

Supreme Court of Nevada

Antee v Antee

FILED

OCT 12 2021

Family Court Appeal

#82887, #81635, #82166-COA

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

**Appellant's Emergency Motion Pursuant to NRAP 27 E to
Extend Time to file Opening Brief**

And

Emergency Injunctive Relief

And

**Appellant's Request for Pro Bono Counsel pursuant to 18 USC
s 3771**

And

**Appellant's Request to Unseal District Court Case D-18-
573154-D**

ACTION NEEDED BY 10.15.2021

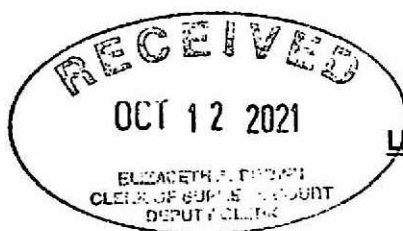
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21-29321

Supreme Court of Nevada

LINDSEY LICARI,
APPELLANT,

BOBBY ANTEE,
RESPONDENT,

Supreme Court No. 81635, 82166-
COA, 82887

District Court Case No. D573154

Appellant's Emergency Motion Pursuant to NRAP 27 E to Extend Time to file Opening Brief

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1. Statement of Facts

I, Appellant, Lindsey Licari (I, my, me, myself, herein) , entered into a marriage based on fraud on November 25, 2017, just three weeks after the loss of my son, Ayden Brown. On January 17, 2018, Respondent Bobby Antee attended a closing without my knowledge, and fraudulently conveyed the Title of 9564 Scorpion Track Ct. Las Vegas, NV 89178 into his name, as a married man his "Sole and Separate Property" violation of NRS 205.355. Bobby Antee married me with the intent to defraud me, in which I was under extreme duress due to the loss of my son Ayden, which legally makes me entitled to Annulment. With the help of Realtor Linda Naw with ERA Brokers, Escrow Agent and Notary Nikki Sikalis Bott with National Title Company, Realtor Melissa Parker with One Realty Group, and Drew Levy with Valley West Mortgage, Bobby Antee secured the mortgage solely in his name, stealing over \$98k. Bobby Antee paid off personal debts, which included \$8374 in student loans and multiple credit cards, in which he did not have gift letters for, and the \$4060 paid to pay off his car, was only paid by Appellant

with the agreement that both myself, and Bobby Antee would be listed on the Title of the home. National Title Company's Nikki Bott, then illegally wired \$62k out of my personal account to close on the loan, not disclosing the debts paid off, or that I would be omitted from the Title of the home. Escrow Agent Nikki Sikalis Bott, then fraudulently notarized a Quit Claim Deed forging my name, "Lindsey LiCari", and then collected commission as the Escrow Agent by closing on the loan. A clear violation of NRS 240.065 1 (b), which makes the forged Quit Claim Deed no longer a valid instrument. A Second Notary, Melanie Treanor, who is the neighbor of Nikki Siklais Bott, knowingly, fraudulently conveyed title into Bobby Antee's name as his "Sole and Separate Property" and collected commissions on that notary. Violation of NRS 240.075 (1) (2) (3) in which Melanie Treanor knowingly enabled Bobby Antee to commit fraud. Linda Naw Perdue, Melissa Parker, and Drew Levey also illegally collected commissions, and knowingly committed and concealed mortgage fraud pursuant to NRS 205.372 for 4 years now. On January 18, 2018, when I realized the funds had been removed from my personal account, I asked Bobby Antee to cancel the home, and annul the marriage of two months. Bobby Antee refused to cancel the home or sign to annul, and then concealed for 4 additional months, the fraud that had occurred on January 17, 2018, the debts paid off, and that I was not listed on the Title. During the 4 months, Bobby Antee, mentally and emotionally abused the Appellant, changing the locks to the home, moving in random friends, and attacking the work I do honestly to help Cancer Children. Bobby Antee could not afford the home he was illegally qualified to close on and began threatening me to give him more money or move out of the home. After months of abuse, sleeping in cars, and at my mothers, I finally investigated why Bobby Antee felt like he had so much control over a house he contributed nothing to. On June 26, 2018, I looked up the home on the Assessors website to find that Bobby Antee, and Linda Naw had defrauded me, and stole everything my son raised, to qualify Bobby Antee, and closed on the home, omitting me from the Title. I then immediately filed to divorce and filed a police report with LVMPD reporting the fraud. I then filed a complaint with NRED, and GLVAR, in which Daryl McClosky from NRED, attempted to conceal the Mortgage Fraud of Linda Naw, and Nikki Sikalis Bott as did Ingrid Trujillo of GLVAR. I appealed the dismissal of both complaints, in which to date NRED, Daryl McClosky refuses to address the appeal and clear concise evidence. Ingrid Trujillo, with GLVAR processed the appeal in December of 2018, and provided Respondent Docs, #18343E. Respondent Docs #18343E were provided by Linda Naw and her counsel Garrett Chase, with Shumway Van Law Firm. Included in the Respondent Docs were a letter of explanation from Linda Naw and another from Bobby Antee, where both Uttered a Forged Deed to be true, which is a violation of NRS 205.110. Garrett Chase then provided the forged Quit Claim Deed, which produced clear Notary Fraud, as Nikki Sikalis Bott could not act as a Notary on a loan file in which she was collecting commission as the Escrow Agent, violation of NRS 240.065 (b) My name was forged to the Quit Claim Deed, therefor it was not a valid instrument, and Bobby Antee had no interest in the home, and had nothing to contest in the annulment. NRS 205.085 I proved forgery through the clear Notary Fraud of Nikki Siklais Bott with Expert Curt Baggett, who is a Court Certified and Board Certified, Handwriting Expert who analyzed the documents and confirmed forgery in May of 2020. NRS 205.170 This evidence

clearly proves that I am a victim of a crime, who has the Federal Constitutional Right pursuant to 18 USC Section 3771 (d) 1 to have legal representation over this matter. As a Victim of a Crime, who reported the crime to LVMPD in June of 2018, LVMPD should have made their best efforts to see that I was accorded my rights to an attorney, and still today have failed to do so. 18 USC section 3771 (c) 2. I was then forced into years of litigation where I paid Chris Tilman \$4k and Jennings and Fulton \$16k, while both Law Firms failed to report the clear Legal Malpractice of Shumway Van, Garret Chase, Grayson Moulton, and Michael Van, who openly represented Realtor, Linda Naw Perdue and Bobby Antee in filing frivolous complaints, in which the assertions of my claims involved both clients. Violation of NRPC Rule 1.7 (b) 3, in which they are still engaging in dual representations of both clients, and litigation against me on the behalf of their own firm. Shumway Van, Garrett Chase and Grayson Moulton are in Violation of NRPC Rule 3.4 (a) (b) (c) (d) (e) as they continue to file harassing motions with the intent to defraud and harm me. NRPC Rule 1.18 (c) states Shumway Van initial representation was on the behalf of Bobby Antee, therefor, Shumway Van should not have taken on the frivolous matter of Linda Naw Perdue in case A-18-786141-C , and my counsel should have reported the misconduct, and failed to do so. Garrett Chase, Grayson Moulton, and Michael Van have had clear evidence that their clients committed criminals acts, and continue to attempt to extort unearned attorney fees, withhold access to my property, and stalk and harass me, which is legal abuse. Garrett Chase, who is not retained counsel of Bobby Antee continues to file motions on his behalf, and the behalf of Linda Naw, failing to disclose the Notary Fraud, Forgery, Mortgage Fraud making false statements about material facts. NRPC Rule 4.1 (a) Marriage is no excuse for Grand Larceny, therefor Bobby Antee, being part of the fraud and concealment, is not entitled to any part of the ownership of 9564 Scorpion Track Ct. Las Vegas, NV 89178. Therefor, Garrett Chase, Shumway Van, Bobby Antee, Linda Naw Perdue, GLVAR, LVMPD, and NRED, my counsel Chris Tilman, Rena Hughes, and my second counsel, Jennings and Fulton, Logan Wilson, Jared Jennings, and Adam Fulton, all had clear evidence of Notary Fraud of, National Title Company and Nikki Bott, produced in December of 2018, in case number D-18-573154-D and in case number D-18-581756-S and attempted to conceal it. Pursuant to NRS 205.372 1 (a) (b) (c) (d) (e) makes them each guilty of Mortgage Fraud.

In October of 2018, I was given Exclusive possession of the home, pending the trial. I was to solely pay for the home, and Bobby was ordered to maintain all insurances until trial. The judge refused to hear anything else at this hearing outside of possession of the home. In December 2018 while Chris Tilman was my counsel, the Respondent Docs were filed into D-18-573154-D, and case D-18-581756-S in which I was representing myself in. I submitted 301 pages 65 Exhibits in which the Respondent Docs were submitted as Exhibit 57 in the d-18-573154-D filing. At this point my case D-18-573154-D was illegally transferred from Judge Kathy Hardcastle to Judge Rena Hughes, with no hearing and no one informing me. Rena Hughes also presided over case D-18-581756-S in which she held a hearing, combing both motions from separate cases. Rena Hughes then refused to allow me to argue my own motion in case D-18-581756-S and made me wait outside the court room for 45 mins, as she contacted Chris Tilman. Chris Tilman then showed up, concealed the Notary Fraud, and consolidated the matters,

stating my filing was made by mistake, and continued to collect legal fees from me. After filing the Legal Separation Documents, reporting the clear Notary Fraud and fabricated stories of Realtor Linda Naw and Bobby Antee, Shumway Van and Linda Naw file a frivolous case against me. A-18-786141-C.

From December 2018 to February 2020, Jennings and Fulton and Shumway Van conspired together to attempt to force me into settling with Bobby Antee, Linda Naw, and Nikki Siklais Bott. Neither law firm filed any motions to report the contempt of court as Bobby Antee, refused to give me access to bills on the home, he canceled my medical insurance, never added me to the homeowner's insurance, and has been free to slander my work, helping cancer children, to conceal his own criminal actions. It is very clear that my legal representation was not only inadequate, but it is also illegal to knowingly defraud your own client, and to delay litigation for 4 years to conceal crimes. Chis Tilman nor Jennings and Fulton acted in my best interest and found a larger profit in conspiring to deprive me of the damages, restitution, and protection then to do the work I paid them to do on my behalf and uphold my Federal Constitutional Rights. On February 7, 2020 two years after filing for annulment, Logan Wilson, Jared Jennings, and Grayson Moulton set up a two day trial over a deed that was known to be invalid since December of 2018. I was then forced to endure the abuse of Shumway Van, Rena Hughes, Bobby Antee, and Linda Naw as my own counsel sat and assisted in attempting to conceal the fraud committed by Bobby Antee and Linda Naw. My counsel then allowed the Legal Separation documents filed in December of 2018 to be removed from the trial binder, and proceeded to attack my foundation, and my character for two days of a trial that should have never taken place. Logan Wilson and Jared Jennings completed no discovery on my behalf, they had no pre-trial meetings to prepare for the trial and allowed the trial to be held without submitting any of my witnesses, and with no jury. This is a violation of 7th Amendment right to a jury, and my 5th Amendment right to due process and the deprivation of my property. The act of forcing a victim of a crime to attend a trial with those who have victimized them, and allow them to be degraded and treated with unfairness is a violation of 18 USC section 3771 (8).

After the trial in Feb of 2020, Rena Hughes then waited until May 22, 2020 to issue a ruling on the matter. During this time, Adam Fulton and Logan Wilson attempted to force me into a settlement with Nikki Siklais Bott and National Title Company for \$5000. Adam Fulton then tried to also convince me to sign a settlement with Linda Naw in which she would simply dismiss her complaint, and we would each pay our own legal fees. I refused to settle with Linda Naw, and Adam Fulton then withdrew from case A-18-786141-C, stating I couldn't afford his services in this matter anymore. I also refused to agree to the terms for case A-20-808737-C also filed by Jennings and Fulton, I then found the bond for Nikki Sikalis Bott, even though Adam Fulton told me he didn't know how to locate a bond. I told Adam I found it and I filed to collect the \$10k for the fraud she committed. After filing for the bond of Nikki Bott with Liberty Mutual, and refusing to take the \$5000 settlement, I decided that I no longer wanted representation from Adam Fulton in the matter of Nikki Bott A-20-808737-C, and I would proceed in seeking justice on my own. I let Adam Fulton go on May 21, 2020, in case A-20-808737-C. On May 22, 2020, Rena Hughes then came out with her opinion of the court, that

was completely fabricated, which stated I was not credible, and that National Title Company, Nikki Bott, and Linda Naw did nothing wrong in the purchase of the property, and Bobby Antee was to be given half of the Equity of my home, and was to pay nothing back of what he stole to purchase the home. This ruling was made by Rena Hughes to deliberately attempt to deprive me of the bond, restitution, damages, and justice owed to me for the crimes committed against me. Very clear evidence was submitted to Rena Hughes two years prior to the trial that proved the fraud, abuse, and neglect of my lawyers and she concealed it and allowed it to continue. Pursuant to 18 USC Section 242 Rena Hughes has no immunity to deprive me of justice, restitution, damages, due process, or my right to be heard, by abusing her position and power. Under the color of law, it was beyond Rena Hughes lawful authority to rule on the guilt of Realtor Linda Naw, or Escrow Agent Nikki Sikalis Bott while presiding over a divorce hearing. Rena Hughes is not a civil court judge, nor does she handle crimes on property or criminal cases. The actions of Rena Hughes are clearly a violation of 18 USC Section 241 in which she has conspired against my Federal Constitutional Rights to a fair trial, to a jury, and to protection from the accused. Title 42 USC Section 3631 makes it illegal for Rena Hughes to interfere with my housing rights and the continued harassment from Shumway Van, Grayson Moulton, and Garrett Chase also violate this statute of the Federal Constitution as they continue to try to force the sale of my home to attach to the proceeds in legal fees. Since I caught Jennings and Fulton, Shumway Van, and Rena Hughes, I have received no justice in family court, district court, or Supreme Court. On 8/3/2020, I filed for Lis Pendens on the marital property, so the Final Decree of Divorce entered into case D-18-573154-D on 8/5/2020, which again was fabricated and still today has no official stamp that actually makes it a valid document, cannot force the sale of my home, as it would have to be heard by a civil court judge over Real Estate Law. The fabricated ruling of Rena Hughes is now being illegally upheld in multiple cases, where my right to be heard, my right to due process, and my right to be made whole have all been denied as the misconduct of the entire Nevada Legal system continues to conspire to attack an innocent victim to protect the companies. The Supreme Court has been notified of the misconduct of all parties since May of 2020, when I started writing to the Supreme Court when Rena Hughes refused to hear my motions and correct her ruling, in which Kristina Pickering also knowingly concealed the misconduct and mortgage fraud, allowing the abuse to continue. I then filed for appeal in August of 2020, and in my Informal Brief, requested Pro Bono Counsel due to the misconduct of Jennings and Fulton, Chris Tilman, Rena Hughes, and Shumway Van, and Nevada State Bar, and was denied my Federal Constitutional Right to an Attorney pursuant to 18 USC Section 3771 (a) 5. In May of 2020, I provided the Supreme Court with my Letter from the Expert, which completely proved that a crime was committed, and Pursuant to 18 USC section 3771 (5) (b) I was able to submit a Writ of Mandamus to Supreme Court in which I submitted 3 within the 10 days allotted and to date all motions have been ignored.

2. Injunctive Relief:

Pursuant to 18 USC Section 3771 (c) 1 when I notified each investigative agency, each judge, and the Supreme Court of Notary Fraud, Forgery, Mortgage Fraud, and Conspiracy to Conceal, all should have immediately acted to protect my rights as a victim of the crime and failed to do so. Due to the failure of each agency refusing to uphold my Constitutional Rights, I have had to leave the State of Nevada to protect my family and myself. In doing so I had to pay \$14k to break the lease at my office, as the Supreme Court denied each motion. I then had to take my ill mother and drive across the Country to protect ourselves. My mother has now been admitted to the hospital in Georgia, with kidney failure, heart failure, and has spent the last 4 years of her life watching me suffer the loss of my son and being senselessly attacked in this annulment to protect companies who commit crimes. My mom is in ICU and may lose her life, and instead of me being able to spend time with her, I am writing another motion, producing the same clear and concise evidence, that has been ignored by everyone. Nevada Supreme Court was notified through many Emergency Motions of the Stalking, Abuse, Harassment, and Slander, and knowingly deprived me of my right to Protection, and Legal Counsel. I informed the Supreme Court since August of 2020, that I am the Sole Caregiver for my mother, in which she is disabled, and on 24 hr oxygen. She is unable to care for herself, and unable to go up and down a three-story home. This 2-month marriage has been drugged out for 4 years, and there is no legal explanation for these proceedings to be constantly delayed. While Nevada Supreme Court refuses to take action and pretends they have no jurisdiction to correct Rena Hughes orders or discipline anyone for their misconduct, I have lost \$37k in mortgage payments, \$20k in legal fees, \$14k in closing my office, I have been forced to be married to my abuser, who has had complete control over my sole and separate property. It's been 20 months since the trial was held over a deed that was invalid, and I still have no decree of annulment, I cannot remarry, I cannot seek fertility treatments, I cannot renew my passport. These are all basic rights, that are promised to me in the Constitution. I have the right to my property, and for judges not to conspire against my rights pursuant to 18 USC Section 241. Rena Hughes clearly abused her power to attempt to deprive me of justice. Rena Hughes, was bound by laws, statutes, and ordinances, and failed to uphold her oath, knowingly depriving me of all my rights as a victim of a crime, and interfering with Interstate Commerce. I have filed numerous motions with the Supreme Court, showing clear evidence that I am not getting justice in District Court, therefor the Supreme Court should issue the annulment in the interest of justice to no longer delay my restitution pursuant to USC Section 3771 (a) (7). The Supreme Court issued a Stay on the sale of the home, and sent the case back to district court where my right to be heard was again denied and another new judge Dawn Thorne, ruled again, without a hearing and ignoring all evidence submitted to the Supreme Court and District Court, ignoring my filing for Annulment. My home is now in the rears \$18k, and will now go into foreclosure, if the Supreme Court does not act now. I am requesting the Supreme Court issue a final judgement according to the law, and place an injunction on any other further litigation in this matter by Shumway Van, Garrett Chase, or Grayson Moulton. The Supreme Court is aware that I am a victim of a crime and as the affected party I am entitled to the full ownership of 9564 Scorpion Track Ct Las Vegas, NV 89178. It is my 6th Amendment Right to legal counsel and a speedy trial in which

Rena Hughes, Kristina Pickering, Ronald Israel, and Dawn Thorne have all denied to me. My mother is now dying, and I should have time to spend with her, rather than rushing to file yet another Opening Brief. I request the court issue an injunction on any more proceedings until my 6th Amendment right is upheld and I have legal counsel to represent me in this matter and to ensure I get justice and full restitution owed to me. I have now suffered losses amounting to over \$150k in which District court refuses to hear any matter I file as judge after judge conceals the misconduct of Rena Hughes. I will never be able to get the 4 years Shumway Van has wasted of my life, I will never get back the \$150k in damages I have suffered, and if my mother dies, I will never get back this time to spend with her, being forced to learn law overnight. It is clear to Supreme Court in which every appeal has been heard by the same Supreme Court Justices, that I am being denied justice and now being accused of crimes I did not commit to conceal the misconduct. I have been labeled vexatious, and my attorneys Jennings and Fulton have put a Restraining order in place against me, when the abuse is against me not them. My mother is dying, so at what point will this abuse be enough? I ask the Supreme Court extend my time to file an Opening Brief, and allow me to spend my mothers last moments with her. I have done everything in my power to follow the law and end this marriage based on fraud, and I have been treated like the criminal, and ignored. As a victim of a crime I am protected from paying legal fees of those I have accused, so allowing the forced sale of my home, is allowing the embezzlement of legal fees that were not earned. I have good credit and can qualify to transfer the home into my name solely, and I request the Supreme Court order the home to be transferred out of Bobby Antee's name and into my name as the District Court refuses to follow the law and is knowingly depriving me of justice. Garrett Chase, who is not Bobby's counsel, continues to file motions and fails to serve them to me. This is clear Legal Malpractice and I ask that Garrett Chase, Logan Wilson, Grayson Moulton, Michael Van are all prohibited from contacting me or handling any more proceedings over this matter.

3. Conclusion

I have now asked District Court to Unseal all matters pertaining to the Divorce, that all have been illegally sealed to conceal the misconduct of each judge. District Court refuses to unseal these matters to conceal their own misconduct. Each case is entitled to one appeal, so I am very confused as to why Supreme Court has allowed multiple appeals in which they have taken no action to address any of them or provide counsel and then continues to dismiss without addressing any of the misconduct, abuse, or fraud. I spent 3 years fighting with my son and watching him suffer, I have now spent 3 more years doing the same thing with my mother. While at the same time, getting abused by the Nevada Legal System, and then being forced to defend myself, when I have the legal right to representation. It was my 7th Amendment right to have a jury at the trial in this matter, in which I had no jury or witnesses, clearly proving a mistrial due to inadequate representation and fraud on the court pursuant to Rule 60, as evidence was removed illegally by Grayson Moulton and Logan Wilson. My 5th Amendment right promised that I would have due process, yet since May of 2020, I have had no due process

in any case relating to this matter, and I have been free to be attacked and degraded by the accused. All matters are being heard in Chambers refusing my right to be heard. I filed for Quiet Title in September of 2020 and to date every judge has refused to hear the matter and is now retaliating through awarding sanctions and legal fees to the accused and their counsel. Therefore I ask the Supreme Court to Quiet the Title and ensure I get justice free from retaliation. I ask that I am given until November 15, 2021 to complete my opening brief, to allow me time to spend with my mother and say goodbye.

4. Relief Requested

1. Assign a Prosecution Attorney for the Government to take over all matters pertaining to violations of NRS 205.372, 18 USC section 3771.
2. Quiet Title to 9564 Scorpion Track Ct Las Vegas, NV 89178
3. Annul marriage to Bobby Antee
4. Issue Writ for Arrest for Bobby Antee
5. Place and injunction on Shumway Van and their staff from further harassment and any contact with me.
6. Debar Logan Wilson, Jared Jennings, Garrett Chase, Adam Fulton, and Grayson Moulton. Michael Van or alternatively force the State Bar to enforce disciplinary action.
7. Order Restitution by Bobby Antee
8. Vacate all orders in this matter due to fraud on the court

Dated October 11, 2021

Lindsey Licari
Appellant, Crime Victim

CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I hereby certify that I am Defendant, Lindsey Licari in proper person,
and that on the 11th day of October, 2021, I caused a true and correct copy of the foregoing
**Appellant's Emergency Motion Pursuant to NRAP 27 E to Extend Time to file
Opening Brief**

And

Emergency Injunctive Relief

And

Appellant's Request for Pro Bono Counsel pursuant to 18 USC s 3771

And

Appellant's Request to Unseal District Court Case D-18-573154-D

AND

PROOF OF SERVICE REQUESTED

to be served as follows:

 X by depositing in the United States Mail, first-class postage prepaid, at Las Vegas,
Nevada, enclosed in a sealed envelope; or

 by facsimile transmission, pursuant to E.D.C.R. 7.26, as indicated below; or

 by electronic service, pursuant to N.E.F.C.R. 9 and Administrative Order 14-2, as
indicated below:

DATED this 11 day of October, 2021.

BOBBY ANTEE
1912 CAMINO MIRADA
NORTH LAS VEGAS, NV 89031
BOBBYANTEE@GMAIL.COM
DEFENDANT/RESPONDENT

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

*Lindsey Licari*__ (Signature)

LINDSEY LICARI

1035 Scales Rd. #4412

Suwanee, GA 30024

7025776657

LINDSEYLICARI14@AOL.COM

APPELLANT, LINDSEY LICARI, In Proper

Person