

IN THE SUPREME COURT OF THE STATE OF NEVADA

AIMEE MORRISON,
Appellant(s),

vs.

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

Electronically Filed
Oct 25 2021 09:30 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No: A-21-832762-C

Docket No: 83389

RECORD ON APPEAL

ATTORNEY FOR APPELLANT
AIMEE MORRISON, PROPER PERSON
1801 S. DECATUR BLVD. #26764
LAS VEGAS, NV 89126

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

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Aimee Morrison
6456 Butterfly Sky Street
North Las Vegas, Nevada 89084
702-302-0481
whereintheworldisaimée@gmail.com
Plaintiff, in proper person

Electronically Filed
04/12/2021

Aimee Morrison
CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT

CLARK COUNTY NEVADA

Aimee Morrison,
Plaintiff,

v.

Charlene O'Neil,

Gloria Mazzoli,
Defendant(s),

A-21-832702-C
XXIX

COMPLAINT

Plaintiff, Aimee Morrison in proper person, complains against defendants,

CHARLENE O'NEIL and GLORIA MAZZOLI inclusive as follows:

1. Plaintiff, AIMEE MORRISON, 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, GLORIA MAZZOLI, is an individual who currently, and

Was at all relevant times herein, a resident of The State of New York,

County of Oswego, City of Oswego.

RECEIVED

APR 12 2021

CLERK OF THE COURT

And was at all relevant times herein, a resident of The State of Florida,
County of Pinellas, City of Palm Harbor.

4. All of The Acts and or failures to the act(s) alleged herein were duly
Performed by both defendant's, individually or acting by through their
Agents.

5. Both defendant's use Attorney, Kevin Beck, 3137 E. Warm Springs
Road, Suite 100, Las Vegas, Nevada 89120 and I spoke with Mr. Beck
And made him aware multiple cases were on there way, he said to
Serve him. He was already aware there was more to follow.

FACTS

1. Both defendant's have been caught by multiple people at the plaintiff's
Multiple places of employment engaging in intentional misconduct.
2. Most recently, the plaintiff was employed at Osaka Japanese Bistro,
In Las Vegas, Nevada.
3. The plaintiff alleges that both defendants are negligent of making known
False statements against the plaintiff.
4. The defendant's both have knowledge that the statements are false
5. These statements were used maliciously in statements intending to
Persuade the owner, Gene, co-workers, and other members of the

Community, as these two defendants are publically exploiting false malicious
Lies intended to interfere with employment by alleging false statements
Intended to persuade one.

6. The plaintiff alleges that both defendant's contacted the owner and
Made him believe that I suffer from mental retardation or some learning
Disability without any evidence to substantiate this.

7. The defendant's both created public schemes of alleged homelessness
And mental impairments.

8. In a previous investigation by The United States Department of Labor,
Defendant O'Neil after an investigation was found to have communicated,
Through a third person, the serious threats of physical violence, " you
Stupid, retarded, handicapped fucker," at a restaurant in full capacity by
Influencing a third party person to communicate publically false information,
Intended to harm the reputation, financial means of support, profits.

9. I have a current Nevada Restraining Order. Defendant O'Neil is NOT
Permitted at my places of employment and her and her cohort, Mazzoli,
Are using a "cop" to engage in this practice of ridicule, shame, lower in
Estimation in the community, employment status. The defendants are
Approaching these employers, and the most recent employer, Osaka

DISCREDIT, exploit, defame....

10. The defendants had the other hire me as a Food Server.

11. The defendants both influenced co-workers and the owner to

Make up lies by saying I was mentally impaired.

12. The plaintiff, as the defendant very well knows, never repeated any
Grades in school, was never in any learning disability classes.

13. The plaintiff's aunt, Josephine Wahrendorf, sister of the defendant,
O'Neil, is a reading specialist. The plaintiff has no impairments and its
Being exploited as lies, hatred, as this communication is being used as
Hatred.

13. The plaintiff graduated from college in 2005. Than 2010. Than started
Her grad degree.

14. Apparently some significant lies are being created to defame the plaintiff
And cause intentional financial harm, injury to reputation, impairs my
Financial well being

15. The plaintiff has a letter from Emily Kleemen, that contradicts further
Slander.

16. Neither defendant has had any contact with the plaintiff in decades.

17. Both defendant's have a serious history of entering, influencing,

Caught. This act is being exploited to the community intentionally by Both defendants as retaliation for being sued. They are intentionally Doing it here.

18. The plaintiff's cousin, Dr. Thom Lappas, also defendant O'Neil's Nephew, whom I resided with for several years, knows very well these Acts are false.

19. Defendant Mazzoli communicated to multiple third party people, Slanderous statements regarding false information over my deceased Grandmother to a close friend, Jeff Knapp.

20. Both defendant's are intentionally slandering to harm my rights to Future college education by degrading statements meant to cause Disassociation from others refraining with you, affecting my livelihood, But is now obstructing my right to work. The defendants know it isn't True but are intentionally engaging in misconduct that causes injury.

21. Both defendants were told in 2018 by Mr. Leigh Hunt, retired head Of The New York State Police to CEASE and DESIST via phone. Both have refused and went on to be caught by Juan Serrata, EEOC Worker for Las Vegas at Amano's Pizza, a former job, and were Ordered to stay away from my employers, they ignored that order

22. Osaka Japanese Bistro, the plaintiff in all good faith with hopes,
The defendants don't have a warrant to be at my employers first
Of all. The defendants are communicating this all over through third
Party people.

23. They are both negligently making statements with reckless disregard,
Designed in a scheme to intentionally harm one's reputation.

24. Charlene O'Neil is a known drug informant. She has pull through some
Sheriff's office where she's wheeling and dealing drugs and employs these
Acts through corrupt law enforcement as does Mazzoli.

25. The plaintiff purchased a body camera for the use of employment and
Has both defendant's on film over 300 hours doing heinous, bizaar, crazy
Acts to disturb, disrupt, interfere, obstruct employment for trial.

26. The individual Gloria Mazzoli used my grandmother's name to endorse,
Has been cited by my cousin Dr. Thom Lappas, that this family engages in
Dangerous illegal activity, all of them. He has made multiple statements
Regarding the safety of these people and this is OUR grandmother, and I
Am certain Dr. Lappas wants to communicate some facts to the courts
Regarding lies of deceit.

27. I was a model. Defendant O'Neil's jealousy, is to target all employment

To ruin credit, stability, career, my college education, and they have been
Caught 9 times. NINE TIMES. This is number TEN. We are only dealing
With this job and this situation, as we have nine more times to go.

28. Defendant O'Neil intentionally violated a Nevada restraining order from
Florida to do this.....I am asking the courts to refer and recommend to the
District attorney's office for a felony charge, as its foreseeable, she REFUSES
To STOP, after dozens and dozens of orders....

29. Both defendants have committed the act of trespass

30. Both defendant's "influenced" a former employer by alleging I was
Mentally disabled

31. I am moving this case into a judgement with attached evidence

A. Letter from Social Security

32. JoAnn O'Neil retired head of The London CIA investigated and caught
Them trespassing and making slanderous lies to my former employer in
Order to prevent me from serving food

34. Both defendant's are libel for intentionally crossing state lines with the
Intent to disrupt employment causing financial devastation once again; this
Is the 7th time. They are under a Federal Rico investigation on top of
Everything else that they conspire. The act of trespass is enough to satisfy

35. Mazzoli is NOT permitted in the State of Nevada as she was just found to be under Federal Kidnapping charges, she knew she was under a Federal Investigation and both defendant's continue to ignore multiple investigations.

36. Both defendant's are under investigations in 3 states for racketeering Acts, RICO

37. BOTH defendant's were ordered by Federal Agent, Juan Serrata to Stay away from my employers 3 jobs ago. They failed to do so and both defendant's and there attorney were aware of SEVERAL Federal Investigations and both defendant's continued to trespass and slander me by influencing a employer

38. Gloria Mazzoli has been caught FEDERALLY for influencing a Transport driver in Arizona. Gloria Mazzoli influenced an attorney in Thev State of Colorado. Gloria Mazzoli has forged medical records. Gloria Mazzoli was warned by Mr. Leigh Hum in the state of Colorado Not to trespass at my employers and continued to do so causing Financial injury

39. Mazzoli is still under several federal investigations

40. According to the Federal Victims Crime Act, as she is now considered A Federal perpetrator, I am entitled to all relief caused directly by her

41. Defendant O'Neil should be incarcerated. A Florida Baker Act
Petition has been filed to hold defendant O'Neil in a psych ward until
Deemed safe to society

42. Mazzoli no longer has any privileges or benefits, especially in a court
Of law

CLAIMS FOR RELIEF

1. Slander and actual malice Section 41.332, A State of Mind arising from
HATE toward the plaintiff and does NOT include a public concern but the
Motive is HATE. Both defendants are communicating finances with third
Party people, which violates marital rights. Once again alleging Im eligible
For Social Security both defendants today attempted threaten restraints
From employment, this is a new Federal complaint, I am ineligible for
Security, but incompetent ignorant defendants think they are Federal
Judges. Read the letter from Social Security, been ineligible since you
Obtained a BA but when we are dealing with ignorance. This is a new
Federal Complaint. Trying to interfere with a Federal Working Order,
This is what normal people do in America. Now a new investigation
Is underway as I turned both defendants in and Im moving this straight
To a judgment, the evidence is overwhelming. Once again both are
Restrained

2. Title 18 USC section 249 HATE CRIMES The Matthew Shepard Act

The defendants know these acts are of malice, designed to interfere and Disrupt finances. Conspiracy of my rights, knowing the act was unlawful And was used as a means to sabotage finances as I have been serving food For a long time, my highest paying job is grossing \$4000 a week, since I Cant serve food according to both defendants, my paystubs show \$4000 A week gross from serving jobs, I believe the defendants should pay Highest grossing wage as a punishment for intentionally interfering with My right to work, communicating to the employer that I couldn't serve Food and this paystub shows \$ 2998.38 weekly gross for a food server who Cant serve food since BOTH defendants are non educated, are crossing State lines to intentionally interfere with employment. I believe a job Separation for current and future wages for the person who cant serve Food but grossed \$4000 a week. HATE and JEALOUSY, Mr. Leigh Hunt says it in the report....

The facts are undisputable. These defendant's have been caught by my Aunt, retired head of The London CIA, JoAnn O'Neil. A statement from Leigh Hunt, An order from The United States Department of Labor Confirming after a Federal Investigation that defendant O'Neil did in

Supports she would continue. Juan Serrata, Federal EEOC Worker also
Caught them and ordered them TO STOP one year ago. They refused, than
On a live feed camera, knowing they were being watched, they got caught
Again. This is not a triable case, The facts are undisputed. I am moving
This court into a judgment against both defendants for slander and
Intentional malice of HATE.

I am requesting a State injunctive order restraining both defendant's
From The State of Nevada, as they have intentionally went to three
Different restaurants with the intent to deceive, manipulate, deface,
As THEY have NO LEGITIMATE PURPOSE in NEVADA. One lives
In New York, one lives in Florida, one is NOT allowed in the State of
Virginia, defendant O'Neil can explain why, she harbored a fugitive to
Virginia on vehicular manslaughter and harbored a missing infant in
A dangerous scheme taking an infant with no custody order out of NY.
An injunctive order restraining both defendant's from The State of Nevada
Is necessary for foreseeable prevention so I can return to work SAFELY.
I am requesting that serious fines for the defendants to be caught at a
Future job be the highest allowable in the State of Nevada, if they violate,

Strict huge financial penalty should be paid to the courts as ongoing
Fine for being in the State when they have NO LAWFUL authority to
Be in Nevada. There not in a restaurant to eat dinner by third parties,
They send people in to disrupt the entire dining room, influence
Supervisors to break the law, these are very serious charges and these
Defendant's act like they won the lottery. It is a Federal felony for them
To influence a Federally Protected Zone to encourage CRIME, slander,
Harassment, interfere with tip wages, to gain control, when THEY HAVE
NO LAWFUL BUSINESS IN NEVADA.

The defendant's knowingly and intentionally entered the plaintiff's former
Employer, Osaka Japanese Bistro, with the intent to slander, defame, and
Act with intentional malice to interfere with employment.

The defendants act have caused intentional economic injury to the plaintiff,
Across many state lines, the last act occurred on January 28, 2021.

The plaintiff alleges injuries have resulted in damages of \$75,000 for
Each defendant, if the defendants choose to go to trial I am requesting a
Trial fee imposed at \$1,000,000 as special witnesses will not communicate
Positive things about the defendants intentional acts of Hate to disrupt
Employment.

There is intent. There is willfulness. They trespassed onto to my job,
Violating a Nevada restraining order, which is trespass. Stalking across
State lines. They conspire to violate the law. They encourage others to
Break the law, and others are “ ordered “ to join as defendant O’Neil,
Thinks she’s some organized crime leader, creating a syndicate of “ schemes “
So heinous, there indescribable. Vicarious liability, one can seek damages
From the indirect person who is the “ mastermind, “ of the criminal
Enterprise. SEVERE forms of exploitation, with force, coercion, fraud, and
LABOR.....the video’s are one way to silence them.

PRAYER FOR RELIEF

WHEREFORE, plaintiff prays for the following relief:

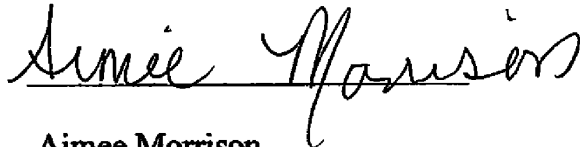
1. Compensatory relief of \$25,000
2. General Damages \$25,000
3. Punitive damages to punish and deter future acts of \$25,000
4. For interest at the statutory rate and any other relief the court deems
Just and equitable.
5. Civil Conspiracy-overt fraud that has resulted in damages Nev. R. Civ
P4 (d) (b)
6. Intentional Infliction of Emotional Distress- Extreme Outrageous Conduct,

Possible bounds of decency and is regarded as utterly intolerable in a civilized community

I declare under the penalty of perjury under the law of The State of Nevada

That the foregoing is true and correct so help me God.....

DATED: 20th day of March, 2021

A handwritten signature in cursive script that reads "Aimee Morrison". The signature is written in black ink and is positioned above the printed name and address.

Aimee Morrison
6456 Butterfly Sky Street
North Las Vegas, Nevada 89084
702-302-0481
whereintheworldisaimée@gmail.com
Plaintiff, in Proper Person

Attorney on record for the Defendant's

Kevin Beck
3137 E. Warm Springs Road
St. 100
Las Vegas, Nevada 89101

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

leighhunt@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. Amiee 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 Amiee'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 Amiee'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

DECLARATION OF GLORIA MAZZOLI

STATE OF NEW YORK)
COUNTY OF OSWEGO) ss:

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.

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

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.

Maverick Colorado LLC
2926 Montessouri Street
Las Vegas, NV 89117



Direct Deposit Advice

Check Date
January 7, 2020

Voucher Number
417

	Direct Deposits	Type	Account	Amount
DIRECT DEPOSIT VOUCHER	Western	C	***9516	83.70
	Commercial B			
	Total Direct Deposits			83.70

102847 1-200-67010 2385 417 416 102847
Non Negotiable - This is not a check - Non Negotiable
 AIMEE ONEIL
 208 35 TH ST SW
 LOVELAND, CO 80537

Non Negotiable - This is not a check - Non Negotiable

Maverick Colorado LLC

AIMEE ONEIL

Earnings Statement

Employee ID	2385	Fed Taxable Income	127.50	Check Date	January 7, 2020	Voucher Number	417
Location	1-200-67010	Fed Filing Status	S-1	Period Beginning	December 30, 2019	Net Pay	83.70
Hourly	\$10.00	State Filing Status	S-1	Period Ending	December 30, 2019		

Earnings	Rate	Hours	Amount	YTD
Cash Tips				10.06
Holiday wo	15.00	8.50	127.50	127.50
Overtime				589.50
Regular				800.00
Tips in/ou				905.33
Gross Earnings		8.50	127.50	2,432.39
Taxes			Amount	YTD
CO			6.00	106.00
FTW			28.05	304.66
MED			1.85	35.27
SS			7.90	150.80
Taxes			43.80	596.73

Deductions	Amount	YTD
Tips in/out		905.33
		905.33
Direct Deposits	Type Account	Amount
Western Commercial Bank	C ***9516	83.70
Total Direct Deposits		83.70
Time Off	Available To Use	Plan Year Used
PTO	0.00	0.00



SOCIAL SECURITY

Refer to:
S9H: SSA-2020-002711

May 12, 2020

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

We have received your request for records and a disability determination. According to our records, you were found to have a favorable physical disability determination on December 16, 1994. At this time we have no such evidence or findings of a mental impairment, learning impairment, or any other such limitation. There was never a disability decision for any such impairment according to federal records and findings. Case number (SSA-2020-002711). After a recent fact finding hearing at the Denver office it was determined that you no longer are eligible for any such physical disability benefits as per request of your Dr.

Mary Ann Zimmerman
Privacy Officer



RE: Aimee O'Neil, Letter of Record
April 28, 2020

To whom it may concern:

Aimee O'Neil was a participant of The Reentry Initiative (TRI) Transitional Housing Program in Longmont, Colorado, between the dates of October 2018 – May 2019. During her time at TRI, Aimee engaged successfully with the program, met weekly with her care manager and actively participated in all requirements of parole and TRI. During the course of her stay, Aimee shared an apartment with three other females and was a leader in the home to others. Aimee's ability to communicate her needs and advocate for herself has granted her the ability to be approved to move on from TRI house in under 9 months from release from incarceration.

Aimee held multiple employment positions throughout her stay at TRI and was employed relatively quickly upon release. Within a few short weeks, Aimee successfully applied and secured two jobs during her stay for over 6 months and managed to pay rent and stay in compliance of all requirements. Aimee attended a mental health assessment as required by her parole plan and stay at TRI house. Aimee was not mandated to attend therapy or substance abuse groups following a comprehensive assessment. In lieu of community mental health, Aimee was offered mental health support from TRI's Executive Director on a weekly basis. During those sessions, Aimee was forthcoming about her needs, able to participate appropriately and was gaining insight around how her anxiety manifests. Aimee followed directives and implemented techniques to improve her mental health functioning.

Aimee has always been independent and can make decisions regarding her health and well-being without the need of professional or personal interventions. Aimee is a strong advocate for herself and determined to stay in compliance with her parole requirements. Aimee understands the importance of mental health and independence and wants to continue to move forward in her life. Aimee successfully exited TRI house in May 2019 and relocated to northern Colorado, with approval from her Parole Officer. Aimee has since been in contact with TRI's ED for further assistance with referrals and resources and can reach out whenever needed for more support.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Kleeman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Emily Kleeman, LCSW
Executive Director, TRI

12/4/2018



Order Accepted for Processing

Your Order Number is 8MD747931

Please retain this number in case you need to contact us about your order.

Additional Action Required

Authorization Form

To obtain your authorization form, please [click here](#) and use our SelfServicePlus™ application to download and print the form which must then be faxed or mailed for processing.

In order for us to comply with national & state privacy and security laws, the only acceptable form of authorization for this order is the student's signature on our authorization form. Your order will not be processed until our form authorizing the school to release this academic transcript is signed by the student and has been received and processed by us. If an authorization form contains any social security or credit card numbers, we consider this a violation of the privacy laws and we will reject the form. Your order will remain un-authorized.

Your order will be canceled if you do not authorize your order within 30 days.

If your order is canceled:

- We will email you a confirmation that it has been canceled
- You will have to re-enter your entire order if you still want the transcript(s)
- You will NOT be charged

Thank you for using TranscriptsPlus® to place your order with Cayuga Community College. You may check the status of your Transcript Order at any time by going to [Credentials Solutions, LLC Self-ServicePlus™](#).

Please select a next action by clicking one of the buttons below:

[Finish](#)

[Order Another](#)

[Transcripts FAQs](#)
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Northfield, IL 60093

12/4/2018

Parchment Exchange - Leader in eTranscript Exchange - University of Northern Colorado



UNIVERSITY OF
NORTHERN
COLORADO

1. Login or Register

2. Select Documents

3. Order Details

4. Provide Consent

5. Payment

6. Review Order

Select Document

The following Transcript Restrictions were found on this record:

We're sorry, but due to a financial hold on your student account we were unable to fulfill your transcript request. Transcript orders will not be released until the hold is clear. Questions concerning financial holds should be directed to our Bursar's Office at (970) 351-2201 or bursar@unco.edu. It is the student's responsibility to reorder the transcript once the financial hold has been satisfied. Your credit card will not be charged until your order has been completed.

We're sorry, but due to a financial hold on your student account we were unable to fulfill your transcript request. Transcript orders will not be released until the hold is clear. Questions concerning financial holds should be directed to our Bursar's Office at (970) 351-2201 or bursar@unco.edu. It is the student's responsibility to reorder the transcript once the financial hold has been satisfied. Your credit card will not be charged until your order has been completed.

For any further questions or help please contact us at transcript@unco.edu, 888 666-9408

Parchment Ordering Service v2.9
Copyright © 2006-2018 Parchment Inc. All Rights Reserved.
Privacy Policy, Refund Policy.
08:36am PST

12/4/2018

Parchment Exchange - Leader in eTranscript Exchange - University of Northern Colorado



UNIVERSITY OF
NORTHERN
COLORADO

1. Login or Register

2. **Select Documents**

3. Order Details

4. Provide Consent

5. Payment

6. Review Order

Select Document

The following Transcript Restrictions were found on this record:

We're sorry, but due to a financial hold on your student account we were unable to fulfill your transcript request. Transcript orders will not be released until the hold is clear. Questions concerning financial holds should be directed to our Bursar's Office at (970) 351-2201 or bursar@unco.edu. It is the student's responsibility to reorder the transcript once the financial hold has been satisfied. Your credit card will not be charged until your order has been completed.

We're sorry, but due to a financial hold on your student account we were unable to fulfill your transcript request. Transcript orders will not be released until the hold is clear. Questions concerning financial holds should be directed to our Bursar's Office at (970) 351-2201 or bursar@unco.edu. It is the student's responsibility to reorder the transcript once the financial hold has been satisfied. Your credit card will not be charged until your order has been completed.

For any further questions or help please contact us at transcript@unco.edu, 888 666-9408

Parchment Ordering Service v2.9
Copyright © 2006-2018 Parchment Inc. All Rights Reserved.
Privacy Policy, Refund Policy,
08:36am PST

12/4/2018

Order Receipt



Order Accepted for Processing

Your Order Number is 8MD748071

Please retain this number in case you need to contact us about your order.

Additional Action Required

Authorization Form

To obtain your authorization form, please [click here](#) and use our SelfServicePlus™ application to download and print the form which must then be faxed or mailed for processing.

In order for us to comply with national & state privacy and security laws, the only acceptable form of authorization for this order is the student's signature on our authorization form. Your order will not be processed until our form authorizing the school to release this academic transcript is signed by the student and has been received and processed by us. If an authorization form contains any social security or credit card numbers, we consider this a violation of the privacy laws and we will reject the form. Your order will remain un-authorized.

Your order will be canceled if you do not authorize your order within 30 days.

If your order is canceled:

- We will email you a confirmation that it has been canceled
- You will have to re-enter your entire order if you still want the transcript(s)
- You will NOT be charged

Thank you for using TranscriptsPlus® to place your order with SUNY-Oswego. You may check the status of your Transcript Order at any time by going to [Credentials Solutions, LLC Self-ServicePlus™](#)

Please select a next action by clicking one of the buttons below:

[Finish](#)

[Order Another](#)

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[Customer Service](#)

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Northfield, IL 60093

**Cayuga Community College
Auburn, NY**

Order Accepted for Processing

Your Order Number is 8MD747931

Please retain this number in case you need to contact us about your order.

Additional Action Required

Authorization Form

To obtain your authorization form, please [click here](#) and use our SelfServicePlus™ application to download and print the form which must then be faxed or mailed for processing.

In order for us to comply with national & state privacy and security laws, the only acceptable form of authorization for this order is the student's signature on our authorization form. Your order will not be processed until our form authorizing the school to release this academic transcript is signed by the student and has been received and processed by us. If an authorization form contains any social security or credit card numbers, we consider this a violation of the privacy laws and we will reject the form. Your order will remain un-authorized.

Your order will be canceled if you do not authorize your order within 30 days.

If your order is canceled:

- We will email you a confirmation that it has been canceled
- You will have to re-enter your entire order if you still want the transcript(s)
- You will NOT be charged

Thank you for using TranscriptsPlus® to place your order with Cayuga Community College. You may check the status of your Transcript Order at any time by going to [Credentia Solutions, LLC Self-ServicePlus™](#).

Please select a next action by clicking one of the buttons below:

[Finish](#)

[Order Another](#)

[Transcripts FAQs](#)

[Privacy Policy](#)

[Customer Service](#)

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Northfield, IL 60093

12/4/2018

Order Receipt



Order Accepted for Processing

Your Order Number is 8MD748071

Please retain this number in case you need to contact us about your order.

Additional Action Required

Authorization Form

To obtain your authorization form, please [click here](#) and use our SelfServicePlus™ application to download and print the form which must then be faxed or mailed for processing.

In order for us to comply with national & state privacy and security laws, the only acceptable form of authorization for this order is the student's signature on our authorization form. Your order will not be processed until our form authorizing the school to release this academic transcript is signed by the student and has been received and processed by us. If an authorization form contains any social security or credit card numbers, we consider this a violation of the privacy laws and we will reject the form. Your order will remain un-authorized.

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- We will email you a confirmation that it has been canceled
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Thank you for using TranscriptsPlus® to place your order with SUNY-Oswego. You may check the status of your Transcript Order at any time by going to [Credentials Solutions, LLC Self-ServicePlus™](#).

Please select a next action by clicking one of the buttons below:

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[Transcripts FAQs](#)

[Privacy Policy](#)

[Customer Service](#)

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Northfield, IL 60093

SUMM

Aimee Morrison

(Your Name)

6456 Butterfly Sky St.

(Your Mailing Address)

N. Las Vegas, NV 89084

(Your City, State, Zip Code)

702-302-0481

(Your Telephone Number)

(Your Fax Number)

whereintheworldisaimed@gmail.com

(Your E-mail Address)

Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff's

Name:

Aimee Morrison

Plaintiff,

vs.

Defendant's

Name:

Gloria Mazzoli

Defendant.

Case No.:

A-21-832762-C

Dept. No.:

XXIX

SUMMONS

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

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 days¹ 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

¹ 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.

1 response) to Plaintiff's complaint.

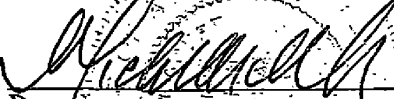
- 2 2. Pay the required filing fee to the court, or file an Application to Proceed *In Forma*
3 *Pauperis* and request a waiver of the filing fee.
4 3. Serve (by mail or hand delivery) a copy of your response upon the Plaintiff whose name
5 and address is shown below.

6 **Information and forms to assist you are available, free of charge, at the Civil Law Self-**
7 **Help Center at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, and on**
8 **the center's website at www.civillawselfhelpcenter.org.**

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

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

13 STEVEN D. GRIERSON, CLERK OF COURT

14 

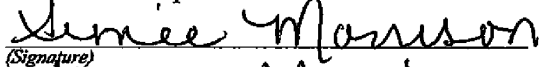
15 APR 12 2021

16 By:

17 Date:

18 Deputy Clerk Michelle McCarthy
19 Regional Justice Center
20 200 Lewis Avenue
21 Las Vegas, Nevada 89155

22 Issued at the request of:

23 

24 (Signature)

25 Aimee Morrison

26 (Your Name)

27 6456 Butterfly Sky St.

28 (Your Street Address)

29 Las Vegas, NV 89084

30 (Your City, State, and Zip Code)

31 Plaintiff, Self-Represented

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

SUMM

Amiee Morrison

(Your Name)

6456 Butterfly Sky St.

(Your Mailing Address)

NLas Vegas, NV 89084

(Your City, State, Zip Code)

702-302-0481

(Your Telephone Number)

(Your Fax Number)

whereintheworldisamiee@gmail.com

(Your E-mail Address)

Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff's

Name:

Amiee Morrison

Plaintiff,

vs.

Defendant's

Name:

Charlene O'Neil

Defendant.

Case No.:

A-21-832762-C

Dept. No.:

XXIX

SUMMONS

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

To the Defendant named above: Charlene O'Neil

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 days¹ 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

¹ 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.

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.

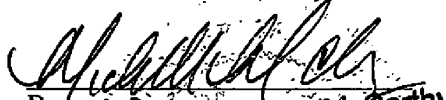
4 3. Serve (by mail or hand delivery) a copy of your response upon the Plaintiff whose name
5 and address is shown below.

6 **Information and forms to assist you are available, free of charge, at the Civil Law Self-**
7 **Help Center at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, and on**
8 **the center's website at www.civillawselfhelpcenter.org.**

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

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

13 STEVEN D. GRIERSON, CLERK OF COURT

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

APR 12 2021

18 Issued at the request of:

19 Aimee Morrison
(Signature)

20 Aimee Morrison
(Your Name)

21 6456 Butterfly
(Your Street Address)

22 N. Las Vegas, NV 89084
(Your City, State, and Zip Code)

23 Plaintiff, Self-Represented

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

Electronically Filed
04/16/2021

Andrew S. Hemin
CLERK OF THE COURT

AOS

Aimee Morrison

(Your Name)

6456 Butterfly Sky St.

(Your Mailing Address)

N. Las Vegas NV 89084

(Your City, State, Zip Code)

702-302-0481

(Your Telephone Number)

(Your Fax Number)

Whereintheworldisaimed@gmail.com

(Your E-mail Address)

Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff's
Name:

Aimee Morrison

Case No.:

A-21-832762-C

Dept. No.:

XXIX

Plaintiff,

vs.

Defendant's
Name:

Gloria Mazzoli

Defendant.

AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY

☒

(Insert name of person performing service)

Vicktor Young II

, being duly

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,

☐ Other (specify) _____ on (insert date and

time you served) _____, 20____, at the hour of _____ M., on Defendant (insert Defendant's

name) _____ by the

following method (complete appropriate paragraph below):

☒

Personal service per NRCP 4.2(a)(1): Delivering and leaving a copy with (insert

Defendant's name)

Kevin Beck Attorney for defendant

at (insert address at

which you served)

3137 E. Warm Springs Rd

Suite 100

Las Vegas, NV 89126

☐ **Substitute service per NRCP 4.2(a)(2):** Delivering and leaving a copy with *(insert name or physical description of person served)* _____, a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at *(insert Defendant's address)* _____.

☐ **Service on a business entity per NRCP 4.2(c)(1)(A):** Delivering and leaving a copy with *(insert name or physical description of person served)* _____ who is Defendant's *(check one)* ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager, ☐ trustee, or ☐ other *(specify)* _____, at *(insert address at which you served)* _____.

☐ **Other method of service authorized by Nevada statute or court rule:** _____

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

SERVER'S SIGNATURE: [Signature] 7-7-21 **Date:** 04/12/2021

Server's Phone: 702) 470-3362

Server's ☒ **Residential/** ☐ **Business Address:** 6125 Sapphire gold st. N. Las Vegas

☐ I am a licensed process server or an employee of a licensed process server; my license or registration number is *(insert license or registration number):* _____.

☒ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another provision of law because am not engaged in the business of serving legal process within the State of Nevada.

AOS

Aimee Morrison

(Your Name)

6456 Butterfly Sky St.

(Your Mailing Address)

Las Vegas, NV 89084

(Your City, State, Zip Code)

702-302-0481

(Your Telephone Number)

whereintheworldisaimae@gmail.com

(Your E-mail Address)

Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff's
Name:

Aimee Morrison

Case No.:

A-21-832762-C

Dept. No.:

XXIX

Plaintiff,

vs.

Defendant's
Name:

Charlene O'Neil

Defendant.

AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY

(Insert name of person performing service)

Vicktor Young II

, being duly

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,

☐ Other (specify)

on (insert date and

time you served)

April 12, 2021

at the hour of

3:00 PM.

on Defendant (insert Defendant's

name)

Kevin Beck - Attorney for Charlene

by the

following method (complete appropriate paragraph below):

O'Neil



Personal service per NRCP 4.2(a)(1): Delivering and leaving a copy with (insert

Defendant's name)

Charlene O'Neil at Kevin Beck

at (insert address at

which you served)

3137 E Warm Springs Rd

Suite 100

Las Vegas, NV 89120

///

Heather Shuman
CLERK OF THE COURT

MISC

Name:

Address:

Telephone:

Email Address:

In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

Plaintiff,

vs.

Defendant.

CASE NO.:

DEPT:

Proof of Service

Title of Document

Respectfully submitted by:

(Your signature)

(Your name)

☒ Plaintiff / ☐ Defendant In Proper Person

RECEIVED

MAY 06 2021

CLERK OF THE COURT

AOS

Aimee Morrison

(Your Name)

1456 Butterfly Sky St.

(Your Mailing Address)

Las Vegas, NV 89084

(Your City, State, Zip Code)

(62-302-0481)

(Your Telephone Number)

(Your Fax Number)

whereintheworldisamee@gmail.com

Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

A-21-832762-C

Plaintiff's
Name:

Aimee Morrison

Case No.:

Dept. No.:

~~A-21-832762-C~~
XXIX

Plaintiff,

vs.

Defendant's
Name:

Charlene O'Neil

Defendant.

AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY

(Insert name of person performing service) LEON GUSTUS

, being duly 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,

☐ Other (specify) _____

on (insert date and time you served) APRIL 26, 2021, at the hour of 1:40 P.M., on Defendant (insert Defendant's name) CHARLENE O'NEIL

by the following method. (complete appropriate paragraph below):

☒

Personal service per NRCP 4.2(a)(1): Delivering and leaving a copy with (insert

Defendant's name)

CHARLENE O'NEIL

at (insert address at

which you served)

1317 WHITEBRIDGE DR. APT. D.
PALM HARBOR FL 34684

///

☐ **Substitute service per NRCP 4.2(a)(2):** Delivering and leaving a copy with (insert name or physical description of person served) _____, a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at (insert Defendant's address) _____.

☐ **Service on a business entity per NRCP 4.2(c)(1)(A):** Delivering and leaving a copy with (insert name or physical description of person served) _____ who is Defendant's (check one) ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager, ☐ trustee, or ☐ other (specify) _____, at (insert address at which you served) _____.

☐ **Other method of service authorized by Nevada statute or court rule:** _____

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

SERVER'S SIGNATURE: _____

Date: 4/26/2021

Server's Phone: 727-492-0651

Server's ☐ Residential/ ☒ **Business Address:** 10485 HAZEL ST. LAS VEGAS NV 89131

☒ I am a licensed process server or an employee of a licensed process server; my license or registration number is (insert license or registration number): APS 32046

☐ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another provision of law because am not engaged in the business of serving legal process within the State of Nevada.

AOS

Aimee Morrison
6456 Butterfly Sky St
N Las Vegas NV 89084
702-302-0481

whereintheworldisamee@gmail.com
Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

Plaintiff's Name: Aimee Morrison
vs. Plaintiff,
Defendant's Name: Charlene D'Neil
Defendant.

Case No.: A-21-832762-C
Dept. No.: XV

AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY

(Insert name of person performing service) LEON GUSTUS, being duly 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, ☐ Other (specify) _____ on (insert date and time you served) APRIL 26, 2021, at the hour of 1:40 P.M., on Defendant (insert Defendant's name) CHARLENE D'NEIL by the

following method (complete appropriate paragraph below):

☒ **Personal service per NRCP 4.2(a)(1):** Delivering and leaving a copy with (insert Defendant's name) CHARLENE D'NEIL at (insert address at which you served) 1317 WHITEBRIDGE DR APT D
PALM HARBOR FL 34684

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☐ **Substitute service per NRCP 4.2(a)(2):** Delivering and leaving a copy with *(insert name or physical description of person served)* _____, a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at *(insert Defendant's address)* _____.

☐ **Service on a business entity per NRCP 4.2(c)(1)(A):** Delivering and leaving a copy with *(insert name or physical description of person served)* _____, who is Defendant's *(check one)* ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager, ☐ trustee, or ☐ other *(specify)* _____, at *(insert address at which you served)* _____.

☐ **Other method of service authorized by Nevada statute or court rule:** _____

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

SERVER'S SIGNATURE: Leon S. V... Date: 4/26/21

Server's Phone: 727-492-0651

Server's ☐ Residential/ ☒ Business Address: 10485 HAZEL ST LARGO FL 33778

☐ I am a licensed process server or an employee of a licensed process server; my license or registration number is *(insert license or registration number)*: APS 32046

☐ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another provision of law because am not engaged in the business of serving legal process within the State of Nevada.

EIGHTH JUDICIAL DISTRICT
CLARK COUNTY NEVADA

Electronically Filed
05/19/2021

Heather S. Shuman
CLERK OF THE COURT

Aimee Morrison,

Plaintiff,

v.

Gloria Mazzoli,

Charlene O'Neil,

Defendant's

A-21-832762-C
Chambers
Hearing
Requested

NOTICE OF MOTION

The plaintiff alleges as follows:

1. Both defendant's entered into a conspiracy to forge HHS documents
2. One or both defendant's forged documents it is believed in New York State by falsifying under sworn affidavit to statements they knew were Untrue and took that chance to lie and face criminal State and Federal Charges
3. These defendant's falsified records saying I was intellectually impaired and Than crossed state lines representing HHS workers and human research after Being told by multiple Federal Agents to leave the State of Nevada instead Dr. Thom Lappas, my cousin, A Federal Employee in Washington DC, got Into the records and said someone is impersonating a Dr., and forged records

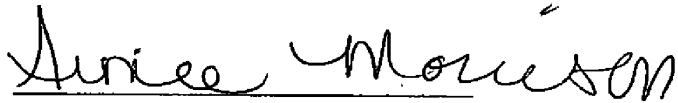
CLERK OF THE COURT

MAY 19 2021

RECEIVED

They knew were untrue and were collecting Federal money and laundering
It, and it is under investigation in Washington DC. Multiple R.I.C.O.
Schemes. These two defendant's are dangerous. They have lied under
Civil torts, the act of deceit intentional misrepresentation to mislead by
False statements that would intentionally cause financial harm, now were
Receiving tax payer dollars to obstruct my employment and this is fraud.
4. Filing an affidavit the defendant's knew to be untrue constitutes the
Tort of abuse of power allowing for additional relief to punish the
Wrongdoers

Dated : May 17, 2021

A handwritten signature in cursive script that reads "Aimee Morrison". The signature is written in dark ink and is positioned above a horizontal line.

Aimee Morrison
6456 Butterfly Sky Street
North Las Vegas, Nevada 89084

EIGHTH JUDICIAL DISTRICT
CLARK COUNTY NEVADA

Electronically Filed
05/19/2021

Heather S. Levin
CLERK OF THE COURT

Aimee Morrison,
Plaintiff,

v.

Case:A-21-832762-C

Charlene O'Neil,
Gloria mazzoli,
Defendant's

*Chambers
Hearing
Requested*

NOTICE OF MOTION

The plaintiff alleges as follows:

1. Osaka Japanese Bistro has posted an ad on Indeed looking for servers,

As I am still unemployed due to the two defendant's communicating

Libel, defamation, and slander that violates confidential communication

The defendant's are not allowed by law even if it was true to communicate

Health information

2. I applied and was hired at TGIFriday's at The Orlean's Casino on

April 17, 2021. I began orientation on April 18, 2021. My first day of

Training was April 22, 2021 at 11:00 am. I worked for four hours and

My trainer said, that the two defendant's were plotting human trafficking,

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MAY 19 2021
CLERK OF THE COURT

Forced movement. The manager called two hours later and stated
That corporate said no hiring but an ad is posted and attached. The
Defendant's found out where I was employed and intentionally made
Up defaming lies in order to obstruct employment

3. I am requesting additional relief and additional wage interference by
Intentional obstruction and the immediate request for a speedy trial so
I can return to serving food immediately.

4. These two defendant's are obstructing my right to employment as a
Food server by communicating fraud to employers so I will not and
Cannot use my education, and I have bills for my Federal Student Loan Debt.

5. As I typed this motion. Gloria Mazzoli just had a person call me from
China Panda and I didn't apply but she had me sexually harassed at China
Panda so I cant go back in.

6. These two defendant's are interfering with marital finances intentionally
And debts.

7. 18 U.S. C. 371 Conspiracy of my Rights

8. 18 U.S.C. 1001 Lying and covering up

9. 18 U.S.C. 1905 Disclosure of Confidential Information that is Fraud

10. The plaintiff wishes to request to put Dr. Ellen Seely on the stand
Immediately so I may return to employment

11. The plaintiff wishes to depose Dr. Thom Lappas, immediately
12. The plaintiff wishes to depose, Jean Charn, from The Harvard Bello-Sacks Law Program
13. The plaintiff wishes to depose Harvard Professor Robert Torrisi, whom she Did her undergrad degree program with.
14. Both defendant's are lying intentionally to harm stable employment as Mazzoli keeps threatening human trafficking
15. The Sixth Amendment guarantees my right to a speedy trial
16. Mr. Leigh Hunt retired head of The New York State Police knows both Defendants conspire to intentionally obstruct employment
17. The plaintiff has a right to seek equitable relief and damages caused by Both defendant's who are conspiring against her education and her right to Work
18. Defendant O'Neil is attempting to influence my husband, Mark Morrison, By communicating deceit, lies, and false information which is fraud
19. The actions of both defendants constitute torts of deceit
20. Intentional misrepresentation with the intent to mislead by the use of False statements
21. The plaintiff alleges the act of trespass
22. The element of scienter is self evident in the instance of this case

23. The defendant's knowingly and continually falsify statements they know
To be fictitious with the intent to deceive, manipulate, coerce, and conspire
Fraud, this is abuse of process

24. The defendant's actions are unethical, and patently unlawful conduct on
The part of both defendants who communicate intentional fraudulent
Statements intended to create harm for employment

25. Both defendant's were ordered by Federal Agent Juan Serrata to
Leave Nevada. They have continued to stay and conspire against
Employment with the intent to commit Federal Fraud

26. JoAnn O'Neil, my aunt, retired head of The London CIA caught
Both defendant's after Juan Serrata caught them in R.I.C.O. conspiracies.
Both defendants refuse to leave

27. Defendant O'Neil has once again violated a Nevada Restraining order
To communicate false information with the intent to mislead and commit
Fraud

28. Both defendant's have falsified documents in New York State by
Deceit and fraud alleging human research

29. Dr. Ellen Seeley is Harvards 2020 World Scientist of the year and will
Communicate that both defendants are lying, perpetrating fraud, and
Conspiring across state lines with the intent to obstruct, interfere, and

Conspire against my right to employment as a food server.

A. Dr. Seeley- Harvards 2020 World Scientist of The Year

B. Jean Charm Director of Bellow-Sacks, Harvards Law Program

C. Mr. Robert Torrisi

D. Tim O'Neil, ex husband of Charlene O'Neil he knows she is lying
To commit fraud

E. Mr. Leigh Hunt, retired head of The NYS Police who gave defendant
O'Neil a cease and desist order from trespassing

F. Juan Serrata Federal Agent

G. JoAnn O'Neil- retired head of The London CIA she told to leave. They
Were given Federal orders to leave.

H. Dr. Thom Lappas, NASA Scientist i\s conducting Confidential Classified

Federal Research on me and both defendants are intentionally interfering

And conspiring to obstruct normal. Dr. Lappas is conduct research and he

Says that I am being tampered with. They are NOT allowed to be harassing,

Interfering, obstructing. Its time Dr. Lappas is deposed against these two

Defendants as he has a lot to offer about both of them and he has entire file

Of Federal Research on me, contradicting their lies. They were ordered out

Of Las Vegas. I am involved in Federal Research and this was the last notice,

Of attempting to interfere with employment and telling employers I am human

Research for them, and this is fraud and they were caught. It is impairitive

Dr. Lappas be deposed. Defendant O'Neil has been impersonating fictitious

People and created a fraudulent human research twin study, but she is my

Mother, and was getting paid to stay in NY boundaries, and conduct

Scientific research while receiving payment, and lets discuss about the money

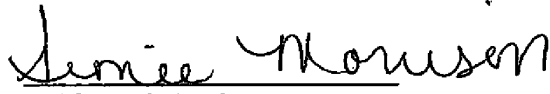
And fraud. Obstructing research for NASA is a Federal Felony and it is
Now being turned over to The US Attorney's Office. These defendant's
Continue to interfere with job interviewing and to maintain my marriage,
And today both defendants communicated more lies with the intent of
Deceit to perpetrate fraud and its time my cousin, Dr. Thom Lappas steps
In and gains control over this out of control situation. Mazzoli keeps
Threatening human trafficking, This is the final time I am stating this, NASA
And The US Navy conduct research at Walker Lake, NV and they conduct
It in Las Vegas, NV. Both of these defendant's are guilty with interfering
With multiple Federal Human researches, including Dr. Seeley, at Harvard
University. This letter from The Federal Court of Claims states I have
Classified judge and classified hearing scheduled as both of these defendants
Are accused of interfering with Federal Research and exploiting and releasing
This information to the employers and it say, " classified ." These defendant's
Are obstructing a normal federal observation by continuing intentional negative
Interactions, obstructing employment. I just worked at Arizona Charlies on
Decatur, in the café for a year. I can serve food and I have body cam video
Showing both defendants on video knowing I can serve food.

These two defendant's are miserable do not want to see me be happy they are
Doing anything they can to destroy my life. Dr. Seeley from Harvard University

Knows both defendant's are lying to intentionally interfere with Federal Medical Research for The United States Military. They were told to leave Nevada, both continue to obstruct and intentionally interfere with Employment.

I am moving this court to a judgement as there are no triable issues, Rule 56 of Nevada Summary Judgement and the plaintiff is entitled to A judgement as a matter of law

Dated: May 15, 2021


Aimee Morrison
6456 Butterfly Sky Street
North Las Vegas, Nevada 89084

CERTIFICATE OF SERVICE

I do hereby certify that on the 16th day of May, 2021, I served a Notice of Motion upon the defendant, Charlene (O'Neil) Wahrendorf, 1317 Whitebridge Dr. Apt D, Palm Harbor, Florida 34684 by First Class United States Mail and Gloria Mazzoli of 119 E. Utica St., Oswego, NY 13126 by First Class United States Mail



8:28

Apply with your Indeed Resume

 Responsive Employer

3 days ago

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new



Server



Timbers Hospitality Group Inc
Henderson, NV

➤ **Apply with your Indeed Resume**

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2 days ago • From server restaurant in North Las Vegas, NV

~~~~~

**new**



## Bartender and Server



Osaka Sunset  
Las Vegas, NV

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**Urgently hiring**

1 day ago • From Servers in North Las Vegas, NV

[illegible]

**new**



## Operations/Restaurant Manager



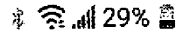

GameWorks Inc 3.6 ★  
Las Vegas, NV

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8:29  29% **Catering Assistant Banquet Manager** 

Station Casinos 3.5 ★

Las Vegas, NV

 Be an early applicant


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new

**Dining Room Manager**

Del Frisco's Las Vegas 3.2 ★

Las Vegas, NV

 Be an early applicant

1 day ago • From management in North Las Vegas, NV

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**Server**TGI FRIDAYS LAS VEGAS/GOLD COAST CASINO 

Las Vegas, NV


 Apply with your Indeed Resume Be an early applicant

Today • From Servers in North Las Vegas, NV

new

**Restaurant Manager**Viva Cocina Latina LLC 

Las Vegas, NV

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Muneerah Saleem - 0152202 - TGI Fridays Inc.

## My Employees

Role  
GM - Hourly

| First name - starts with aimee |                                      |                    |           |        | Displaying all records |                             |
|--------------------------------|--------------------------------------|--------------------|-----------|--------|------------------------|-----------------------------|
| Name                           | Employee Number                      | Primary Work Phone | Extension | Status | Job                    | Site                        |
| O'Neil (Morrison),<br>Aimee    | 0161143 ← Username<br>DOB ← Password |                    |           | Active | W/W                    | 60743-<br>LV/Orleans,<br>NV |

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

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

10 AIMEE MORRISON,  
11 Plaintiff,

Case No.: A-21-832762-C  
Dept. No.: 29

12 vs.

**HEARING REQUESTED: YES**

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

16 **MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT,**  
17 **TO HAVE PLAINTIFF DEEMED A VEXATIOUS LITIGANT, AND FOR**  
18 **ATTORNEY'S FEES UNDER NRS 18.010**

19 Defendants Charlene O'Neil ("O'Neil") and Gloria Mazzoli ("Mazzoli") hereby move  
20 this honorable Court for relief from Plaintiffs' Complaint, filed April 12, 2021 (the  
21 "Complaint"), pursuant to NRCP 12(b)(5). Alternatively, Defendants seek summary  
22 judgment to the extent the Court finds it necessary to consider matters outside of the  
23 pleadings. Plaintiff Aimee Morrison a/k/a Aimee O'Neil ("Morrison") has become a serial,  
24 vexatious litigant—having filed six state-court lawsuits against O'Neil in the last year and six  
25 lawsuits against Mazzoli in the same timeframe. This does not include the federal-court cases  
26 Plaintiff has filed against the Defendants. Each of the cases are baseless, containing contrived  
27 and fantastical allegations against Morrison's mother, O'Neil (who resides in Florida and has  
28 nothing to do with Plaintiff), and her former partner's mother, Mazzoli (who resides in New

1 York and has nothing to do with Plaintiff). Consistent with the Judgment entered in Case No.  
2 A-20-815618-C (the "May 2020 Action"), between the same parties, this Court should find  
3 Plaintiff has failed to state a claim against Defendants as her claims are barred by the doctrine  
4 of claim preclusion. Any claims that are based on facts prior to the filing of that case should  
5 have been brought in that action.

6 To the extent Plaintiff is alleging claims that arose after the filing of the May 2020  
7 Action, Defendants seek summary judgment on any such claims as (1) Plaintiff cannot  
8 produce any admissible evidence in support of her claims for relief and (2) Plaintiff's  
9 allegations are facially deficient and without any reasonable basis.

10 Defendants further move the Court for an Order that Plaintiff be added to the list of  
11 vexatious litigants as provided for in Supreme Court Rule 9.5. By filing six lawsuits against  
12 the Defendants in the last year, Plaintiff has demonstrated that she is a vexations litigant. In  
13 granting the Defendants' Motion for Summary Judgment in the May 2020 Action, Judge  
14 Sturman found Plaintiff was potentially a vexations litigant, noting that she had filed multiple  
15 federal and state cases based on the same allegations of wrongdoing. In her Order Granting  
16 Summary Judgment, Judge Sturman found Plaintiff's conduct to be indicative of forum or  
17 judge shopping and harassing the Defendants. The Court cautioned that if Morrison were to  
18 continue on with multiple actions against Defendants, Morrison should be deemed a vexations  
19 litigant.

20 Defendants also seek an award of attorney's fees against Morrison pursuant to NRS  
21 18.010. Morrison has no reasonable ground for bringing these claims against Defendants and  
22 has done so merely to harass Defendants.

23 ///

24 ///

25 ///

1 This Motion is made and based upon the pleadings and papers on file herein, the  
2 attached Points and Authorities, the Declarations of Charlene O'Neil and Gloria Mazzoli, and  
3 the argument of counsel at the hearing on this Motion.

4 DATED this 19th day of May 2021.

5  
6 **Kevin E. Beck, Ltd.**

7 /s/ Kevin E. Beck  
8 Kevin E. Beck, NSB# 8371  
9 3137 E. Warm Springs Rd., Ste. 100  
10 Las Vegas, Nevada 89120  
11 *Attorney for Defendants*

12 **POINTS AND AUTHORITIES**

13 Morrison's claims against the Defendants must be dismissed for failure to state a  
14 claim as most, if not all, of her claims are barred under the doctrine of claim preclusion or res  
15 judicata. In 2020, Plaintiff filed two different cases in Federal Court against Defendants  
16 alleging much of the same fabricated stories she has set forth in this case. She then filed no  
17 less than six State-Court actions against each of the defendants. Plaintiff could have brought  
18 all claims against the Defendants in any of the earlier actions. Significantly, both the Federal  
19 Court and the State Court has entered judgment in favor of Defendants in those actions. In  
20 the May 2020 Action, Judge Sturman granted summary judgment in favor of Defendants on  
21 Morrison's claims based on claim preclusion and the fact that Morrison presented no  
22 arguments, facts, or evidence in support of her claims. Plaintiff has now wrongfully filed  
23 more actions against Defendants based on the same baseless allegations in an effort to rehash  
24 the same nonsensical claims. The Court should find Morrison's claims are barred by claim  
25 preclusion to the extent they could have been brought in an earlier action.

26 With regard to any claims based on allegations that occurred after the May 2020  
27 Action was initiated, the Court should grant summary judgment as to those claims. There is  
28 not a scintilla of truth to the allegations of wrongdoing that Plaintiff has made against the

1 Defendants. Plaintiff is estranged from the Defendants (Plaintiff's mother and the  
2 grandmother of her child) and has had no substantive interaction or communications with  
3 them for over ten years. Plaintiff has become so preoccupied with manufacturing unfounded  
4 allegations against the defendants that she blames Defendants for each negative interaction  
5 she may have in her life and claims—without any support—the Defendants hired each and  
6 every person who has any interactions with Morrison. Defendants have supported this motion  
7 with Declarations swearing that they did not engage in the conduct Plaintiff accuses them of  
8 doing. It is anticipated that Plaintiff will not be able to present any reliable evidence to  
9 contradict Defendant's Declarations.

10 It is time for the Court to intercede and take some action to keep Morrison from  
11 continuing to bring redundant, baseless claims against Defendants. Morrison must be added  
12 to the list of vexatious litigants and ordered to pay Defendants' attorney's fees.

#### 13 I. STATEMENT OF FACTS

14  
15 1. On April 7, 2020, Plaintiff filed a Complaint in the United States District Court for the  
16 District of Nevada ("Federal Court") against Charlene O'Neil and Gloria Mazzoli. *See* Case  
17 No. 2:20-cv-00652-JAD-BNW (the "First Federal Case"). A true and correct copy of the  
18 Complaint is attached as Exhibit C.

19 2. The Complaint in the First Federal Case contained various allegations related to  
20 violations of privacy, harassment, conspiracy against Morrison's rights out of hate, interfering  
21 with employment, hiring others to make threats against Morrison at her jobs, influencing  
22 others to sexually harass Morrison, causing Morrison's disability, intercepting phone calls and  
23 text messages, interference with Morrison's romantic relationships, causing Morrison's co-  
24 workers to be mean to her, paying others to drug and attempt to kill Morrison, using nude  
25 photos to force Morrison into child pornography, and a host of other nonsensical allegations.  
26 Some of these allegations, and variations on the same, are set forth in the instant action.

27 3. On August 18, 2020 the Magistrate Judge in the First Federal Case entered an Order  
28 and Report and Recommendation finding Plaintiff's claims to be frivolous in that Plaintiff's

1 allegations "describe fantastic and delusional scenarios and do not state a claim upon which  
2 relief can be granted." A true and correct copy of the Order and Report and Recommendation  
3 is attached as Exhibit D.

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

7 5. On June 17, 2020, Plaintiff filed a second case in Federal Court against Charlene  
8 O'Neil, again alleging wild allegations similar to those set forth in the prior case. *See* Case  
9 No. 2:20-cv-01050-JAD-DJA (the "Second Federal Case"). A true and correct copy of the  
10 Complaint is attached as Exhibit G.

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

14 7. Plaintiff appealed the Judgment in the Second Federal Case to the Ninth Circuit, but  
15 the Ninth Circuit dismissed the Notice of Appeal.

16 8. A mere two days after filing the Second Federal Case, Morrison filed a third case in the  
17 Federal Court, case number 2:20-cv-01109-GMN-BNW. This case rehashed the same types of  
18 allegations against O'Neil. As with the first two cases, the Federal Court dismissed the case  
19 and entered judgment against Morrison and in favor of O'Neil.

20 9. In the State Court, Plaintiff has filed at least six other cases with this Court involving  
21 one or both Defendants:

- 22 a. On May 28, 2020, Plaintiff filed Case No. A-20-815618-C against O'Neil and  
23 Mazzoli;
- 24 b. On September 29, 2020, Plaintiff filed Case No. A-20-822153-C against  
25 O'Neil;
- 26 c. On September 29, 2020, Plaintiff filed Case No. A-20-822159-C against O'Neil  
27 and Mazzoli;
- 28

- d. On October 6, 2020, Plaintiff filed Case No. A-20-822562-C against Mazzoli;
- e. On October 6, 2020, Plaintiff filed Case No. A-20-822573-C against Mazzoli;
- and
- f. On October 13, 2020, Plaintiff filed Case No. A-20-822965-C O'Neil.

10. The Court may review the Complaints filed in the seven actions Morrison has filed with the Court against Defendants over the course of the last year, but suffice it to say the Complaints are filled with similar fictitious scenarios and allegations as pled in both this case and the three Federal Court Cases.

11. In the other State Court actions, including the case where Judge Sturman granted summary judgment in favor of Defendants, Morrison has alleged the Defendants have: interfered with her employment, wages and tips; implanted a device into Morrison to track her; and have harassed her in a myriad of manners—the same allegations Morrison repeats here.

12. On January 27, 2021, Judge Sturman entered summary judgment in favor of Defendants on all of Morrison's claims. The Order is attached as Exhibit J. In relevant part, the Order provides:

THE COURT FINDS that Plaintiff's claims as set forth in this action are barred under the doctrine of claim preclusion. On or about April 7, 2020, two months prior to the Plaintiff's filing this action, Plaintiff filed an action in the United States District Court for the District of Nevada, case number 2:20-cv-00652-JAD-BNW. The Federal Court case involved the same parties as are present in this case. The Court in the Federal Court case entered a valid and final judgment in favor of the Defendants in that action on September 16, 2020. The claims that Plaintiff have alleged in this case were raised, or could have been raised, in the Federal Court case. Accordingly, Plaintiff is precluded, under the doctrine of claim preclusion, from litigating those claims in this case.

THE COURT FURTHER FINDS that Plaintiff is potentially a vexatious litigant. The Court notes that Plaintiff has filed multiple cases in the Federal Court (Case Nos. 2:20-cv-00652-JAD-BNW and 2:20-cv-01050-JAD-DJA) and in the Eighth Judicial District Court for the State of Nevada (Case Nos. A-20-822153-C, A-20-822159-C, A-20-822562-C, A-20-822573-C, and A-20-822965-C) that appear to relate to the same claims and allegations of wrongdoing that Plaintiff has alleged against the Defendants in this case. The Court finds the Plaintiff's conduct to be indicative of forum shopping or judge shopping. The Court further finds that Plaintiff's filing of multiple actions against Defendants appears to be an attempt to harass the Defendants. The Court further finds that Plaintiff's multiple actions appear to be without merit as she has alleged extraordinary allegations against

1 Defendants without providing any facts or evidence in support of her  
2 allegations. If Plaintiff continues to pursue with these multiple actions  
3 against Defendants, Plaintiff should be deemed a vexatious litigant and the  
4 Court will cause her name to be added to the list of vexatious litigants.

5 THE COURT FURTHER FINDS that Plaintiff has presented no arguments,  
6 facts, or evidence in support of her allegations in in opposition to  
7 Defendants' *Countermotion for Summary Judgment*.

8 IT IS HEREBY ORDERED *Defendant's Countermotion for Summary*  
9 *Judgment* is granted in favor of Defendants and against Plaintiff on all of  
10 Plaintiff's claims.

11 IT IS FURTHER ORDERED that Judgment is entered in favor of  
12 Defendants and against Plaintiff on each and every claim for relief alleged in  
13 this action.

14 13. In just over year, Plaintiff has filed at least ten different cases here in Nevada against  
15 Defendants.

16 **B. RELEVANT FACTS**

17 Plaintiff Aimee Morrison a/k/a Aimee O'Neil ("Morrison") is the daughter of  
18 Defendant Charlene O'Neil ("O'Neil"). See Exhibit A, Declaration of Charlene O'Neil  
19 ("O'Neil Decl."), ¶ 3. Due to Morrison's erratic thoughts and behaviors, O'Neil has not had  
20 any recent contact with Morrison. *Id.* at ¶ 4. O'Neil believes that she has not seen Morrison  
21 for over ten years. *Id.* at ¶ 5. Similarly, O'Neil has not had any conversations with Morrison  
22 in over ten years. *Id.* at ¶ 6. Morrison has sent a large amount of mail to O'Neil, but O'Neil  
23 does not respond to the correspondence, and sometimes does not even open the letters. *Id.* at  
24 ¶ 7. O'Neil has intentionally distanced herself from Morrison over the past decade because  
25 interactions between the two of them have historically been difficult on O'Neil. *Id.* at ¶ 8.

26 Defendant Gloria Mazzoli ("Mazzoli") is the mother of Morrison's former long-term  
27 boyfriend, John Mazzoli. John and Morrison have a child together. See Exhibit B,  
28 Declaration of Gloria Mazzoli ("Mazzoli Decl."), ¶ 3. Due to Morrison's erratic thoughts and  
behaviors and the fact that Morrison is no longer in a relationship with Mazzoli's son,  
Mazzoli has not had any recent, meaningful contact with Morrison. *Id.* at ¶ 4. Mazzoli has  
not seen Morrison in over ten years. *Id.* at ¶ 5. Aside from two short phone calls (one in  
March of 2020 and another in 2017), Mazzoli has not had any conversations with Morrison  
for over ten years. *Id.* at ¶ 6. In the March 2020 phone call, Morrison made some wild

1 accusations against Mazzoli and Mazzoli promptly ended the conversation. In the 2017  
2 conversation, Morrison was talking with Mazzoli about Morrison's children. *Id.* at ¶ 7.  
3 Although Morrison has sent a large amount of mail to Mazzoli, Mazzoli does not respond to  
4 Morrison's correspondence. *Id.* at ¶ 8.

### 5 **FACTS THAT SUPPORT A DISMISSAL OF PLAINTIFF'S CLAIMS**

6 The following facts support Defendants' Motion to Dismiss or Motion for Summary  
7 Judgment, in the alternative:

8 1. Neither Defendant has directly harassed, stalked, intimidated, intruded, or caused any  
9 harm or emotional distress to Morrison. *See* O'Neil Decl., ¶ 9; *see* Mazzoli Decl., ¶ 9.  
10 Morrison has failed to provide any admissible evidence to the contrary and she bears the  
11 burden of proof on this issue.

12 2. Neither Defendant has hired or requested that any third party harass, stalk, intimidate,  
13 intrude, or cause any harm or emotional distress to Morrison. *See* O'Neil Decl., ¶ 10; *see*  
14 Mazzoli Decl., ¶ 10. Morrison has failed to provide any admissible evidence to the contrary  
15 and she bears the burden of proof on this issue.

16 3. Neither Defendant has caused any persons to engage in any intentional misconduct  
17 against Morrison, including any persons who work at or patronize Morrison's current or prior  
18 places of employment.. *See* O'Neil Decl., ¶ 11; *see* Mazzoli Decl., ¶ 11. Morrison has failed  
19 to provide any admissible evidence to the contrary and she bears the burden of proof on this  
20 issue.

21 4. Neither Defendant made false statements or malicious lies about Morrison and have  
22 not used any false statements to interfere with her employment.. *See* O'Neil Decl., ¶ 12; *see*  
23 Mazzoli Decl., ¶ 12. Morrison has failed to provide any admissible evidence to the contrary  
24 and she bears the burden of proof on this issue.

25 5. Neither Defendant has, within the last ten years, talked with any of Morrison's  
26 employers and neither have suggested to any employer or coworker that Morrison suffers from  
27 mental retardation, a learning disability, or homelessness. *See* O'Neil Decl., ¶ 13; *see* Mazzoli  
28

1 Decl., ¶ 13. Morrison has failed to provide any admissible evidence to the contrary and she  
2 bears the burden of proof on this issue.

3 6. Neither Defendant has communicated with any third party, including Morrison's  
4 employers or co-workers, sentiments of hatred toward Morrison or disparaged her or her  
5 reputation. *See* O'Neil Decl., ¶ 14; *see* Mazzoli Decl., ¶ 14. Morrison has failed to provide  
6 any admissible evidence to the contrary and she bears the burden of proof on this issue.

7 7. Neither Defendant has slandered Morrison in any manner. *See* O'Neil Decl., ¶ 15; *see*  
8 Mazzoli Decl., ¶ 15. Morrison has failed to provide any admissible evidence to the contrary  
9 and she bears the burden of proof on this issue.

10 8. Neither Defendant is a drug informant and neither of them deal drugs. *See* O'Neil  
11 Decl., ¶ 16; *see* Mazzoli Decl., ¶ 16. Morrison has failed to provide any admissible evidence  
12 of her claimed damages and she bears the burden of proof on this issue.

13 9. Neither Defendant has violated any restraining orders or engaged in acts of trespass.  
14 *See* O'Neil Decl., ¶ 17; *see* Mazzoli Decl., ¶ 17. Morrison has failed to provide any admissible  
15 evidence to the contrary and she bears the burden of proof on this issue.

16 10. Neither Defendant has interfered with any of Morrison's financial rights related to her  
17 marriage or employment. *See* O'Neil Decl., ¶ 18; *see* Mazzoli Decl., ¶ 18. Morrison has  
18 failed to provide any admissible evidence to the contrary and she bears the burden of proof on  
19 this issue.

20 11. Neither Defendant has caused any damages to Morrison. *See* O'Neil Decl., ¶ 19; *see*  
21 Mazzoli Decl., ¶ 19. Morrison has failed to provide any admissible evidence to the contrary  
22 and she bears the burden of proof on this issue.

## 23 II. LEGAL ARGUMENT

### 24 A. The Court Should Dismiss Plaintiff's Complaint for Failure to 25 State a Claim Against Defendants Because the Claims are Barred 26 by the Doctrine of Claim Preclusion.

27 Pursuant to NRCP 12(b)(5), Plaintiffs' complaint fails to state a claim upon which  
28 relief can be granted against Defendants. *See* NRCP 12(b)(5). A motion to dismiss for failure

1 to state a claim is proper under NRCP 12(b)(5) if it appears that the plaintiff could prove no  
2 set of facts that would entitle it to relief. *Pankopf v. Peterson*, 175 P.3d 910, 912 (Nev.  
3 2008). "Dismissal is proper where the allegations are insufficient to establish the elements of  
4 a claim for relief." *Stockmeter v. Nev. Dep't of Corr. Psychological Review Panel*, 183 P.3d  
5 133, 135 (Nev. 2008).

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

15 In this case, all of the elements of claim preclusion are present. Plaintiff has brought  
16 nine other cases against the Defendants. All three of the Federal Court Cases and the State  
17 Court Case before Judge Sturman, Case No. A-20-815618-C (the "May 2020 Action"), have  
18 been brought to a final judgment and involved the same parties. For simplicity, Defendants  
19 will focus on the May 2020 Action wherein Judge Sturman granted summary judgment in  
20 favor of Defendants, though the Federal Court cases would have a preclusive effect, as well.  
21 The May 2020 Action involved the the same parties as are present in this case: Morrison  
22 (formerly known as Aimee O'Neil), O'Neil and Mazzoli. The Court in the May 2020 Action  
23 entered a valid, final Order granting summary judgment in favor of Defendants on January  
24 27, 2021.<sup>1</sup> Third, it is clear that the claims that Morrison has raised in this case were raised,  
25

26  
27 <sup>1</sup> Although Plaintiff has appealed this Order it should be of no consequence. The Order  
28 currently stands. Even if the Court were to take the position that the Order is not a valid, final  
Order at this time, the Court could look to any of the Orders and Judgments in the Federal

1 or could have been raised, in the May 2020 Action or any of the dismissed Federal Court  
2 cases. Throughout the relevant complaints, Morrison has complained of harassment, privacy  
3 violations, acts of hatred and interference, conspiring with others, interfering with  
4 employment, and disparaging or slanderous comments regarding Morrison. Moreover,  
5 because this case was filed within a year of the May 2020 Action, Morrison could have  
6 brought the claims she brought here in the May 2020 Action. To the extent there are recent  
7 allegations, those can be addressed through summary judgment. Morrison's repetitive claims  
8 are precluded and must be dismissed.

9 The policy behind claim preclusion is to prevent the relitigation of claims and applies  
10 perfectly to this situation. Within the span of just over a year, Morrison has filed ten separate  
11 actions against the Defendants in Nevada. The Court should not condone Morrison's  
12 repetitive attempts to relitigate the case or to sneak a ruling or judgment past the Defendants  
13 by filing multiple actions on fictitious claims. As Judge Sturman pointed out in her Order,  
14 Morrison's conduct smacks of forum or judge shopping. Defendants urge the Court to find  
15 that Morrison is a vexatious litigant.

16 Any claims that rely on allegations prior to May of 2020 should be dismissed as they  
17 are properly precluded. This would appear to cover the bulk, if not all of Morrison's  
18 allegations. Out of an abundance of caution, the Court can similarly dismiss any claims  
19 allegedly arising after May of 2020 through summary judgment.

20 **B. The Court Should Grant Summary Judgment in Favor of**  
21 **Defendants.**

22 "Summary judgment is appropriate ...when the pleadings and other evidence on file  
23 demonstrate that no 'genuine issue as to any material fact exists and that the moving party is  
24 entitled to a judgment as a matter of law.'" *Wood v. Safeway, Inc.*, 121 Nev. 724, 731, 121  
25 P.3d 1026, 1031 (2005). "A factual dispute is genuine when the evidence is such that a  
26

27 Court cases for the same preclusive effect. None of those are subject to an appeal and they  
28 have the same preclusive effect.

1 rational trier of fact could return a verdict for the nonmoving party.” *Id.* at 731, 121 P.3d at  
2 1031.

3 Pursuant to NRCP 56(c)(1)(b) and (e), Defendants request summary judgment in their  
4 favor because Morrison has not, and cannot, present the Court with evidence of the material  
5 facts she alleged in her Complaint. Though she has alleged these same or similar facts in  
6 each of her ten actions against the Defendants in Nevada, Morrison has failed to produce any  
7 competent evidence to support such allegations. Defendants have denied all of the relevant  
8 allegations of wrongdoing that Morrison has stated. Now, in addition to denying such  
9 allegations, Defendants affirmatively state that Aimee has no admissible evidence to support  
10 her claims and request that the Court enter judgment in their favor.

11 NRCP 56(c)(1)(b) allows a defendant to show the absence of a material issue of fact  
12 by pointing to the fact that an adverse party cannot produce admissible evidence to support a  
13 fact. Morrison has made fantastic, wild allegations against Defendants, but the fact is that  
14 Morrison has absolutely no admissible evidence to support those allegations. Her claims are  
15 based entirely on supposition and what appears to be delusions that two elderly women living  
16 on the opposite end of the country are conspiring with Morrison’s employers, coworkers, and  
17 many third parties to cause damage to Morrison, here in Nevada. There is no evidence to  
18 support this, and Defendants flatly deny it.

19 Plaintiff lacks admissible evidence to support her claims for slander, malice and hate  
20 crimes. Morrison does not have any evidence to support the essential elements of those  
21 claims. If Morrison does have actual evidence to support her fantastic allegations, she should  
22 present that evidence in opposition to this Motion. Unless she is able to produce admissible  
23 evidence in response to this Motion, the Court should enter judgment in favor of Defendants,  
24 pursuant to NRCP 56.

25 **C. The Court Should Deem Morrison a Vexatious Litigant.**

26 Pursuant to Supreme Court Rule 9.5, this Court should designate Morrison a vexatious  
27 litigant. This Court has the ability to declare a party a vexatious litigant. Upon entering an  
28 order declaring a litigant to be vexatious, the Court submits a copy of the order to the directed

1 of the administrative office of the Courts. The director then enters the name of the litigant on  
2 the list of vexatious litigants. See SCT 9.5.

3 In order to impose a vexatious litigant status on a party the Court must (1) provide  
4 notice and an opportunity to oppose the proposed restrictions; (2) create an adequate record  
5 that includes a list of filings of other reasons that led it to conclude a restrictive order was  
6 necessary; (3) make substantive findings as to the frivolous or harassing nature of the  
7 litigant's actions; and (4) narrowly tailor the restrictions to address the specific problem and  
8 set an appropriate standard by which to measure future filings. *Jones v. Eighth Judicial Dist.*  
9 *Ct.*, 130 Nev. 493, 495-496, 330 P.3d 475 (2014).

10 Morrison has filed ten different actions against Defendants in just over a year's time.  
11 These are actions filed in Nevada, where neither of the Defendants reside. The cases all  
12 involve the same type of meritless allegations against Defendants. Defendants should not  
13 have to continue to incur attorney's fees in addressing these actions and run the risk that  
14 Plaintiff will get a judgment against Defendants by some surprise or mistake.

15 Judge Sturman laid the framework for a vexatious litigant filing and it is time for the  
16 Court to complete that process. In relevant part, Judge Sturman noted:

17 THE COURT FURTHER FINDS that Plaintiff is potentially a  
18 vexatious litigant. The Court notes that Plaintiff has filed multiple  
19 cases in the Federal Court (Case Nos. 2:20-cv-00652-JAD-BNW  
20 and 2:20-cv-01050-JAD-DJA) and in the Eighth Judicial District  
21 Court for the State of Nevada (Case Nos. A-20-822153-C, A-20-  
22 822159-C, A-20-822562-C, A-20-822573-C, and A-20-822965-C)  
23 that appear to relate to the same claims and allegations of  
24 wrongdoing that Plaintiff has alleged against the Defendants in this  
25 case. The Court finds the Plaintiff's conduct to be indicative of  
26 forum shopping or judge shopping. The Court further finds that  
27 Plaintiff's filing of multiple actions against Defendants appears to  
28 be an attempt to harass the Defendants. The Court further finds  
that Plaintiff's multiple actions appear to be without merit as she  
has alleged extraordinary allegations against Defendants without  
providing any facts or evidence in support of her allegations. If  
Plaintiff continues to pursue with these multiple actions against  
Defendants, Plaintiff should be deemed a vexations litigant and the  
Court will cause her name to be added to the list of vexatious  
litigants.

Despite Judge Sturman's clear warning, Morrison continues to bring multiple actions against  
Defendants, relying on the same type of nonsensical allegations.

1 Through her opposition, Morrison is provided with an opportunity to address this  
2 issue, fully. The Court should function a remedy that will protect the Defendants from  
3 multiple additional filings, resting on the same claims or allegations. The clerk of the court  
4 could screen any future proposed filing that Morrison presents alleging claims against either  
5 Defendant.

6 Defendants plead with the Court for relief in this regard. They are elderly women  
7 who cannot afford to continue to pay legal fees for Morrison's baseless claims.

8  
9 **D. The Court Should Order Morrison to Pay Defendant's Attorney's Fees.**

10 Under NRS 18.010(2)(b), the Court may award attorney's fees to a litigant if the Court  
11 finds a claim was brought without reasonable ground or to harass the prevailing party. The  
12 statutes provides the Court should liberally construe the provisions of the statutes to award  
13 attorney's fees in all appropriate situations. Specifically, the rule is intended to "punish for  
14 and deter frivolous or vexatious claims." NRS 18.010(2)(b).

15 Defendants urge the Court to award them their incurred legal fees in connection with  
16 this matter. This would hopefully deter future frivolous filings by Morrison. As discussed  
17 above, Morrison has filed ten separate actions against Defendants in the span of a year. Each  
18 time, Plaintiff has no evidence to support her claims, just delusional allegations and claims.  
19 Defendants will present the Court with billing records to support their claim for attorney's  
20 fees in this matter should the Court find in their favor.

21 ///

22 ///

23 ///

1           **III. CONCLUSION**

2           For each of the foregoing reasons, Defendants requests that the Court dismiss  
3 Plaintiff's Complaint in its entirety. Defendants further request the Court deem Plaintiff a  
4 vexatious litigant and award attorney's fees under NRS 18.010.

5  
6           DATED this 19th day of May 2021.

7  
8                           **Kevin E. Beck, Ltd.**

9                                   /s/ Kevin E. Beck  
10 Kevin E. Beck, NSB# 8371  
11 3137 E. Warm Springs Rd., Ste. 100  
12 Las Vegas, Nevada 89120  
13 *Attorney for Defendants*

14                           **CERTIFICATE OF SERVICE**

15           I hereby certify that on this 19th day of May, 2021, a true and correct copy of the  
16 foregoing *MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY*  
17 *JUDGMENT, TO HAVE PLAINTIFF DEEMED A VEXATIOUS LITIGANT, AND FOR*  
18 *ATTORNEY'S FEES UNDER NRS 18.010* was sent via electronic means in the Eighth  
19 Judicial District Court pursuant to Administrative Order 14-2 and by U.S. Mail, first class  
20 postage prepaid, to the following at their last known address:  
21  
22

23           Aimee Morrison  
24           6456 Butterfly Sky St.  
25           North Las Vegas, NV 89084

26                                   /s/ Kevin E. Beck  
27 An employee of Kevin E. Beck, Ltd.  
28

# EXHIBIT A

# EXHIBIT A

**DECLARATION OF CHARLENE O'NEIL**

STATE OF FLORIDA        }  
COUNTY OF PINELLAS    } ss:

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

1. I am a defendant in the matter of Aimee Morrison 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' *MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT, TO HAVE PLAINTIFF DEEMED A VEXATIOUS LITIGANT, AND FOR ATTORNEY'S FEES UNDER NRS 18.010*. 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.

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

11. I have not caused any persons to engage in any intentional misconduct against Aimee, including any persons who work at or patronize Aimee's current or prior places of employment.

12. I have not made false statements or malicious lies about Aimee and have not used any false statements to interfere with her employment.

13. In the last ten years, I have not talked with any of Aimee's employers and I have certainly not suggested to any employer or coworker that Aimee suffers from mental retardation, a learning disability, or homelessness.

14. I have not communicated with any third party, including Aimee's employers or co-workers, sentiments of hatred toward Aimee or disparaged her or her reputation.

15. I have not slandered Aimee in any manner.

16. I am not a drug informant and I do not deal drugs.

17. I have never intentionally violated any restraining order or engaged in acts of trespass.

18. I have not interfered with any of Aimee's financial rights related to her marriage or employment.

19. I have not caused any damages to Aimee.

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

/s/ Charlene O'Neil  
Charlene O'Neil

# **EXHIBIT B**

# **EXHIBIT B**

**DECLARATION OF GLORIA MAZZOLI**

STATE OF NEW YORK     }  
COUNTY OF OSWEGO    } ss:

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

1. I am a defendant in the matter of Aimee Morrison 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' *MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT, TO HAVE PLAINTIFF DEEMED A VEXATIOUS LITIGANT, AND FOR ATTORNEY'S FEES UNDER NRS 18.010*. 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.

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

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 caused any persons to engage in any intentional misconduct against  
4 Aimee, including any persons who work at or patronize Aimee's current or prior places of  
5 employment.

6           12.     I have not made false statements or malicious lies about Aimee and have not  
7 used any false statements to interfere with her employment.

8           13.     In the last ten years, I have not talked with any of Aimee's employers and I  
9 have certainly not suggested to any employer or coworker that Aimee suffers from mental  
10 retardation, a learning disability, or homelessness.

11           14.     I have not communicated with any third party, including Aimee's employers or  
12 co-workers, sentiments of hatred toward Aimee or disparaged her or her reputation.

13           15.     I have not slandered Aimee in any manner.

14           16.     I am not a drug informant and I do not deal drugs.

15           17.     I have never intentionally violated any restraining order or engaged in acts of  
16 trespass.

17           18.     I have not interfered with any of Aimee's financial rights related to her  
18 marriage or employment.

19           19.     I have not caused any damages to Aimee.

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

22  
23  
24                               /s/ Gloria Mazzoli  
25                               Gloria Mazzoli  
26  
27  
28

# **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<br>ENTERED                              | RECEIVED<br>SERVED ON |
| COUNSEL/PARTIES OF RECORD                     |                       |
| APR - 7 2020                                  |                       |
| CLERK US DISTRICT COURT<br>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  
whereintheworldisaimae  
@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. 12/15) 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
  - ② 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 Aimee O. Neil  
Printed Name of Plaintiff 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 exploitment 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 Probation  
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 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 Amye O'Neil by calling Dumez 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 Amye'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's 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

Charlene O'Neil asked Aimee to bring home wine from Paris, France. Customs agents held Aimee and called Charlene demanding her to pick Aimee 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

XXVII

"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**

1  
2  
3 UNITED STATES DISTRICT COURT  
4 DISTRICT OF NEVADA

5 \* \* \*

6 AIMEE LYNN O'NEIL,  
7 Plaintiff,

8 v.

9 CHARLENE O'NEIL,  
10 GLORIA MAZZOLI

11 Defendants.  
12

Case No. 2:20-cv-652-JAD-BNW

**ORDER AND  
REPORT AND RECOMMENDATION**

13 Presently before the court is pro se Plaintiff Aimee O'Neil's application to proceed *in*  
14 *forma pauperis* and her complaint filed on April 7, 2020. ECF No. 1. Plaintiff filed a second such  
15 motion on April 27, 2020. ECF No. 14. In addition, on May 5, 2020, she filed a motion to make  
16 payments in lieu of appearing in forma pauperis.<sup>1</sup> ECF No. 18.

17 Plaintiff submitted the declaration required by 28 U.S.C. § 1915(a) showing an inability to  
18 prepay fees and costs or give security for them. ECF No. 1. Accordingly, Plaintiff's request to  
19 proceed *in forma pauperis* will be granted. Given her first application to proceed *in forma*  
20 *pauperis* (ECF No. 1) is granted, her second application (ECF No. 14) and her motion to make  
21 payments (ECF No. 18) are denied a moot. The Court will next screen the complaint. ECF No. 1-  
22 1.

23 **I. SCREENING OF COMPLAINT AND MOTIONS TO AMEND COMPLAINT**

24 **A. BACKGROUND**  
25  
26

27  
28 <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.

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.


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

13   
14 BRENDA WEKSLER  
15 UNITED STATES MAGISTRATE JUDGE  
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# **EXHIBIT E**

# **EXHIBIT E**

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3  
4 Aimee Lynn O'Neil,  
5 Plaintiff  
6 v.  
7 Charlene O'Neil, et al.,  
8 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]

10  
11 Aimee Lynn O'Neil claims that her mother in Florida, aided by another woman in New  
12 York, interfered with her ability to earn a living in Colorado, plotted to have her killed, had her  
13 phone tapped, recruited her coworkers to stalk and intimidate her, and had men sexually harass  
14 her, all "out of hate, jealousy and revenge."<sup>1</sup> To provide insight into her relationship with her  
15 mother, O'Neill recounts a dark tale of childhood abuse and exploitation, murder, and grave-  
16 switching. She sues for conspiracy, Fourth Amendment privacy violations, lost profits, and the  
17 "intentional tort" of "hate," and she has filed nearly a dozen motions, including ones for default,  
18 summary judgment, injunctive relief, and leave to amend.

19 Magistrate Judge Brenda Weksler has screened O'Neil's complaint. Highlighting  
20 O'Neil's more outrageous allegations, the magistrate judge found that they "describe fantastic  
21 and delusional scenarios and do not state a claim upon which relief can be granted."<sup>2</sup> She adds  
22 that, although O'Neil proposes amendments, they fail to cure the problems with her claims. She  
23 recommends that I dismiss this action on that basis and deny all pending motions.<sup>3</sup>

24  
25 <sup>1</sup> ECF No. 1-1.

26 <sup>2</sup> ECF No. 22 at 3.

27 <sup>3</sup> *Id.*  
28

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  
15  
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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**

AO450 (NVD Rev. 2/18) Judgment in a Civil Case

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.

X **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

# **EXHIBIT G**

# **EXHIBIT G**

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

UNITED STATES DISTRICT COURT

Las Vegas for the District of Nevada

Division

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.)

2:20-cv-01050-JAD-DJA

Jury Trial: (check one) ☐ Yes ☐ No

|                                               |          |
|-----------------------------------------------|----------|
| FILED                                         | RECEIVED |
| ENTERED                                       | RECEIVED |
| COUNSEL/ARTIES OF RECORD                      |          |
| JUN 11 2020                                   |          |
| CLERK US DISTRICT COURT<br>DISTRICT OF NEVADA |          |
| BY:                                           | DEPUTY   |

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  
844 N. Rainbow  
Las Vegas Clark  
NV  
702-302-0461  
whereintheworldis  
aimmee@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

Charlene A. Nei /

Job or Title (if known)

Street Address

1317 Whitebridge Dr.

City and County

Palm Harbor Pinellas

State and Zip Code

Fl. 34684

Telephone Number

E-mail Address (if known)

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)

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) Amiee 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) \_\_\_\_\_.

**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:

June 6, 2020

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

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):

*\$500,000 Actual  
\$1,000,000 Punitive  
\$1,000,000 Compensatory*  
Court Costs and a  
injunctive order restraining  
Charlene O'Neil

### 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.

18 USC 1514 civil action  
restraining harassment \$1,000,000  
18 USC 245 \$1,000,000  
Hate Crimes Prevention Act

### 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 requests  
a injunctive order restraining  
Charlene O'Neil from any harassment  
Actual Damages \$500,000  
Punitive \$1,000,000  
Compensatory \$1,000,000

## 1<sup>st</sup> Cause of Action

1. 18 USC 1514. Charlene O'Neil perpetrated Angie Richardson on Nov. 29, 2019 to threaten to break every bone in my body out of jealousy and hate.

This was a restaurant, a federally protected area and I am physically disabled. I was working full time as a server in a restaurant when Charlene O'Neil conspired to have me assaulted, Police Report 487-2020-01191 - Loveland, Co. Police.

2.

2. In 1994 Charlene O'Neil, conspired with Paul Janes to drive my 1994 Acura Integra in a dangerous way to kill me as I was pinned in the trunk of the motor vehicle.

Charlene O'Neil drove a getaway car from the accident scene and took Paul Janes to Virginia to avoid prosecution. Case 94-126

3. On or about Dec. 3, 2019 I began working at the Grand Z casino in Central City Colorado and somehow Charlene O'Neil had me followed at this

3.

employer and influenced customers to harass and intimidate me. This is a Federal Public Accommodation area and I am physically disabled. It is alleged that Charlene O'Neil had customers steal pay books off of tables from 12/3/19 until 1/24/20.

4. I am alleging that Charlene O'Neil attempted to interfere with my tips and actual wages with constant job harassment in a federally protected area of employment.

4.

5. On or about May 27, 2020 Charlene O'Neil had me followed to RPM Car rental at 6356 S. Pecos, Las Vegas NV 89120, which is also a federally protected public area where I was extending a motor vehicle rental. I am alleging Charlene O'Neil somehow had me followed and intimidated while I was waiting to be heard, by 3rd party people who arrive after me and intimidate, harass, all on camera.

5.

6. On June 2, 2020 I allege that Charlene O'Neil had my Storage Unit broken into at 3360 N. Las Vegas Blvd, Unit A084. The storage Unit has only been occupied 14 days when I allege that Charlene O'Neil had someone cut the lock and break in to the Storage Unit as she is having me followed some how. Las Vegas Metro Report # LLV200600002859.

6.

7. On or about the 26<sup>th</sup> day of February, 2020 a temporary order of protection was filed on my behalf against Charlene O'Neil, case # T-20-203945T, in the Family Court of Las Vegas, N.V.

8. The plaintiff alleges that on June 4, 2020 the plaintiff was attending a federally scheduled mandated job appointment for the United States Census Bureau. The plaintiff's federal ID # 6155718.

8. The plaintiff, Aimee O'Neil was at a scheduled appointment for federal employment at 2143 Craig Rd, Office Depot and that Charlene O'Neil had a male individual intimidate her so she could not get into a motor vehicle that was being used for official government business. At approximately 1:00 pm a white unidentified male obstructed the pathway so the physically disabled plaintiff, Aimee O'Neil could not get

8.

8. Into the motor vehicle. Charlene O'Neil refuses to have 2nd party people intimidate, harass, interfere and abuse me. Charlene O'Neil is perpetrating this as a Crime of hate.

9. On June 8, 2020, Aimee O'Neil went to look at a house for rent in Las Vegas. It is alleged Charlene O'Neil, taking full responsibility for this, influenced a landlord or prospective landlord by lying and providing false

4.

9. information to a perspective landlord so he would not rent to me. The plaintiff Anne O'Neil alleges that Charlene O'Neil is a violent, dangerous, abusive person who is malicious. The plaintiff alleges that Charlene O'Neil told this perspective landlord that she was mentally ill and not to rent to her, to intentionally embarrass her.

10.

10. The plaintiff Aimee O'Neil alleges that Charlene O'Neil is conspiring to perpetrate hate crimes against Aimee O'Neil and she absolutely refuses to stop. In 2009 The National Hate Crimes Prevention Act was legislated and it applies directly to crimes perpetrated against a victim, myself, because I am physically disabled.

11. 29 USC 994 Violent Crime Control and Law Enforcement Act enforces Crimes of hate perpetrated intentionally to victimize a individual

12. Title I of the Civil Rights Act of 1968, 18 USC 245 enacted for anyone interfering with, attempting to injure, intimidating a individual who attempts to engage in a federally protected public place.

The plaintiff, Aimee O'Neil alleges

12. That Charlene O'Neil is perpetrating a crime of hate against Amiee O'Neil and refuses to stop.

13. 18 USC 1514 is a civil action to restrain harassment of a victim who is being followed and intimidated and interfered with on a daily basis by Charlene O'Neil.

14. The Victim and Witness Protection Act of 1982 created

13.

14. a federal Civil Cause of Action authorizing a United States District Court to restrain the "harassment" of crime victims and witnesses.

15. The plaintiff, Aimee O'Neil alleges that somehow Charlene O'Neil is attempting to interfere with everything she is doing by using constant surveillance and people to harass and intimidate the plaintiff.

16. The plaintiff Arnee O'Neil alleges that Charlene O'Neil not only is interfering with her employment wages but her ability to pay a enormous federal student loan debt.

17. It is alleged that Charlene O'Neil, out of hate and jealousy continues to perpetrate crimes almost daily against Arnee O'Neil out of hate.

18. The plaintiff Aimee O'Neil, is requesting a injunctive permanent federal restraining order against Charlene O'Neil.

19. The plaintiff Aimee O'Neil, requests punitive and compensatory damages of \$1,000,000 each.  
Actual damages \$500,000

Aimee O'Neil  
Aimee O'Neil  
June 8, 2020

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                   |                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------------------------------------------|
| <b>COMPLAINT OF DISCRIMINATION</b><br>The Privacy Act of 1974 affects this form.<br>See Privacy Act Statement before completing this form.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                   | EEOC Complaint No.<br><br>CCRD Complaint No.<br>E2000008020                             |
| <b>COLORADO CIVIL RIGHTS DIVISION AND EEOC</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                   |                                                                                         |
| Name (Complainant)<br>Aimee O'Neil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                   | (Area Code) Telephone<br>(702) 302-0481                                                 |
| Street Address<br>6500 W. Charleston Blvd<br>#268                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | City, State, and Zip Code<br>Las Vegas, NV, 89146 | County<br>Clark                                                                         |
| The Employer, Labor Organization, Employment Agency, Apprenticeship Committee, State or Local Government Agency who discriminated against me is:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                   |                                                                                         |
| Name (Respondent)<br>Beemalicious LLC d/b/a<br>Sports Station                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Number of Employees<br>15+                        | (Area Code) Telephone<br>(970) 461-8825.<br>Email Address<br>office@sportsstationco.com |
| Street Address<br>409 N. Railroad Ave.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | City, State, and Zip Code<br>Loveland, CO 80537   | County<br>Larimer                                                                       |
| Discrimination Based on:<br>Disability (Physical); Retaliation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                   | Date Most Recent Discrimination Occurred:<br>December 3, 2019                           |
| <p>I. <b>Jurisdiction:</b> The Colorado Civil Rights Division and Equal Employment Opportunity Commission have jurisdiction over the subject matter of this charge and the named Respondent, pursuant to the provisions of the Colorado Revised Statutes (C.R.S. 1973, 24-34-301, <i>et seq.</i>), as reenacted, and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101, <i>et seq.</i>), as amended.</p> <p>II. <b>Personal Harm:</b> On or about November 29, 2019, prior and thereafter, I was harassed and subjected to unequal terms and conditions of employment, based on my disability (mobility impairment) and/or in retaliation for engaging in protected activity. On or about December 3, 2019, I was constructively discharged based on my protected class and/or in retaliation for engaging in protected activity.</p> <p>III. <b>Respondent's Position:</b> Unknown.</p> <p>IV. <b>Discrimination Statement:</b> I believe I was unlawfully discriminated against because: of my protected class and/or in retaliation for engaging in protected activity in violation of the Colorado Anti-Discrimination Act (CADA). 1.) I began employment with the Respondent in or around April 2019, performed my job duties satisfactorily at all times, and my most recent job title was Server. 2.) In or around April 2019, the Respondent's Owner, James Beemer ("Beemer"), told me he thought I could "handle" one of my coworkers, Angie Richardson ("Richardson") after Richardson began to harass me about my disability. 3.) In or around April 2019, and thereafter, I engaged in protected activity when I complained to Beemer about Richardson's ongoing harassment based on my disability. 4.) On or about November 29, 2019, Richardson threatened to attack me and mocked my disability. 5.) I immediately notified Beemer about Richardson's continued harassment; however, the Respondent refused to take action to stop Richardson's harassment and permitted her to work her usual shifts while reducing my</p> |                                                   |                                                                                         |

scheduled hours. 6.) On or about December 3, 2019, I was constructively discharged when my Parole Officer determined the Respondent's work environment was unsafe and required that I resign. 7.) I believe that I was discriminated against based on my protected class and/or in retaliation for engaging in protected activity.

**V. WHEREFORE:** The Complainant prays that the Colorado Civil Rights Division grant such relief as may exist within the Division's power and which the Division may deem necessary and proper.

*I want this charge filed with both the Equal Employment Opportunity Commission and the State or local agency, if any. I will advise the agency if I change my address or telephone number, and I will cooperate fully with them in the processing of my charge in accordance with their procedures.*

**I declare under penalty of perjury that the foregoing is true and correct.**

Date

Charging Party/Complainant (Signature)

**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. Almee 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 Almee'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 Almee'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.

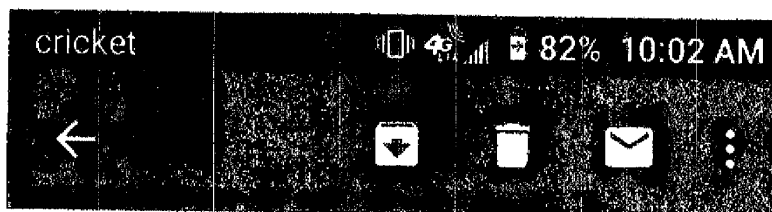
Of utmost importance currently is the belief by Ms. O'Neil that somewhere on her person is a microchip or some other type of sophisticated device allowing for the monitoring of not only her location but also possibly monitoring her conversations.

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



REMINDER: Fingerprinting  
Appointment for  
06/04/2020 at 01:30 PM



Inbox



Census

to me

6:41 AM [View details](#)



United States™  
**Census**  
Bureau

June 03, 2020

Dear Aimee Oneil, HRS Person ID: 6155718,



This is a reminder that your fingerprinting  
appointment is June 04, 2020 at 01:30 PM at  
NV-2143-NORTH LAS VEGAS-OFFICE DEPOT.  
Please read through this email to understand  
what to bring to your fingerprinting.





RE: Aimee O'Neil, Letter of Record  
April 28, 2020

To whom it may concern:

Aimee O'Neil was a participant of The Reentry Initiative (TRI) Transitional Housing Program in Longmont, Colorado, between the dates of October 2018 – May 2019. During her time at TRI, Aimee engaged successfully with the program, met weekly with her care manager and actively participated in all requirements of parole and TRI. During the course of her stay, Aimee shared an apartment with three other females and was a leader in the home to others. Aimee's ability to communicate her needs and advocate for herself has granted her the ability to be approved to move on from TRI house in under 9 months from release from incarceration.

Aimee held multiple employment positions throughout her stay at TRI and was employed relatively quickly upon release. Within a few short weeks, Aimee successfully applied and secured two jobs during her stay for over 6 months and managed to pay rent and stay in compliance of all requirements. Aimee attended a mental health assessment as required by her parole plan and stay at TRI house. Aimee was not mandated to attend therapy or substance abuse groups following a comprehensive assessment. In lieu of community mental health, Aimee was offered mental health support from TRI's Executive Director on a weekly basis. During those sessions, Aimee was forthcoming about her needs, able to participate appropriately and was gaining insight around how her anxiety manifests. Aimee followed directives and implemented techniques to improve her mental health functioning.

Aimee has always been independent and can make decisions regarding her health and well-being without the need of professional or personal interventions. Aimee is a strong advocate for herself and determined to stay in compliance with her parole requirements. Aimee understands the importance of mental health and independence and wants to continue to move forward in her life. Aimee successfully exited TRI house in May 2019 and relocated to northern Colorado, with approval from her Parole Officer. Aimee has since been in contact with TRI's ED for further assistance with referrals and resources and can reach out whenever needed for more support.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Kleeman".

*Emily Kleeman, LCSW*  
Executive Director, TRI

RESTORING LIVES, RECONCILING FAMILIES, RENEWING COMMUNITIES

# **EXHIBIT H**

# **EXHIBIT H**

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 Aimee O'Neil,

4 Plaintiff

5 v.

6 Charlene O'Neil,

7 Defendant

Case No. 2:20-cv-01050-JAD-DJA

**Order Adopting Report and  
Recommendation and Dismissing Case**

[ECF Nos. 5, 7]

8  
9 On June 17, 2020, the magistrate judge granted Plaintiff Aimee O'Neil's *in forma*  
10 *pauperis* application, screened her complaint, dismissed it as deficient, and gave her until July  
11 16, 2020, to file an amended complaint.<sup>1</sup> The dismissal order advised O'Neil in bold that her  
12 failure to file a proper amended complaint by that deadline would result in a recommendation  
13 that her case be dismissed.<sup>2</sup> That July 16, 2020, deadline passed without an amended complaint,  
14 so—as warned—the magistrate judge issued a report and recommendation to dismiss this action  
15 because there are no viable claims on file.<sup>3</sup> The deadline for objections to that recommendation  
16 passed without objection or any request to extend the deadline to file one.<sup>4</sup> “[N]o review is  
17 required of a magistrate judge’s report and recommendation unless objections are filed.”<sup>5</sup>

18  
19  
20 <sup>1</sup> ECF No. 3.

21 <sup>2</sup> *Id.* at 4.

22 <sup>3</sup> ECF No. 5.

23 <sup>4</sup> On August 5, 2020, the court received from O'Neil a motion for entry of default, which appears to ignore the magistrate judge's order and report and recommendation. *See* ECF No. 7.

<sup>5</sup> *Schmidt v. Johnstone*, 263 F. Supp. 2d 1219, 1226 (D. Ariz. 2003); *see also Thomas v. Arn*, 474 U.S. 140, 150 (1985); *United States v. Reyna-Tapia*, 328 F.3d 1114, 1121 (9th Cir. 2003).

1 A court may dismiss an action based on a party's failure to prosecute her case or obey a  
2 court order.<sup>6</sup> In determining whether to dismiss an action on one of these grounds, the court  
3 must consider: (1) the public's interest in expeditious resolution of litigation; (2) the court's need  
4 to manage its docket; (3) the risk of prejudice to the defendants; (4) the public policy favoring  
5 disposition of cases on their merits; and (5) the availability of less drastic alternatives.<sup>7</sup>

6 The first two factors, the public's interest in expeditiously resolving this litigation and the  
7 court's interest in managing its docket, weigh in favor of dismissal. The third factor, risk of  
8 prejudice to defendants, also weighs in favor of dismissal because a presumption of injury arises  
9 from the occurrence of unreasonable delay in filing a pleading ordered by the court or  
10 prosecuting an action.<sup>8</sup> A court's warning to a party that its failure to obey the court's order will  
11 result in dismissal satisfies the fifth factor's "consideration of alternatives" requirement,<sup>9</sup> and  
12 that warning was given here.<sup>10</sup> The fourth factor—the public policy favoring disposition of  
13 cases on their merits—is greatly outweighed by the factors favoring dismissal.

14  
15  
16 <sup>6</sup> See *Ghazali v. Moran*, 46 F.3d 52, 53–54 (9th Cir. 1995) (dismissal for noncompliance with  
17 local rule); *Ferdik v. Bonzelet*, 963 F.2d 1258, 1260–61 (9th Cir. 1992) (dismissal for failure to  
18 comply with an order requiring amendment of complaint); *Carey v. King*, 856 F.2d 1439, 1440–  
19 41 (9th Cir. 1988) (dismissal for failure to comply with local rule requiring *pro se* plaintiffs to  
keep court apprised of address); *Malone v. U.S. Postal Service*, 833 F.2d 128, 130 (9th Cir.  
1987) (dismissal for failure to comply with court order); *Henderson v. Duncan*, 779 F.2d 1421,  
1424 (9th Cir. 1986) (dismissal for lack of prosecution and failure to comply with local rules).

20 <sup>7</sup> *Thompson*, 782 F.2d at 831; *Henderson*, 779 F.2d at 1423–24; *Malone*, 833 F.2d at 130;  
21 *Ferdik*, 963 F.2d at 1260–61; *Ghazali*, 46 F.3d at 53.

22 <sup>8</sup> See *Anderson v. Air West*, 542 F.2d 522, 524 (9th Cir. 1976).

23 <sup>9</sup> *Ferdik*, 963 F.2d at 1262; *Malone*, 833 F.2d at 132–33; *Henderson*, 779 F.2d at 1424.


<sup>10</sup> ECF Nos. 3, 5.

1 Accordingly, IT IS HEREBY ORDERED that the magistrate judge's report and  
2 recommendation [ECF No. 5] is **ADOPTED** in full;

3 IT IS FURTHER ORDERED that **this action is DISMISSED**, and the Motion for  
4 Default [ECF No. 7] is **DENIED** as moot.

5 The Clerk of Court is directed to ENTER JUDGMENT ACCORDINGLY and CLOSE  
6 THIS CASE.

7 Dated: August 5, 2020

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9 U.S. District Judge Jennifer A. Dorsey  
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23

# **EXHIBIT I**

# **EXHIBIT I**

AO450 (NVD Rev. 2/18) Judgment in a Civil Case

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Aimee O'Neil,

Plaintiff,

v.

Charlene O'Neil,

Defendant.

JUDGMENT IN A CIVIL CASE

Case Number: 2:20-cv-01050-JAD-DJA

\_\_\_ **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.

X **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 entered this action is dismissed.

8/6/2020

Date

DEBRA K. KEMPI

Clerk



/s/ M. Reyes

Deputy Clerk

# **EXHIBIT J**

# **EXHIBIT J**

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

1 **OGSJ**  
Kevin E. Beck, NSB #8371  
2 KEVIN E. BECK, LTD.  
3137 E. Warm Springs Rd., Ste. 100  
3 Las Vegas, NV 89120  
Telephone: (702) 641-9900  
4 Facsimile: (702) 260-8983  
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.

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

14  
15 **ORDER GRANTING DEFENDANTS' COUNTERMOTION FOR SUMMARY**  
16 **JUDGMENT AND JUDGMENT**

17 This matter came before the Court on January 19, 2021 for a hearing on *Defendants'*  
18 *Countermotion for Summary Judgment*. Attorney Kevin E. Beck, Esq. of Kevin E. Beck Ltd.  
19 appeared on behalf of the Defendants. Plaintiff did not appear at the hearing. The Plaintiff  
20 filed a *Motion for Summary Judgment* on November 9, 2020. Defendants filed an Opposition  
21 and Countermotion for Summary Judgment on December 8, 2020. On December 8, 2020, the  
22 Clerk of the Court filed a *Clerk's Notice of Nonconforming Document* regarding *Plaintiff's*  
23 *Motion for Summary Judgment*. Plaintiff took no action to cure the nonconforming document  
24 prior to the hearing. Plaintiff failed to file an Opposition Brief to Defendants' Countermotion  
25 for Summary Judgment and failed to appear at the hearing thereof.

26 The Court, having reviewed the Countermotion for Summary Judgment and all  
27 corresponding papers and pleadings on file, and having considered the arguments of counsel at  
28 the time of the hearing, enters the following findings and orders in this matter:

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

1 THE COURT FINDS that Plaintiff's claims as set forth in this action are barred under  
2 the doctrine of claim preclusion. On or about April 7, 2020, two months prior to the Plaintiff's  
3 filing this action, Plaintiff filed an action in the United States District Court for the District of  
4 Nevada, case number 2:20-cv-00652-JAD-BNW. The Federal Court case involved the same  
5 parties as are present in this case. The Court in the Federal Court case entered a valid and final  
6 judgment in favor of the Defendants in that action on September 16, 2020. The claims that  
7 Plaintiff have alleged in this case were raised, or could have been raised, in the Federal Court  
8 case. Accordingly, Plaintiff is precluded, under the doctrine of claim preclusion, from  
9 litigating those claims in this case.

10 THE COURT FURTHER FINDS that Plaintiff is potentially a vexatious litigant. The  
11 Court notes that Plaintiff has filed multiple cases in the Federal Court (Case Nos. 2:20-cv-00652-  
12 JAD-BNW and 2:20-cv-01050-JAD-DJA) and in the Eighth Judicial District Court for the State  
13 of Nevada (Case Nos. A-20-822153-C, A-20-822159-C, A-20-822562-C, A-20-822573-C, and  
14 A-20-822965-C) that appear to relate to the same claims and allegations of wrongdoing that  
15 Plaintiff has alleged against the Defendants in this case. The Court finds the Plaintiff's conduct  
16 to be indicative of forum shopping or judge shopping. The Court further finds that Plaintiff's  
17 filing of multiple actions against Defendants appears to be an attempt to harass the Defendants.  
18 The Court further finds that Plaintiff's multiple actions appear to be without merit as she has  
19 alleged extraordinary allegations against Defendants without providing any facts or evidence in  
20 support of her allegations. If Plaintiff continues to pursue with these multiple actions against  
21 Defendants, Plaintiff should be deemed a vexatious litigant and the Court will cause her name to  
22 be added to the list of vexatious litigants.

24 THE COURT FURTHER FINDS that Plaintiff has presented no arguments, facts, or  
25 evidence in support of her allegations in in opposition to Defendants' *Countermotion for*  
26 *Summary Judgment*.

27 IT IS HEREBY ORDERED *Defendant's Countermotion for Summary Judgment* is  
28 granted in favor of Defendants and against Plaintiff on all of Plaintiff's claims.

KEVIN E. BECK, LTD.  
3137 E. WARM SPRINGS ROAD, SUITE 100  
LAS VEGAS, NEVADA 89120  
TELEPHONE: (702) 641-9900  
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IT IS FURTHER ORDERED that Judgment is entered in favor of Defendants and against Plaintiff on each and every claim for relief alleged in this action.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Dated this 27th day of January, 2021

  
DISTRICT COURT JUDGE

DCB F06 507E 4B40  
Gloria Sturman  
District Court Judge

Respectfully submitted,

KEVIN E. BECK, LTD.

By: /s/ Kevin E. Beck  
Kevin E. Beck, Esq.  
Nevada Bar No. 8371  
3137 E. Warm Springs Road, Ste. 100  
Las Vegas, NV 89120  
*Attorney for Defendants*

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CSERV

DISTRICT COURT  
CLARK COUNTY, NEVADA

Aimee O'Neil, Plaintiff(s)

CASE NO: A-20-815618-C

vs.

DEPT. NO. Department 26

Gloria Mazzoli, Defendant(s)

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order Granting Summary Judgment was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 1/27/2021

Kevin Beck

kevin@kevinbecklaw.com

Eva Garcia -Mendoza

aaron@gms4law.com

Eva Garcia-Mendoza

evagm@gms4law.com



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 Defendants*

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

9 AMIEE MORRISON,  
10 Plaintiff,

Case No. A-21-832762-C  
Dept. No. 29

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:

|                    |           |
|--------------------|-----------|
| 19 Charlene O'Neil | \$ 223.00 |
| 20 Gloria Mazzoli  | \$ 30.00  |

21 **TOTAL REMITTED:** **\$253.00**

22 DATED this 21st day of August, 2020.

23  
24 **Kevin E. Beck, Ltd.**

25 /s/ Kevin E. Beck  
26 Kevin E. Beck, NSB# 8371  
27 3137 E. Warm Springs Rd., Ste. 100  
28 Las Vegas, Nevada 89120  
*Attorney for Defendants*



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 Defendants*

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

9 AMIEE MORRISON,  
10 Plaintiff,

Case No. A-21-832762-C  
Dept. No. 29

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:  
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|                    |           |
|--------------------|-----------|
| 19 Charlene O'Neil | \$ 223.00 |
| 20 Gloria Mazzoli  | \$ 30.00  |

21 **TOTAL REMITTED:** **\$253.00**

22 DATED this 21st day of August, 2020.  
23

24 **Kevin E. Beck, Ltd.**

25 /s/ Kevin E. Beck  
26 Kevin E. Beck, NSB# 8371  
27 3137 E. Warm Springs Rd., Ste. 100  
28 Las Vegas, Nevada 89120  
*Attorney for Defendants*

DISTRICT COURT  
CLARK COUNTY, NEVADA  
\*\*\*\*



Aimee Morrison, Plaintiff(s)  
vs.  
Charlene O'Neil, Defendant(s)

Case No.: A-21-832762-C  
Department 29

**NOTICE OF HEARING**

Please be advised that the Motion to Dismiss or, In the Alternative, For Summary Judgment, To Have Plaintiff Deemed a Vexatious Litigant, and for Attorney's Fees Under NRS 18.010 in the above-entitled matter is set for hearing as follows:

**Date:** June 22, 2021  
**Time:** 9:00 AM  
**Location:** RJC Courtroom 15A  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Kadira Beckom  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Kadira Beckom  
Deputy Clerk of the Court



KEVIN E. BECK, LTD.

3137 E. WARM SPRINGS RD., STE. 100

LAS VEGAS, NEVADA 89120

TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-8983

1 **NOH**  
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 Defendants*

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

12 **AIMEE MORRISON,**  
13 **Plaintiff,**

14 **vs.**

15 **CHARLENE O'NEIL and GLORIA**  
16 **MAZZOLI,**  
17 **Defendants.**

Case No.: A-21-832762-C  
Dept. No.: 29

18 **NOTICE OF HEARING**

19 **TO: AIMEE MORRISON, Plaintiff in Proper Person:**

20 **NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO**  
21 **THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE**  
22 **THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN**  
23 **FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE**  
24 **TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT**  
25 **WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION**  
26 **MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE**  
27 **COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING**  
28 **DATE.**

29 **You are hereby notified that a hearing has been set on Defendants' MOTION TO**  
30 **DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT, TO HAVE PLAINTIFF**  
31 **DEEMED A VEXATIOUS LITIGANT, AND FOR ATTORNEY'S FEES UNDER NRS 18.010,**

KEVIN E. BECK, LTD.

3137 E. WARM SPRINGS RD., STE. 100

LAS VEGAS, NEVADA 89120

TELEPHONE: (702) 641-9900 FACSIMILE: (702) 260-8983

1 filed in the above-entitled matter. The Court's notice of hearing is attached hereto. You are  
2 required to be present for the hearing if you desire to oppose the Motion.

3 DATED this 20th day of May, 2021.

4

5

KEVIN E. BECK, LTD.

6

/s/ Kevin E. Beck

7

Kevin E. Beck, Esq.

8

3137 E. Warm Springs Rd., Ste. 100

Las Vegas, NV 89120

*Attorney for Defendants*

9

10

**CERTIFICATE OF SERVICE**

11

12

I hereby certify that on this 20th day of May, 2021, I served a true and correct copy of  
the foregoing *Notice of Hearing* by first-class mail, postage prepaid, to the following at her last  
known address:

13

14

Aimee Morrison

15

6456 Butterfly Sky St.

16

North Las Vegas, NV 89084

*Defendant*

17

18

/s/ Kevin E. Beck

19

An Employee of Kevin E. Beck, Ltd.

20

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

Electronically Filed  
5/20/2021 7:44 AM  
Steven D. Grierson  
CLERK OF THE COURT



Aimee Morrison, Plaintiff(s)  
vs.  
Charlene O'Neil, Defendant(s)

Case No.: A-21-832762-C  
Department 29

**NOTICE OF HEARING**

Please be advised that the Motion to Dismiss or, In the Alternative, For Summary Judgment, To Have Plaintiff Deemed a Vexatious Litigant, and for Attorney's Fees Under NRS 18.010 in the above-entitled matter is set for hearing as follows:

**Date:** June 22, 2021

**Time:** 9:00 AM

**Location:** RJC Courtroom 15A  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Kadira Beckom  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Kadira Beckom  
Deputy Clerk of the Court

Case Number: A-21-832762-C

EIGHTH JUDICIAL DISTRICT  
CLARK COUNTY NEVADA

FILED

MAY 28 2021

*Sharon A. Affin*  
CLERK OF COURT

FILED

MAY 28 2021

*Sharon A. Affin*  
CLERK OF COURT

Aimee Morrison,

Plaintiff,

v.

Case: A-21-832764-C

Dept. 29

Charlene O'Neil,

Gloria Mazzoli,

Defendants'

Hearing date  
Hearing requested

Hearing: 6/29/2021  
Time: 9:00AM  
Courtroom 15A

NOTICE OF MOTION

1. The plaintiff alleges the following:

Dr. Thom Lappas, the plaintiff's cousin graduated from Colgate, Stanford,

And U.C. Berkeley. He is capable and competent to make intellectual

Impairment diagnosis's on individuals, especially individuals he knows...

And genetic lineage, as it does not run in my family and Dr. Lappas will

Confirm this beyond a reasonable doubt. He is a metal research scientist

For The United States Government in Washington DC for NASA. His

Qualifications are impeccable, they are undisputed especially when it

Comes to our family and genetics.

2. I am giving both defendants seven days from the date on this document

RECEIVED  
MAY 28 2021  
CLERK OF THE COURT

To provide evidence of a Federal Dr capability to asses and diagnose Intellectual impairments that would grant for Social Security Disability Hearings, ie: since both defendants claim to be doctors and both Defendants claim they are Federal diagnostic doctors who have the Capacity to make a determination for Social Security Disability. Seven Days this clock will tick for proof of education.

3. Defendant O'Neil is still running her mouth all over by interfering with Job interviews by alleging in Las Vegas, Nevada that she is a Federal Social Security Disability Diagnostic Doctor of the law, as required by Federal law, they must be a Federal doctor.

4. These two woman committed the intentional act of trespass onto my Former employer. Defendant O'Neil violated a Nevada restraining order, Also violating the VAWA Act making this a chargeable felony. Defendant O'Neil has open case at The D.A.'s office that she needs to turn herself In on. She knowingly crossed state lines to commit the act of trespass Knowing there was a restraining order and intentionally with reckless Disregard for the courts violated that restraining order. LLV201000071305 Open case on defendant O'Neil trying to run me over with a motor vehicle On camera. We don't run people over. Defendant O'Neil doesn't reside in Nevada, she doesn't belong in Nevada as she has no lawful purpose in

Society in Nevada

5. These two woman are required by law to possess a warrant to enter

My place of employments. Katz v. US 389 US 347, requires anyone

Trespassing onto a person, job, or medical requires a warrant.

6. A warrant to the employer Fourth Amendment id at 464.

7. Deceit cannot be communicating false or non false medical

Information to an employer. This is confidential. So is my employment.

Defendant O'Neil is not allowed to know my place of employment, as

Restraining order determines that fate and right that she forfeited

5. The plaintiff has stated a claim for relief NRS 200.510 Libel

6. Deceit NRS 90.245 as misrepresentation with the intent to mislead

By the use of false statements. The element of scienter is self-evident in

The instance of this case

Dated: May 21, 2021



Aimee Morrison  
6456 Butterfly Sky Street  
North Las Vegas, Nevada 89084

CERTIFICATE OF SERVICE

I do hereby certify that on the 21<sup>st</sup> day of May, 2021 I served a  
Notice of Motion upon Attorney Kevin Beck, 3137 E. Warm Springs  
Road, Suite 100, Las Vegas, Nevada 89120 by First Class United  
States Mail

Amiee Morrison

OSWEGO COUNTY SHERIFF'S OFFICE  
39 Churchill Road  
Oswego City, NY 13126  
315-349-3307 1-800-582-7583

EIGHTH JUDICIAL DISTRICT COURT - CLARK CO., NV CASE #A-21-832762-C  
COUNTY OF:

AIMEE MORRISON

Plaintiff(s)

Against

GLORIA MAZZOLI

Defendant(s)

CERTIFICATE  
OF  
SERVICE

STATE OF NEW YORK, COUNTY OF OSWEGO

I, DEPUTY THOMAS MCCANN, Badge # 6949 of the Oswego County Sheriff's Office, being duly sworn, certify and affirm that:

On 5/6/2021 at 10:28 AM at 119 EAST UTICA STREET OSWEGO, NY 13126 I served the within **SUMMONS & COMPLAINT** on **GLORIA MAZZOLI**, Defendant therein named.

**INDIVIDUAL** by delivering a true copy of each to said defendants personally: I knew the person so served to be the person described as said defendant therein.

**DESCRIPTION** Deponent describes the individual served as follows:

|                             |        |         |       |             |
|-----------------------------|--------|---------|-------|-------------|
| Sex                         | Female | height  | 5' 5" | approx. age |
| skin                        | White  | weight  | 140   | mustache    |
| hair                        | White  | glasses |       | beard       |
| eyes                        | Blue   |         |       | birth date  |
| other identifying features: |        |         |       |             |

**MILITARY**

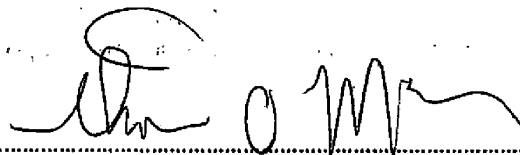
**SERVICE**

I asked the person spoken to whether defendant was in active military service of the United States, or of the State of New York in any capacity whatever and received a negative reply. The source of my information and the grounds of my belief are the conversations and the observations above narrated.

Upon information and belief, I aver that the defendant is not in the Military service of New York State or of the United States and that term is defined in either the State or Federal statutes.

Dated:

Thursday, May 13, 2021



THOMAS MCCANN  
Deputy Sheriff

Badge #6949



  
CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT

CLARK COUNTY NEVADA

Aimee Morrison,  
Plaintiff,

v.

Case: A-21-832762-C

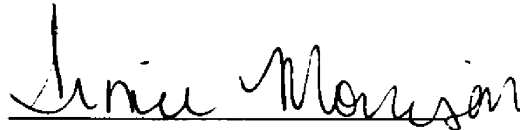
Dept:29

Charlene O'Neil,  
Gloria Mazzoli,  
Defendants'

NOTICE OF MOTION TO STAY

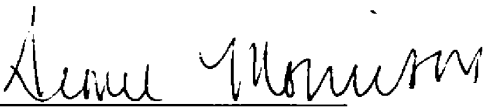
1. The plaintiff, Aimee Morrison, is requesting the courts grant a stay in This case until the plaintiff travels to London, England, to her aunt's home, The head of The London CIA and will appear by camera for this case from London; as the plaintiff will be resolving all her civil legal issues from London, England, including this case, as her aunt, JoAnn O'Neil, as will Others be available for testimony for this proceeding.

Dated: June 23, 2021



**CERTIFICATE OF SERVICE**

**I do hereby certify that on this 23<sup>rd</sup> day of June, 2021, I served a Notice of Motion to Stay upon the attorney for the defendants', Kevin Beck, 3137 E. Warm Springs Rd., Suite 100, Las Vegas, Nevada 89120 by First Class United States Mail**



**ORDR**  
Kevin E. Beck, NSB #8371  
KEVIN E. BECK, LTD.  
3137 E. Warm Springs Rd., Ste. 100  
Las Vegas, NV 89120  
Telephone: (702) 641-9900  
Facsimile: (702) 260-8983  
E-mail: kevin@kevinbecklaw.com  
*Attorney for Defendants*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

AIMEE MORRISON,  
Plaintiff,

Case No.: A-21-832762-C  
Dept. No.: 29

vs.

CHARLENE O'NEIL and GLORIA  
MAZZOLI,  
Defendants.

**ORDER GRANTING DEFENDANTS' MOTION TO DISMISS OR, IN THE  
ALTERNATIVE, FOR SUMMARY JUDGMENT AND RELATED RELIEF**

This matter came before the Court on June 22, 2021 for a hearing on Defendants' *Motion to Dismiss or, in the Alternative, for Summary Judgment, to have Plaintiff Deemed a Vexatious Litigant, and for Attorney's Fees Under NRS 18.010.* Attorney Kevin E. Beck, Esq. of Kevin E. Beck Ltd. appeared on behalf of the Defendants. Plaintiff did not appear at the hearing. The Plaintiff also failed to file any written opposition to Defendants' Motion.

The Court, having reviewed the Defendants' Motion and all corresponding papers and pleadings on file, and having considered the arguments of counsel at the time of the hearing, enters the following findings and orders in this matter:

THE COURT FINDS that Plaintiff's claims as set forth in this action, to the extent they could have been raised in one of the prior state or federal-court actions, are barred under the

1 doctrine of claim preclusion. Plaintiff has filed multiple actions within the last eighteen months  
2 involving the same parties as are present in this case. Several of those cases have resulted in a  
3 valid and final judgment in favor of the Defendants. The claims that Plaintiff has alleged in  
4 this case were raised, or could have been raised, in those actions. Accordingly, Plaintiff is  
5 precluded, under the doctrine of claim preclusion, from litigating those claims in this case.

6 THE COURT FURTHER FINDS that to the extent Plaintiff's claims could not have  
7 been brought in a prior action, Defendants are entitled to summary judgment on those claims.  
8 Defendants' Motion was supported by Declarations from both Defendants. Plaintiff failed to  
9 preset the Court with any evidence to show the existence of any material issues of fact that  
10 would preclude summary judgment as required under NRCP 56(c)(1)(b). In fact, Plaintiff  
11 failed to file any written opposition to Defendants' Motion and failed to appear at the hearing  
12 on the Motion.

13 THE COURT FURTHER FINDS that that there are facts supporting Defendants' request  
14 that Plaintiff be deemed a vexatious litigant and the Court shall refer this matter to the Chief  
15 Judge with a recommendation that Plaintiff be listed as a vexatious litigant. The Court finds that  
16 Plaintiff has filed multiple cases in the Federal Court (Case Nos. 2:20-cv-00652-JAD-BNW,  
17 2:20-cv-01050-JAD-DJA, and 2:20-cv-01109-GMN-BNW) and in the Eighth Judicial District  
18 Court for the State of Nevada (Case Nos. A-20-815618-C, A-20-822153-C, A-20-822159-C, A-  
19 20-822562-C, A-20-822573-C, A-20-822965-C, and A-21-832761-C) that appear to relate to the  
20 same claims and allegations of wrongdoing that Plaintiff has alleged against the Defendants in  
21 this case. The Court finds the Plaintiff's conduct is indicative of forum shopping or judge  
22 shopping. The Court further finds that Plaintiff's filing of multiple actions against Defendants  
23 appears to be an attempt to harass the Defendants. The Court further finds that Plaintiff's  
24 multiple actions appear to be without merit as she has alleged extraordinary allegations against  
25 Defendants without providing any facts or evidence in support of her allegations.

26 IT IS HEREBY ORDERED Defendants' Motion to Dismiss, or in the Alternative, for  
27 Summary Judgment is granted in favor of Defendants and against Plaintiff on all of Plaintiff's  
28 claims.

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

1 IT IS FURTHER ORDERED that the Court shall refer this matter to the Chief Judge with  
2 a recommendation that the Plaintiff be listed as a vexatious litigant.

3 IT IS FURTHER ORDERED that Defendants' request for attorney's fees under NRS  
4 18.010 shall be addressed upon Defendants' filing of an Application for Fees and Costs.

5 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

6 Dated this 25th day of June, 2021

7   
8 \_\_\_\_\_  
9 DISTRICT COURT JUDGE

10 Respectfully submitted,

11 KEVIN E. BECK, LTD.

**A88 3C3 55A4 9379**  
**David M Jones**  
**District Court Judge**

12  
13 By: /s/ Kevin E. Beck  
14 Kevin E. Beck, Esq.  
15 Nevada Bar No. 8371  
16 3137 E. Warm Springs Road, Ste. 100  
17 Las Vegas, NV 89120  
18 *Attorney for Defendants*  
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1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Aimee Morrison, Plaintiff(s) | CASE NO: A-21-832762-C  
7 vs. | DEPT. NO. Department 29  
8 Charlene O'Neil, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District  
12 Court. The foregoing Order was served via the court's electronic eFile system to all  
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/25/2021

15 Kevin Beck kevin@kevinbecklaw.com  
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Electronically Filed  
06/30/2021

EIGHTH JUDICIAL DISTRICT

*Heather Shinn*  
CLERK OF THE COURT

CLARK COUNTY NEVADA

Aimee Morrison,

Plaintiff,

v.

Case: A-21-832762-C

08/10/2021  
9:00 am

Charlene O'Neil,

Gloria Mazzoli,

Defendant's

Hearing  
Requested  
dept. 29

MOTION FOR RECONSIDERATION

1. The plaintiff alleges that on the morning of June 29, 2021, Charlene O'Neil influenced the bus to be intentionally late for pick up. A bus didn't Show up for almost 45 minutes which she has done this before as I had to Fly to Denver, Colorado for a job hate case, in which Charlene O'Neil Had the bus arrive late intentionally because O'Neil had my daughter, Morgan O'Neil call me on June 27, 2021 at 3:00 am stating that Charlene O'Neil was conspiring acts of hate to intentionally interfere with civil Proceedings.
2. I arrived to the courts 30 minutes late, my deepest apologies, and was told To file a Motion of Reconsideration immediately
3. A copy of my college transcripts are attached showing I was Magna Cum Laude, Dean's list, and Student Ambassador from 2003-2005 as I worked for a Harvard professor, Robert Torrisi. No such intellect

CLERK OF THE COURT

JUN 30 2021

RECEIVED

Impairment exists. Both defendant's hate me, have used state powers to Interfere and intentionally obstruct gainful permanent employment until My aunt, Josephine Wahrendorf, sister of Charlene O'Neil stated you need to Find a job. Wahrendorf is a intellect impairment diagnostic individual for The Oswego City School District in Oswego, New York and concludes that this Information relayed to the defendant's is false. Dr. Thom Lappas, my cousin, Who graduated from Colgate, Stanford, and U.C. Berkley has moved several Cases insisting that I have no such impairment. They are alleging this because My eldest child has an intellect impairment from his father's DNA. His cousin, Devin Baker has an intellect impairment as well. It does not run in my families DNA and both defendant's lack the necessary qualifications required by Federal Laws to diagnose intellect impairments. The law states that a person must possess A certain degree of education. Both defendant's lack any higher education as Required by law.

I am asking this court to reconsider this motion and reverse this decision  
Based upon the facts listed above.

Dated: June 29, 2021

Amie Morrison

#### CERTIFICATE OF SERVICE

I do hereby certify that on June 29, 2021, I served a Motion for Reconsideration To Kevin Beck, attorney for the defendant's, 3137 E. Warm Springs Road, Suite 100, Las Vegas, Nevada 89120 by First Class United States Mail

Amie Morrison

Re: Aimee Morrison

To who it may concern,

My name is Ellen Seeley and I have taken on the health restoration process of Aimee O' Neil Morrison. To start, Aimee and her husband Mark, were married in the state of Colorado in 2018 as I have confirmed The findings to be true and accurate as there is a lot of ongoing marital Interference by a Joe Brancatro.

Aimee and her husband Mark are participating in our Federal Human Research program for blood replacement surgery due to the insertion Of an illegal device that was placed inside Aimee' s blood stream by Involuntary consent and this device has caused invasive injuries.

This is a temporary condition, it is not a disability or impairment and I have ordered permanent full time employment status.

After an investigation on many issues, it was deemed that a fiscal report From Suny Oswego indicates multiple individuals were receiving money and or payments for fraudulent research in very large amounts. These individuals have demonstrated patterns of alarming and outrageous conduct with no regards to the health and safety of others around them.

I will start first with Charlene O' Neil who has engaged in multiple acts of domestic terrorism compromising not only Aimee's health and safety but the safety of others. First of all, Aimee is not participating in any twin research for profit and I have ordered immediate removal of such fraud. We have taken every reasonable action possible to avoid the judicial system but these individuals refuse to stop even with Federal orders, as they follow Aimee around all day over this device and terrorize her by acts of intentional hate. They use this illegal device as involuntary servitude of brainwashing, torture, and cult like activity by inflicting intentional emotional distress each time she leaves the house.

As they refuse to stop. It has been brought to my immediate attention that this group of individuals create schemes of illusive terminology that have precipitated multiple acts of violence and reckless disregard to the health and safety of others. As I am not permitting any further crimes of violence that we as a nation do not coherently recognize.

I am very concerned about the abuse, both physical and psychological in nature by this fake sister scheme that is designed to cause psychological torture by unlawful deceit. This group has violated the Federal Protective Order and must face criminal and civil penalties.

Aimee is not intellectually impaired. Aimee is an intelligent woman who has a college education.

I have ordered the immediate removal of this device as Aimee is allergic to metal compounds and the usage of this device is for

The purpose of human torture by profit. I have selected Aimee as a candidate based upon my scientific abilities to determine a coherent health and treatment plan for my patient. It is vital for the scientific research world to progress in the advancement of blood disease treatment by the utilization of appropriate DNA.

I am concerned about this group of individuals who continue to threaten, torture, and kidnap Aimee by the displays of disturbing behavior, as these tendencies compromise and restrict the progression of medical research in the scientific world.

I cannot speak confidentially to Aimee because it appears multiple individuals are on her cell phone illegally and Aimee cannot see a Dr until this device is removed because of the imminent risk of medical Exploiment by fraud.

Charlene O' Neil has been removed from Aimee' s life due to ongoing acts of domestic terrorism that puts Aimee in great fear.

I have recommended an immediate mental health assessment on Charlene O' Neil, as she continues to follow Aimee around terrorizing her and upon my findings Ms. O' Neil has demonstrated actions and behavior that are recognized as dangerous to society as the recommendation of incarceration is encouraged. Ms. O' Neil is not permitted to follow Aimee around and I am enforcing the fact that O' Neil and several others are violating that Federal order.

Dr. Ellen Seeley

# CAYUGA COMMUNITY COLLEGE

A UNIT OF THE STATE UNIVERSITY OF NEW YORK  
197 Franklin Street • Auburn, NY 13021-3099  
11 River Glen Drive • Fulton, NY 13069-1560

Supervised by the State of New York  
Accredited by Middle States Association  
& Colleges and Secondary Schools  
Formerly Auburn Community College

SSN: \*\*\*\*\*6368

Student No: C00052108

Date of Birth: 26-NOV

Date Issued: 21-MAY-2021

Record of: Aimee L O'Neill

Page: 1

Issued To: AIMEE O'NEIL

6456 BUTTERFLY SKY ST

NORTH LAS VEGAS, NV 89084-1322

Course Level: Undergraduate

Current Program

Associate in Applied Science

Program : Crim Just: Corrections A.A.S.

College : Cayuga Community College

Major : Criminal Justice: Corrections

SUBJ NO. COURSE TITLE CRED GRD PTS R

Institution Information continued:

Fall 2010

Criminal Justice: Corrections

ART 252 Photoshop 3.00 D- 2.10

CJ 211 Case Studies: Criminal Behav 3.00 B- 8.10

HLTH 103 Health 1.00 A 4.00

Ehrs: 7.00 GPA-Hrs: 7.00 QPts: 14.20 GPA: 2.02

Good Standing

\*\*\*\*\* TRANSCRIPT TOTALS \*\*\*\*\*

Earned Hrs GPA Hrs Points GPA

TOTAL INSTITUTION 64.00 67.00 218.70 3.26

TOTAL TRANSFER 0.00 0.00 0.00 0.00

OVERALL 64.00 67.00 218.70 3.26

\*\*\*\*\* END OF TRANSCRIPT \*\*\*\*\*

SUBJ NO. COURSE TITLE CRED GRD PTS R

INSTITUTION CREDIT:

Spring 2004

Criminal Justice: Corrections

CJ 119 CRIM INVESTIGATION 3.00 B 9.00

CJ 213 PROBATION AND PAROLE 3.00 B+ 10.50

MATH 070 PRE ALGEBRA 0.00 B+ 0.00

PSY 101 INTROD PSYCHOLOGY 3.00 A 12.00

SOC 101 INTROD SOCIOLOGY 3.00 B+ 10.50

Ehrs: 12.00 GPA-Hrs: 12.00 QPts: 42.00 GPA: 3.50

Fall 2004

Criminal Justice: Corrections

ASC 101 FOUNDATIONS OF TUTOR 1.00 A 4.00

CJ 111 INTRO TO JUSTICE SYS 3.00 A 12.00

CJ 115 CRIMINAL CIVIL LAW I 3.00 A 12.00

CJ 121 INST TREAT CRIM 3.00 A 12.00

ENGL 097 FUND. OF READING 0.00 A\* 0.00

PE 161 SUPER CIRCUIT I 1.00 A 4.00

SOC 105 DEVIANT BEHAVIOR 3.00 B+ 10.50

Ehrs: 14.00 GPA-Hrs: 14.00 QPts: 54.50 GPA: 3.89

Spring 2005

Criminal Justice: Corrections

BIOL 208 CONSERV NAT RESOURCE 3.00 B 9.00

CJ 112 ORG/ADM JUSTICE SYS 3.00 A 12.00

CJ 113 CRIMINOLOGY 3.00 A+ 12.00

CJ 117 JUVENILE DELINQUENCY 3.00 C+ 7.50

ENGL 101 FRESHMAN ENGLISH I 3.00 B 9.00

PE 162 SUPER CIRCUIT II 1.00 B 4.00

Ehrs: 16.00 GPA-Hrs: 16.00 QPts: 52.50 GPA: 3.28

Spring 2010

Criminal Justice: Corrections

ART 103 Essentials of Art 3.00 A 12.00

CHEM 108 Forensic Science 3.00 B 9.00

CJ 265 Internship: Criminal Justice 3.00 A 12.00

HLTH 103 Health 0.00 W 0.00

Ehrs: 9.00 GPA-Hrs: 9.00 QPts: 33.00 GPA: 3.66

Good Standing

Summer 2010

Criminal Justice: Corrections

ENGL 102 Freshman English II 3.00 F 0.00

ENGL 221 Eff Speech: Public Address 3.00 A 12.00

HIST 201 History of the United States I 3.00 B+ 10.50

Ehrs: 6.00 GPA-Hrs: 9.00 QPts: 22.50 GPA: 2.50

Good Standing

\*\*\*\*\* CONTINUED ON NEXT COLUMN \*\*\*\*\*

Shannon M. Patrie

Shannon M. Patrie  
Registrar

This transcript processed and delivered by Credentials TranscriptsNetwork



env: 975 page: 3 of 3

A BLACK AND WHITE DOCUMENT IS NOT OFFICIAL

A SECURITY STATEMENT APPEARS WHEN PHOTOCOPIED

*Heather L. Smith*  
CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT  
CLARK COUNTY NEVADA

Aimee Morrison,  
Plaintiff,

v.

Case: A-21-832762-C

Gloria Mazzoli,  
Charlene O'Neil  
Defendant's

NOTICE OF MOTION

1. The plaintiff alleges that the defendant's engaged in conduct directly Organized to cause labor trafficking and torturous interference of Employment by alleging an intellect impairment when both defendant's Are not qualified by Federal standards and guidelines to diagnose anything
2. The defendant's engaged in conduct directed at HATE under 18 U.S.C. 249
3. The defendant's have intentionally violated The Matthew Shepard Act of Hate Crime Prevention of 2009
4. president Biden just signed The Hate has no place in America Bill for crimes Of Asian hate and both defendant's engaged in hate related activity by the Exploitation of one's personality or character by alleging a intellect impairment Because my eldest child is intellectually impaired by his father's DNA, as his cousin Devin Baker is also intellectually impaired as it does NOT genetically un on my family's DNA as determined by Dr. Thom Lappas, my cousin,

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JUL 12 2021

CLERK OF THE COURT

The nephew of Charlene O'Neil, a graduate of Colgate, Stanford, and U.C. Berkley who has concluded no such genetic defect exists and that I am not In anyway intellectually impaired

5. Evidence, the preponderance of evidence standard exists that concludes this Is a HATE crime

6. Both defendant's continue to engage in the activity of trespass onto employers, As I just worked for three days at Torrey Pines Pub, in Las Vegas and Gloria Mazzoli made threats of Labor trafficking and torturous interference of employment

By violating a Federal Human Research Protection order issued by The United States NAVY that states the defendants CANNOT go into my employer under Any such circumstances and both defendant's conspired and engaged in Conduct designed to interfere with financial stability by engaging in hate Related activity

7. Both defendant's are accused of intercepting cell phone communication Under 18 U.S.C. 2518 by illegally tapping my cell phone to locate prospective Employers and communicate information they know to be false because of HATE

8. Both defendant's are accused of intimidation of a witness 18 U.S.C. 1512 By the act of intentional trespass to interfere and intimidate a witness at their Place of employment

9. Both defendant's are accused of the threat to injure, oppress, exercise The enjoyment of a right and privilege

Dated: July 7, 2021

Shirley Morrison

CERTIFICATE OF SERVICE

I do hereby certify that on the 7<sup>th</sup> day of July, 2021 I mailed a Notice  
Of Motion to Attorney Kevin Beck, 3137 E. warm Springs Rd.,  
Suite 100, Las Vegas, Nevada 89120 by First Class United States Mail

Amie Morrison

*Heather A. Hemin*  
CLERK OF THE COURT

EIGHT JUDICIAL DISTRICT  
CLARK COUNTY NEVADA

Aimee Morrison,  
Plaintiff,

v.

Case: A- 21-832762-C

Gloria Mazzoli,  
Charlene O'Neil,  
Defendant's

NOTICE OF MOTION

1. The plaintiff, Aimee Morrison, alleges that she has been out work  
For the longest timeline in her life because of these two defendant's  
And hate 18 U.S.C. 249
2. The report from Mr. Leigh Hunt states that Charlene O'Neil is not only  
Engaging in hate related activity that directly interferes with stable long  
Term employment, she intentionally obstructed and has interfered with  
Jobs resulting in direct loss of wages
3. The report from Mr. Leigh Hunt, retired head of The New York State  
Police states that "BAD BLOOD" between my family, The O'Neil's and  
Myself has caused ongoing outrageous activity including acts of false  
Allegations such as an intellect impairment as hate related criminal conspiring
4. Mr. Leigh Hunt retired head of The New York State Police also investigated  
Gloria Mazzoli having me followed as a result of bad blood between these families

RECEIVED

JUL 12 2021

CLERK OF THE COURT

Has caused aggravated financial injury including long term stable employment  
5. Dr. Thom Lappas, Scientist and Dr. for NASA in Washington DC,  
Who attended Colgate, Stanford, and U.C. Berkeley confirmed that “ OUR “  
DNA does not contain intellect impairments and why are these two defendants  
Crossing state lines and violating Federal Protection to engage in the act of  
Intentional trespass? I have full federal Protection by The United States Navy  
Which confirms that both defendants have intentionally violated a Federal  
Protective order which states they are NOT permitted to engage in the act of  
Trespass onto an employer with the intent to interfere with employment.

Dated: July 11, 2021

Amie Monison

#### CERTIFICATE OF SERVICE

I do hereby certify that on July 11, 2021 I served a Notice of Motion upon  
The defendant's attorney, Kevin Beck, 3137 E. Warm Springs Rd., Suite 100  
By United States First Class Mail

Amie Monison

#29

Electronically Filed  
07/19/2021

*Heather S. Hemin*  
CLERK OF THE COURT

EIGHTH JUDICIAL DISTRICT

CLARK COUNTY NEVADA

Aimee Morrison,

Plaintiff,

v.

Case: A-21-83276<sup>2</sup> C

Gloria Mazzoli,

Charlene O'Neil,

Defendant's

NOTICE OF MOTION

1. The plaintiff, Aimee Morrison, alleges that both defendant's have knowingly and intentionally committed the act of trespass onto the plaintiff's new employer, Town and Country gas station. Both defendant's have violated the Federal Protection order issued by The United States Navy on July 16, 2021, July 17 2021, and July 18, 2021 which has an enforceable punishment of

6 months in Federal prison and up to a \$500,000 fine for each act of intentional Conspiring.

2. Attorney Kevin Beck is responsible for reinforcing compliance with Federal And State laws of his clients who are routinely known and have a long term History of violating restraining orders.

3. I am requesting the courts order both defendant's to a mandatory 6 month

RECEIVED

JUL 19 2021

CLERK OF THE COURT

Sentence of imprisonment and an additional financial award of other

Relief that the court deems appropriate as these defendant's are intentionally engaging in hate related activity that violates 18 U.S.C. 249, Federal HATE.

4. The defendant's conspired a scheme of an intellect impairment to intentionally Lie, defame, slander and cause financial devastation by committing the act of Trespass once again.

5. Gloria Mazzoli got into my Colorado Unemployment and deactivated my Benefits without authorization or consent violating The Federal Protective Order. I have 17 weeks of Colorado Unemployment benefits missing. It has Been reported to The Colorado Unemployment fraud unit and The Washington DC oversight department for prosecution.

6. My aunt, JoAnn O'Neil, once again caught Mazzoli committing the act of Trespass, violating a Federal order issued by The United States Navy. I am Requesting the courts issue a sentence of Federal incarceration to punish Both defendant's

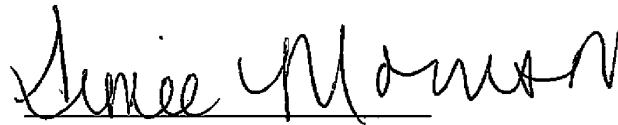
7. My marriage. My aunt, JoAnn O'Neil is remarrying Mark Morrison and Myself because Mr. Beck is not communicating to his clients the expectation Of litigants who are participating in Court procedures

8. The 8<sup>th</sup> Amendment, Cruel and Unusual Punishment to continue to conspire Hate related activity after President Biden just passed the new Asain Hate Bill, " America has no room for hate." Both defendant's continue to engage in Conduct of outrage by the threats to injure, oppress, interfere with the enjoyment Of a right or privilege

9. Section 802 of The United States Patriot Act, " coercing a population." Both Defendant's are coercing large groups by communicating false information with

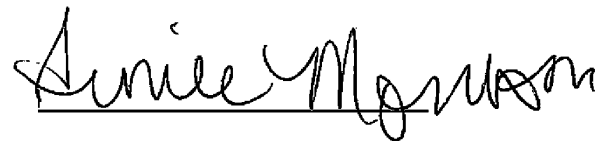
The intent to disturb, interfere, or obstruct employment. This also is under  
18 U.S.C. 1961-1963, Labor Trafficking.

Dated: July 19, 2021

A handwritten signature in black ink, appearing to read "Julie Morrison", written over a horizontal line.

#### CERTIFICATE OF SERVICE

I do hereby certify that on the 19<sup>th</sup> day of July, 2021 I served a Notice of Motion  
Upon Attorney, Kevin Beck, 3137 E. Warm Springs Rd., Suite 100, Las Vegas,  
Nevada 89120 by First Class United States Mail

A handwritten signature in black ink, appearing to read "Julie Morrison", written over a horizontal line.

FILED

AUG - 2 2021

*Sharon A. Brown*  
CLERK OF COURT

SUPREME COURT OF THE STATE OF NEVADA

Aimee Morrison,

Petitioner-Appellant,

v.

A-21-83276-2-C

Case: ~~A-21-83276-C~~

Charlene O'Neil,

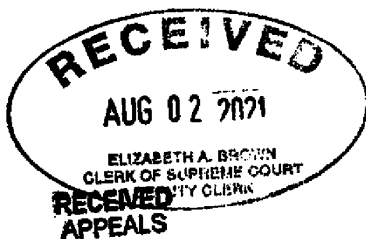
Respondent-Appellee,

*Gloria Mazzoli,*

NOTICE OF APPEAL

1. The Petitioner Aimee L. Morrison, appeals this decision of motion to  
Dismiss on \_\_\_\_\_ to The Nevada Supreme Court.

*Aimee Morrison*  
*July 10, 2021*



AUG 18 2021

CLERK OF THE COURT

A-21-832762-C  
NOAS  
Notice of Appeal  
4964335



CERTIFICATE OF SERVICE

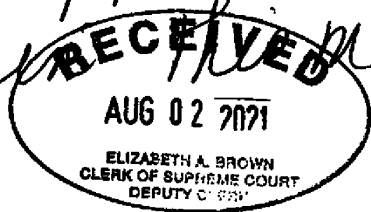
I do hereby certify that on this 10<sup>th</sup> of July 2021, I served a Notice  
Of Appeal upon Kevin Beck, 3137 E. Warm Springs Rd, Suite 100,  
Las Vegas, Nevada 89120 by First Class united States mail

Aimee Morrison

Amiee Morrison  
1801 S. Decatur  
#26764  
Las Vegas, NV 89126  
702-302-0481

Re: A-21-832762-C

Dear Clerk of the Court,  
I am filing a Notice  
of Appeal on the above  
listed case. Please file  
this in accordance to  
your normal filing  
procedures. I certainly  
appreciate your assistance  
in this matter. Respectfully  
Submitted  
Amiee Morrison



2) I filed a Reconsideration Motion and requested a hearing but I was advised to file a Notice of Appeal on this case as well.

Armed Morrison  
1801 S. Decatur  
#26764  
Las Vegas, NV 89126

Supreme Court of Nevada  
201 S. Carson St.  
#201

City NV 89701





**EIGHTH JUDICIAL DISTRICT COURT**  
**CLERK OF THE COURT**  
**CIVIL DIVISION**  
REGIONAL JUSTICE CENTER  
200 LEWIS AVE.  
LAS VEGAS, NEVADA 89101

Electronically Filed  
8/7/2021 4:35 PM  
Steven D. Grierson  
CLERK OF THE COURT

Steven D. Grierson  
Clerk of the Court

Anntoinette Naumec-Miller  
Court Division Administrator

**Filing Fee Remittance**

This form may be used to submit outstanding filing fees to the Eighth Judicial District Court via the Odyssey File & Serve system. By using this method to submit fees you acknowledge that all processing/convenience fees and E-File fees will be assessed in addition to the filing fee(s) as part of this filing transaction.

To submit this form, use filing code **Filing Fee Remittance - FFR (CIV)** and select the applicable fee(s) in the Optional Services section of the envelope.

|                                    |                                    |                                                |
|------------------------------------|------------------------------------|------------------------------------------------|
| <b>Case Number:</b>                | A-21-832762-C                      |                                                |
| <b>Party Responsible for Fees:</b> | Charlene O'Neil                    |                                                |
| <b>Related Filing:</b>             | <b>DATE OF FILING</b><br>5-16-2021 | <b>FILING DESCRIPTION</b><br>Motion to Dismiss |

Required-filing fees for the above entitled action are submitted as indicated below: *(Please check the applicable boxes and indicate the quantities below).*

|                          | <b>Fee Schedule</b>                                   | <b>Fee Amount</b> |
|--------------------------|-------------------------------------------------------|-------------------|
| <input type="checkbox"/> | 01 Civil Complaint                                    | \$270.00          |
| <input type="checkbox"/> | 01BC Business Court Complaint                         | \$1,530.00        |
| <input type="checkbox"/> | 01C Statutory Lien                                    | \$299.00          |
| <input type="checkbox"/> | 01CD Constr Defect Complaint                          | \$520.00          |
| <input type="checkbox"/> | 01FM Foreclosure Mediation Petition                   | \$275.00          |
| <input type="checkbox"/> | 01TBC Transfer to Business Court (after civil action) | \$1,260.00        |
| <input type="checkbox"/> | 01TPC Third Party Complaint                           | \$135.00          |
| <input type="checkbox"/> | 03 Civil Confession of Judgment                       | \$28.00           |

|                                     |                                          |            |
|-------------------------------------|------------------------------------------|------------|
| <input type="checkbox"/>            | 04A Appeals JC/Muni Court                | \$47.00    |
| <input type="checkbox"/>            | 04B Civil Notice of Appeal               | \$24.00    |
| <input type="checkbox"/>            | 05A Civil Answer/Appear                  | \$223.00   |
| <input type="checkbox"/>            | 05BC Business Court Answer/Appear        | \$1,483.00 |
| <input type="checkbox"/>            | 05CD Construction Defect Answer/Appear   | \$473.00   |
| <input type="checkbox"/>            | 05FM Foreclosure Mediation Answer/Appear | \$250.00   |
| <input type="checkbox"/>            | 05G Answer Additional Party              | \$30.00    |
| <input type="checkbox"/>            | 07A Transfer from another District Court | \$270.00   |
| <input type="checkbox"/>            | 41 Civil Writ                            | \$10.00    |
| <input checked="" type="checkbox"/> | 42 Civil Motion Summary Judg/Joinder     | \$200.00   |
| <input type="checkbox"/>            | 43 Civil Motion Certify/Decertify Class  | \$349.00   |
| <input type="checkbox"/>            | 44 Civil Motion Partial Summary Judg     | \$200.00   |
| <input type="checkbox"/>            | Civil Peremptory Challenge of Judge      | \$450.00   |

|                                                                                                                                                                                 |    |                        |                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|------------------------|-----------------------------|
| <input type="checkbox"/> 01G Complaint Additional Party<br>Enter additional party names in the spaces below.<br>Please complete additional form if adding more than 10 parties. |    |                        |                             |
|                                                                                                                                                                                 | 1  | \$30.00<br>(per party) | Quantity: _____<br>\$ _____ |
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|                                                                                                                                                                                 | 9  |                        |                             |
|                                                                                                                                                                                 | 10 |                        |                             |

**TOTAL PAID: \$** 200



1 ORDR  
2 Aimee Morrison  
3 6456 Butterfly Sky St  
4 North Las Vegas, NV 89084  
5 *Plaintiff, Pro Se*

6 **IN THE EIGHTH JUDICIAL DISTRICT COURT**  
7 **CLARK COUNTY, STATE OF NEVADA**

8 AIMEE MORRISON

Case No.: A-21-832762-C

Dept. No.: 29

9 Plaintiff,

10 vs.

**ORDER DENYING PLAINTIFF'S**  
**MOTION TO RECONSIDER**

11 CHARLENE O'NEIL; and DOES I through X,  
12 inclusive,

13 Defendant(s).

14 THIS MATTER coming before the Honorable Court on the 10<sup>th</sup> day of August, 2021, and  
15 after considering the paper and pleading on file:

16 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that pursuant to E.D.C.R.  
17 2.24 Plaintiffs' Motion to Reconsider is hereby **DENIED**:

18 **ORDER**

19 IT IS SO ORDERED this 11 day of Aug, 2021.

20  
21  
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23   
24 DISTRICT COURT JUDGE  
25  
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28



1 ASTA

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6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**  
7 **STATE OF NEVADA IN AND FOR**  
8 **THE COUNTY OF CLARK**  
9

10 AIMEE MORRISON,

11 Plaintiff(s),

12 vs.

13 CHARLENE O'NEIL; GLORIA MAZZOLI,

14 Defendant(s),  
15

Case No: A-21-832762-C

Dept No: XXIX

16  
17 **CASE APPEAL STATEMENT**  
18

19 1. Appellant(s): Aimee Morrison

20 2. Judge: David M. Jones

21 3. Appellant(s): Aimee Morrison

22 Counsel:

23 Aimee Morrison  
24 1801 S. Decatur #26764  
Las Vegas, NV 89126

25 4. Respondent (s): Charlene O'Neil; Gloria Mazzoli

26 Counsel:

27 Kevin E. Beck  
28 3137 E. Warm Springs Rd., Ste. 100  
Las Vegas, NV 89120

A-21-832762-C

-1-

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5. Appellant(s)'s Attorney Licensed in Nevada: N/A  
Permission Granted: N/A
- Respondent(s)'s Attorney Licensed in Nevada: Yes  
Permission Granted: N/A
6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No
7. Appellant Represented by Appointed Counsel On Appeal: N/A
8. Appellant Granted Leave to Proceed in Forma Pauperis\*\*: N/A  
*\*\*Expires 1 year from date filed*  
Appellant Filed Application to Proceed in Forma Pauperis: No  
Date Application(s) filed: N/A
9. Date Commenced in District Court: April 12, 2021
10. Brief Description of the Nature of the Action: TORT - Other
- Type of Judgment or Order Being Appealed: Dismissal
11. Previous Appeal: No
- Supreme Court Docket Number(s): N/A
12. Child Custody or Visitation: N/A
13. Possibility of Settlement: Unknown

Dated This 18 day of August 2021.

Steven D. Grierson, Clerk of the Court

/s/ Heather Ungermann  
Heather Ungermann, Deputy Clerk  
200 Lewis Ave  
PO Box 551601  
Las Vegas, Nevada 89155-1601  
(702) 671-0512

cc: Aimee Morrison

*Steven D. Grierson*

OSCC

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

AIMEE MORRISON, PLAINTIFF(S)      CASE NO.: A-21-832762-C  
VS.  
CHARLENE O'NEIL, DEFENDANT(S)      DEPARTMENT 29

**CIVIL ORDER TO STATISTICALLY CLOSE CASE**

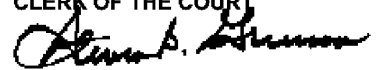
Upon review of this matter and good cause appearing,  
IT IS HEREBY ORDERED that the Clerk of the Court is hereby directed to  
statistically close this case for the following reason:

**DISPOSITIONS:**

- ☐ Default Judgment
- ☐ Judgment on Arbitration
- ☐ Stipulated Judgment
- ☐ Summary Judgment
- ☐ Involuntary Dismissal
- ☐ Motion to Dismiss by Defendant(s)
- ☐ Stipulated Dismissal
- ☐ Voluntary Dismissal
- ☐ Transferred (before trial)
- ☐ Non-Jury – Disposed After Trial Starts
- ☐ Non-Jury – Judgment Reached
- ☐ Jury – Disposed After Trial Starts
- ☐ Jury – Verdict Reached
- ☒ Other Manner of Disposition

DATED this 24th day of August, 2021.

  
\_\_\_\_\_  
DAVID M JONES  
DISTRICT COURT JUDGE



EIGHTH JUDICIAL DISTRICT  
CLARK COUNTY NEVADA

Aimee Morrison,  
Plaintiff,

v.

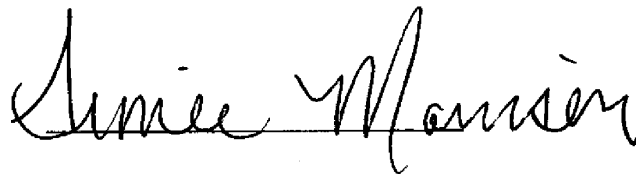
case: A21-832762-C

Charlene O'Neil,  
Gloria Mazzoli,

Defendant's

NOTICE OF APPEAL

The plaintiff appeals this decision to The Nevada Supreme Court on  
September 1, 2021



RECEIVED  
SEP 08 2021  
CLERK OF THE COURT

CERTIFICATE OF SERVICE

A 21-832762-C

I do hereby certify that on this 1<sup>st</sup> day of September, 2021 I served  
A Notice of Appeal upon Attorney Kevin Beck, 3137 E. Warm Springs  
Road, Suite 100, Las Vegas, Nevada 89120 by First Class United States  
Mail

Amie Morrison

Arniee Morrison  
1801 S. Decatur  
#26764  
-Las Vegas, NV 89126

Steven Grierison  
Clerk of the Court  
200 Lewis Ave. 3rd Fl.  
Las Vegas NV 89155-1160



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6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**  
7 **STATE OF NEVADA IN AND FOR**  
8 **THE COUNTY OF CLARK**  
9

10 AIMEE MORRISON,

11 Plaintiff(s),

12 vs.

13 CHARLENE O'NEIL; GLORIA MAZZOLI,

14 Defendant(s),  
15

Case No: A-21-832762-C

Dept No: XXIX

16  
17 **CASE APPEAL STATEMENT**  
18

19 1. Appellant(s): Aimee Morrison

20 2. Judge: David M. Jones

21 3. Appellant(s): Aimee Morrison

22 Counsel:

23 Aimee Morrison  
24 1801 S. Decatur #26764  
Las Vegas, NV 89126

25 4. Respondent (s): Charlene O'Neil; Gloria Mazzoli

26 Counsel:

27 Kevin E. Beck  
28 3137 E. Warm Springs Rd., Ste. 100  
Las Vegas, NV 89120

A-21-832762-C

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5. Appellant(s)'s Attorney Licensed in Nevada: N/A  
Permission Granted: N/A
- Respondent(s)'s Attorney Licensed in Nevada: Yes  
Permission Granted: N/A
6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No
7. Appellant Represented by Appointed Counsel On Appeal: N/A
8. Appellant Granted Leave to Proceed in Forma Pauperis\*\*: N/A  
*\*\*Expires 1 year from date filed*  
Appellant Filed Application to Proceed in Forma Pauperis: Yes,  
Date Application(s) filed: September 10, 2021
9. Date Commenced in District Court: April 12, 2021
10. Brief Description of the Nature of the Action: TORT - Other
- Type of Judgment or Order Being Appealed: Unknown
11. Previous Appeal: Yes
- Supreme Court Docket Number(s): 82418, 83317, 83389
12. Child Custody or Visitation: N/A
13. Possibility of Settlement: Unknown

Dated This 10 day of September 2021.

Steven D. Grierson, Clerk of the Court

/s/ Heather Ungermann  
Heather Ungermann, Deputy Clerk  
200 Lewis Ave  
PO Box 551601  
Las Vegas, Nevada 89155-1601  
(702) 671-0512

cc: Aimee Morrison

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NUMBERED PAGE(S)  
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U.S. MAIL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

|                   |                      |                      |
|-------------------|----------------------|----------------------|
| <b>Other Tort</b> | <b>COURT MINUTES</b> | <b>June 22, 2021</b> |
|-------------------|----------------------|----------------------|

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|               |                                                                      |
|---------------|----------------------------------------------------------------------|
| A-21-832762-C | Aimee Morrison, Plaintiff(s)<br>vs.<br>Charlene O'Neil, Defendant(s) |
|---------------|----------------------------------------------------------------------|

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|               |         |                   |
|---------------|---------|-------------------|
| June 22, 2021 | 9:00 AM | Motion to Dismiss |
|---------------|---------|-------------------|

|                          |                              |
|--------------------------|------------------------------|
| HEARD BY: Jones, David M | COURTROOM: RJC Courtroom 15A |
|--------------------------|------------------------------|

COURT CLERK: Michaela Tapia

RECORDER: Melissa Delgado-Murphy

REPORTER:

**PARTIES**

|                         |          |
|-------------------------|----------|
| PRESENT: Beck, Kevin E. | Attorney |
|-------------------------|----------|

**JOURNAL ENTRIES**

- COURT ORDERED, motion GRANTED. The request to deem the Plaintiff a vexatious litigant to be forwarded to the Chief Judge. Counsel to submit the amount requested for attorney's fees.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Other Tort

## COURT MINUTES

**June 29, 2021**

A-21-832762-C      Aimee Morrison, Plaintiff(s)  
vs.  
Charlene O'Neil, Defendant(s)

**June 29, 2021                      9:00 AM                      Hearing**

HEARD BY: Jones, David M

COURTROOM: RJC Courtroom 15A

**COURT CLERK:** Michaela Tapia

**RECORDER:** Melissa Delgado-Murphy

**REPORTER:**

## PARTIES

**PRESENT:**

## JOURNAL ENTRIES

- No parties present.

COURT ORDERED, Motion to Dismiss GRANTED. Request to deem the Plaintiff as a vexatious litigant to be forwarded to Chief Judge Bell. COURT FURTHER ORDERED, fees and costs GRANTED. Mr. Beck to prepare the order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

|                   |                      |                        |
|-------------------|----------------------|------------------------|
| <b>Other Tort</b> | <b>COURT MINUTES</b> | <b>August 10, 2021</b> |
|-------------------|----------------------|------------------------|

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|               |                                                                      |
|---------------|----------------------------------------------------------------------|
| A-21-832762-C | Aimee Morrison, Plaintiff(s)<br>vs.<br>Charlene O'Neil, Defendant(s) |
|---------------|----------------------------------------------------------------------|

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|                 |         |                               |
|-----------------|---------|-------------------------------|
| August 10, 2021 | 9:00 AM | Motion For<br>Reconsideration |
|-----------------|---------|-------------------------------|

|                          |                              |
|--------------------------|------------------------------|
| HEARD BY: Jones, David M | COURTROOM: RJC Courtroom 15A |
|--------------------------|------------------------------|

COURT CLERK: Michaela Tapia

RECORDER: Angelica Michaux

REPORTER:

**PARTIES**

|          |                 |           |
|----------|-----------------|-----------|
| PRESENT: | Morrison, Aimee | Plaintiff |
|----------|-----------------|-----------|

**JOURNAL ENTRIES**

- Argument by Ms. Morrison. COURT ORDERED, written decision to issue via minute order.

# Certification of Copy and Transmittal of Record

State of Nevada }  
County of Clark } SS:

Pursuant to the Supreme Court order dated October 20, 2021, I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, do hereby certify that the foregoing is a true, full and correct copy of the complete trial court record for the case referenced below. The record comprises one volume with pages numbered 1 through 216.

AIMEE MORRISON,

Plaintiff(s),

vs.

CHARLENE O'NEIL; GLORIA MAZZOLI,

Defendant(s),

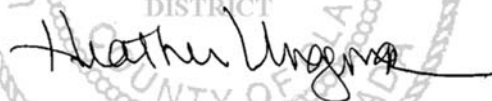
Case No: A-21-832762-C

Dept. No: XXIX

now on file and of record in this office.

**IN WITNESS THEREOF**, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 25 day of October 2021.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk

