NEVADA SUPREME COURT #82166

FEB 17 2021

ANTEE VS ANTEE

APPEAL FROM FAMILY COURT
D-18-573154-D

APPEALANTS INFORMAL BRIEF

PRO SEC

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LAS VEGAS, NV 89178

702-577-6657

LINDSEYLICARI14@AOL.COM



IN THE SUPREME COURT OF THE STATE OF NEVADA

LINDSEY LICARI AKA ANTEE	
Appellant,	Supreme Court No. <u>82166</u>
vs.	
BOBBY ANTEE Respondent.	District Court No. <u>D-18-573154-D</u>

APPELLANT'S INFORMAL BRIEF

INSTRUCTIONS: If you are an appellant proceeding pro se (without an attorney) in the Nevada Supreme Court, you must file either (1) a brief that complies with Nevada Rule of Appellate Procedure (NRAP) 28(a), or (2) a completed copy of this informal brief form, see NRAP 28(k), with the Nevada Supreme Court on or before the due date, see NRAP 31. In civil appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court may dismiss your appeal. In postconviction criminal appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court or Nevada Court of Appeals may decide your appeal on the record without briefing.

HOW TO FILL OUT THIS FORM: This form must be typed, unless you are incarcerated, in which case it must be clearly handwritten. You do not need to refer to legal authority or the district court record. If you are completing your brief on this form, write only in the space allowed on the form. Additional pages and attachments are not allowed. If typing an informal brief, you may either use the lined paper contained in this form or an equivalent number of pages of your own paper. Your brief will be stricken if you fail to follow the directions in this form and the Nevada Rules of Appellate Procedure.

WHERE TO FILE THE BRIEF: You may submit your brief for filing in person or by mail.

To file your brief in person: Briefs may be submitted for filing Monday through Friday, 8:00 a.m. to 4:00 p.m.

Carson City: Bring the brief to the Clerk's Office at the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada, 89701.

Las Vegas: Place your brief in the Clerk's Office Drop Box at the Las Vegas courthouse for the Nevada Appellate Courts, 408 East Clark Avenue, Las Vegas, Nevada, 89101.

<u>To file your brief by mail</u>: Mail the brief to the Clerk of the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada 89701. **Your brief must be postmarked on or before the due date**.

You must file the original brief and 1 copy with the clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your brief, you must file the original form and 2 copies and include a self- addressed, stamped envelope. Documents cannot be faxed or emailed to the Supreme Court Clerk's Office.

Copies of the brief must be mailed or delivered to the other parties to this appeal or to the parties' attorneys, if they have attorneys. You must also include a proper certificate of service or complete the certificate that is attached to the informal brief form.

<u>CAUTION</u>: Pro se parties are prohibited from representing other parties. A pro se party may not complete a brief on behalf of other parties. Pro se parties may collaborate on their briefs, however, provided that if one brief is submitted on behalf of multiple pro se parties, each party must sign and date the brief to confirm that he or she has participated in the preparation of the brief and, by his or her signature, joins in the arguments and representations contained therein.

Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
8/5/2020	Decree of Divorce
12/04/2020	PLAINTIFF'S MOTION FOR RECONSIDERATION, PLAINTIFFS MOTION FOR ATTORNEY FEES AND COST, PLAINTIFF'S MOTION FOR AN ORDER TO ENFORCE AND ORDER TO SHOW CAUSE, PLAINTIFF'S MOTION FOR STAY OF EXECUTION, PLAINTIFF'S MOTION FOR NEW TRIAL, and appealing the granting of DEFENDANTS MOTION FOR ATTORNEY FEES, MOFDIFY CUSTODY TO ALLOW DEFENDANT TO SELECT REALTOR

Notice of Appeal. Give the date you filed your notice of appeal in the district court: 12/04/2020 and 8/5/2020

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
D-18-581756-	Antee vs Antee Legal Separation	Family Court
S		400
81635	Antee vs Antee Appeal	Nevada Supreme Court
82166	Antee vs Antee Appeal	Nevada Supreme Court
D-18-573154-	Antee vs Antee Divorce Annulment	Family Court
D		
A-20-820963-	Licari vs Jennings and Fulton &	District Court
	Shumway Van	
A-20-820980-	Licari vs Antee et al,	District Court
C		
A-20-821757-	Licari vs Attorney General	District Court
J	•	
A-20-820446-	Licari vs Jared Jennings et al,	District Court
C		
2:20-CV-	Licari vs Hughes et al.	US District Court
02114-GMN-		
VCF		
A-20-808737-	Licari vs Bott and National Title Co.	District Court

C		
81942	Licari vs Bott et al.	Nevada Supreme Court
82039	Licari vs Naw	Nevada Supreme Court
82096	Licari vs Jennings and Fulton et al,	Nevada Supreme Court
A-18-786141 - C	Naw vs Licari	District Court

Pro Bono Counsel. Would you be interested in having pro bono counsel assigned to represent you in this appeal?

Yes	☐ No

NOTE: If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the

This is a simple case of Mortgage Fraud that was reported to the LVMPD on June 26. 2018, in which LVMPD refused to follow the law and uphold my rights as a victim of a crime. Due to the misconduct of LVMPD I was put through 3 years of unnecessary litigation to conceal Mortgage Fraud and Forgery. Due to the loss of my son, my mental and physical state was extremely fragile, which enabled Jennings and Fulton, Chris Tillman, Grayson Moulton, and Garrett Chase to defraud me for 3 years before I knew what I was entitled to. On December 26,2018, I filed for Legal Separation and Separate Maintenance with Rena Hughes in case D-18-573154-D and case D-18-581756-S, in which I provided respondent docs from Linda Naw, Bobby Antee, and Garrett Chase from Shumway Van. That clearly produced evidence of Mortgage Fraud and Notary Fraud as Nikki Bott Escrow Agent for National Title Company, notarized the forged Quit Claim deed as Nikki Sikalis, and collected commission off the closing of the home. Bobby Antee attended the closing alone and knowingly fraudulently conveyed title into his name. At closing, Bobby Antee stole \$8374.03 of deposit and illegally paid off his student loans. After providing respondent docs to LVMPD, NSOS, NRED, GLVAR with clear evidence of forgery and fraud, they all concealed this evidence and under the color of law, violated my rights as a victim of a crime, and my seventh amendment right to have a trial by jury. Rena Hughes allowed unjust enrichment by Jared Jennings, Logan Wilson, Garrett Chase, Chris Tillman, and Grayson Moulton and has failed to report any of the misconduct that occurred in this matter. Rena Hughes allowed a two day trial that cost me \$18k for two days over a deed that isn't even valid, then at trial knowingly removed the respondent docs from evidence that was given to her in December of

2018. Linda Naw to be a witness on the behalf of Bobby Antee knowing she was not a credible witness due to the open litigation against me over the same matter in case A-18786141-C. Rena Hughes then ruled on civil matters that were out of her jurisdiction, in which Nikki Siklais Bott, National Title Company nor the lender Valley West Mortgage showed up to the trial, but were relieved of all responsibility for the crimes they committed by Rena Hughes. I submitted many motions after the fabricated ruling was released on 8/05/2020, in which Rena Hughes refused my right to be heard for 5 months, while she knowingly allowed Bobby Antee, Linda Naw, and Nikki Bott to use her ruling to illegally deny the bond payments for notary Nikki Sikalis Bott and Melanie Treanor the second notary that fraudulently conveyed title into Bobby Antee's name. Jennings and Fulton remained on my case until July of 2020, but refused to advocate on behalf since retention, and even after providing them with a Letter from an Expert, who is court and board certified. They failed to report the conflict of interest in the shared representation of Shumway Van, by Linda Naw and Bobby Antee, in which Shumway Van is still representing both clients, and are also defendants in case A-20-820980-C and defendants in Title 42 Civil Rights matter 2:20-cv-02114-GMN-VCF. On December 23, 2020 Supreme Court Stayed the execution of the Decree of Divorce, in which Grayson Moulton continues to harass and stalk me through endless filings, trying to still force the sale of the home, to collect legal fees he did not earn. Per the Letter of Agreement, Bobby Antee agreed to pay all legal fees if we were to go to court over matter, in which he has been ordered to pay nothing, and has used Shumway Van and their connections to evade arrest. As a victim of a crime, I have been treated as criminal, stolen from, and now my business has received losses of over \$50k due to the misconduct of Rena Hughes and Shumway Van, Grayson Moulton was served with a Stay from the Supreme Court, then filed again to force the sale of the home and label me vexatious to attempt to again deprive me of justice. I filed with the Supreme Court reporting the misconduct of Grayson Moulton, Logan Wilson, Jared Jennings, Adam Fulton, and Angela Ochoa, in which the Supreme Court refused to act. Kristina Pickering was notified of the Judicial Misconduct of Rena Hughes and allowed it to continue an deprive me of justice restitution, and protection for those who are attacking me still today. I am now being bullied, slandered, stalked, on social media by Linda Naw, Bobby Antee, and Nikki Bott, who should have been arrested 3 years ago when this was reported to LVMPD. Rena Hughes refusing to correct her ruling, has now put me through an additional year of litigation, in which since May of 2020. I have filed over 100 motions to have every single one ignored, and the criminals involved protected. I then reported the misconduct to the Supreme Court who refused to follow the law and Quite the Title of my home. I filed for Quiet Title in case -20-820980-C in September 2020 along with a Motion to enforce the payout of both notary bonds, and was given a court date of 11-17-2020, to date nothing has been heard, and the judge has now been

changed twice, in which Quiet Title should be completed within 8-10 weeks. The Attorney General and LVMPD refuse to offer the protections promised to me in the US Constitution or the Nevada Constitution, and have left my life in danger as well as the Federal Court. USC 18 Section 3771. Bobby Antee made a clear choice to defraud me and commit mortgage fraud, wire fraud, and forgery, therefore I am not entitled to pay him anything, and I am entitled to annulment, which I filed on October of 2020, and it still has not been heard. Bobby Antee legally should be in prison and should repay every cent he stole with 3 times the damages. but has been protected by Shumway Van for agreeing to further defraud me. Jennings and Fulton charged me \$16k and Chris Tillman \$4K to litigate over a deed that was not valid. Elizabeth Gonzalez used Rena Hughes fabricated ruling to dismiss the case improperly filed by Jennings and Fulton and then awarded Nikki Botts Lawyer \$9k for committing malpractice. Bobby Antee kept my entire savings of \$26k and did not live in the home or pay for the home since I discovered the Mortgage Fraud in June of 2018, so should not be awarded any equity for his criminal acts I would like all attorneys debarred for the crimes they have committed against me.

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

On December 26,2018 Rena Hughes received the Respondent Docs from Shumway Van, Linda Naw and Bobby Antee. This was clear and concise evidence of forgery, notary fraud, and the abuse I suffered in the six months that Bobby Antee concealed this from me. I provided proof of Nikki Bott acting as the Escrow Agent and Notary, and text messages from Bobby Antee clearly stating that he attended the closing alone and fraudulently conveyed title into his name. Bobby Antee admitted at trial that I told him to cancel the home the day after he closed behind my back., and Rena Hughes ignored this evidence. Bobby Antee did not provide any evidence that I was with him at the Title Company, in fact he and the Realtor Linda Naw admitted I did not attend the closing and Rena Hughes fabricated that I was there to fulfill her own agenda. Rena Hughes concealed the evidence through two filings in case D-18573154-D and Case D-18-581756-S knowing that I had just suffered the loss of my only child and was clearly traumatized and in a disabled state which allowed each person to take advantage of me and lie about the court processes and laws. As a victim of a crime USC 18 Section 3771, I am not entitled to pay any of these defendant's legal fees, yet I have been ordered to pay Jennings and Fulton's legal fees, Nikki Sikalis Botts Legal fees, Bobby Antee's legal fees, and Shumway Van's legal fees, totaling to almost \$100k in legal fees for a one-month marriage when Bobby Antee defrauded me. In which no one has been held accountable for the crimes committed against me or my property. Rena Hughes is a family court Judge and does not have jurisdiction to rule on civil matters, especially when she removed evidence, and none of these parties even attended the trial to prove their case. They have now illegally sealed both family court cases to conceal their own misconduct, as I filed an Emergency Motion to the Supreme Court informing them of the misconduct, in which it was denied again and the next Emergency Motion completely ignored, and Grayson Moulton is continuing legal malpractice, and deprivation of my constitutional and civil rights. I filed my initial appeal in 8/2020 in which it is now 2/2021 and the Supreme Court has delayed this process and refuses to properly litigate this matter and hold those involved accountable for their crimes. I requested Pro Bono Counsel in August and as a victim of a crime I should have been offered this right by the Supreme Court in which now since May of 2020 I have had to litigate my own matters with no protections from those who victimized me. Rena Hughes should have reported the egal Malpractice of both firms and failed to do so, and both firms failed to report the judicial misconduct of Rena Hughes. The court Transcripts are not accurate, and many parts of the trial have been

removed. Rena Hughes is a trespasser of law, and therefor her orders are void and have no legal affect and my annulment should be granted. I am asking the Supreme Court to issue Pro Bono Counsel immediately and uphold my rights as a victim, as forcing me to litigate this matter is abuse when I am entitled to a attorney for the government. My life is now in danger as Bobby Antee, Linda Naw, Nikki Siklais Bott post my address, social security number, ID, and phone number on social media to attempt to conceal their crimes. I informed Supreme Court in May of 2020 prior to Rena Hughes entering her fabricated ruling and Kristina Pickering knowingly allowed the misconduct and abuse to continue. Due to her refusal to litigate this matter fairly and without bias, I have had to spend over \$10k in appeals, scanning, copying, printing, and now hotels to protect myself. Bobby Antee, Linda Naw, and Shumway Van continue to send people to my home to threaten me to further conceal their actions. I now fear for my life, while everyone who is acting under the color of law deprives me of justice and attacks me for asking for justice. Bobby Antee did not produce any evidence of the lender disqualifying me from being on the title of the home, he produced no evidence of every telling me I would be on the loan, and then for 3 years uttered the deed to be true with Shumway Van and Linda Naw. Grayson Moulton continues to instruct Bobby Antee to continue defrauding me to evade prosecution, in which they have only been able to evade arrest due to clear misconduct of LVMPD. I am asking the Supreme Court to put an end to this nightmare and stop the endless delays. Bobby Antee married me with the intent to defraud me, once he did he spent 6 months abusing me, and once I caught him, he spent 3 years lying about it and concealing his actions. Rena Hughes then also tried to attack my work by fabricating her ruling to state that I used monies from my foundation to purchase the home, when she know that to be untrue, but had every intent ofn defrauding me and causing me harm by abusing her judicial position. As an adverse party, I am entitled to Quiet Title, return of monies stolen from me, damages, restitution, and protection from all parties. Rena Hughes ordered me to stay in the home and refused to force the sale, forcing me to pay \$37k in mortgage payments when I was clearly entitled to the home outright. I would like the Supreme Court to issue a Writ of Arrest for Linda Naw, Bobby Antee, Nikki Siklais Bott, Grayson Moulton, Melissa Parker, Drew Levey, Melanie Treanor, and Logan Wilson. They all knowingly concealed or committed mortgage fraud and therefore are all guilty of Felony charges and imprisonment. Grayson Moulton does not serve anything he files; he ignores orders from the Supreme Court and is abusing the legal system for his own agenda. Grayson Moulton, Garrett Chase has both represented Bobby Antee so should not impose a conflict of interest with their representation of Realtor Linda Naw. I filed for annulment in October 2020, in which the motion was ignored, and my case moved to a completely different department, to further ensure I do not get due process. I am not being informed of telephone hearings and every judge is deciding matters in chambers

depriving me of my right to be heard and condoning the attacks and abuse on me by Grayson Moulton. Now I have file Title 42 complaint being that Kristina Pickering was informed of the Judicial Misconduct, Legal Malpractice, and fraud and did nothing to uphold her oath to the Constitution and my rights as a victim or a disabled litigant. This case should have never gone to trial, therefor the appeal process taking a year is judicial abuse.

DATED this 9	day of February	, 2021
		Lindsey Licari Signature of Appellant
		Lindsey Licari
		Print Name of Appellant

CERTIFICATE OF SERVICE

I certify that on the date indicat	ed below, I served a copy of this completed
informal brief form upon all parties to the app	peal as follows:
☐ By personally serving it upon him/he	er; or
By mailing it by first-class mail with	sufficient postage prepaid to the following
address(es) (list names and address(es)	
SHUMWAY VAN GARRETT CHASE GRAYSON MOULTON 8985 s Eastern Ave #100 Las Vegas, NV 89123 grayson@shumwayvan.com Garrett@shumwayvan.com	
DATED this 9 day of FEBURARY	June 2021. Signature of Appellant LINDSEY LICARI Print Name of Appellant 9564 Scorpion Track of
	Address

LAS Vegas, NV 89178
City/State/Zip
7025776657
Telephone