and her complaint filed on April 7, 2020. ECF No. 1. Plaintiff filed a second such motion on April 27, 2020. ECF No. 14. In addition, on May 5, 2020, she filed a motion to make payments in lieu of appearing in forma pauperis.<sup>1</sup> ECF No. 18.

Plaintiff submitted the declaration required by 28 U.S.C. § 1915(a) showing an inability to prepay fees and costs or give security for them. ECF No. 1. Accordingly, Plaintiff's request to proceed *in forma pauperis* will be granted. Given her first application to proceed *in forma pauperis* (ECF No. 1) is granted, her second application (ECF No. 14) and her motion to make payments (ECF No. 18) are denied a moot. The Court will next screen the complaint. ECF No. 1-1.

**I. SCREENING OF COMPLAINT AND MOTIONS TO AMEND COMPLAINT**

**A. BACKGROUND**

<sup>1</sup> It appears Plaintiff believed that the court could rule on her claims more quickly if she were to pay the filing fee rather than proceed *in forma pauperis*.

1 Plaintiff's original complaint is a 35-page document recounting the many ways she  
2 believes her mother, defendant Charlene O'Neil, interfered with her ability to earn a living, her  
3 rights to privacy, as well as many other rights under the constitution. For example, Plaintiff  
4 claims her mother plotted to have her killed resulting in her needing to quit her job, had her phone  
5 tapped, and had Plaintiff's co-workers follow her, harass her, stalk her, and intimidate her. ECF  
6 No. 1-1 at 9. Plaintiff also explains that, based on the fact her mother had her phone tapped, all  
7 her co-workers and customers knew about the text messages on her phone. *Id.* at 10.

8 Given the number of threats, Plaintiff explains that the Colorado Department of Parole  
9 deemed this conduct to be an immediate threat "and made [her] quit [her] job and pack all of her  
10 possessions and had a[n] emergency parole meeting to discuss a safety plan." *Id.* at 15. But her  
11 mother's behavior continued at her new employment, and now her mother somehow directed  
12 male customers to sexually harass her. *Id.* at 16. Plaintiff explains she has had to contact the  
13 police because her mother was having her followed and the Department of Parole "ordered to  
14 obtain a restraining order." *Id.* at 20.

15 Immediately after Plaintiff obtained the restraining order, her mother had men sexually  
16 harass her. *Id.* at 21. Plaintiff explains her mother also interfered with her relationship with Mark  
17 Morrison, even though the Department of Parole "made it clear that they approved of the  
18 relationship" and that her mother "needed to stop interfering in her daughter's personal life." *Id.*

19 Plaintiff alleges that Gloria Mazzoli, the other defendant, has been helping her mother in  
20 her acts of interference and intimidation. *Id.* at 35.

21 Plaintiff also provides some background into her relationship with her mother. Plaintiff  
22 explains her mother "locked [her] in her bedroom for days at a time with only a bucket to  
23 defecate and urinate in." *Id.* at 30. Plaintiff also explains that a man was found stabbed to death in  
24 the kitchen of the house she grew up in and that she was forced to watch as her father dug a  
25 shallow grave for him. *Id.* at 31. Later, this man's body was dug up and placed in her uncle's  
26 well. She also claims that her mother forced her to pose for pornographic pictures as a child. *Id.* at  
27 32.  
28

1 Plaintiff filed two motions for leave to file an amended complaint. *See* ECF Nos. 19, 21.  
2 The most recent such motion was filed on June 1, 2020. ECF No. 21-1. This proposed amended  
3 complaint is eleven pages long and is, in essence, a summarized version of the original complaint.  
4 *Id.*

#### 5 B. ANALYSIS

6 In screening a complaint, a court must identify cognizable claims and dismiss claims that  
7 are frivolous, malicious, fail to state a claim on which relief may be granted, or seek monetary  
8 relief from a defendant who is immune from such relief. 28 U.S.C. § 1915(e)(2). A complaint is  
9 frivolous if it contains “claims whose factual contentions are clearly baseless,” such as “claims  
10 describing fantastic or delusional scenarios.” *Neitzke v. Williams*, 490 U.S. 319, 327-28 (1989).  
11 Dismissal for failure to state a claim under § 1915(e)(2) incorporates the standard for failure to  
12 state a claim under Federal Rule of Civil Procedure 12(b)(6). *Watson v. Carter*, 668 F.3d 1108,  
13 1112 (9th Cir. 2012). To survive § 1915 review, a complaint must “contain sufficient factual  
14 matter, accepted as true, to state a claim to relief that is plausible on its face.” *See Ashcroft v.*  
15 *Iqbal*, 556 U.S. 662, 678 (2009). The court liberally construes pro se complaints and may only  
16 dismiss them “if it appears beyond doubt that the plaintiff can prove no set of facts in support of  
17 his claim which would entitle him to relief.” *Nordstrom v. Ryan*, 762 F.3d 903, 908 (9th Cir.  
18 2014) (quoting *Iqbal*, 556 U.S. at 678).

19 Even liberally construing Plaintiff’s complaint, the court finds that her factual allegations  
20 describe fantastic and delusional scenarios and do not state a claim upon which relief can be  
21 granted. Additionally, the docket is replete with additional “notices” Plaintiff filed that purport to  
22 supplement the claims in her complaint. *See, e.g.*, ECF No. 3 (“Notice of Sexual Harassment”  
23 where Plaintiff explains her mother recently had a man sexually harass her and that she had to file  
24 a claim with the Federal Trade Commission based on her phone being tapped); ECF No. 8  
25 (“Notice of Retaliation” explaining how defendants continue to engage in the same conduct  
26 alleged in the complaint); ECF No. 10 (“Notice of Harassment” explaining one or both of the  
27 defendants had an RFID chip placed on her leg); ECF Nos. 15-17 (other similar notices). Given  
28



1 that Plaintiff's complaint does not set forth a plausible claim, it is recommended that the  
2 complaint be dismissed.

3 The Court also reviewed Plaintiff's two motions to amend her complaint. Even construing  
4 these complaints liberally, neither states a claim upon which relief can be based. Accordingly, the  
5 Court recommends that these motions (ECF Nos. 19, 21) be denied, as amendment would be  
6 futile. Furthermore, given that Plaintiff has now unsuccessfully attempted to state a claim upon  
7 which relief can be based three times and appears to be delusional, the Court recommends that  
8 Plaintiff's case be dismissed. *See Lopez v. Smith*, 203 F.3d 1122, 1126 (9th Cir. 2000) (stating  
9 that a district court is not required to provide leave to amend a complaint if the complaint could  
10 not possibly be cured by the allegation of other facts).

11 **II. OTHER MOTIONS**

12 Plaintiff also filed a motion for summary judgment (ECF No. 4), a motion for a  
13 restraining order (ECF No. 5), and motions for orders (ECF Nos. 7 and 9) to have the RFID in her  
14 leg removed. Given the Court is recommending that this case be dismissed, the Court also  
15 recommends these motions be denied as moot.

16 **III. CONCLUSION**

17 IT IS ORDERED Plaintiff's request to proceed in forma pauperis (ECF No. 1) is granted.

18 IT IS FURTHER ORDERED that ECF Nos. 14 and 18 are DENIED as moot.

19 IT IS RECOMMENDED that Plaintiff's complaint (ECF No. 1-1) be DISMISSED.

20 IT IS FURTHER RECOMMENDED that Plaintiff's motions for leave to amend her  
21 complaint (ECF Nos. 19 and 21) be DENIED.

22 IT IS FURTHER RECOMMENDED that Plaintiff's Motion for Summary Judgment (ECF  
23 No. 4) be DENIED as moot.

24 IT IS FURTHER RECOMMENDED that Plaintiff's Motion for Restraining Order (ECF  
25 No. 5) be DENIED as moot.

26 IT IS FURTHER RECOMMENDED that Plaintiff's Motions for Order (to have RFID  
27 device removed from leg) (ECF Nos. 7 and 9) be DENIED as moot.  
28

1 IT IS FURTHER RECOMMENDED that Plaintiff's Motions for Default Judgment (ECF  
2 Nos. 11 and 13) be DENIED as moot.

3 IT IS FURTHER RECOMMENDED that Plaintiff's case be DISMISSED.

4 **IV. NOTICE**

5 This report and recommendation is submitted to the United States district judge assigned  
6 to this case under 28 U.S.C. § 636(b)(1). A party who objects to this report and recommendation  
7 may file a written objection supported by points and authorities within fourteen days of being  
8 served with this report and recommendation. Local Rule IB 3-2(a). Failure to file a timely  
9 objection may waive the right to appeal the district court's order. *Martinez v. Ylst*, 951 F.2d 1153,  
10 1157 (9th Cir. 1991).

11  
12 DATED: August 14, 2020



14 **BRENDA WEKSLER**  
15 **UNITED STATES MAGISTRATE JUDGE**

# **EXHIBIT E**

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Aimee Lynn O'Neil,  
Plaintiff

v.

Charlene O'Neil, et al.,  
Defendants

Case No.: 2:20-cv-0652-JAD-BNW

**Order Adopting  
Report & Recommendation, Denying  
Motions, and Dismissing Case**

[ECF Nos. 4, 5, 7, 9, 11, 13, 19, 21, 22, 23]

Aimee Lynn O'Neil claims that her mother in Florida, aided by another woman in New York, interfered with her ability to earn a living in Colorado, plotted to have her killed, had her phone tapped, recruited her coworkers to stalk and intimidate her, and had men sexually harass her, all "out of hate, jealousy and revenge."<sup>1</sup> To provide insight into her relationship with her mother, O'Neill recounts a dark tale of childhood abuse and exploitation, murder, and grave-switching. She sues for conspiracy, Fourth Amendment privacy violations, lost profits, and the "intentional tort" of "hate," and she has filed nearly a dozen motions, including ones for default, summary judgment, injunctive relief, and leave to amend.

Magistrate Judge Brenda Weksler has screened O'Neil's complaint. Highlighting O'Neil's more outrageous allegations, the magistrate judge found that they "describe fantastic and delusional scenarios and do not state a claim upon which relief can be granted."<sup>2</sup> She adds that, although O'Neil proposes amendments, they fail to cure the problems with her claims. She recommends that I dismiss this action on that basis and deny all pending motions.<sup>3</sup>

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<sup>1</sup> ECF No. 1-1.

<sup>2</sup> ECF No. 22 at 3.

<sup>3</sup> *Id.*

1 The deadline for O'Neil to object to that recommendation ran 15 days ago, and O'Neil  
2 filed no objections. "[N]o review is required of a magistrate judge's report and recommendation  
3 unless objections are filed."<sup>4</sup> Having reviewed the R&R, I find good cause to adopt it, and I do.


4 Accordingly, IT IS HEREBY ORDERED that the Magistrate Judge's Report and  
5 Recommendation [ECF No. 22] is **ADOPTED** in its entirety.

6 IT IS FURTHER ORDERED that O'Neil's motions for leave to amend [ECF Nos. 19,  
7 21] are **DENIED** because amendment would be futile.

8 IT IS FURTHER ORDERED that all other motions [ECF Nos. 4, 5, 7, 9, 11, 13, 23] are  
9 **DENIED** as moot.

10 The Clerk of Court is directed to ENTER JUDGMENT ACCORDINGLY and CLOSE  
11 THIS CASE.

12 Dated: September 16, 2020

13   
14 U.S. District Judge Jennifer A. Dorsey  
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26 <sup>4</sup> *Schmidt v. Johnstone*, 263 F. Supp. 2d 1219, 1226 (D. Ariz. 2003); see also *Thomas v. Arn*, 474  
27 U.S. 140, 150 (1985); *United States v. Reyna-Tapia*, 328 F.3d 1114, 1121 (9th Cir. 2003).  
28

# **EXHIBIT F**

# **EXHIBIT F**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Aimee Lynn O'Neil

Plaintiff,

v.

Charlene O'Neil, et al

JUDGMENT IN A CIVIL CASE

Case Number: 2:20-cv-00652-JAD-BNW

Defendants.

— **Jury Verdict.** This action came before the Court for a trial by jury. The issues have been tried and the jury has rendered its verdict.

— **Decision by Court.** This action came to trial or hearing before the Court. The issues have been tried or heard and a decision has been rendered.

☒ **Decision by Court.** This action came for consideration before the Court. The issues have been considered and a decision has been rendered.

**IT IS ORDERED AND ADJUDGED**  
that judgment is hereby entered in favor of Defendants against Plaintiff.

September 16, 2020

Date

DEBRA K. KEMPI

Clerk



/s/ J. Matott

Deputy Clerk

**PLEADING  
CONTINUES  
IN NEXT  
VOLUME**