

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

THOMAS BAHR,  
Appellant,

vs.

GESENIA ARTEAGA,  
Respondent,

) Supreme Court Case No. 84306

) District Case No. D-16-538413-C

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**FILED**

JUN 24 2022

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY *[Signature]*  
DEPUTY CLERK

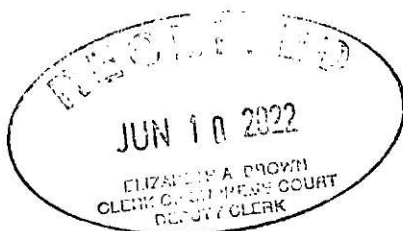
**REPLY TO FAST TRACK RESPONSE**

Comes Now, **THOMAS BAHR**, and files this Reply to Fast Track Response, in compliance with NRAP Rule 3E(d)(3) as follows.

Respondent's Appeal Response does not address or resolve any of the issues set forth in Appellant's Fast Track Brief.

This matter relates to the best interest of the parties minor child, to wit: GESENIA DIANE ARTEAGA (DOB: 3/6/14).

Respondent filed a motion to modify the joint legal and physical custody of the minor child. Appellant/Dad opposed. Both parties were in proper person for the trial. Appellant's Fast Track details that evidence presented did not met the burden to remove joint legal and joint physical custody of the child. The issues with the decision were detailed in Appellant's motion for reconsideration in great detail. They were further expounded on in the Fast Track Brief either directly or



by reference to Appellant's underlying motion for reconsideration.

The details of the letter from the minor child's school nurse regarding the mother's failure to provide the minor child her required leukemia cancer medication is an example of why the custody order is not appropriate.

In fact, the child's pediatric oncologist filed an official Child Abuse Report #1967302, as a mandatory reporter, which was included in the CPS records previously referenced by Appellant.

Additionally, there was a letter from the child's school counselor regarding the child crying and statements made by the child that she was afraid to be in her mother's care due to acts of child abuse from the mother, which was in the court record.

The child has cried to Appellant/Dad for help due to child abuse by Respondent, or Respondent's boyfriend, which Respondent fails to protect the child from.

Even on 10/5/2020, in Report #950547 to CPS, Dr. Nicole Silk, Psy.D, a specialist in trauma child abuse, domestic violence and family crisis matters, indicated there were concerns with abuse in Respondent's parenting of the child.

There is so much clinical and forensic evidence on video of the child unsolicited crying to Appellant for help due to child abuse in Respondent's home,

it cannot be ignored.

There have been thirteen Emergency Reports Filed To CPS by the Court Ordered Visitation Monitors from the Child Haven Facility regarding the child's unsolicited cries for help from the acts of Child Abuse as in NRS: 432B (from Mother's then-boyfriend.)

All these matters are detailed in the court record and were available to the District Court, and all the evidence has been forensically substantiated by an official report from the Psy.D Specialist, verifying the child is telling the truth, which Respondent simply denies - both in District Court and in her Response Brief. The child was not coached or coerced and has told the truth, and Appellant simply desires the child's voice to be heard.

Respondent has also withheld the child's address while in her care, in spite of this being in every custody order of the parties.

Respondent simply denies any wrongdoing, in spite of the evidence, and seeks to find fault with Appellant, because she is unable and unwilling to co-parent. Appellant is compelled to protect the child, and this is what this case is about.

Appellant is aware that child support issues will be addressed and resolved upon addressing the custody matters above, and did not spend a great deal of time

on this matter in his Fast Track Brief due to this legitimate reason.

However, the present district court custody order led to child support being imposed in the final custody Order in violation of federal law, as Appellant is an SSI recipient, as detailed in the underlying motion for reconsideration. Appellant has addressed this in the child support division.

### **CONCLUSION**

Based upon the facts and evidence in the record, as pointed out in the fast track statement, Appellant requests the court remand the matter due to abuse of discretion, and that the best interest of the child be considered.

Dated this 8<sup>th</sup> day of June, 2022.



THOMAS BAHR

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Appellant In Proper Person

## CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed child custody fast track statement upon all parties to the appeal as follows:

By mailing it first class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served):

Gesenia Arteaga  
804 Sarajane Lane  
Las Vegas, NV 89107

DATED this 8<sup>th</sup> day of June, 2022.

Thomas Bahr

THOMAS BAHR

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