

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

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ADAM MICHAEL SOLINGER,

Appellant,

vs.

CHALESE MARIE SOLINGER,

Respondent.

) Case No.: 84832-COA

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**APPELLANT'S APPENDIX
VOLUME 2**

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Appellant's Appendix* was filed electronically with the Clerk of the Court of Appeals of Nevada in the above-entitled matters on Monday, November 21, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

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/s/ David J. Schoen, IV, ACP
An employee of The Abrams & Mayo Law Firm

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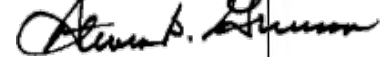
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11/02/2022	Transcript from April 14, 2022 Hearing (Trial Decision)	22	4771 - 4791
11/02/2022	Transcript from January 21, 2022 Evidentiary Hearing (Trial Day 2)	19	3994 - 4155
11/02/2022	Transcript from March 1, 2022 Evidentiary Hearing (Trial Day 3)	20	4156 - 4402
11/02/2022	Transcript from March 2, 2022 Evidentiary Hearing (Trial Day 4)	21	4403 - 4669
11/02/2022	Transcript from March 3, 2022 Evidentiary Hearing (Trial Day 5)	22	4670 - 4770
01/25/2022	Transcript from May 10, 2021 Evidentiary Hearing (Trial Day 1)	16	3416 - 3574



1 **NEOJ**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

3 **THE ABRAMS & MAYO LAW FIRM**

6252 South Rainbow Blvd., Suite 100

4 Las Vegas, Nevada 89118

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6 Attorney for Plaintiff

7 Eighth Judicial District Court

8 Family Division

Clark County, Nevada

9 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D

10 Plaintiff,

) Department: I

11 vs.

12 CHALESE MARIE SOLINGER,

13 Defendant.

16 **NOTICE OF ENTRY OF ORDER AFTER HEARING OF**

17 **MARCH 19, 2019**

18 PLEASE TAKE NOTICE that the Order After Hearing of March 19,
19 2019 was duly entered in the above-referenced matter. A true and correct
20 copy of said
21

22 ///

23 ///

24 ///

1 Order is attached hereto.

2 DATED Friday, May 03, 2019.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

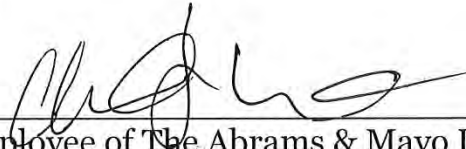
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7 Vincent Mayo, Esq.
8 Nevada State Bar Number: 8564
9 6252 South Rainbow Blvd., Suite 100
10 Las Vegas, Nevada 89118
11 Attorney for Plaintiff
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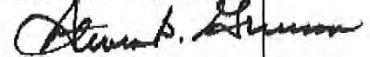
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Notice of Entry of Order After Hearing of March 19, 2019* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Friday, May 03, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Louis C. Schneider, Esq.
Attorney for Defendant


An Employee of The Abrams & Mayo Law Firm



ORDR

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
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Attorney for Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
Plaintiff,)	Department: I
vs.)	
)	Date of Hearing: March 19, 2019
CHALESE MARIE SOLINGER,)	Time of Hearing: 3:30 p.m.
)	
Defendant.)	

ORDER AFTER HEARING OF MARCH 19, 2019

This matter coming on for hearing on the on the 19th day of March 2019, before the Honorable Cheryl B. Moss, upon Defendant's *Motion to set Aside Default; for Exclusive Possession of the Marital Residence and Ordering Plaintiff to Assist in Making Mortgage Payments; for Medical Legal Custody of the Minor Children, for an Order Referring the Parties to Mediation Pursuant to EDCR 5.70, for an Order Awarding Plaintiff Child Support; for an Order Awarding Plaintiff Alimony; and for Attorney's Fees and Costs and Plaintiff's Opposition to Amended*

1 *Motion to set Aside Default; for Exclusive Possession of the Marital*
2 *Residence and Ordering Plaintiff to Assist in Making Mortgage*
3 *Payments; for Medical Legal Custody of the Minor Children, for an*
4 *Order Referring the Parties to Mediation Pursuant to EDCR 5.70, for*
5 *an Order Awarding Plaintiff Child Support; for an Order Awarding*
6 *Plaintiff Alimony; and for Attorney's Fees and Costs and*
7 *Countermotion for Joint Legal Custody, Primary Physical Custody to*
8 *Plaintiff and Supervised Visitation to Defendant; to Establish Child*
9 *Support; to Establish Payment of Marital Expenses for an Order*
10 *Protecting the Parties' Community Property; Defendant to Obtain*
11 *Employment and to Cooperate in a Vocational Assessment, with*
12 Plaintiff, ADAM MICHAEL SOLINGER (hereinafter referred to as
13 "Adam"), having appeared personally and by and through his attorney of
14 record, VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM,
15 and Defendant, CHALESE MARIE SOLINGER (hereinafter referred to
16 as "Chalese"), having appeared personally and by and through her
17 attorney of record, LOUIS C. SCHNEIDER, ESQ., or LAW OFFICE OF
18 LOUIS C. SCHNEIDER and the Court having listened to the
19 representations and arguments of counsel, and good cause appearing:

20 **IT IS HEREBY NOTED** that both Counsel represent that each
21 party has appropriate living conditions for the children. Video time

1 index 9:41:42 to 9:42:08.

2 **IT IS FURTHER NOTED** that Attorney Schneider represented
3 that from the \$7,500.00 withdrawn by Chalese from the parties'
4 account, \$2,500.00 was given to Ed Kainen and \$5,000.00 was given to
5 Mr. Schneider's office for attorney's fees. Video time index 10:15:42 to
6 10:16:06.

7 **IT IS FURTHER NOTED** that Chalese represented she has quit
8 using marijuana and Adam represents he does not use marijuana. Video
9 time index: 9:36:11 to 9:36:17.

10 **IT IS HEREBY ORDERED** that the parties are awarded on a
11 temporary basis joint legal and joint physical custody of the minor
12 children. Video time index 10:40:52 to 10:40:56.

13 **IT IS HEREBY ORDERED** that the parties shall follow a 4-3-3-
14 4 schedule, consisting of the following: Week 1 shall be defined as
15 Chalese having the children from Sunday at 6:00 p.m. through Thursday
16 at 6:00 p.m. and Adam having the children from Thursday at 6:00 p.m.
17 through Sunday at 6:00 p.m. Week 2 shall be defined as Chalese having
18 the children from Sunday at 6:00 p.m. through Wednesday at 6:00 p.m.
19 and Adam having the children from Wednesday at 6:00 p.m. through
20 Sunday at 6:00 p.m. Video time index 10:39:42 to 10:39:47. Week 1 shall
21 commence on Sunday, March 24th. The receiving parent shall pick-up

1 the children. Video time index 10:39:42 to 10:39:47. The exchanges shall
2 take place at the non-receiving parent's residence, curbside, with the
3 parties utilizing the text/honk and seat-belt rule. Video time index
4 10:40:56 to 10:41:01. The parties may video record each other in person.
5 Video time index 10:41:29 to 10:41:37.

6 **NOTICE IS HEREBY GIVEN** that the parties are subject to the
7 following provisions:

8 1. The parties are subject to the provisions of NRS 125C.0065
9 which provides:

10 1. If joint physical custody has been established pursuant to
11 an order, judgment or decree of a court and one parent intends to
12 relocate his or her residence to a place outside of this State or to a
13 place within this State that is at such a distance that would
14 substantially impair the ability of the other parent to maintain a
15 meaningful relationship with the child, and the relocating parent
16 desires to take the child with him or her, the relocating parent
17 shall, before relocating:

18 (a) Attempt to obtain the written consent of the non-
19 relocating parent to relocate with the child; and

20 (b) If the non-relocating parent refuses to give that consent,
21 petition the court for primary physical custody for the purpose of
relocating.

2. The court may award reasonable attorney's fees and
costs to the relocating parent if the court finds that the non-
relocating parent refused to consent to the relocating parent's
relocation with the child:

(a) Without having reasonable grounds for such refusal; or

(b) For the purpose of harassing the relocating parent.

3. A parent who relocates with a child pursuant to this
section before the court enters an order granting the parent
primary physical custody of the child and permission to relocate
with the child is subject to the provisions of NRS 200.359.

1 2. The parties are subject to the provisions of NRS 125.510(6),
2 which provides:

3 PENALTY FOR VIOLATION OF ORDER: THAN ABDUCTION,
4 CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION
5 OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY
6 AS PROVIDED IN NRS 193.130.

6 3. The parties are subject to the provisions of NRS 200.359
7 which provides that every person having a limited right of custody to a
8 child or any parent having no right of custody to the child who willfully
9 detains, conceals or removes the child from a parent, guardian or other
10 person having lawful custody or a right of visitation of the child in
11 violation of any order of this court, or removes the child from the
12 jurisdiction of the court without the consent of either the court or all
13 persons who have the right to custody or visitation is subject to being
14 punished for a category D felony as provided in NRS 193.130.

15 4. Pursuant to NRS 125.510(7) and (8), the terms of the Hague
16 Convention of October 25, 1980, adopted by the 14th Session of the
17 Hague Conference on Private Internal Law, apply if a parent abducts or
18 wrongfully retains a child in a foreign country. For the purposes of
19 applying the terms of the Hague Convention, the State of Nevada, United
20 States of America, is the habitual residence of the minor child.

21 ///

1 5. Under the terms of the Parental Kidnapping Prevention Act,
2 28 U.S.C. Sec. 1738A, and the Uniform Child Custody Jurisdiction and
3 Enforcement Act, NRS 125A.005 *et seq.*, the courts of Nevada have
4 exclusive modification jurisdiction of the custody, visitation and child
5 support terms relating to the child at issue in this case so long as either
6 of the parties, or the child, continue to reside in this jurisdiction.

7 **IT IS FURTHER ORDERED** that the Partial Parenting
8 Agreement reached at FMC between the parties regarding joint legal
9 custody, holidays and vacations is attached hereto as Exhibit "1" and
10 fully incorporated into this order as if set forth herein.

11 **IT IS FURTHER ORDERED** that both parties are referred to
12 the American Toxicology Institute (ATI) for drug testing to include hair
13 and urine. Each party shall bear their own fees. The referral was left-side
14 filed. Counsel may obtain the results by contacting Department I. Video
15 time index: 9:37:02 to 9:37:21.

16 **IT IS FURTHER ORDERED** that Chalese is referred to the
17 American Toxicology Institute (ATI) for one (1) random drug test 90
18 days after today's date, which will be on or after June 20, 2019, to
19 include hair and urine. Adam or his counsel shall give notice to Chalese
20 or her counsel as to when she needs to go in for testing in June, with
21 Chalese going to test the same day and with Adam paying. Video time

1 index 9:47:07 to 9:47:16; 9:48:48 to 9:49:41. Adam shall bear the cost of
2 such test. The referral was left-side filed.

3 **IT IS FURTHER ORDERED** that neither party shall use
4 marijuana. Further, neither party shall consume alcohol 24 hours prior
5 to and during their custodial timeshare with the children. Video time
6 index 9:48:31 to 9:48:47.

7 **IT IS FURTHER ORDERED** that both parties shall child proof
8 their residences and keep their homes in a habitable living condition.
9 Video time index 9:41:42 to 9:42:08 and 9:53:12 to 9:53:31.

10 **IT IS FURTHER ORDERED** that the parties have an agreement
11 to change the school/daycare to a more affordable one. Video time index
12 9:33:59 to 9:34:19.

13 **IT IS FURTHER ORDERED** that each party shall take a UNLV
14 high conflict parenting class, without prejudice, Adam shall pay for the
15 classes. Chalese shall take the class first and once she completes it, Adam
16 shall take the class. Video time index 9:54:35 to 9:56:10.

17 **IT IS FURTHER ORDERED** that based on Adam's gross
18 income as represented and pursuant to NRS 125B.070, Adam shall pay
19 Chalese temporary child support for the two minor children in the
20 amount of One Thousand Nine Hundred Ninety Dollars (\$1,990.00) per
21 month. Video time index 9:59:01 to 9:59:17; 10:29:55 to 10:29:57.

1 **NOTICE IS HEREBY GIVEN** that the parties are subject to the
2 following statutory provisions:

3 1. Pursuant to NRS 125B.145, an award of child support shall
4 be reviewed by the court at least every three (3) years to determine
5 whether the award should be modified. The review will be conducted
6 upon the filing of a request by (1) a parent or legal guardian of the child;
7 or (2) the Nevada State Welfare Division or the District Attorney's
8 Office, if the Division of the District Attorney has jurisdiction over the
9 case.

10 2. Pursuant to NRS 125.450(2), the wages and commissions of
11 the parent responsible for paying support shall be subject to assignment
12 or withholding for the purpose of payment of the foregoing obligation of
13 support as provided in NRS 31A.020 through 31A.240, inclusive.

14 3. Pursuant to NRS 125.130 the social security numbers of the
15 parties shall be provided on a separate form to the Court for the Welfare
16 Division of the Department of Human Resources within ten days from
17 the date this Decree is filed. Such information shall be maintained by the
18 clerk in a confidential manner and not be a part of the public record.

19 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**
20 that the parties will submit the information required in NRS 125B.055,
21 NRS 125.130, and NRS 125.230, on a separate form, to the court and the

1 Welfare Division of the Department of Human Resources, within ten
2 (10) days from the date this Decree is filed. Such information will be
3 maintained by the clerk in a confidential manner and not part of the
4 public record. The parties will update the information filed with the
5 court and the Welfare Division of the Department of Human Resources
6 within ten (10) days should any of that information become inaccurate.

7 **IT IS FURTHER ORDERED** that the claim of constructive
8 arrears is deferred. Video time index 10:11:53 to 10:12:01; 10:16:51 to
9 10:17:22.

10 **IT IS FURTHER ORDERED** that the children shall be kept on
11 their current health insurance coverage. Any unreimbursed/uncovered
12 out of pocket medical, dental, optical, orthodontic or other health related
13 expense incurred for the benefit of the minor child/children is to be
14 divided equally between the parties with out of pocket unreimbursed /
15 uncovered health expenses paid pursuant to the 30/30 Rule. Video time
16 index 10:11:47 to to 10:11:52. The 30/30 Rule holds that either party
17 incurring an out of pocket medical expense for the child/children shall
18 provide a copy of the paid invoice/receipt to the other party within thirty
19 days of incurring such expense, if not tendered within the thirty-day
20 period, the Court may consider it as a waiver of reimbursement. The
21 other party will then have thirty days from receipt within which to

1 dispute the expense in writing or reimburse the incurring party for one-
2 half of the out of pocket expense, if not disputed or paid within the
3 thirty-day period, the party may be subject to a finding of contempt and
4 appropriate sanctions.

5 **IT IS FURTHER ORDERED** that Chalese shall obtain
6 employment within three months. If she does not, she shall commence
7 keeping a diary of her employment attempts, which shall consist of at
8 least three (3) attempts per day. Once Chalese obtains employment, she
9 shall notify Adam with her date of hire, pay structure, etc. Video Time
10 Index 9:39:10 to 9:39:44. Once Chalese obtains employment, the family
11 support order will be reassessed with Adam filing a supplemental
12 motion. Video time index 10:05:35 to 10:05:39; 10:05:48 to 10:06:02.

13 **IT IS FURTHER ORDERED** that the parties shall be equally
14 responsible for one-half of the monthly mortgage on the 8500 Highland
15 View Avenue residence, in the total amount of One Thousand Three
16 Hundred Twenty Dollars (\$1,320.00) per month, with each side being
17 responsible for \$660.00 per month. Video time index 10:30:01 to
18 10:30:04; 10:34:52 to 10:34:57.

19 **IT IS FURTHER ORDERED** that Chalese shall be responsible
20 for the following monthly expenses, commencing April 1, 2019:
21 Electricity, water, gas, sewer and internet on the 8500 Highland View

1 Avenue residence, gas for a vehicle, groceries and other discretionary
2 expenses. The parties shall coordinate with transferring the utilities into
3 Chalese's name. Video Time Index: 10:34:52 to 10:35:55; 10:06:52 to
4 10:07:16.

5 **IT IS FURTHER ORDERED** that the parties shall place the
6 marital residence on the market for sale. Adam shall choose three (3)
7 realtors within one (1) week and Chalese shall choose one (1) name
8 within the following week. Chalese shall keep the property in sale
9 condition. If the parties cannot agree with a sales price after conferring
10 with the realtor, the court shall decide, as well as any reduction in price.
11 The proceeds from the sale of the home shall be placed in Attorney
12 Mayo's trust account. Video time index 10:00:02 to 10:00:44; 10:03:50
13 to 10:04:51; 10:12:31 to 10:12:39.

14 **IT IS FURTHER ORDERED** that Adam may at random, and
15 not when Chalese is asleep, request Chalese perform a walk-through of
16 Chalese's house when she is at home by requesting same from Chalese
17 once every two (2) months, which shall occur during May 2019, July
18 2019, and September 2019. Chalese shall respond with a video to Adam
19 within three (3) hours of said request. Video time index 9:51:00 to
20 9:52:52.

21 ///

1 **IT IS FURTHER ORDERED** that Chalese shall neatly place all
2 of Adam's clothing, shoes, belts, toiletries, etc., in boxes for him to pick
3 up. Video time index 9:51:42 to 9:51:47.

4 **IT IS FURTHER ORDERED** that neither party is to sell,
5 transfer or convey any property at the 8500 Highland View Avenue
6 residence as the Joint Preliminary Injunction is in effect. Video time
7 index 9:43:14 to 9:43:37.

8 **IT IS FURTHER ORDERED** that Adam shall hire a repair
9 person to obtain a repair estimate related to the water leak at the 8500
10 Highland View Avenue residence. Adam shall obtain a repair person to
11 fix the water leak in the marital residence. If Adam has to front the bill,
12 he shall save his bill and the court will consider reimbursement for half
13 of the bill from the proceeds of the sale of the marital residence. Video
14 time index 10:08:58 to 10:11:15.

15 **IT IS FURTHER ORDERED** that both counsel and/or their
16 assistant will schedule a video walk through of the marital residence for
17 purposes of Adam inventorying the contents prior to division of the
18 marital furniture, furnishings, electronics, kitchenware, linens, etc. Both
19 counsel can be present during the walkthrough or send a representative
20 from their office. Counsel shall coordinate with the parties as to same.
21 Video time index 10:19:29 to 10:20:06.

1 **IT IS FURTHER ORDERED** that the artwork shall be appraised
2 during the video walk through of the residence. Without prejudice,
3 Adam shall pre-pay for the appraiser. Chalese shall allow access to the
4 house, which can be done at the same time video walk-through inventory
5 occurs. Video time index 10:20:31 to 10:21:23.

6 **IT IS FURTHER ORDERED** that if Adam's father permits the
7 parties to continue to use his truck, Chalese shall be the only person to
8 drive the truck. Josh Lloyd shall not drive the truck or the children in
9 any other vehicle. Video time index 9:45:42 to 9:45:45. Further,
10 Chalese's significant other shall not be left alone with the children or
11 babysit them. Video time index 9:45:46 to 9:45:59.

12 **IT IS FURTHER ORDERED** that Adam shall keep Chalese on
13 his health insurance until the divorce is finalized. Chalese shall begin
14 looking for private health insurance or insurance through an employer.
15 Video time index 10:11:35 to 10:11:45.

16 **IT IS FURTHER ORDERED** that the parties are referred to the
17 Settlement Master's program. The Court encourages parties to choose a
18 Settlement Master from the Court's approved list. Video time index
19 10:17:52 to 10:19:01.

20 ///

21 ///

1 **IT IS FURTHER ORDERED** that the parties are issued a
2 Mutual Behavior Order. There shall be no posting on social media. Order
3 signed and filed in open Court. Video time index 10:41:45 to to 10:41:52.

4 **IT IS FURTHER ORDERED** that Calendar Call is set for
5 September 9, 2019 at 9:00 a.m. Discovery closes at Calendar Call. Pre-
6 Trial Memos along with the final List of Witnesses and List of Exhibits
7 are due on or before Calendar Call. Exhibit notebooks are to be provided
8 to the Court three days prior to trial. Video time index 10:32:34 to
9 10:33:25.

10 **IT IS FURTHER ORDERED** that Evidentiary Hearing
11 regarding Custody (Stack #1) is set for day 1 on October 9, 2019 at 9:00
12 a.m. and day 2 on October 10, 2019 at 9:00 a.m. Video time index
13 9:31:46 to 9:32:06.

14 **IT IS FURTHER ORDERED** that Case Management Order
15 signed and filed in open Court.

16 **IT IS FURTHER ORDERED** that attorney's fees is deferred
17 until the time of the selling of the 8500 Highland View Avenue
18 residence. Video time index 10:14:50 to 10:14:55.

19 **IT IS FURTHER ORDERED** that the issue of reimbursement to
20 Adam of Adam's half of the \$7,500 in attorney's fees withdrawn by
21 Chalese, with half being \$3,750, is reserved. Video time index 10:16:12

1 to 10:16:20.

2 **IT IS FURTHER ORDERED** that Attorney Mayo shall prepare
3 the Order from today's hearing; Attorney Schneider shall review and
4 countersign. Video time index 10:42:01 to 10:42:09.

5 Dated this day of , 2019.

MAY 02 2019

6 
DISTRICT COURT JUDGE

7
8 Respectfully Submitted:

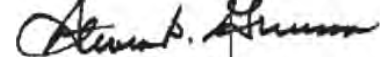
Approved as to form and content:

9 THE ABRAMS & MAYO LAW
10 FIRM

LAW OFFICE OF LOUIS C.
SCHNEIDER

11
12 
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14 Tel: (702) 222-4021
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15 Attorney for Plaintiff

16
17 
Louis C. Schneider, Esq.
Nevada State Bar Number: 9683
430 South Seventh Street
Las Vegas, Nevada 89101
18 Tel: (702) 435-2121
Fax: (702) 431-3807
Attorney for Defendant



1 **MOT**

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2 Nevada State Bar Number: 8564
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5 Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

6 Eighth Judicial District Court
Family Division
7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
9 Plaintiff,) Department: I
vs.)
10 CHALESE MARIE SOLINGER,)
11 Defendant.) **Oral argument is requested**

12 NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION
WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A
13 COPY OF YOUR RESPONSE WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS
MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE
14 COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN
THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT A HEARING
PRIOR TO THE SCHEDULED HEARING DATE.

15 **EMERGENCY MOTION FOR A CHANGE OF CUSTODY; FOR**
16 **ATTORNEY'S FEES AND COSTS AND RELATED RELIEF**

17 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
18 SOLINGER, by and through his attorney, Vincent Mayo, Esq., of The
19 Abrams & Mayo Law Firm, and hereby submits his *EMERGENCY*
20 *MOTION FOR AN EMERGENCY CHANGE OF CUSTODY;*
21 *ATTORNEY'S FEES AND COSTS AND RELATED RELIEF.*

1 This Motion is made and based upon the attached Points and
2 Authorities, the Affidavit attached hereto, the Appendix of Exhibits in
3 support, all papers and pleadings on file herein, and any oral argument
4 adduced at the hearing of this matter.

5 Dated Tuesday, May 14, 2019.

6 Respectfully Submitted,

7 THE ABRAMS & MAYO LAW FIRM

8 /s/ Vincent Mayo, Esq.

9 Vincent Mayo, Esq.

10 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Plaintiff

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 **I. STATEMENT OF FACTS**

13 Plaintiff, ADAM SOLINGER ("Adam") and Defendant, CHALESE
14 SOLINGER, were married on May 12, 2012 in Las Vegas, Nevada. There
15 are two (2) minor children of the marriage, to wit: Michael Adam
16 Solinger ("Michael"), born June 16, 2015 (3 years of age); and Marie
17 Leona Solinger ("Marie"), born August 28, 2017 (1 year of age). Adam is
18 30 years old and Chalese is 28 years old.

19 ///

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21 ///

1 At the last hearing, Adam detailed how Chalese's poor judgment,
2 defiant behavior and irresponsibility have threatened the safety of the
3 children. Chalese's reprehensible conduct consisted of:

- 4 • Chalese doing drugs and drinking alcohol while caring for a 3-
year-old and a 1-year-old;
- 5 • Chalese unilaterally making major health care decisions for the
children;
- 6 • Chalese allowing her boyfriend Josh Lloyd, a man who uses
7 drugs and has a horrible driving record, drive the parties'
children;
- 8 • Chalese keeping the marital residence filthy; and
- 9 • Chalese barring co-parenting by cursing and insulting Adam in
communications.

10 The Court responded by making a number of protective orders
11 with the goal of safeguarding the children from Chalese's harmful
12 behavior. These include (1) Chalese taking a high conflict parenting class
13 at UNLV; (2) Chalese completing the COPE requirement; (3) Chalese
14 abiding by the Mutual Behavioral Order; (4) Chalese not permitting Josh
15 Lloyd to drive the parties' children or care for them; (5) requiring
16 Chalese to be drug and alcohol free; and (6) admonishing Chalese to
17 make good decisions. Unfortunately, Chalese cares nothing for this
18 Court's orders and continues to both place the parties' young children
19 directly in harm's way, as well as to confuse them emotionally.

20 ///

21 ///

1 **Chalese is Now Married to Josh Lloyd Who is Living at**
2 **the Marital Residence**

3 Chalese denied at the March 19th hearing having anything serious
4 with Josh Lloyd. Low and behold, Chalese in fact married Josh Lloyd
5 three weeks later on April 9th. Facebook photos of Chalese's ceremony,
6 Chalese referring to herself as "Chalese Anderson Lloyd", Josh's post
7 that he and Chalese married and congratulations from numerous friends
8 are attached as **Exhibit 1**.

9 Adam could not believe Chalese would do something so
10 irresponsible, especially when he and she are still married, as it at least
11 would confuse the children. Indeed, Chalese has started referring to
12 Josh, his children and Adam's children as her and Josh's "family."¹ The
13 parties' oldest child, Michael, has even started telling Adam he has a
14 second father and a new sister.

15 Further, Chalese also lied by stating that Josh Lloyd did not live
16 with her at the marital residence when questioned by the Court. It is of
17 note that Adam represented Michael had told him Josh Lloyd was living
18 at the residence. In response, Chalese stated Josh Lloyd was only at the
19 marital residence "one to two days" per week. Adam had a PI investigate
20 this and Josh has stayed overnight at the marital residence almost every

21 ¹ See the April 27th Facebook post, attached as **Exhibit 2**.

1 night since April 4th – essentially a month ago.² Josh Lloyd even
2 confirmed he had moved at the April 2019 hearing in his divorce case.

3 **Josh Lloyd’s Recent Battery and Harassment of His Ex-**
4 **Girlfriend Carmen Watson**

5 What’s truly concerning is that Chalese has the children living with
6 a woman batterer. Josh Lloyd’s ex-girlfriend Carmen applied and
7 obtained a TPO against him in February 2019 relating to Josh kicking
8 and punching her several times, as well as striking her child from
9 another relationship.³ Josh was also calling Carmen's employer and
10 making threats to her boss and coworkers, saying that he was going to
11 put his daughter in a box in the road in front of the store if Carmen kept
12 her from him. It is notable that Mr. Schneider, who is also representing
13 Josh Lloyd in his custody case, stated in those proceedings that Carmen
14 is bringing battery charges against Josh.

15 As if these acts were not bad enough, Josh Lloyd then violated the
16 TPO. Neither Josh Lloyd, nor anyone on his behalf, was to have any
17 contact with Carmen. Despite this restriction, Josh, his family **and even**
18 **Chalese** contacted Carmen through calls, Facebook messenger and text

20 ² See the PI’s GPS records, attached as **Exhibit 3**. They show that from April 4th
21 through May 7th, Josh Lloyd was at the marital residence overnight for all but two
days.

³ Case No. T-19-195107-T.

1 message.⁴ The communications in violation of the TPO consisted of
2 threats and cursing at Carmen. Carmen added that Josh and “Chalese
3 Anderson Lloyd” took her child and refused to return her, resulting in
4 the police being called.⁵ This occurred on April 6, 2019 – the same day
5 Chalese had the parties’ children. Hence, Chalese was involved in a
6 category D felony while in the care of the minor children.⁶

7 Josh is a bad individual and has a criminal past. He has a felony
8 from 2010 for possession of illegal drugs, was charged a misdemeanor
9 for domestic violence in 2012 and was criminally charged for obtaining
10 monies through false pretenses in 2015.⁷ This is on top of Josh’s 10
11 traffic citations over the last 9 years.⁸

12 **Chalese is Having Josh Lloyd Drive the Children and Try**
13 **to Pick Them Up from School**

14 This Court specifically barred Chalese from letting Josh drive the
15 parties’ children. Chalese allowed Josh to do so anyways and has done so
16 on more than one occasion since March 19th. In fact, the first day Adam’s
17 PI was surveilling Chalese, he witnessed Josh driving Chalese and the
18

19 ⁴ See the Motion for an Order to Show Cause Regarding Contempt, filed April 16,
2019, in Case No. T-19-195107-T.

⁵ *Id.*

20 ⁶ The police eventually had Josh return the child.

⁷ Josh evidently had the charge dismissed based on his meeting the terms of a plea
21 deal.

⁸ See the traffic citation lists, attached as **Exhibit 4**.

1 children to the children's school. This was observed again recently on
2 April 25th and April 26th. Photos of Josh driving the children and taking
3 them to their school are attached as **Exhibit 5**.

4 A situation even arose from this when Josh tried to pick up the
5 children from school and was denied due to the fact he was not
6 authorized to do so. Chalese, who was outside, came in and caused a
7 scene when told that Josh could not be added to the approved pickup
8 list. Rachel, the employee at Creative Kids who Chalese was yelling at,
9 will give a statement as to same.

10 Worse, Chalese is letting Josh drive the 3-year-old and 1-year-old
11 around on quads in the desert.⁹ It's bad enough Josh has been driving
12 the children in a vehicle with his horrible driving record but is doing so
13 in the desert in a dangerous activity.

14 **Chalese Is Leaving the Children Alone with Josh**

15 Adam's PI observed on May 4, 2019 that Chalese left three-year-
16 old Michael alone with Josh while she went out multiple times¹⁰. Of note
17
18

19 ⁹ See the April 21st Facebook posts of the children quading, attached as **Exhibit 6**.

20 ¹⁰ In candor, one of those times was to take Marie to the emergency room for a
21 reported fever, but she still left both children alone with Josh to go to the gas station
to grab beer which would be unnecessary because Josh and Chalese should not be
drinking when they have the children.

1 is that Chalese did so twice on the same day when she went to the gas
2 station to buy a case of beer for her and Josh.¹¹

3 The Court will remember that Adam stated Josh had a history of
4 drug use, including a prior arrest for possession and he therefore did not
5 want him driving or caring for the minor children. Sure enough, the PI
6 observed Josh come out of a dispensary with marijuana.¹² Later that day,
7 Josh was at the marital residence outside drinking beer. Josh's children
8 were outside as well. Then, one of the dogs got out and went out on the
9 street. While Josh went inside the house, three-year-old Michael went
10 out in the street to retrieve the dog.¹³ This is extremely concerning for
11 Adam as Michael could have been hit by a car.

12 **Chalese Drank Alcohol When She Had the Children**

13 The March 19th order states Chalese was not to drink alcohol 24
14 hours prior to or during the time she has the minor children. However,
15 Chalese was observed picking up the children on April 17th for her days
16 and then immediately going to the liquor store on April 17th to make a
17 purchase while the children were with her. The Court should not forget
18 Chalese was the one who also tested positive for marijuana after initially
19 lying and stating she did not use the drug.

20 ¹¹ See the relevant portion of the PI report, attached as **Exhibit 7**.

21 ¹² See the relevant portion of the PI report, attached as **Exhibit 8**.

¹³ See the relevant portion of the PI report, attached as **Exhibit 9**.

1 Worse, Chalese is so desperate to not get caught drinking and
2 using drugs that will make up lies about Adam to black mail him into
3 allowing her to do so. Adam was telling Chalese she should not have
4 picked up Michael from school on his day (addressed below). In
5 response, Chalese stated “So you were asking me about when you could
6 get your drone back. I’ll tell you when the fbi returns it all after finding
7 all your child porn on all the computers and laptops and old iPads you
8 left here.”¹⁴

9 Adam had no idea what Chalese was talking about and told
10 Chalese she was making a ridiculous and completely fabricated claim
11 and it is clear Chalese is just trying to get back at Adam – especially
12 since Chalese did not file a motion and has continued the joint
13 schedule.¹⁵ When Adam called Chalese out telling her to produce same,
14 Chalese did not, only changing her story to state she has a “drawing” of
15 “child porn” – further evidencing Chalese is lying.

16 However, the real purpose behind Chalese’s false allegation
17 became evident when Chalese tried using her ridiculous claim to black
18 mail Adam into letting Chalese use alcohol and marijuana when she has

19
20 ¹⁴ See the texts between the parties’ related to Chalese false accusation, attached as
21 **Exhibit 10**. It is worth noting that while Adam denies Chalese’s ridiculous
accusation, all of his electronics were password protected which Chalese did not have
access to, meaning she had her counsel illegally access Adam’s electronics.

¹⁵ *Id.*

1 the children. The texts between the parties has Chalese actually stating
2 that she will “drop” the issue if Adam agrees to drop the alcohol and
3 drug screenings on her.¹⁶

4 Josh has now joined the fray in trying to blackmail Adam. In
5 recent texts to Adam, Josh states that Adam needs to leave Josh out of
6 the litigation and allow Josh to be in the children’s lives or he will
7 somehow press the child pornography claim.¹⁷

8 **Chalese’s Violation of the Custodial Order**

9 Adam had custody of the children on April 16, 2019 and he was to
10 pick them up from their school that day. Before Adam could, he received
11 a text from Chalese stating the school had called, that Michael was
12 crying and that she was going to pick him up and take him to her home.¹⁸
13 Adam stated he was only five minutes away and would go get Michael as
14 it was his day. Chalese picked Michael up anyways minutes before Adam
15 arrived and it upset Michael very much and confused him because he
16 didn’t understand why he couldn’t go home with his mother.

17 Worse, Chalese lied about when the school notified her. The school
18 stated they notified Chalese at 3:15 p.m. but she did not call Adam until
19 3:45 p.m. Clearly, Chalese knew Adam could pick Michael up right away

20 ¹⁶ *Id.*

¹⁷ See the texts from Josh to Adam, attached as **Exhibit 11**.

21 ¹⁸ See the texts between the parties regarding Chalese taking Michael from school on
Adam’s day, attached as **Exhibit 12**.

1 (as the school is close to Adam's place) and she couldn't so she waited
2 half an hour – when she was available – to tell Adam.

3 Both parties are also to have audio visual contact with the children
4 while they are in the other's care. Adam reached out to Chalese on April
5 24th at 7:57 p.m. asking to speak to Michael. Chalese stated Michael was
6 already asleep¹⁹ but on her Facebook page, Chalese posted a photo of
7 her, Michael and Josh's son staying up late watching a movie.²⁰
8 Evidently, Chalese did not want Adam to know Josh and his son were
9 living at the home (as Michael would have mentioned) – further
10 evidencing her efforts to hide the fact Josh is living with Chalese.

11 **Chalese's Continued Neglect in Regard to the Children's**
12 **Health**

13 Adam detailed how Chalese had been making unilateral medical
14 decisions in regards to the children and being reckless in regard to
15 having them properly diagnosed. Chalese's negligent behavior has
16 continued:

- 17 • Chalese took Marie to the dentist on April 17th without telling
18 Adam. He was only notified afterwards when Chalese told him
19 that it would be medically necessary to fix a broken tooth Marie

20
21 ¹⁹ See the April 24th texts between the parties, attached as **Exhibit 13**.

²⁰ See the April 24th Facebook post, attached as **Exhibit 14**.

1 had and that Chalese had even scheduled the surgery²¹ – all
2 without notifying Adam or allowing him to speak to the dentist;

- 3 • Later that night (April 17th), Chalese told Adam Michael had a
4 fever of 101.6.²² Chalese then took the children to the doctor on
5 April 22nd. Adam spoke to the doctor, who represented Chalese
6 said both children (not just Michael) had fevers of 101 for the
7 past three days.²³ The pediatrician's office also said they
8 prescribed antibiotics due to Chalese claiming the children had
9 such high fevers for so long. However, and alarmingly, Chalese
10 had Josh take the 3-year-old and 1-year-old quading in the
11 desert that weekend – while the children had 101 degree plus
12 fevers.²⁴ Adam found this very strange and concerning,
13 resulting in him believing Chalese was being completely
14 reckless or was lying. Chalese did state Marie supposedly had
15 pink eye and was prescribed antibiotics for it;

- 16 • On April 22nd at 10:56 a.m., Chalese let Adam know the children
17 were “still” sick and they couldn't go to school on Tuesday.
18 However, when Adam picked the children up from Chalese,

19 ²¹ See the April 17th texts between the parties regarding Marie's tooth, attached as
20 **Exhibit 15.**

21 ²² See the April 17th texts between the parties regarding Michael's fever, attached as
Exhibit 16.

²³ Making it April 20th through April 22.

²⁴ See the April 21st Facebook posts of the children quading, attached as **Exhibit 11.**

1 both children seemed fine, although Marie's head looked
2 swollen. Adam told Chalese he was concerned and decided to
3 take Marie to the ER.²⁵ The ER doctor concluded the
4 pediatrician had misdiagnosed pink eye and it's actually an
5 eyelid infection. The ER doctor was unsure what caused Marie's
6 head to appear swollen as the doctor had no familiarity with
7 Marie, but nonetheless instructed Adam to bring Marie back in
8 if the swelling continued or if Adam noticed a change in Marie's
9 behavior. The ER doctor prescribed an ointment for Marie's eye
10 which Adam obtained. All of this could have been avoided but
11 Chalese refused to give Adam any information about what
12 Marie's regular pediatrician had said or diagnosed Marie with
13 and when confront with this Chalese reverted to her usual
14 insults. It was not until Adam and Marie, well past Marie's
15 regular bedtime, were waiting in the ER for a test to come back
16 did Chalese say that the test they were waiting on had already
17 been done and come back negative.

- 18 • On May 4, 2019, when Chalese took Marie to the ER for another
19 "fever," Adam was aware that a related prescription had been
20 written for little Marie. However, Chalese did not go to the

21 ²⁵ See the April 22nd and 23rd texts between the parties regarding Marie's swelling,
attached as **Exhibit 17**.

1 pharmacy that day, although she did have time to go to the gas
2 station to buy beer. Chalese in fact did not go to the pharmacy
3 until the next day – when she was observed to be rushing there
4 – and making several trips between Josh and herself to locate
5 this medication before it was Adam’s time with the kids.

6 **Chalese’s Violation of the Mutual Behavior Order**

7 The Court’s Mutual Behavior Order barred the parties from name
8 calling, using foul language, etc., during their communications, which
9 includes emails and texts.²⁶ Despite this, Chalese is regularly demeaning

10
11 ²⁶ Chalese is also being vexatious in regard to the litigation in general. The parties
12 agreed in court and after the hearing to utilize a less expensive childcare provider.
13 Chalese stated in Attorney Mayo and Attorney Schneider’s presence that Adam could
14 pick the provider and then give her the information. Adam did but then Chalese
15 objected, stating it was due to the location. However, Chalese will be moving once
16 the marital residence sells and it does not make sense to place the children in a
17 daycare halfway between the parties’ current residences when that location will
18 change in the next few months, thereby necessitating another daycare. Adam
conveyed such continuous transfers from daycare to daycare do not provide stability
and therefore are not in any child’s best interests.

15 Next, the funds in the joint marital bank account needed to be divided. There
16 are multiple text messages between the parties regarding Adam’s proposals on how
17 to divide the monies and then either close it or remove his name. Chalese chose to
18 instead hurl insults at Adam rather than to work amicably with Adam to resolve the
issue. Regardless, the account was closed, and the funds divided, resulting in Chalese
receiving her half (around \$8,000) from it. Adam suggested Chalese use her half to
purchase a vehicle. Chalese acknowledged she needed her own vehicle but
inexplicably objected.

19 Chalese then complained about the utilities being shut off at the marital
20 residence – something she allowed to happen. Switching over the utilities was
21 addressed as early as March 19th in court that she would need to switch the utilities
into her own name as he would be terminating the service if she did not on April 1st.
Adam even reminded her of it the next day on March 20th, as the attached text
message demonstrates. The bills through the end of March were paid up and Chalese
did not tell Adam she did not have sufficient funds to switch them over, nor did she
ask for his assistance. Hence, Chalese knew and chose to do nothing until after the

1 to Adam, stating, "You are a joke" and that Adam is "being an ass".²⁷
2 Another time, Chalese tells Adam to kiss her ass.²⁸ There are numerous
3 other examples that can be provided to the Court upon request.

4 **Josh's Income**

5 Josh's FDF from his custody case²⁹ states Josh receives \$3,000 in
6 temporary disability. While it is believed Josh's disability claim is
7 fraudulent, he is nevertheless receiving the \$3,000 monthly.

8 utilities were switched off.

9 The parties also agreed in court to each being one-half responsible for the
10 payment of the mortgage on the marital residence until it sold. However, Adam
11 proposed he withhold Chalese's half of the mortgage from the support payments and
12 Adam would, in exchange, pay the whole monthly mortgage. This was a reasonable
13 suggestion and Adam stated he would conclude this was fine unless Chalese's
14 counsel stated otherwise. Adam and his attorney heard nothing on this, so he
15 proceeded accordingly. Not surprisingly, it was only after Adam deducted Chalese's
16 half of the mortgage payment from his support payment and used the funds to pay
17 Chalese's half to the lender that Chalese complained.

18 Additionally, Adam provided the name of three realtors and when Chalese did
19 not pick one in the allotted time, Adam did. Chalese then came up with reasons not
20 to allow her to inspect the home, such as Adam had to get his personal possessions
21 first (which was not required by the court). Obviously, Chalese wants to stay in the
marital residence for as long as she can and will use any excuse to do so, even if it
violates the Court's order.

Chalese also refused to coordinate with Adam in regard to him picking up his
personal property. Instead of giving Adam sufficient notice, Chalese would text
Adam hours ahead of time and demand he come over. Adam will tell Chalese he has
work or a conflict and that he needs more prior notice. Chalese has responded by
stating that she has placed his personal property on the porch per her attorney's
instructions, for him to get and if anything happens to it, it is his issue, not hers. She
finally dumped it off curbside when she dropped the children off.

Finally, Chalese is delaying the sale of the marital residence – which was
Adam's concern and was expressed by his counsel at the last hearing. The realtor,
Daniel Kalai, has been in contact with Adam but Chalese kept putting him off. It is of
note it has taken Adam some time to arrange the inspection of the home and
appraisal of art as it has taken some time to locate an appraiser with experience in
pop culture art.

²⁷ See the texts between the parties in which Chalese is demeaning, attached as

Exhibit 18.

²⁸ *Id.*

1 **Chalese Refuses to Comply with the Court's Order for a**
2 **Video Walkthrough**

3 Chalese has refused to permit the video walkthrough of the marital
4 residence as authorized in the last court order. Specifically, Adam asked
5 for a video walkthrough of the house, per the court order. Chalese
6 claimed that she could not as she was supposedly not home and was at
7 Josh's dad's house with the kids so that they could play. This was a lie
8 because the PI saw her at the former marital residence when she
9 responded to Adam stating she was not at home. She eventually sent a
10 video, but it doesn't show the garage, the bathrooms, or the master
11 bedroom. A partial walkthrough is not what this court ordered. She
12 claims that this is by the advice of her counsel. However, as pointed out
13 above, this order was put in place to assure Adam that the children had a
14 clean and safe environment when they are with Chalese. Unsurprisingly,
15 the children are frequently getting eyelid infections and fevers when they
16 are with Chalese and Adam is required to care for them and nurse them
17 back to health. This is likely to do with the unsanitary environment at
18 Chalese's residence.

19 ///

20 ///

21 ²⁹ See Josh's March 19, 2019 FDF, attached as **Exhibit 19**.

1 **III. LAW AND ARGUMENT**

2 **A. Chalese's Blatant Disregard of this Court's Orders**
3 **Threatens the Children's Safety and Requires a**
4 **Change in Custody**

4 NRS 125C.0045 states in relevant part:

5 **[M]odification or termination of orders.**

6 1. In any action for determining the custody of a minor
7 child, the court may, except as otherwise provided in this section
8 and NRS 125C.0601 to 125C.0693, inclusive, and chapter 130 of
9 NRS:

10 (a) During the pendency of the action, at the final hearing or
11 at any time thereafter during the minority of the child, make such
12 an order for the custody, care, education, maintenance and
13 support of the minor child as appears in his or her best interest;...

14 Chalese's reckless conduct threatens the safety of the children and
15 warrants a temporary change in custody to ensure their protection.
16 Chalese has lost it and is oblivious to how her choices and behavior
17 threatens, and in fact hurts, the children.

18 In Chalese's mind, she is remarried and is presenting herself as
19 remarried to the world, including the parties' children. Worse, she has
20 told Michael that Josh is "a second daddy." This has left Michael
21 confused and hurt, something which directly interferes with how he
identifies with his father.

Chalese is also intentionally allowing the children to live with a
man with a past and present record of domestic violence, with this most
recent incident involving kicking and punching his ex-girlfriend and her

1 son. Worse, this individual recently violated a TPO – ***with Chalese***
2 ***participating in that violation.***

3 Josh is a bad individual and has a criminal past. He has a felony
4 from 2010 for possession of illegal drugs, a misdemeanor for domestic
5 violence in 2012 and was criminally charged for obtaining monies
6 through false pretenses in 2015. This is on top of Josh's 10 traffic
7 citations over the last 9 years, including speeding and reckless driving.
8 Neither this Court nor Adam want the children to be involved in some
9 horrible accident before Chalese sees the error of her ways and since she
10 refuses to follow the court order, she cannot be trusted with their care or
11 transportation.

12 Chalese is also letting Josh, who has a history of drug use and
13 possession, as well as a horrible driving record, drive the parties' children
14 despite this Court specifically prohibiting him from doing so. Josh has
15 done so several times, often with Chalese in the vehicle. Chalese is also
16 allowing Josh to watch the minor children unattended, including when
17 he is high on marijuana and consuming alcohol.

18 Chalese, as well as Josh, are drinking when she has the minor
19 children, despite the Court prohibiting Chalese from doing so. A large
20 part of the Court's basis for this order was that a three-year-old and a
21 one-year-old need constant care and a person who is under the influence

1 cannot do so. Chalese has disregarded this admonishment and is under
2 the influence when she has the toddlers.

3 Chalese is so desperate not to get caught with alcohol and drugs in
4 her system in June that she is trying to black mail Adam into letting
5 Chalese use alcohol and marijuana again. Essentially, Chalese falsely
6 states that Adam is some kind of pedophile but what is more concerning
7 is that Chalese would propose Adam continue having joint custody of
8 their children if he allows her to drink and do drugs. What kind of parent
9 who truly believed the other was into child porn would offer that?
10 Chalese has clearly stepped over the edge, demonstrating not only
11 Chalese has drinking and drug use issues but that she is incapable of
12 prioritizing her children. Worse, she has her new husband Josh trying to
13 blackmail Adam as well.

14 Chalese is also neglecting the children's healthcare. Examples of
15 this are allowing the 3-year-old and 1-year-old to go quading when they
16 are sick and running high fevers and Chalese ignoring Marie's allergic
17 reaction to antibiotics.

18 Simply put, Chalese is endangering the parties' two small children
19 – children that cannot protect themselves. At the last hearing, the Court
20 put orders it found necessary in place to ensure their safety but which
21 Chalese is intent on violating. As Chalese cannot follow those orders, she

1 cannot be trusted to protect the children, especially when the Court
2 considers we are dealing with a 3-year-old and 1-year-old. Adam has
3 already shown in this Motion how Chalese has lied to this Court:

- 4 • Chalese said Josh did not live with her when he has been.
- 5 • Chalese said she would not let Josh drive the children when she
6 has been having him do so.
- 7 • Chalese said she would not leave the children alone with Josh,
8 but she has.
- 9 • Chalese is supposed to coordinate with Adam regarding third
10 party babysitters but is having Josh watch the children without
11 Adam's knowledge or consent.
- 12 • Chalese is not supposed to consume alcohol while she has the
13 children, but she has been buying alcohol for her and Josh on
14 the days she has the children, including at the beginning of her
15 time.
- 16 • Chalese stated she would follow the custodial time share when
17 she has not.
- 18 • Chalese stated she would not make unilateral decisions
19 regarding medical procedures when she has been, etc.

20 ///

21 ///

- 1 • Chalese stated she was not at home to conduct the video
2 walkthrough when the PI confirmed she was.

3 Worse, Chalese does not want to co-parent for the benefit of the
4 children. She still has not taken her COPE requirement or started the
5 UNLV Parenting Course. Chalese just doesn't care and she will do what
6 she wants when she wants – even if it places the children in danger.

7 The Court can rest assured that in Adam's care, the children will be
8 safe. Adam has a safe home, a good driving record, has been diligent
9 regarding their medical care and thoroughly investigated the need for
10 major medical procedures, not drank when he has the children and
11 tested negative for marijuana when the Court ordered both parties to do
12 so.

13 Therefore, it is in the children's best interest that Adam be
14 temporarily given sole legal custody and primary physical custody of the
15 young children, with Chalese having supervised visitation, in addition to
16 audio/visual contact, until she completes COPE, completes the UNLV
17 Parenting Course, bars Josh from living at the marital residence and
18 having him in contact with the minor children.

19 **B. Modification of Child And Spousal Support**

20 The Court based Adam's family support obligation (child and
21 spousal support) on the parties exercising joint custody and Chalese

1 having no income. With it being in the children's best interest to be
2 primarily in Adam's care, Chalese would owe Adam child support.

3 Chalese has obtained employment as a cosmetologist (although
4 she has cunningly refused to disclose same).³⁰ Further, she has Josh and
5 his son living in the marital residence.³¹ Josh's FDF shows he collects
6 \$3,000 per month in disability and Adam obviously objects to a a third
7 party mooching off the community when Josh has the funds to
8 contribute. If Josh refuses to leave the marital residence, he must at least
9 be imputed \$1,500 in rent for he and his son. Therefore, Chalese should
10 be ordered to provide an updated FDF and disclose her employment
11 information so that child and spousal support can be updated.

12 **C. Adam Should be Awarded Attorney's Fees and Costs**

13 Chalese is the one who decided to intentionally violate this Court's
14 orders and jeopardize the safety of the children in the process. It is
15 Chalese's conduct that has driven Adam to file this motion and seek the
16 help of the Court. Adam should therefore be made whole and not be
17 forced to go out of pocket in order to protect his children's welfare.

18 In evaluating requests in addition to the cases where an allowance
19 of fees is authorized by specific statute, the Court may also make an

20 ³⁰ Josh states in a text to Adam that "Chalese has a job" (**Exhibit 11**) and posts a
photo of Chalese doing hair, attached as **Exhibit 20**.

21 ³¹ Josh's Decree of Divorce from his prior marriage (case D-18-576197-Z) states he
has primary custody of his son.

1 allowance of attorney's fees to a prevailing party under NRS 18.010, and
2 EDCR 7.60. In addition, the parties must identify the legal basis for the
3 award, and the District Court must evaluate the *Brunzell Factors* for the
4 attorney and their support staff:³²

5 1. *The Qualities of the Advocate:* his ability, his training,
6 education, experience, professional standing and skill.

7 a. Attorney Vincent Mayo

8 Attorney Vincent Mayo has been practicing family law in Nevada
9 almost exclusively for over eight years. He is a Nevada Board Certified
10 Family Law Specialist, a National Board of Family Law Trial Advocacy
11 Specialist, a member in good standing of the State Bar of Nevada, State
12 Bar of Nevada Family Law Section, American Bar Association, Nevada
13 Justice Association and Clark County Bar Association. Attorney Mayo is
14 admitted to practice before the United States District Court for the
15 District of Nevada.

16 Attorney Mayo started his legal career in Nevada working in the
17 Clark County Family Courts system. He worked directly for former
18 Clark County Family Court Judge Gloria O'Malley (F.K.A. Sanchez) as a
19 Law Clerk, from September 2002 to March 2004. Before joining The

20 ³² *Brunel v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969);
21 *Las Vegas Metropolitan Police Department v. Yeghiazarian*, 129 Nev. ___, 312 P.3d
503 (2013).

1 Abrams & Mayo Law Firm, he practiced for four years, primarily in
2 Family Law, with Bruce I. Shapiro, Esq. Attorney Mayo joined The
3 Abrams & Mayo Law Firm in March 2008 and has been practicing
4 exclusively in Family Law ever since. Attorney Mayo was a co-editor of
5 the Nevada Family Law Practice Manual and is a published attorney in
6 regard to family law matters with numerous credits to his name. He also
7 successfully completed the American Bar Association's Family Law Trial
8 Advocacy Institute program.

9 b. Certified Paralegal Stephanie Stolz

10 Stephanie Stolz is the current Firm Administrator / Lead Certified
11 Paralegal and began her legal career at The Abrams Law Firm eleven
12 years ago. She started at the receptionist position in May 2004. While
13 working full-time for the firm, she simultaneously completed the
14 Paralegal Studies Program with special emphasis in Nevada Practices
15 and Procedures, Contract Law, and Family Law from the University of
16 Nevada Las Vegas. In 2005 she was promoted to a Certified Paralegal
17 position. In 2006 she achieved the role of Lead Certified Paralegal.
18 Stephanie was promoted to the role of Firm Administrator in 2010. In
19 addition to her Lead Certified Paralegal duties, she is responsible for
20 numerous areas of the firm's business operations including accounting
21 and vendor relationships. In 2017, Mrs. Stolz obtained the prestigious

1 Certified Paralegal (CP) designation from the National Association of
2 Legal Assistants (NALA).

3 c. Advanced Certified Paralegal David Schoen

4 Advanced Certified Paralegal David Schoen received his paralegal
5 certificate from the United States Army's Judge Advocate General's
6 Corps Legal Center in 2009 as an Honor Graduate, before serving four
7 years as a Paralegal Non-Commissioned Officer with the decorated
8 XVIII Airborne Corps. Mr. Schoen gained extensive experience in
9 multiple legal disciplines, from capital litigation to military family law,
10 and supported challenging and intensive campaigns, including
11 Operation Unified Response – Haiti, and Operation New Dawn – Iraq,
12 where he received numerous awards and commendations for his service
13 and the quality of work in the legal field. In 2016, Mr. Schoen obtained
14 the prestigious Certified Paralegal (CP) designation from the National
15 Association of Legal Assistants (NALA). He has also earned his
16 Advanced Certified Paralegal (ACP) designation in Family Law – Child
17 Custody, Visitation, and Support. Mr. Schoen is responsible for
18 maintaining the General and Detailed Financial Disclosure Forms, used
19 state-wide by Family Court litigants and counsel. Recently, he prepared
20 and instructed courses on the Financial Disclosure Forms during the
21 Paralegal Tracks of the 2013 and 2015 Family Law Conferences.

1 d. Certified Paralegal Julie Schoen

2 Certified Paralegal Julie Schoen joined The Abrams & Mayo Law
3 Firm in 2014. Prior to joining the Firm, Ms. Schoen was employed by the
4 local office of a national medical malpractice litigation law firm in an
5 executive level support capacity. In this role, she assisted in the defense
6 of several Las Vegas-area hospitals and medical clinics from various
7 types of lawsuits. She completed the Certified Paralegal Studies
8 Program at the University of Nevada Las Vegas in 2015 with special
9 emphasis in Contract Law and Tort Law and is also a certified legal
10 transcriptionist. Ms. Schoen's volunteer work focuses on her dedication
11 to our nation's armed forces, where she has served as an Army Family
12 Readiness Group Leader. This role included being a liaison and advisor
13 to families of service members who are deployed throughout the world.

14 2. *The Character of the Work to Be Done:* the difficulty, the
15 intricacy, the importance, time and skill required, the responsibility
16 imposed and the prominence and character of the parties where they
17 affect the importance of the litigation. Attorney Mayo has diligently
18 reviewed the applicable law, explored the relevant facts and has properly
19 applied one to the other.

20 3. *The Work Actually Performed by the Lawyer:* the skill, time
21 and attention given to the work. Work is still ongoing regarding these

1 issues. Thus, redacted billing can be provided upon request.

2 4. *The Result:* whether the attorney was successful and what
3 benefits were derived. It is anticipated that, given the facts of this case,
4 the court will grant Adam's requests.

5 Each of these factors should be given consideration, and no one
6 element should predominate or be given undue weight.³³

7 **III. CONCLUSION**

8 Based upon the foregoing, Adam respectfully requests that this
9 Honorable Court grant the relief requested in this Motion, consisting of
10 the following:

11 (1) Temporary sole legal custody and primary physical custody
12 of the children, with Chalese having supervised visitation, in addition to
13 audio/visual contact, until she completes COPE, completes the UNLV
14 Parenting Course, bars Josh from living at the marital residence and
15 having him in contact with the minor children;

16 (2) Modification of child support;

17 (3) An award of attorney's fees; and

18 ///

19 ///

20 ///

21 ³³ *Miller v. Wilfong*, 121 Nev. 619, 119 P. 3d 727 (2005).

1 (4) Any other relief the Court deems proper and just.

2 Dated Tuesday, May 14, 2019.

3 Respectfully Submitted:

4 THE ABRAMS & MAYO LAW FIRM

5 /s/ Vincent Mayo, Esq.

6 Vincent Mayo, Esq.

7 Nevada State Bar Number: 8564

8 6252 South Rainbow Blvd., Suite 100

9 Las Vegas, Nevada 89118

10 Attorney for Plaintiff

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AFFIDAVIT OF ADAM MICHAEL SOLINGER

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, ADAM MICHAEL SOLINGER, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

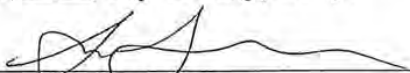
1. I am the Plaintiff in the above-entitled action, and I am above the age of majority and am competent to testify to the facts contained in this affidavit.

2. I make this affidavit in support of the foregoing *EMERGENCY MOTION FOR A CHANGE OF CUSTODY; ATTORNEY'S FEES AND COSTS AND RELATED RELIEF.*

3. I have read said *Motion* and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. I incorporate said facts into this Affidavit as though fully set forth herein. FURTHER, AFFIANT SAYETH NAUGHT.


ADAM MICHAEL SOLINGER

Subscribed and sworn to before me
this 14th day of May, 2019.


NOTARY PUBLIC



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *EMERGENCY MOTION FOR AN EMERGENCY CHANGE OF CUSTODY; ATTORNEY'S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Tuesday, May 14, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Louis C. Schneider, Esq.
Attorney for Defendant

/s/ Chantel Wade
An Employee of The Abrams & Mayo Law Firm

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

ADAM MICHAEL SOLINGER
Plaintiff/Petitioner

v.
CHALESE MARIE SOLINGER
Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

- ☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
- OR-
- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
- ☒ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
 - ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
 - ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
 - ☐ Other Excluded Motion (must specify) _____.

Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
 - ☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
- OR-
- ☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
- OR-
- ☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

Step 3. Add the filing fees from Step 1 and Step 2.

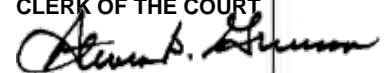
The total filing fee for the motion/opposition I am filing with this form is:

☒ \$0 ☐ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

Party filing Motion/Opposition: Plaintiff/Petitioner Date 05/14/2019

Signature of Party or Preparer





1 **EXH**

Vincent Mayo, Esq.
2 Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
3 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
4 Tel: (702) 222-4021
Fax: (702) 248-9750
5 Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

6 Eighth Judicial District Court
7 Family Division
Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
9 Plaintiff,) Department: I
vs.)
10 CHALESE MARIE SOLINGER,)
11 Defendant.)

12 **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S**
13 **EMERGENCY MOTION FOR A CHANGE OF CUSTODY; FOR**
14 **ATTORNEY'S FEES AND COSTS AND RELATED RELIEF**

Exhibit	Description
1	Facebook photos of Chalese's ceremony, Chalese referring to herself as "Chalese Anderson Lloyd", Josh's post that he and Chalese married and congratulations from numerous friends
2	April 27 th Facebook post
3	PI's GPS records
4	Josh Lloyd's traffic citation lists
5	Photos of Josh driving the children and taking them to school
6	April 21 st Facebook posts of the children quading

7	Relevant portion of the PI report regarding Chalese buying a case of beer on her custodial day
8	Relevant portion of the PI report regarding Josh going to a dispensary
9	Relevant portion of the PI report regarding 3-year-old Michael in the street alone attempting to retrieve the dog
10	Texts between the parties' related to Chalese's false accusation
11	Texts from Josh to Adam
12	Texts between the parties regarding Chalese taking Michael from school on Adam's day
13	April 24 th texts between the parties
14	April 24 th Facebook post
15	April 17 th texts between the parties regarding Marie's tooth
16	April 17 th texts between the parties regarding Michael's fever
17	April 22 nd and 23 rd texts between the parties regarding Marie's swelling
18	Texts between the parties in which Chalese is demeaning
19	Josh's March 19, 2019 FDF
20	Josh's Facebook photo of Chalese doing hair

Dated Monday, May 13, 2019.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM

Vincent Mayo, Esq. (8564)
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Attorney for Plaintiff

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that the foregoing *APPENDIX OF EXHIBITS IN*
3 *SUPPORT OF PLAINTIFF'S EMERGENCY MOTION FOR A CHANGE*
4 *OF CUSTODY; FOR ATTORNEY'S FEES AND COSTS AND RELATED*
5 *RELIEF* was filed electronically with the Eighth Judicial District Court in
6 the above-entitled matter, on Tuesday, May 14, 2019. Electronic service
7 of the foregoing document shall be made in accordance with the Master
8 Service List, pursuant to NEFCR 9, as follows:

9 Louis Schneider, Esq.
10 Attorney for Defendant

11 /s/ Chantel Wade
12 An Employee of The Abrams & Mayo Law Firm
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EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



Josh Lloyd is with Chalese Anderson Lloyd.

April 9 · 🌐 · 🌐



Married Chalese Anderson Lloyd

April 9

👍❤️👤 27

8 Comments

👍 Like

➦ Share



Russ Vollmer Congratulations

Like · 3w



1



Adam Moreno Congrats cuz

Like · 3w



1



Dustin Hicks Congratulations to you all cuz

Like · 3w



1



Jade-Elizabeth Evans Congrats wow

Like · 3w



Elizabeth Brewster Congrats 🎉

Like · 3w



Judy Paltridge Congretz

Like · 2w



Josh Lloyd is with Chalese Anderson.



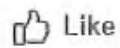
Yesterday · 🌐 · 🌐



Married Chalese Anderson

Yesterday

👍 2




Like







Share




 **Josh Lloyd** 42 mins · 🌐

7 1 Comment

 Like  Share

 **Stephanie Valdibia** Nice did you get married?  1

 Like 37m



Chalese Anderson Lloyd

[Add Friend](#)[Message](#)[...](#)

[Timeline](#)[About](#)[Friends](#)[Photos](#)[More ▾](#)

DO YOU KNOW CHALESE?

To see what she shares with friends, send her a friend request.

[Add Friend](#)

Intro

- Went to Incline High School
- Lives in Las Vegas, Nevada
- From Ogden, Utah
- Joined March 2008



Photos



Chalese Anderson Lloyd

13 hrs ·

When you're on your third mood of the day and someone asks if you're ok



Memes

[Follow](#)

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

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 Add Friend



Chalese Anderson Lloyd is with Josh Lloyd.

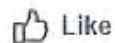
April 27 at 4:55 PM · 🌐

Little bit of pool time with our family (minus 2 kids)



8

3 Comments



Like



Share



Christina Lopez Sandoval The younger two must be with their Father man.

So you have a pool now.

Yay you!

Like · 1d



Chalese Anderson Lloyd Christina Lopez Sandoval not our pool, yeah, Maq and Marie are with their dad

Like · 1d



Christina Lopez Sandoval Chalese Anderson Lloyd well I hope they are having fun

000309

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

Time	Length of stop	Address	Maps link	Possible Location
4/4/2019 Thursday				
9:22 a.m.	1 hr 13 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence Parent's Residence
11:07 a.m.	1 day 8 hrs	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	
4/5/2019 Friday				
8:21 p.m.	4 hr 14 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence
4/6/2019 Saturday				
12:36 a.m.	9 hr 17 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence Parent's Residence Bath & Body Works, Ross, Carter's parking lot Chalese Solinger's Residence
10:22 a.m.	34 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	
11:03 a.m.	37 min	8800 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/kwMsvBxTuwM	
12:14 p.m.	19 hr 11 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	
4/7/2019 Sunday				
7:26 a.m.	1 hr 19 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence Rebel Oil Co. Parent's Residence Orange Grove Apartments Chalese Solinger's Residence Chalese Solinger's Residence Parent's Residence Parent's Residence
9:03 a.m.	7 min	2001 N Las Vegas Blvd, North Las Vegas, NV 89030	https://goo.gl/maps/GucXB7ghM9T2	
9:23 a.m.	23 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	
10:06 a.m.	43 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/mcZtaG9HtU	
10:55 a.m.	1 hr 26 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	
12:22 p.m.	33 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	
2:19 p.m.	2 hr 40 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	
4:07 p.m.	16 hr 23 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	
4/8/2019 Monday				
8:59 a.m.	30 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence Creative Kids of Las Vegas
10:08 a.m.	8 min	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/4hnlP25bB42	
10:49 a.m.	12 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence
11:26 a.m.	49 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Parent's Residence
12:37 p.m.	1 hr 3 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/mcZtaG9HtU	Orange Grove Apartments
1:48 p.m.	2 hr 23 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKc5VshH2	Chalese Solinger's Residence
4:39 p.m.	23 min	4897 Rita Dr, Las Vegas, NV 89121	None	Residential area
5:16 p.m.	29 min	5198 Boulder Hwy, Las Vegas, NV 89122	https://goo.gl/maps/WUx8t0qaE2	Walmart Supercenter Parking lot
5:25 p.m.	still there at 11:55 p.m.	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Parent's Residence

Possible Location

Maps link

Address

Time Length of stop

4/6/2019 Saturday

10:21 a.m. 6 min 5430 W Eugene Ave, Las Vegas, NV 89108
 10:28 a.m. 17 min 5712 W Auburn Ave, Las Vegas, NV 89108
 11:17 a.m. 22 hr 57 min 2256 Grand Clover Lane, Las Vegas, NV

<https://goo.gl/maps/DMGNwf7QLV62>
<https://goo.gl/maps/5r2vqTxE1HN2>
<https://goo.gl/maps/VVvVKcSjvSH2>

Residential area
 Residential area
 Chalese Solinger's Residence

4/7/2019 Sunday

10:45 a.m. 1 hr 10 min 2256 Grand Clover Lane, Las Vegas, NV
 12:20 p.m. 1 hr 30 min 8500 Highland View, Las Vegas, NV 89145
 1:58 p.m. 25 min 8750 W Charleston Blvd, Las Vegas, NV 89117
 2:26 p.m. 4 hr 23 min 8500 Highland View, Las Vegas, NV 89145
 6:53 p.m. 6 min 900 S Rampart Blvd, Las Vegas, NV 89145
 7:01 p.m. 8 hr 23 min 8500 Highland View, Las Vegas, NV 89145

<https://goo.gl/maps/VVvVKcSjvSH2>
<https://goo.gl/maps/vQvV5se5dUw>
<https://goo.gl/maps/PTqkqRrNnoD2>
<https://goo.gl/maps/vQvV5se5dUw>
<https://goo.gl/maps/mGsBzzGt7SC2>
<https://goo.gl/maps/vQvV5se5dUw>

Chalese Solinger's Residence
 Parent's Residence
 Target parking lot
 Parent's Residence
 McDonalds
 Parent's Residence

4/8/2019 Monday

No movement from

residence

Possible Location

Maps link

Address

Length of stop

Time

4/9/2019 Tuesday

3:12 a.m.	4 hr 28 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwVSe5dUw	Chalese Solinger's Residence
8:03 a.m.	13 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKcSivH2	Parent's Residence
8:16 a.m.	3 min	5710 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/GmZiA7Rv7D2	7-Eleven
8:21 a.m.	21 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKcSivH2	Parent's Residence
8:44 a.m.	8 min	6570 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/ZB7apnzKZ42	Walmart Neighborhood Market
8:53 a.m.	1 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKcSivH2	Parent's Residence
8:54 a.m.	10 min	2152 Briddle Wreath Lane, Las Vegas, NV 89156	https://goo.gl/maps/TLBVJ27K1eu	Residential Area
9:21 a.m.	7 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKcSivH2	Parent's Residence
9:40 a.m.	7 min	3540 E Lake Mead Blvd, Las Vegas, NV 89115	https://goo.gl/maps/9y6xK5utYUO2	Rebel Dill
10:09 a.m.	7 min	8601 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/hnmhXNedC32	Shell Oil
10:23 a.m.	14 min	8450 Westcliff Dr, Las Vegas, NV 89145	https://goo.gl/maps/2VxJufKX1A2	Bounty Hunter or Chevron
10:40 a.m.	3 hr 19 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwVSe5dUw	Chalese Solinger's Residence
2:41 p.m.	12 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VvVvKcSivH2	Parent's Residence
3:12 p.m.	21 min	4980 Novato Cir, Las Vegas, NV 89120	https://goo.gl/maps/LZLmcoXm122	Residential Area
3:42 p.m.	7 min	6190 S Mountain Vista St, Henderson, NV 89014	https://goo.gl/maps/9968UdtpEVL2	VSR Industries
4:25 p.m.	12 min	8500 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/petK1UhrUJ2	Chevron
4:25 p.m.	51 min	8750 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/PTqKqRnnoD2	Target parking lot
5:33 p.m.	8 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwVSe5dUw	Chalese Solinger's Residence
5:42 p.m.	6 min	9300 W Sahara Ave, Las Vegas, NV 89117	https://goo.gl/maps/F34pH8mzgo	Walgreens
5:55 p.m.	5 min	9975 Peace Way, Las Vegas, NV 89147	https://goo.gl/maps/FQfegRNxHY42	Chateau Nouveau Complex
6:50 p.m.	4 hr 23 min	4897 Rita Dr, Las Vegas, NV 89121	None	Residential area
11:27 p.m.	sell there at 11:55 p.m.	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwVSe5dUw	Chalese Solinger's Residence

Residential area
Residential area<https://goo.gl/maps/3MGNw7QUR62>
<https://goo.gl/maps/5r2vQXf1HN2>5430 W Eugene Ave, Las Vegas, NV 89108
5712 W Auburn Ave, Las Vegas, NV 8910810:21 a.m.
10:28 a.m.

McDonalds

<https://goo.gl/maps/mGsBzG75C7>

900 S Rampart Blvd, Las Vegas, NV 89145

6:53 p.m.
6 min

Possible Location

Maps link

Address

Length of stop

Time

4/9/2019

Tuesday

movement

from Chalese Solinger's Residence

No

Possible Location

Maps link

Address

Length of stop

Time

4/10/2019

Wednesday

7:50 a.m.	Drive-by no stop	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VVvVvKcSlyxH2	Parent's Residence
7:56 a.m.	7 min	6710 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/T8vuoG4uHnD2	7-Eleven
8:24 a.m.	1 hr 15 min	4897 Rita Dr, Las Vegas, NV 89121	None	Residential area
9:53 a.m.	11 hr 17 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence
9:14 p.m.	3 min	8900 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/znaB85CfeED2	Wendy's
9:20 p.m.	Still there at 11:55 p.m	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
4/10/2019	Wednesday			
1:42 p.m.	6 min	5330, 136 S Rainbow Blvd, Las Vegas, NV 89145	https://goo.gl/maps/JERTZGMAFPp	Serrano's Mexican Fast Food Parking Lot
2:19 p.m.	12 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/5sLYLHYDWJEt	Orange Grove Apartments
2:50 p.m.	35 min	1401 S Lamb Blvd, Las Vegas, NV 89104	https://goo.gl/maps/hCugUtu5pdEZ	The Home Depot Parking Lot
3:43 p.m.	17 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VwvVKcSly3H2	Parent's Residence
4:07 p.m.	9 min	4438 E Lake Mead Blvd, Las Vegas, NV 89115	https://goo.gl/maps/qY39rNlaZiq	Meads Hardware
4:40 p.m.	Still there at 11:55 p.m.	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvY5se5dUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
4/11/2019 Thursday				
2:54 a.m.	40 hr 55 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence
4/12/2019 Friday				
8:00 p.m.	3 min	10320 W Charleston Blvd, Las Vegas, NV 89135	https://goo.gl/maps/dlq95ps4RUZ	Del Taco
8:18 p.m.	16 hr 47 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence
4/13/2019 Saturday				
1:11 p.m.	1 hr 1 min	7598 Vegas Dr, Las Vegas, NV 89128	https://goo.gl/maps/dNK9oSGLDAB2	CVS, Albertsons, Carl's Jr Parking Lot
2:19 p.m.	2 hr 25 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence
5:15 p.m.	4 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VVwVKcSjysH2	Parent's Residence
6:36 p.m.	3 min	4970 E Tropicana Ave, Las Vegas, NV 89121	https://goo.gl/maps/b6bQemI3bEF2	Nevada State Bank
6:51 p.m.	3 min	370 N Stephanie St, Henderson, NV 89014	https://goo.gl/maps/Vlbpopsynj2sN2	America First Credit Union
7:17 p.m.	13 min	150 S Rainbow Blvd, Las Vegas, NV 89145	https://goo.gl/maps/bxIU4oh5v6L2	Carl's Jr.
7:37 p.m.	16 hr 22 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence
4/14/2019 Sunday				
1:15 p.m.	40 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/mcZtaG9HtiU	Orange Grove Apartments
2:02 p.m.	5 min	3540 E Lake Mead Blvd, Las Vegas, NV 89115	https://goo.gl/maps/tPFZY9amD52	Rebel Dill
2:23 p.m.	2 hr 49 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence
5:21 p.m.	4 min	8750 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/uevsn5wAal62	Target and Ross Dress For Less Parking Lot
5:28 p.m.	1 hr 17 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvVSe5dUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
4/11/2019	Thursday			
9:35 a.m.	7 min	6351 E Vegas Valley Dr, Las Vegas, NV 89142	https://goo.gl/maps/1QvFEnBpP2	SA Recycling and Abble's Recycling Center
10:23 a.m.	7 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwV5se5dUw	Chalese Solinger's Residence
10:49 a.m.	1 hr 13 min	657 N Town Center Dr, Las Vegas, NV 89144	https://goo.gl/maps/5MvVX1TtRqE2	Summerlin Hospital Medical Center
12:09 p.m.	6 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwV5se5dUw	Chalese Solinger's Residence
12:24 p.m.	6 min	861 S Rainbow Blvd, Las Vegas, NV 89145	https://goo.gl/maps/rqwxcmRD7DQ2	The Home Depot Parking Lot
12:41 p.m.	18 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwV5se5dUw	Chalese Solinger's Residence
1:18 p.m.	23 min	2400 Apricot Lane, Las Vegas, NV 89108	https://goo.gl/maps/QE4bb8U6vYQ2	Residential area
2:06 p.m.	43 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwV5se5dUw	Chalese Solinger's Residence
3:22 p.m.	5 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VVvVX5vH2	Parent's Residence and Helen Herr Elementary school
3:50 p.m.	9 min	4380 N Nellis Blvd, Las Vegas, NV 89115	https://goo.gl/maps/x4323HGBUJ72	Del Taco
5:00 p.m.	8 min	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/4hixPz5bB42	Creative Kids of Las Vegas
5:37 p.m.	11 hr 48 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwV5se5dUw	Chalese Solinger's Residence
4/12/2019	Friday			
5:48 a.m.	3 hr 38 min	3186 S Maryland Pkwy, Las Vegas, NV 89109	https://goo.gl/maps/VB5wvqPjVSM2	Sunrise Children's Hospital
9:27 a.m.	1 hr 27 min	3186 S Maryland Pkwy, Las Vegas, NV 89109	https://goo.gl/maps/VB5wvqPjVSM2	Sunrise Children's Hospital
11:01 a.m.	4 min	1201 E Sahara Ave, Las Vegas, NV 89104	https://goo.gl/maps/KcrW2kCBu1k	7-Eleven
11:24 a.m.	Last known position	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQwV5se5dUw	Chalese Solinger's Residence
4/13/2019	Saturday			
No	movement	on this day		
4/14/2019	Sunday			
No	movement	on this day		

Time	Length of stop	Address	Maps link	Possible Location
4/15/2019	Monday			
4:19 p.m.	31 min	Red Rock Canyon Road, Las Vegas, NV 89161	https://goo.gl/maps/qHmEoAQYxq1z	White Rock Trailhead
5:12 p.m.	1 hr 25 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQV5seS6Uw	Chalese Solinger's Residence
No.	other	movement		

Possible Location

Maps link

Address

Length of stop

Time

4/15/2019 Monday

No Movement on this day

Time	Length of stop	Address	Maps Link	Possible Location
4/14/2019	Tuesday			
11:52 a.m.	6 min	8520 N. Juliette, Las Vegas, NV 89131	https://www.google.com/maps/@36.1833333,-115.1333333,15z	Trill Canyon Head, Mount Charleston, Mackay Canyon Road, Farrast Road 1835
1:11 p.m.	11 min	Mount Charleston	https://www.google.com/maps/@36.1833333,-115.1333333,15z	See Canyon Road, Saw Mill Trill Head
1:39 p.m.	14 min	Sawmill Canyon Loop A Rd, Las Vegas, NV 89165	https://www.google.com/maps/@36.1833333,-115.1333333,15z	Creative Kids of Las Vegas
2:50 p.m.	9 min	8555 Farm Rd, Las Vegas, NV 89131	https://www.google.com/maps/@36.1833333,-115.1333333,15z	Chelsea Solinger's Residence
3:21 a.m.	Last Known Position	8500 Highland View, Las Vegas, NV 89105		

Possible Location

Maps link

Address

Length of stop

Time

4/16/2019

Tuesday

No

Movement

on this day

Time	Length of stop	Address	Maps Link	Possible Location
4/17/2019	Wednesday			
10:25 a.m.	3 min	8500 Highland View, Las Vegas, NV 89145	https://www.google.com/maps/@36.1755556,115.1555556,15z	Chelsea Solinger's Residence
10:45 a.m.	6 min	8555 Farm Rd, Las Vegas, NV 89131	https://www.google.com/maps/@36.1755556,115.1555556,15z	Creative Kids of Las Vegas
11:11 a.m.	55 min	857 N Town Center Dr, Las Vegas, NV 89144	https://www.google.com/maps/@36.1755556,115.1555556,15z	Sumnerlin Hospital Medical Center Parking Lot
12:10 a.m.	3 hr 13 min	8500 Highland View, Las Vegas, NV 89145	https://www.google.com/maps/@36.1755556,115.1555556,15z	Chelsea Solinger's Residence
3:54 a.m.	27 min	5785 W Charleston Blvd, Las Vegas, NV 89117	https://www.google.com/maps/@36.1755556,115.1555556,15z	Don Demarco's Plaza, Smith's, The Home Depot Parking Lot
4:04 a.m.	3 min	7800 S Rampart Blvd, Las Vegas, NV 89145	https://www.google.com/maps/@36.1755556,115.1555556,15z	Lee's Discount Liquor
4:09 a.m.	2 hr 25 min	8500 Highland View, Las Vegas, NV 89145	https://www.google.com/maps/@36.1755556,115.1555556,15z	Chelsea Solinger's Residence
6:52 a.m.	5 min	3993 N Nellis Blvd, Las Vegas, NV 89115	https://www.google.com/maps/@36.1755556,115.1555556,15z	3-Eleven
7:00 a.m.	3 min	6515 E Lake Mead Blvd, Las Vegas, NV 89156	https://www.google.com/maps/@36.1755556,115.1555556,15z	5 and 5 Gas Station / 7-Eleven
7:36 a.m.	Last Known Position	8500 Highland View, Las Vegas, NV 89145	https://www.google.com/maps/@36.1755556,115.1555556,15z	Chelsea Solinger's Residence

Possible Location

Maps link

Address

Length of stop

Time

4/17/2019 Wednesday

No Movement on this day

Possible Location

Maps link

Address

Length of stop

Time

4/18/2019 Thursday

No Movement on this day

Time	Length of stop	Address	Map link	Possible location
4/18/2015	Thursday			
1:27 a.m.	2 hr 8 min	3500 Highland View, Las Vegas, NV 89145	https://www.google.com/maps/@36.1144444, -115.1555556, 15z	Crause Salinger's Residence
3:09 a.m.	1 hr 10 min	4923 36th St, Las Vegas, NV 89121	https://www.google.com/maps/@36.1144444, -115.1555556, 15z	Law Office of Louis Schneider
12:07 p.m.	50 min	4877 Alta Dr, Las Vegas, NV 89121	https://www.google.com/maps/@36.1144444, -115.1555556, 15z	Residential area
1:29 a.m.	9 min	Between 2220 E Charleston Blvd, Las Vegas, NV 89104 and 2101 Ballard Jctw, Las Vegas, NV 89104	https://www.google.com/maps/@36.1144444, -115.1555556, 15z	In the back of Audio Xpert / auto accessories market/ cars and car maintenance Salinger's office
3:27 a.m.	7 min	4877 Alta Dr, Las Vegas, NV 89121	https://www.google.com/maps/@36.1144444, -115.1555556, 15z	Residential area
3:55 p.m.	Last known position	3500 Highland View, Las Vegas, NV 89145	https://www.google.com/maps/@36.1144444, -115.1555556, 15z	Crause Salinger's Residence

Possible Location

Maps link

Address

Length of stop

Time

4/19/2019 Friday

5:28 a.m.	2 hr 40 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence
8:23 a.m.	18 min	7043-7058 Salt Marsh Court, Las Vegas, NV 89148	https://goo.gl/maps/vQvV5se5dlUw	Residential Area
9:00 a.m.	6 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence
9:07 a.m.	20 min	Near Ion Belger Drive and Logansberry Lane	https://goo.gl/maps/vQvV5se5dlUw	Residential Area
9:42 a.m.	9 min	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/vQvV5se5dlUw	Creative Kids of Las Vegas
10:06 a.m.	1 hr 47 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence
12:21 p.m.	3 min	1835 Green Acres Avenue, Las Vegas, NV 89156	https://goo.gl/maps/vQvV5se5dlUw	Residential Area
12:30 p.m.	33 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/vQvV5se5dlUw	Orange Grove Apartments
1:05 p.m.	6 min	6705 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/vQvV5se5dlUw	CVS Parking Lot
1:33 p.m.	9 min	7121 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/vQvV5se5dlUw	Shell Gas and Green Valley Grocery
1:47 p.m.	53 min	Campground Road and Calville Road, Nevada 89040	https://goo.gl/maps/vQvV5se5dlUw	Campgrounds
3:09 p.m.	7 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/vQvV5se5dlUw	Orange Grove Apartments
3:38 p.m.	15 min	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/vQvV5se5dlUw	Creative Kids of Las Vegas
4:08 p.m.	1 hr 54 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence
6:10 p.m.	7 min	8661 or 8633 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/vQvV5se5dlUw	Walgreens or Jack in the Box
6:23 p.m.	15 hr 56 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence

4/20/2019 Saturday

10:20 a.m.	10 min	8450 Westcliff Dr, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chevron and Terrible Harbst Convenience Store
10:30 a.m.	36 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence
11:26 a.m.	24 min	4897 Rita Dr, Las Vegas, NV 89121	None	Residential area
11:57 a.m.	2 hr 5 min	1050 W Warm Springs Rd, Henderson, NV 89014	https://goo.gl/maps/vQvV5se5dlUw	Enterprise Rent-A-Car and Car Max
2:28 a.m.	19 hr 12 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence

4/21/2019 Sunday

10:04 a.m.	8 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/vQvV5se5dlUw	Parent's Residence
10:14 a.m.	3 min	6710 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/vQvV5se5dlUw	7-Eleven
10:21 a.m.	7 min	5649-5657 E Owens Avenue, Las Vegas, NV	https://goo.gl/maps/vQvV5se5dlUw	Residential Area
10:50 a.m.	Last Known Position	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dlUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
4/19/2019 Friday				
1:10 p.m.	27 hr 6 min	8490 Westcliff Dr, Las Vegas, NV 89145	https://goo.gl/maps/Zf6EM8MkRKh2baU1A	Chevron and Terrible Herost Convenience Store
4/20/2019 Saturday				
4:20 p.m.	53 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQW5se5dUw	Chalese Solinger's Residence
5:39 p.m.	6 min	4954 Boulder Hwy, Las Vegas, NV 89121	https://goo.gl/maps/U81UHTDLzcbhbHk8A	McDonald's
5:46 p.m.	1 min	4897 Rita Dr, Las Vegas, NV 89121	None	Residential area
5:07 p.m.	1 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VVwVKslystH2	Parent's Residence
6:08 p.m.	45 min	6685 East Lake Mead Boulevard Ste 105, Las Vegas, NV 89156	https://goo.gl/maps/VVwVKslystH2	Dollar Loan Center
6:53 p.m.	1 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VVwVKslystH2	Parent's Residence
6:57 p.m.	9 min	6310 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/VoTashCT57DXhmdG	7-Eleven
7:31 p.m.	15 hr 45 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQW5se5dUw	Chalese Solinger's Residence
4/21/2019 Sunday				
11:26 a.m.	8 min	901 N Buffalo Dr, Las Vegas, NV 89128	https://goo.gl/maps/Wu0XCRJA3aBEECg	Rebel Oil
3:38 p.m.	20 min	Willow Spring Loop Rd, Las Vegas, NV 89124	https://goo.gl/maps/5ncBav7Fg81rChv5	Willow Spring Loop Road
4:01 p.m.	8 min	Wheeler Pass Road, Las Vegas, Nevada 89124	https://goo.gl/maps/2DA5kR9BEVVG3z17	Wheeler Pass Road
5:21 p.m.	Last Known Position	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQW5se5dUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
4/22/2019	Monday			
7:44 a.m.	8 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/vVwK5v8=2	Parent's Residence
8:19 a.m.	5 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
8:44 a.m.	1 hr 24 min	9091- 9097 W Post Rd, Las Vegas, NV 89148	https://goo.gl/maps/pK633MmFcgMWoeE9	Thomas Dermatology or Sunshine Valley Pediatrics Parking Lot
10:25 a.m.	25 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
11:09 a.m.	5 min	107 E Charleston Blvd, Las Vegas, NV 89104	https://goo.gl/maps/Gk7MTqB4KcHd6fmX7	The Arts Factory
11:26 a.m.	1 min	1601 W, NV-159, Las Vegas, NV 89102	https://goo.gl/maps/te594grBbgJEDUA	McDonald's
11:21 a.m.	10 min	107 E Charleston Blvd, Las Vegas, NV 89104	https://goo.gl/maps/Gk7MTqB4KcHd6fmX7	Across the street from the Arts Factory
11:33 a.m.	10 min	430 S 7th St, Las Vegas, NV 89101	https://goo.gl/maps/wseDhUfz7C3xkqIG9	Law Offices Of Louis Schneider
11:55 a.m.	7 min	8661 or 8633 W Charleston Blvd, Las Vegas, NV	https://goo.gl/maps/rf1a7UJ15712A56	Walgreens or Jack in the Box
12:07 p.m.	2 hr 5 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
2:38 p.m.	31 min	4949 E Borsanza Rd, Las Vegas, NV 89110	https://goo.gl/maps/5rnkv5Qz7mwcYpww5	Jet Car Wash
3:32 p.m.	3 hr 37 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
4/22/2019	Monday			
5:33 p.m.	18 min	7598 Vegas Dr, Las Vegas, NV 89128	https://a.co/d/Maps/c/NK9oSG1DA32	CVS, Albertsons, Carl's Jr. Parking Lot
6:12 p.m.	N/A	N/A	N/A	Headed toward Solinger's residence, device was disconnected

Time	Length of stop	Address	Maps link	Possible Location
4/23/2019	Tuesday			
7:56 a.m.	1 hr 6 min	2256 Grand Clover Lane, Las Vegas, NV 89156	https://goo.gl/maps/VvWKC3v3H2	Parent's Residence
9:22 a.m.	2 hr 9 min	6650 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/qfVpmGohcnrgdmHVA	Walgreens
11:38 a.m.	58 min	701 N Pecos Rd, Las Vegas, NV 89101	https://goo.gl/maps/9l5nv5aRGww7Avr8	Clark County Family Services Department
12:58 p.m.	Last Known Position	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/mcZlag9Htlu	Orange Grove Apartments
		8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Charles Solinger's Residence

Possible Location

Maps Link

Address

Length of stop

Time

4/24/2019 Wednesday

8:47 a.m. 18 min 2256 Grand Clover Lane, Las Vegas, NV
 9:42 a.m. 1 hr 19 min 9705 W Charleston Blvd, Las Vegas, NV 89117
 11:25 a.m. Quick Stop 9090 Alta Dr, Las Vegas, NV 89145
 11:31 a.m. 3 hr 34 min 8500 Highland View, Las Vegas, NV 89145
 3:26 p.m. 26 min 4279 E Lake Mead Blvd, Las Vegas, NV 89115
 4:00 p.m. 12 min 2256 Grand Clover Lane, Las Vegas, NV
 4:53 p.m. 8 min 8355 Farm Rd, Las Vegas, NV 89131
 5:30 p.m. 8 min 2836 S Durango Dr, Las Vegas, NV 89117
 5:42 p.m. 14 hr 11 min 8500 Highland View, Las Vegas, NV 89145

4/25/2019 Thursday

8:09 a.m. 8 min 8355 Farm Rd, Las Vegas, NV 89131
 8:34 a.m. 5 min 4240 E Craig Rd, North Las Vegas, NV 89030
 8:50 a.m. Quick Stop 6710 E Lake Mead Blvd, Las Vegas, NV 89156
 8:55 a.m. 46 min 2256 Grand Clover Lane, Las Vegas, NV
 10:03 a.m. 2 hr 24 min 8500 Highland View, Las Vegas, NV 89145
 12:51 p.m. 50 min 6600 Auction Ln, Downtown, NV 89155
 2:01 p.m. 46 min 8500 Highland View, Las Vegas, NV 89145
 3:22 p.m. 8 min 2256 Grand Clover Lane, Las Vegas, NV
 3:43 p.m. 16 min 4240 E Craig Rd, North Las Vegas, NV 89030
 4:28 p.m. 7 min 8355 Farm Rd, Las Vegas, NV 89131
 4:55 p.m. 4 min 9850 W Cheyenne Ave, Las Vegas, NV 89129
 5:14 p.m. 14 hr 44 min 8500 Highland View, Las Vegas, NV 89145

4/26/2019 Friday

8:14 a.m. 8 min 8355 Farm Rd, Las Vegas, NV 89131
 8:58 a.m. 13 min 2256 Grand Clover Lane, Las Vegas, NV
 9:19 a.m. 20 min 5708-5700 Forchester Court, Las Vegas, NV 89110
 9:55 a.m. 15 min 4440 E Craig Rd suite 300, Las Vegas, NV 89115
 10:20 a.m. 7 min 2025 N Lamb Blvd, Las Vegas, NV 89115
 10:29 a.m. 37 min 4770 E Owens Ave, Las Vegas, NV 89110
 11:22 a.m. 1 hr 55 min Nellis Bypass, Nellis AFB, NV 89191
 2:45 p.m. 27 min 4770 E Owens Ave, Las Vegas, NV 89110
 3:17 p.m. 34 min 2256 Grand Clover Lane, Las Vegas, NV
 4:34 p.m. 2 hr 25 min 8500 Highland View, Las Vegas, NV 89145
 7:20 p.m. 12 min 5185 E Lake Mead Blvd A, Las Vegas, NV 89156
 7:35 p.m. 15 hr 2256 Grand Clover Lane, Las Vegas, NV

Parent's Residence
 The Home Depot Parking Lot
 Suncoast Hotel and Casino
 Chalese Solinger's Residence
 Karlus Kars Auto Sales
 Parent's Residence
 Creative Kids of Las Vegas
 Children's Learning Adventure Parking Lot
 Chalese Solinger's Residence

<https://goo.gl/maps/vvwwKc5IvsH2>
<https://goo.gl/maps/dAVS2CmZJ8VCqSv6>
<https://goo.gl/maps/4YY5g51M5FbGKRIFA>
<https://goo.gl/maps/vQvV5se5dUw>
<https://goo.gl/maps/yessxgcWfKpJ3Xxcv6>
<https://goo.gl/maps/vvwwKc5IvsH2>
<https://goo.gl/maps/b4wZowFFvMvPvFWX8>
<https://goo.gl/maps/M5TFtnaqD4u566r16>
<https://goo.gl/maps/vQvV5se5dUw>

Creative Kids of Las Vegas
 Rebel
 7-Eleven
 Parent's Residence
 Chalese Solinger's Residence
 Manheim Nevada
 Chalese Solinger's Residence
 Parent's Residence
 Rebel
 Creative Kids of Las Vegas
 Las Vegas Metropolitan Police Department
 Chalese Solinger's Residence

<https://goo.gl/maps/b4wZowFFvMvPvFWX8>
<https://goo.gl/maps/AskI3bamkWiPho916>
<https://goo.gl/maps/8GvKqmadNV8Ha8tV6>
<https://goo.gl/maps/vvwwKc5IvsH2>
<https://goo.gl/maps/vQvV5se5dUw>
<https://goo.gl/maps/xYBw8igMNEwZEIGaZ>
<https://goo.gl/maps/vQvV5se5dUw>
<https://goo.gl/maps/vvwwKc5IvsH2>
<https://goo.gl/maps/AskI3bamkWiPho916>
<https://goo.gl/maps/b4wZowFFvMvPvFWX8>
<https://goo.gl/maps/dBW3eF7wn9AowwC9>
<https://goo.gl/maps/vQvV5se5dUw>

Creative Kids of Las Vegas
 Parent's Residence
 Residential Area
 ATV Cycle Sports
 Terrible Herbst
 Orange Grove Apartment Homes
 Nellis Dunes
 Orange Grove Apartment Homes
 Parent's Residence
 Chalese Solinger's Residence
 Rubalcaba Taco Shop #2
 Parent's Residence

<https://goo.gl/maps/b4wZowFFvMvPvFWX8>
<https://goo.gl/maps/vvwwKc5IvsH2>
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<https://goo.gl/maps/OGAW5D1-rx3QzUu8>
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<https://goo.gl/maps/Yenn5AUgUICYL2n6>
<https://goo.gl/maps/k4EMqCeRdclpCSP47>
<https://goo.gl/maps/vvwwKc5IvsH2>
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<https://goo.gl/maps/vvwwKc5IvsH2>

[illegible]

000333

Time	Length of stop	Address	Maps link	Possible Location
5/6/2019	Monday			
8:11 a.m.	3 min	8490 Westcliff Dr, Las Vegas, NV 89145	https://goo.gl/maps/vxxqdE3c1575u16GA	Chevron
8:25 a.m.	14 min	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/rTPBNikchr5G1u059	Creative Kids of Las Vegas
9:15 a.m.	Quick Stop	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VWVKcSvsH2	Parent's Residence
9:18 a.m.	6 min	6710 E Lake Mead Blvd, Las Vegas, NV 89156	https://goo.gl/maps/DH3ZspKrrR3rvQWDE	7-Eleven
9:30 a.m.	15 min	4770 E Owens Ave, Las Vegas, NV 89110	https://goo.gl/maps/31T7a7X5fcmk1169	Orange Grove Apartment Homes
9:45 a.m.	1 hr 10 min	430 S 7th St, Las Vegas, NV 89101	https://goo.gl/maps/11XdoiaRceHagbUX9	Law Offices Of Louis Schneider
11:10 a.m.	6 min	428 S Valley View Blvd, Las Vegas, NV 89107	https://goo.gl/maps/vWvTQv28BA54HkEXZ	Circle K
11:24 a.m.	2 hr 27 min	3500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
1:54 p.m.	49 min	450 S Buffalo Dr, Las Vegas, NV 89145	https://goo.gl/maps/G32x41AS1YcP3w0w9	Buffalo Shopping Center Parking Lot In front of Cosmo Pro
3:04 p.m.	7 min	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/rTPBNikchr5G1u059	Creative Kids of Las Vegas
3:36 p.m.	17 min	7598 Vegas Dr, Las Vegas, NV 89128	https://goo.gl/maps/vQx0KQ6575ack16	Carl's Jr. Parking Lot
3:57 p.m.	30 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
4:52 p.m.	Quick Stop	780 S Rampart Blvd, Las Vegas, NV 89145	https://goo.gl/maps/enfC3hPNUapDPN-H78	Lee's Discount Liquor Parking Lot
4:56 p.m.	15 hr 44 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence

Time	Length of stop	Address	Maps link	Possible Location
5/7/2019	Tuesday			
9:13 a.m.	Quick Stop	6475 Eagle Creek Ln, Las Vegas, NV 89155	https://goo.gl/maps/8vTmBQvG2awgLCMY6	Helen Herr Elementary School
9:15 a.m.	Quick Stop	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VwVvKcSivSH2	Parent's Residence
9:43 a.m.	2 Hr 9 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
11:54 a.m.	Quick Stop	8601 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/hFucRc2NYszTq7	Shel
11:56 a.m.	4 min	8633 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/cN6icr3b3fxbkNC7	Walgreens
12:00 p.m.	10 min	8651 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/qCcna1muuobxvMie6	Jack in the Box
12:14 p.m.	1 Hr 18 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
1:27 p.m.	6 min	8633 W Charleston Blvd, Las Vegas, NV 89117	https://goo.gl/maps/cN6icr3b3fxbkNC7	Walgreens
1:46 p.m.	1 hr 1 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
3:25 p.m.	5 min	2256 Grand Clover Lane, Las Vegas, NV	https://goo.gl/maps/VwVvKcSivSH2	Parent's Residence
4:03 p.m.	1 hr 3 min	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence
5:23 p.m.	Quick Stop	8355 Farm Rd, Las Vegas, NV 89131	https://goo.gl/maps/FTPB6ikhtF5G4qD59	Creative Kids of Las Vegas
5:26 p.m.	4 min	8001 W Radigan Ave, Las Vegas, NV 89131	https://goo.gl/maps/4qpwv6p2Voe46fSX9	Residential Area
6:05 p.m.	4 min	2400 Atlantic St, Las Vegas, NV 89104	https://goo.gl/maps/Wat5tL6ao5ov5BN7	K O Knudson Middle School Parking lot
6:34 p.m.	Last Known Position	8500 Highland View, Las Vegas, NV 89145	https://goo.gl/maps/vQvV5se5dUw	Chalese Solinger's Residence

EXHIBIT 4

EXHIBIT 4

EXHIBIT 4

Traffic Case Records Search Results

[Skip to Main Content](#) [Logout My Account](#) [Search Menu](#) [New Traffic Search](#) [Refine Search](#)
[Closebox](#) [Home](#) [Help](#)

Record Count: 10

Search By: Defendant Party Search Mode: Name Last Name: lloyd First Name: joshua All All Sort By: Filed Date

Case Number	Citation Number	Defendant Info	Filed/Location	Type/Status	Charge(s)
104449209	104449208	LLOYD, JOSHUA DOUGLAS	01/02/2010 Traffic	Traffic Open	DRIVING W/O VALID LICENSE
104526363	104526363	LLOYD, JOSHUA DOUGLAS	03/04/2010 Traffic	Traffic Open	DRIVING W/O VALID LICENSE
104379380	104379380 104379380	LLOYD, JOSHUA DOUGLAS	03/08/2010 Traffic	Traffic Open	LICENSE PLATE LIGHT REQUIRED DRIVING W/O VALID LICENSE
104611105	104611105 104611105	LLOYD, JOSHUA	08/14/2010 Traffic	Traffic Closed	SPEEDING 1-10 MPH OVR POSTED SPD LIMIT INSURANCE REQUIRED
104395434	104395434 104395434	LLOYD, JOSHUA DOUGLAS	01/19/2011 Traffic	Traffic Open	SPEEDING 11-20 MPH OVR POSTED SPD LIMIT/NONCMV UNSAFE TURNING MOVEMENT
104806155	104806155 104806155	LLOYD, JOSHUA DOUGLAS	09/23/2011 Traffic	Traffic Open	DISREGARDING OFFICIAL TRAFFIC CONTROL DEVICE INSURANCE REQUIRED
E10151684	E10151684 E10151684	LLOYD, JOSHUA DOUGLAS	03/05/2012 Traffic	Traffic Open	SPEEDING 1-10 MPH OVR POSTED SPD LIMIT LICENSE IN POSSESSION- SURRENDER ON DEMAND
105075925	105075925	LLOYD, JOSHUA D	06/11/2013 Traffic	Traffic Open	TURNING AT INTERSECTION
E10519374	E10519374	LLOYD, JOSHUA D	05/21/2015 Traffic	Traffic Closed	Follow too closely [53794]
LVM0214608	LVM0214608	LLOYD, JOSHUA DOUGLAS	04/14/2017 Traffic	Traffic Closed	Basic speed - 1-10 mph over posted limit [53849]

16TR004054

Case Type: TRAFFIC
Case Status: CLOSED
File Date: 03/01/2016
DCM Track:
Action: DRIVER FAIL TO OBEY
TRAFFIC CONTROL
DEVICES
Status Date:
Case Judge: STEVENS, MARK J
Next Event:

All Information	Party	Charge	Ticket/Citation #	Event	Docket	Financial
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Party Information

LLOYD, JOSHUA DOUGLAS - DEFENDANT
DOB: 09/27/1991

Party Charge Information

LLOYD, JOSHUA DOUGLAS

Charge # 1:

53760 - MISDEMEANOR DRIVER FAIL TO OBEY TRAFFIC CONTROL DEVICES

Original Charge: 53760 DRIVER FAIL TO OBEY TRAFFIC CONTROL
DEVICES (MISDEMEANOR)

Ticket #: X01543548
Date of Offense: 02/19/2016

Party Charge Disposition

Disposition Date:
Disposition:
06/15/2016
SENTENCED

Ticket/Citation #

Citation #: X01543548 Offense Date: 02/19/2016

Officer: NHP, NHP(NHP)

Speed Cited:
Speed Limit:
Location: 215/146
Accident: N
Work Zone:
Haz Mat:

Events

Date/Time	Location	Type	Result	Event Judge
05/24/2016 08:00 AM	DEPARTMENT 1	ADULT TRAFFIC ARRAIGNMENT	FTA BENCH WARRANT NOTICE ORDERED - TR	STEVENS, MARK J

Docket Information

Date	Description
03/01/2016	COURT DATE SET:
05/24/2016	EVENT PARTICIPANTS:
05/24/2016	FTA - BWN ORDERED

000338

Date	Description
05/24/2016	FTA BWN MAILED
06/15/2016	BWN CLEARED
06/15/2016	FINE PAID IN FULL
06/15/2016	DMV CONVICTION SENT
06/15/2016	PLEA: GUILTY PLEA ENTERED
06/15/2016	SENTENCED: VIA WEB
06/15/2016	FINE/FORFEITURE: \$100 + 95
06/15/2016	CASE CLOSED

Financial Summary

Cost Type	Amount Owed	Amount Paid	Amount Adjusted	Amount Outstanding
COST	\$195.00	\$195.00	\$0.00	\$0.00
	\$195.00	\$195.00	\$0.00	\$0.00

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5





EXHIBIT 6

EXHIBIT 6

EXHIBIT 6

15

Like

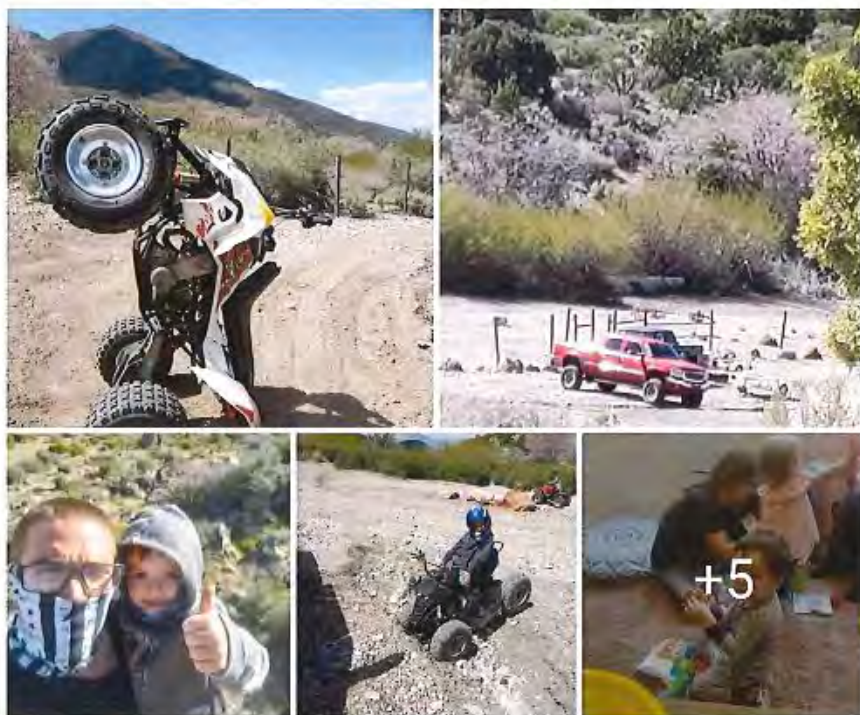
Share

Album Easter 2019



Josh Lloyd added 9 new photos — with **Chalese Anderson Lloyd**.

Apr 21 at 6:31 PM • [location icon]



7

Like

Share



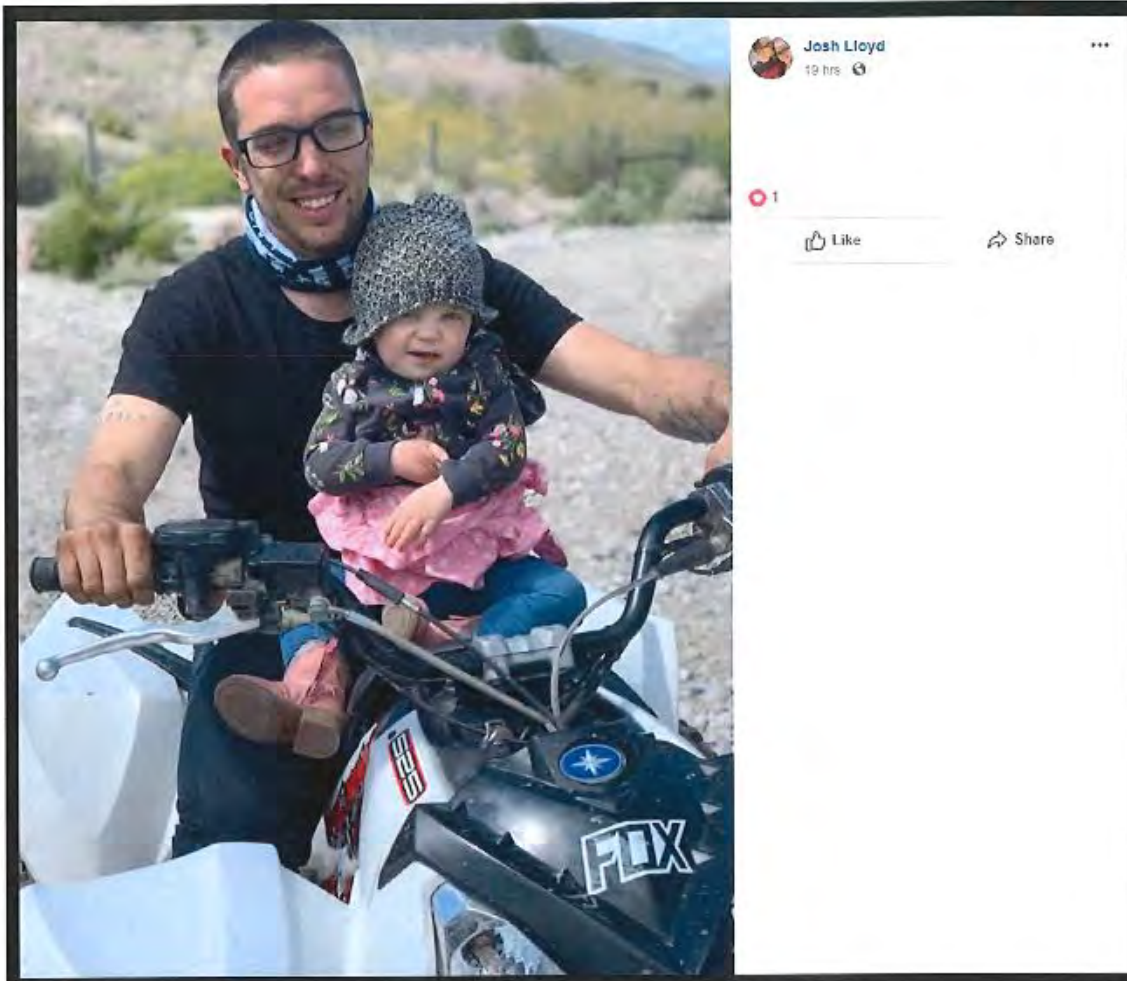
Josh Lloyd

Apr 21 at 6:27 PM • [location icon]



Nipsey Hussle Quotes







 Josh Lloyd
12 hrs · 🌐

👍👍👍 3

👍 Like



EXHIBIT 7

EXHIBIT 7

EXHIBIT 7

her to Mr. Lloyd who then placed her in the back seat of the vehicle before entering the garage. Ms. Solinger entered the Ford F-150 and departed. **(VIDEO OBTAINED)**

10:37 AM Ms. Solinger returned and parked on the driveway. She exited the vehicle, retrieved the toddler from the back seat, and entered the garage. The garage door closed automatically. **(VIDEO OBTAINED)**

12:33 PM-
1:16 PM The garage door opened automatically. Mr. Lloyd and Ms. Solinger removed items from the Ford F-150 pickup truck and placed them inside the garage. They entered the garage and the door closed automatically. **(VIDEO OBTAINED)**

2:28 PM A man and woman arrived in the Toyota Prius. They parked curbside in front of the residence and walked onto the driveway. Mr. Lloyd and three children exited the residence and conversed with the couple. **(VIDEO OBTAINED)**

2:31 PM Mr. Lloyd and the children walked toward the residence, out of view. The man departed in the Ford F-150 and the woman departed in the Toyota Prius. **(VIDEO OBTAINED)**

4:01 PM The garage door opened. Ms. Solinger exited the garage, entered the Chevrolet Suburban, and departed the area.

4:12 PM Ms. Solinger returned and parked on the driveway. The garage door had remained open. She exited the vehicle and carried a 12 pack of Coke, a gallon of milk, and a case of Corona beer into the residence. The garage door closed. **(VIDEO OBTAINED)**

4:28 PM The garage door opened. A boy, whom was believed to be Mr. Lloyd's son, exited and played on a scooter. Mr. Lloyd exited the garage and retrieved the scooter from the boy. The boy then rode a bicycle. They entered the residence. Moments later, the boy exited the residence and stood on an object inside the garage. He reached up, stepped down, and entered the residence. A young girl exited the residence and played with toys. Mr. Lloyd exited the residence and put her on a scooter, holding it up as she held on. The boy exited the garage on a bicycle and rode down the street, in and out of view. They all entered the residence. The garage door remained open. **(VIDEO OBTAINED)**

4:40 PM The boy exited the residence and rode the bicycle in the immediate area. Mr. Lloyd exited the garage with a can of Corona beer in his hand. He drank from the can while utilizing a cellular telephone as he sat on a trailer inside the garage. Moments later, the girl exited the residence. Mr. Lloyd placed the beer can down and crouched. Moments later, he stood, finished the can, and entered the residence as the girl walked toward the street. Moments later, Mr. Lloyd exited the residence with a second can of beer while smoking a cigarette. He leaned his back against

EXHIBIT 8

EXHIBIT 8

EXHIBIT 8

11:11 AM He arrived at 7-Eleven:

2510 South Rainbow Boulevard
Las Vegas, Nevada 89146

He parked in front of the building and entered. (VIDEO OBTAINED)

11:13 AM Mr. Lloyd exited the building utilizing his cellular telephone. He entered his vehicle and continued utilizing the cellular telephone. (VIDEO OBTAINED)

11:16 AM He departed the parking lot and entered the adjacent lot (VIDEO OBTAINED)

11:17 AM He arrived at The Source Las Vegas Cannabis Dispensary:

2550 South Rainbow Boulevard, Suite 8
Las Vegas, Nevada 89146

He parked on the lot and entered the building. (VIDEO OBTAINED)

11:29 AM Mr. Lloyd exited the building carrying a white sealed package. He entered his vehicle and departed the area. (VIDEO OBTAINED)

11:40 AM He arrived at his residence:

8500 Highland View
Las Vegas, Nevada 89145

He parked on the driveway as the garage door opened. He entered the residence carrying the package from the dispensary and the garage door closed. (VIDEO OBTAINED)

12:47 PM Ms. Solinger departed in the Chevrolet Suburban. (VIDEO OBTAINED)

12:50 PM She arrived at CVS Pharmacy:

8580 West Charleston Boulevard
Las Vegas, Nevada 89117

She waited in the drive-thru line. (VIDEO OBTAINED)

12:55 PM She opened her window as she approached the service window. She exited the vehicle, placed an item in the service drawer, and entered the vehicle. She conversed with an employee. (VIDEO OBTAINED)

1:01 PM She finished her conversation and departed the drive-thru. (VIDEO OBTAINED)

EXHIBIT 9

EXHIBIT 9

EXHIBIT 9

the Chevrolet Suburban and utilized his cellular telephone. He walked to the street and took pictures. Ms. Solinger exited the residence and joined Mr. Lloyd on the sidewalk. Mr. Lloyd continued to hold the cellular telephone in his right hand and his can of beer in his left. Ms. Solinger entered the residence. Mr. Lloyd walked up the street, out of view. **(VIDEO OBTAINED)**

4:52 PM Mr. Lloyd walked into view and entered the garage. The two children entered the residence, followed by Mr. Lloyd. Mr. Lloyd moved a bicycle from the edge of the garage and let it fall just inside the garage. He entered the residence and the door closed then opened partially, approximately three feet. **(VIDEO OBTAINED)**

4:56 PM The boy walked into view from under the garage door. The door opened slightly more, and the boy exited on his bicycle followed by Mr. Lloyd, who was holding a can of beer. A dog exited the garage. The boy chased the dog on his bicycle. Moments later, a younger boy, whom was believed to be Ms. Solinger's son, exited the residence and guided the dog into the garage by the collar. The garage door closed. **(VIDEO OBTAINED)**

6:57 PM Mr. Lloyd departed in the Chevrolet Suburban. Due to the brief visual of this activity, no video was obtained.

6:59 PM He traveled to Guitar Center:

**8621 West Charleston Boulevard
Las Vegas, Nevada 89117**

He entered the parking lot and traveled out of view as the investigator became detained by slower moving vehicles. As traffic conditions permitted, a search was conducted to locate Mr. Lloyd.

7:05 PM Mr. Lloyd was located as he departed the Green Valley Grocery parking lot next door.

7:08 PM He arrived at his residence:

**8500 Highland View
Las Vegas, Nevada 89145**

He parked on the driveway and remained inside the vehicle. **(VIDEO OBTAINED)**

7:13 PM The garage door opened. Mr. Lloyd exited the vehicle, entered the garage, and the door closed.

7:30 PM No activity was observed that was thought to be associated with the Subjects. Due to the lack of activity, surveillance was terminated, and the investigator departed for his destination.

EXHIBIT 10

EXHIBIT 10

EXHIBIT 10

1:50 ↗



Chalese >

I was up at mt Charleston and
dodnt get the message until I
was back in town

You're telling ME to stop with
the lies?! 😂

Yes because it's getting really
old

Ha

So you were asking when you
could get your drone. I'll tell
you when the fbi returns it all
after finding all your child porn
on all the computers and
laptops and old iPads you left
here



You have lost your mind.
There's nothing on anything.
Whatever you tried to do will be
found out and you will go
prison.



iMessage



3:11



c.soli@icloud.com >

removed so I can have help.

Also, I'd appreciate you stop all contact with Carmen, especially since I have to go down and file a restraining order against her that specifically names Maq and Marie after her continuous harassment and threats towards them.

I'd never expect or demand to come into your residence and I'd appreciate the same respect

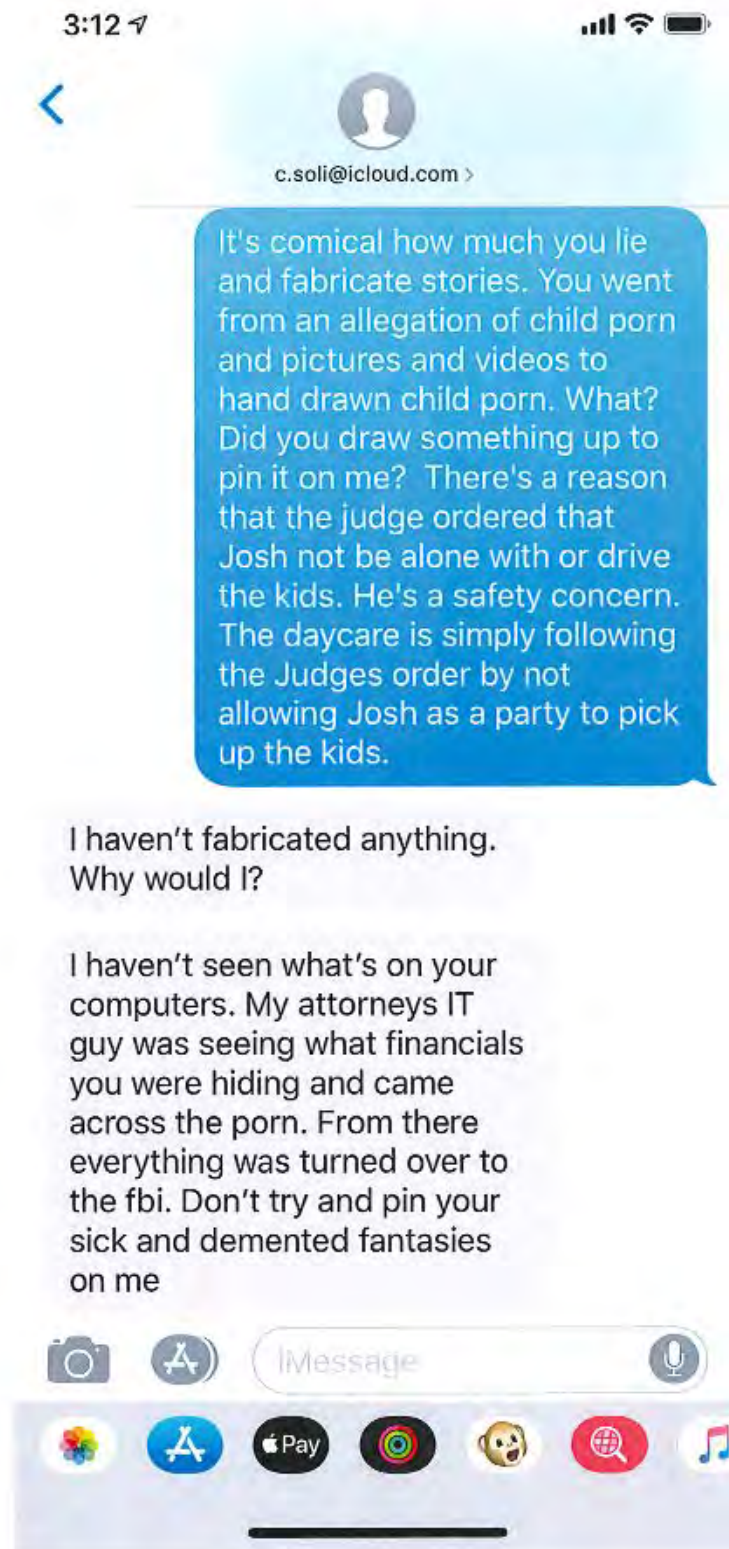
Also, I'll drop the issue with the hand drawn child porn in return of you dropping the laughable drug and alcohol screenings, because you and I both know I don't like taking prescription drugs because of what it does to my head let alone be a drug and alcohol abuser

Do you agree, or are you still wanting to drag this out?



iMessage





3:13



c.soli@icloud.com >

If you would like to play dirty I'd be more than happy to forward Jessica all of the proof of your nastiness

I'm sure that will go over extremely well considering her teenage daughter is there at all times

He's not a safety concern at all, if he was he wouldn't be anywhere near me or my kids

Go ahead. Let Jessica know. There is nothing to share with her.

You're really dragging this out? What is wrong with you?

I'm not dragging anything out. Where can I pick up the kids?

Then let's end this already

Trust me I want this over with



iMessage



EXHIBIT 11

EXHIBIT 11

EXHIBIT 11

8:33



(725) 202-5525

Today 9:24 AM

Hey Adam sorry to bother you but I have a favor to ask. Can you please keep my name out of your mouth and out of your court papers I care about maq and Marie but I'm not trying to take anyone's place so if you feel threatened by me I apologize I just dont appreciate being drug into your business because to be quite honest I do not speak bad about you or Jessica never would nor have I spoken to Jessica or anyone else about the child pornography that you enjoy looking at or watching so please keep me out of your business I do not appreciate you involving me in your problems. Thank you and enjoy your day.

Chalese has a job and it is going to be very difficult to maintain a job with her unable



Text Message



8:33



(725) 202-5525

problems. Thank you and enjoy your day.

Chalese has a job and it is going to be very difficult to maintain a job with her unable to get any help on her days getting them to and from school like you and Jessica are able to do. Trying to make this as simple as possible so she can do what she needs to do.

If I don't get a reply from you I'll take it as you didn't receive it so I'll copy and paste the same message to Jessica so if you got this please let me know.

The report will be released from the FBI shortly

Today 8:32 PM

Did you get my message?
Pretty sure this wouldn't be good for your job if your habits got out to the media or the bar.



Text Message



EXHIBIT 12

EXHIBIT 12

EXHIBIT 12

1:50 ↗



Chalese >

Maqs school just called. He's been crying in pain for the last 20 mins so I'm going to pick him up

No I'll go get him

I'm 5 mins away anyway. I'll meet you somewhere with him

I'm 5 minutes away. I just got to the house

Great, then I meet you there

It is so beyond unacceptable what you did. Instead of calling or texting me first on my day you go there and confuse him. Even after I tell you I'm literally 5 minutes away you charge in and confuse him. He doesn't understand why he doesn't get to go with you because he's 3. You need to be the adult and understand your actions affect the kids. You need to learn to think about the kids first.



iMessage



1:50 ↗



Chalese >

I was right by the school when they called. I texted you right away but there was no way I wasn't going to make sure he was ok. I never told him he was coming with me, I told him he was going with you but mommy was a little closer so I got there first

You need to stop blaming me. Open your eyes and realize I am not making things difficult, I'm just very concerned and knew I could get there first to assess the situation. When the school called they seemed really worried and concerned

But when I told you I was minutes away, you should have let me handle it and check on him. You didn't even give me a chance. I have no problem if I'm too far away, but what you did was for you, not for him.

You are wrong and I am done with you and your neglectful



iMessage



1:50 ↗



CA

Chalese >

You are wrong and I am done with you and your neglectful ways of thinking. If something like this were to happen and they called you I would hope if you could get there before me you would. Even if it's just minutes before.

I just called the school. They said they that they called you at about 315. You texted me at 345 so being 5 minutes away is another lie you've told. So you left him in pain longer by not calling me.

So who is the one being neglectful? Our poor son was in pain and you waited 30 minutes to let me know. If it was the other way around I would have called you immediately, especially if it was your day. So please, just stop with the lies and acting like you had Maq's best interest in mind here because that clearly wasn't the case. You'd rather let your son suffer at school



iMessage



EXHIBIT 13

EXHIBIT 13

EXHIBIT 13



Chalese Anderson Lloyd is with Josh Lloyd.

17 hrs · 🌐



My boys got to stay up a little later tonight to have a movie night



👍❤️ 17



Like



Share



Chalese Anderson Lloyd updated her profile picture.

April 16 at 3:44 PM · 🌐



EXHIBIT 14

EXHIBIT 14

EXHIBIT 14

1:41



Chalese >

Wednesday 7:57 PM

Kids are in bed

Did you put their eye ointment on before they went to bed?

I hope you're doing the right thing and putting it on so that their eyelid infection goes away.

Thursday 6:22 PM

How did it go with the realtor?

Unfortunately you never came to pick up your stuff so I canceled

You literally could have put them in the garage. Home prices are going down. So please, keep playing your games and let the house keep going down in value. A realtor can look at the house with boxes in it, it wasn't like he was showing the house.



iMessage



EXHIBIT 15

EXHIBIT 15

EXHIBIT 15

1:50 ↗



Chalese >

If you have any questions you can contact my attorney. All I did was surrender the property over

Wed, Apr 17, 12:57 PM

I took Marie to the dentist about her broken tooth. It is now medically necessary to fix it so her "surgery" is scheduled for May 15

Dr. Hoban?

Yes

I have copies of everything for you

Wed, Apr 17, 4:38 PM

I've got an appointment that goes late today so I will FaceTime at 830 if the kids are still awake.

Maq told me how much he loves your two new puppies! That's great abandon your



iMessage



000370

EXHIBIT 16

EXHIBIT 16

EXHIBIT 16

2:11



Chalese >

Wed, Apr 17, 9:33 PM

Just letting you know, Maq has a fever of 101.6 and was just given Motrin but we may end up in the er. I'll let you know if I end up taking him in

Please keep me posted

Thu, Apr 18, 7:00 PM

When can I FaceTime with the kids?

Sat, Apr 20, 8:09 AM

Can I please FaceTime with the kids?

Monday 10:56 AM

Both kids are sick and can't go to school until Wednesday at the earliest

So then I'm picking them up from you today?

Yes



iMessage



000372

EXHIBIT 17

EXHIBIT 17

EXHIBIT 17

1:39



CA

Chalese >

Monday 7:24 PM

Can you send me a picture of the diagnosis of the kids?

The paperwork

I'm sure you can call and have them send you a copy. We saw dr Joann at the southwest location. Why, do you think I would insist on giving them antibiotics for no reason?

Wow...I was simply asking so I can know what is wrong with them. But in the future, when they need to go to the doctors/ dentist, notice BEFOREHAND is appropriate. I should be able to attend the appointments. So it would be nice if you send the paperwork like a decent co-parent so I can know what is wrong with the kids. Also, did the doctor address the fact that Marie's head is swollen? What happened?

I took them in as a walk in because of their coughs and



iMessage



000374

1:39



Chalese >

I took them in as a walk in because of their coughs and Marie's eyes were green and goopy. There's no swelling in her head, besides from the bruises that happened last week when they were with you/ school. How about be a decent co parent and tell me what happened to her tooth? Please don't try and tell me how to be a parent, I've been doing this alone for almost 4 years

Her head wasn't swollen, it's literally swollen now. Her tooth was fine with me and at daycare. Maybe you should tell the truth about what happened with her tooth while she was with you. I'm taking her to the ER for safe measure

Which er

Centennial hills. See how easy that is?



1:39



Chalese >



This is her at the dr. No swelling in the head.

I have video proof of her leaving in this exact condition

You can clearly see her face is swollen in the pic

You can clearly see she's sick

If her head was swollen the medical doctor would have



iMessage



000376

1:39



Chalese >

You can clearly see she's sick

If her head was swollen the
medical doctor would have
addressed it

I'm just taking precautions.
There's no reason to get upset.
I'm not making accusations.

So, if it's swollen now, it
happened in your care.

The doctor doesn't know what
her face normally looks like.

And her face looks the same
now as in the picture you sent
me.

Doctor Laura does and visited
with her for at least five
minutes

Let me know what they say

I will let you know.

Monday 9:12 AM



iMessage



000377

1:40



Chalese >

Monday 9:18 PM

Anything?

What are they saying

Nothing right now. They're running some tests and took x rays.

She was already swabbed for rsv and strep and both came back negative

Well, all that information would have been useful when I asked for the paperwork. Once again, great co-parenting.

I don't have paperwork for her. Only a receipt. I was trying to talk to you before you left but you were being an ass and refused to say anything

You should've asked like a concerned parent

Tuesday 2:13 AM



iMessage



000378

1:40



Chalese >

Tuesday 2:13 AM

What ended up happening

Tuesday 6:48 AM

They said they can't explain why her face appears swollen, if it gets worse to bring her in. They also said they don't know why she is on antibiotics because she has an eyelid infection not pink eye and that she shouldn't be on them. They said an eyelid infection can come from bacteria or allergies. They said bacteria infections happen from kids who don't wash their hands and rub their eyes.

Tuesday 3:55 PM

I need you to come pick up all of your clothes before the realtor comes on Thursday

It's all packed up and ready for you

Tuesday 6:29 PM



iMessage



EXHIBIT 18

EXHIBIT 18

EXHIBIT 18

9:11



CA

Chalese >

is court ordered to not be
alone with them.

All I can say is you can kiss my
ass

It's also court ordered that you
pay me \$1990 a month and
provide me with the money to
get a working car, or work with
me about the kids schooling

You're a joke.

I did leave you money for a car
did you forget about the
whatever it was Seven Grand in
the joint account. And I did pay
you child support of 1990 -
what you owed for the
mortgage.

Delivered

Today 9:04 AM

If the rest of the money isn't in
my possession by the end of
today I'm calling the cops



iMessage



EXHIBIT 19

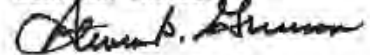
EXHIBIT 19

EXHIBIT 19

FDF

Name: Louis C. Schneider, Esq.
Address: 430 So. 7th Street
Las Vegas Nevada 89101
Phone: 702-435-2121
Email: lcslawllc@gmail.com
Attorney for Joshua Lloyd
Nevada State Bar No. 9683

Electronically Filed
3/19/2019 9:49 AM
Steven D. Grierson
CLERK OF THE COURT



Eighth Judicial District Court

Clark County, Nevada

<u>Joshua Lloyd</u> Plaintiff,	Case No. <u>D-19-584570-C</u>
vs. <u>Carmen Disaio-Watson</u> Defendant.	Dept. <u>L</u>

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) Joshua Douglas Lloyd
2. How old are you? 27
3. What is your date of birth? 09/27/1991
4. What is your highest level of education? High School

B. Employment Information:

1. Are you currently employed/ self-employed? (☒ check one)
☒ No
☐ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)

2. Are you disabled? (☒ check one)
☐ No
☒ Yes If yes, what is your level of disability? Short Term
What agency certified you disabled? _____
What is the nature of your disability? _____

C. Prior Employment: If you are unemployed or have been working at your current job for less than 2 years, complete the following information.

Prior Employer: n/a Date of Hire: _____ Date of Termination: _____
Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 02/24/2019 my gross year to date pay is \$6,000.00

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=	\$0.00	×	52	=	\$0.00	÷	12	=	\$0.00
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

	÷	12	=	\$0.00
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other: Disability	Weekly	\$750.00	\$3,000.00
Total Average Other Income Received			\$3,000.00
Total Average Gross Monthly Income (add totals from B and C above)			\$3,000.00

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): _____	0.00
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	
7.	Retirement, Pension, IRA, or 401(k)	
8.	Savings	
9.	Social Security	
10.	Union Dues	
11.	Other: (Type of Deduction) _____	
Total Monthly Deductions (Lines 1-11)		0.00

Business/Self-Employment Income & Expense Schedule**A. Business Income:**

What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses?
\$ _____

B. Business Expenses: Attach an additional page if needed.

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage or Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities			
Other: _____			
Total Average Business Expenses			0.00

Personal Expense Schedule (Monthly)

A. Fill in the table with the amount of money **you** spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me ☑	Other Party ☑	For Both ☑
Alimony/Spousal Support				
Auto Insurance	370.00	✓		
Car Loan/Lease Payment	420.00	✓		
Cell Phone	60.00	✓		
Child Support (not deducted from pay)				
Clothing, Shoes, Etc...	50.00	✓		
Credit Card Payments (minimum due)	105.00	✓		
Dry Cleaning				
Electric				
Food (groceries & restaurants)	200.00	✓		
Fuel	300.00	✓		
Gas (for home)				
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)				
Home Phone				
Internet/Cable				
Lawn Care				
Membership Fees				
Mortgage/Rent/Lease				
Pest Control				
Pets	40.00	✓		
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer				
Student Loans				
Unreimbursed Medical Expense				
Water				
Other:				
Total Monthly Expenses	1,545.00			

Household Information

- A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attached a separate sheet if needed.

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Jesse James Lloyd	04/02/13	Me	No	No
2 nd	Arielle Lloyd	03/07/16	Carmen	Yes	No
3 rd					
4 th					

- B. Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone				
Child Care	100.00			
Clothing	100.00			
Education				
Entertainment	100.00			
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses				
Vehicle				
Other:				
Total Monthly Expenses	300.00	0.00	0.00	0.00

- C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution

Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

Line	Description of Asset and Debt Thereon	Gross Value	Total Amount Owed	Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	1989 Boat	\$ 1,300.00	- \$ 0.00	= \$ 1,300.00	Self
2.	2004 GMC Sierra	\$ 12,900.00	- \$ 15,000.00	= \$ -2,100.00	Self/Father
3.	2003 Kawasaki	\$ 1,200.00	- \$ 0.00	= \$ 1,200.00	Self
4.		\$	- \$	= \$ 0.00	
5.		\$	- \$	= \$ 0.00	
6.		\$	- \$	= \$ 0.00	
7.		\$	- \$	= \$ 0.00	
8.		\$	- \$	= \$ 0.00	
9.		\$	- \$	= \$ 0.00	
10.		\$	- \$	= \$ 0.00	
11.		\$	- \$	= \$ 0.00	
12.		\$	- \$	= \$ 0.00	
13.		\$	- \$	= \$ 0.00	
14.		\$	- \$	= \$ 0.00	
15.		\$	- \$	= \$ 0.00	
Total Value of Assets (add lines 1-15)		\$ 15,400.00	- \$ 15,000.00	= \$ 400.00	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	First Premier Bank	\$ 470.00	Self
2.	America First Credit	\$ 425.00	Self
3.	First Premier Bank	\$ 97.00	Self
4.		\$	
5.		\$	
6.		\$	
Total Unsecured Debt (add lines 1-6)		\$ 992.00	

CERTIFICATION

Attorney Information: Complete the following sentences:

1. I (have/have not) Have retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$ 3100.00 on my behalf.
3. I have a credit with my attorney in the amount of \$ _____.
4. I currently owe my attorney a total of \$ \$2400.00.
5. I owe my prior attorney a total of \$ _____.

IMPORTANT: Read the following paragraphs carefully and initial each one.

AA I swear or affirm under penalty of perjury that I have read and followed all instructions in completing this Financial Disclosure Form. I understand that, by my signature, I guarantee the truthfulness of the information on this Form. I also understand that if I knowingly make false statements I may be subject to punishment, including contempt of court.

 I have attached a copy of my 3 most recent pay stubs to this form.

 I have attached a copy of my most recent YTD income statement/P&L statement to this form, if self-employed.

 I have not attached a copy of my pay stubs to this form because I am currently unemployed.


Signature

3/4/19
Date

EXHIBIT 20

EXHIBIT 20

EXHIBIT 20

8:15

75%

Search



Josh Lloyd is with **Dhee Diemoz**.

...

32 mins •



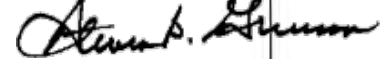
3

Like

Share



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LIST

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
Plaintiff,)	Department: I
vs.)	
)	
CHALESE MARIE SOLINGER,)	
)	
Defendant.)	

PLAINTIFF'S INITIAL EXPERT WITNESS LIST

TO: CHALESE MARIE SOLINGER, Defendant;

TO: LOUIS C. SCHNEIDER, ESQ., 430 South 7th Street, Las Vegas,
Nevada 89101, Attorney for Defendant;

COMES NOW the Plaintiff, ADAM MICHAEL SOLINGER, by
and through his attorney of record, VINCENT MAYO, ESQ., of THE
ABRAMS & MAYO LAW FIRM, and hereby submits his Initial Expert
Witness List.

///

- 1 1. Brett K. Maly and/or Dara Dzurinko
2 Art Encounter
3 5720 Arville Street, Suite 119
 Las Vegas, Nevada 89118
 Tel: (702) 227-0220

4 Mr. Maly and/or Ms. Dzurinko will testify as to their
5 findings regarding the value of the art collection. Mr. Maly's
6 and Ms. Dzurinko's credentials are attached hereto as
 Exhibit 1.

- 7 2. Ira I. Spector, M.S., C.R.C.
8 3440 East Russell Road, Suite 208
 Las Vegas, Nevada 89120
 Tel: (702) 214-4294

9 Mr. Spector is a vocational expert who would testify
10 regarding Defendant's work abilities, opportunities and
11 related issues. Mr. Spector's credentials are attached hereto
 as Exhibit 2.

- 12 3. Any and all expert witnesses relied upon by the Defendant
 that are properly disclosed.

- 13 4. Any and all rebuttal expert witnesses as necessary.

14 Plaintiff reserves the right to supplement this list as additional
15 information and expert witnesses become available.

16 DATED: Wednesday, May 15, 2019.

17 Respectfully Submitted,

18 THE ABRAMS & MAYO LAW FIRM

19 _____
20 Vincent Mayo, Esq.
 Nevada State Bar Number: 8564
21 6252 South Rainbow Blvd., Suite 100
 Las Vegas, Nevada 89118
 Attorney for Plaintiff

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Louis C. Schneider, Esq.
Attorney for Defendant

Chf

An Employee of The Abrams & Mayo Law Firm

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

Dara Dzurinko Credentials:

Education:

Bachelor of Fine Arts

Carnegie Mellon University, 1994

Certificate in Appraisal Studies in Fine & Decorative Arts

University of California, Irvine, 2012

Classes/Examinations Completed:

*ASA Ethics Exam, 2008

*ART HIS X404: Inspecting and Describing Fine Art

*PP/GJ 201 Introduction to Personal Property Valuation

*PP/GJ 202 Personal Property Valuation Methodology: Research and Analysis

*PP/GJ 203 Personal Property Valuation: Report Writing

*PP/GJ 204 Personal Property Valuation: The Legal and Commercial Environment

*SE 100 Uniform Standards of Professional Appraisal Practice (USPAP): 2011-13

*Successfully passed American Society of Appraisers' Specialty Exam for Fine Art, 2014

Appraisal Experience:

Fine Art Appraiser/Assistant to Mr. Brett K. Maly for *Art encounter*: October 2015-Present

Fine Art Appraiser (Self), June 2012-Present

Other Related Experience:

Art Consultant, **National Geographic Fine Art Gallery**, Las Vegas, NV, 11/2017-4/2019

Assistant Director, **SKYE Art Gallery**, Las Vegas, NV, November 2016-November 2017

Art Consultant, **Oh My Godard Gallery**, Las Vegas, NV, December 2015-October 2016

Art Consultant, **Martin Lawrence Gallery**, Las Vegas, NV, March 2015-November 2015

Gallery Director, **Luis Sotttil Studios**, Key West, FL, 2005-2008

Art Consultant, **Wyland Gallery**, Key West, FL, 2003-2005

Fine Art Consultant & Framer, **Zebra Fine Art**, New Orleans, LA, 1995-6

Archival Assistant, **Hunt Library, Carnegie Mellon**, 1994

Association Memberships:

Candidate Member, American Society of Appraisers 2012-2017

Brett K. Maly: Appraiser

Credentials

Education:

Larson-Juhl Custom Framers Training
Los Angeles, California, 1992

Bachelor of Arts
University of Nevada, Las Vegas, 1996

Certificate in Appraisal Studies in Fine and Decorative Arts
University of California, Irvine, 2004

Classes/Examinations completed:

- *ASA Ethics Exam, 2008
- *ART HIS X404: Inspecting and Describing Fine Art
- * PP/GJ 201 Introduction to Personal Property Valuation
- * PP/GJ 202 Personal Property Valuation Methodology: Research and Analysis
- * PP/GJ 203 Personal Property Valuation: Report Writing
- * PP/GJ 204 Personal Property Valuation: The Legal and Commercial Environment
- * SE 100 Uniform Standards of Professional Appraisal Practice (USPAP): 2004, 2009, 2013 & 2017.
- * MGMT X404 Insurance, Appraisers and the Law: Fine and Decorative Arts

Appraisal Experience:

Fine Art Appraiser for *Art Encounter*: February 2004 – Present

Other Relevant Experience:

Director of Artist Relations (*Art Encounter*): May 1996 - June 2003
Director of Marketing (*Art Encounter*): September 2003 - August 2005

Association Memberships:

Candidate, American Society of Appraisers
American Society of Interior Designers
Industry Partner, Central California/Nevada Chapter

EXHIBIT 2

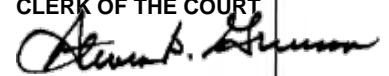
EXHIBIT 2

EXHIBIT 2

Ira I. Spector M.S., C.R.C.
3440 E. Russell Road, Suite 208
Las Vegas, NV 89120
Ph: (702) 214-4294
Fax: (702) 214-4295

Educational History:	Masters of Science Degree - Rehabilitation Counseling University of Nevada at Las Vegas	1992
	Recipient of UNLV 1992 William D. Carlson Award <i>Excellence in Counseling</i>	
	Certified Rehabilitation Counselor (CRC) Commission of Rehabilitation Counselor Certification	1992
	Bachelor of Arts Degree - Psychology University of Nevada, at Las Vegas	1974
Professional History:	Certified Vocational Services Owner Rehabilitation Counseling, Disability Management, Case Management Forensic Testimony, Vocational Evaluations, Job Development, & Training	9/2000
	VES, Inc. Senior Vocational Consultant Vocational Rehabilitation, Employer Services, Return to Work Programs.	4/1996 to 8/2000
	Rehabilitation Hospital of Nevada - Las Vegas Vocational Rehabilitation Counselor Clinical and Vocational Rehabilitation Counseling	4/94 to 3/96
	D.G. Morrow and Associates Vocational Rehabilitation Counselor Vocational Rehabilitation Counseling, Case Management Forensic Testimony, Vocational Evaluations, Job Development	5/91 to 4/94

	Jack Dymond and Associates Job Development Specialist	1/91 to 5/91
	University of Nevada at Las Vegas Graduate Assistant - Department of Counseling and Educational Psychology	8/89 to 12/90
Professional Affiliations:	American Counseling Association	Since 1992
	International Association of Rehabilitation Professionals (IARP)	Since 1992
	American Rehabilitation Counseling Association	Since 1991
	National Employment Counseling Association	Since 1994
	American Board of Vocational Experts (ABVE)	Since 2002
Professional Presentations:	American Board of Vocational Experts – Fall Conference <i>Development of a Mock Trial</i>	Oct. 2004
	International Association of Rehabilitation Professionals (NV Chapter) <i>Vocational Counseling & Vocational Schools: A Symbiotic Relationship</i>	Oct. 2005
Offices:	President - State of Nevada IARP Chapter <i>International Association of Rehabilitation Professionals</i>	April 2007-2009



1 **EXH**

Vincent Mayo, Esq.
Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
9 Plaintiff,) Department: I
10 vs.)
11 CHALESE MARIE SOLINGER,)
12 Defendant.)

**APPENDIX OF SUPPLEMENTAL EXHIBITS IN SUPPORT OF
PLAINTIFF'S EMERGENCY MOTION FOR A CHANGE OF
CUSTODY; FOR ATTORNEY'S FEES AND COSTS AND
RELATED RELIEF**

Exhibit	Description
21	Josh's May 16, 2019 post regarding street racing

Dated Friday, May 24, 2019.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM



Vincent Mayo, Esq. (8564)
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *APPENDIX OF SUPPLEMENTAL EXHIBITS IN SUPPORT OF PLAINTIFF'S EMERGENCY MOTION FOR A CHANGE OF CUSTODY; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Friday, May 24, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Louis Schneider, Esq.
Attorney for Defendant

/s/ Chantel Wade
An Employee of The Abrams & Mayo Law Firm

EXHIBIT 21

EXHIBIT 21

EXHIBIT 21



Josh Lloyd

3 hrs · 🌐



5/16/19, 9:59 AM

6 mins · 👥



I support people's choice to street race
because it's a victimless crime



Like



Comment



You and 1 other



Until they t bone a family van full of kids
killing the entire family.

4m Like Reply



That's street crashing; which I am very
against

3m Haha Reply



2

Truckthusiast

May 14 at 6:00 PM · 🌐



Like Page



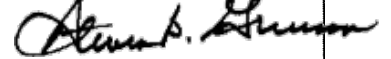
1



Like



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LOUIS SCHNEIDER, ESQ.
Nevada Bar No.: 9683
LAW OFFICES OF LOUIS C. SCHNEIDER, LLC
Email: lcslaw@yahoo.com
430 South 7th Street
Las Vegas, NV 89101
Ph: (702) 435-2121
Fax: (702) 431-3807
Attorney for Defendant

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

ADAM MICHAEL SOLINGER

Plaintiff,

vs.

CHALESE MARIE SOLINGER

Defendant.

Case No. D-19-582245-D

Dept. I

**OPPOSITION TO PLAINTIFF'S EMERGENCY MOTION FOR A CHANGE OF
CUSTODY/SPOUSAL SUPPORT/CHILD SUPPORT, FOR ATTORNEY'S FEES
AND COSTS AND RELATED RELIEF. COUNTER MOTION FOR CHANGE
OF CUSTODY FOR PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY.
PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF.**

Comes now Defendant, CHALESE MARIE SOLINGER, by and through her
Attorney, Louis Schneider, Esq., of the Law offices of Louis Schneider, and hereby
submits her opposition to Plaintiff's EMERGENCY MOTION FOR AN EMERGENCY
CHANGE OF CUSTODY; ATTORNEY'S FEES AND COSTS AND RELATED
RELIEF.

1
2 This motion is made and based upon the attached Points and Authorities, the
3 Affidavit attached hereto, the appendix of Exhibits in support, all papers and pleadings
4 on file herein, and any oral argument adduced at the hearing of this matter.

5 Dated Tuesday, May 28, 2019.

6 Respectfully Submitted,
7 Law Offices of Attorney Louis Schneider
8 /s/ Louis Schneider, Esq. _____

9
10 **Memorandum of Points and Authorities**

11 **I. STATEMENT OF FACTS**

12 Plaintiff, ADAM SOLINGER (“Adam”) and Defendant, CHALESE SOLINGER,
13 were married on May 12, 2012 in Las Vegas, Nevada. There are two (2) minor children
14 of the marriage, to wit: Michael Adam Solinger (“Michael”), born June 16, 2015 (3 years
15 of age); and Marie Leona Solinger (“Marie”), born August 28, 2017 (1 year of age).
16 Adam is 30 years old and Chalese is 28 years old.

17 Chalese categorically denies all allegations that she has been drinking when the
18 children at her home. Furthermore, the unilateral health care decisions alluded to by the
19 Plaintiff are Emergency Room visits which are done on an emergency basis. Chalese
20 further denies allegations that the marital residence is filthy, and no direct evidence has
21 exhibited to support Plaintiff’s allegation. Chalese also has ceased cursing at the Plaintiff
22 through messenger and adjusted her attitude accordingly to facilitate co-parenting.

23 Regarding the courts protective orders done in the best interest of the children. On
24 point one Chalese is to take a high conflict parenting class at UNLV; however, she is
25 unable to do so until Adam prepays for the course which he has not done as ordered by
26 the court. Adam was to pay for this course and failed to do so. Adam is merely paying
27 for Chalese’s expenses having left her penniless and taken the only vehicle she had left

1
2 to drive. Meanwhile, Adam is spending exorbitant amounts of money on private
3 investigators to follow Chalese's every move. The Adam has have gone as far to place
4 GPS tracking devices in her boyfriend's truck. The GPS device was turned over to Metro
5 for criminal investigation.

6 **Chalese is Not Married to Joshua Lloyd**

7 Chalese is not married to Josh Lloyd and no Marriage license was issued to either
8 of them. Facebook posts are done on a causal basis and are not official documents. For
9 example Chalese could also post that she is married to the earth, because its posted on
10 Facebook does not make it true. Additionally, this post was done to test the waters to see
11 if the plaintiff was stalking Chalese and low and behold here it appears in Plaintiff's
12 emergency motion. The Plaintiff Adam Solinger is consumed by his obsession of
13 Chalese.

14 Furthermore, regarding confusing the children Chalese has not told the children to
15 call Joshua their father. The fact that Michael has begun addressing him as such is
16 because Michael himself requested that he call Joshua a nickname of his own choosing.
17 This was not engineered by Chalese. Additionally, it is unreasonable to expect parties
18 not to pursue relationships after separating from their prior spouse.

19 Chalese did not lie to the court regarding Joshua's residence at her home. At the
20 time of her statement he did not live there; however, their relationship has since
21 deepened since and Joshua now resides with Chalese.

22 **Alleged battery by Joshua Lloyd**

23 Regarding the TPO taken out against Joshua by Carmen Watson. The TPO has
24 been since set aside by stipulation by both parties and both parties have stipulated to
25 joint legal and physical custody in Joshua's custody dispute, because Joshua is a good
26 father. Carmen Watson intends to testify on behalf of Joshua at trial in this case.
27 Furthermore, Carmen categorically denies all allegations that Joshua violated the now set
28

1
2 aside TPO between Joshua and Carmen. The Order to Show cause for alleged violations
3 was dismissed.

4 Additionally, Chalese also denies the allegation by the Plaintiff that she was
5 involved in a category D felony, because it is untrue that she took Joshua and Carmen's
6 children and kept them away from there mother.

7
8 **Chalese had Joshua Drive the Children for a safety reason**

9 Regarding the order for Joshua Lloyd not to drive the children, Chalese was left with no
10 alternative to transport the children as on occasion she must take her anti-anxiety
11 medication which precludes her from driving. However, on every occasion that Joshua
12 has driven the children Chalese has been present. Additionally, it is important to consider
13 that the level of stalking Adam has been carrying out on Chalese creates enough anxiety
14 and stress that would require anyone to need anxiety medication.

15 Chalese denies creating a scene at Creative Kids over their refusal to allow Joshua
16 to pick up the children. We would be interested to see the video footage that supports
17 Plaintiff's allegation.

18 Chalese never allowed Joshua to drive the quad with the children on it. All the
19 photos of Joshua with the children on the quad are stationary and are simply poses for
20 the camera nothing more.

21
22 **Chalese has only left the children alone with Joshua on an emergency basis**

23 On May 4, 2019 Chalese did leave Michael alone with Joshua but only so that she
24 could take her daughter Marie to the emergency room.

1
2 **Chalese did not drink Alcohol when she had the Children**

3 While, the Plaintiff may show that Chalese purchased alcohol while she had the
4 children she did not drink alcohol, and the plaintiff has not shown any evidence that she
5 drank alcohol. This allegation is a fabrication. On the other hand, Chalese's allegation
6 that Adam is in possession of Child Pornography is supported by evidence which will be
7 attached in a sealed motion later this week.

8
9 **Chalese did not Violate the Custodial Order**

10 This allegation is ridiculous. The school called Chalese not Adam that Michael
11 was crying and wanted to go home. So Chalese texted Adam, because it was his day to
12 go get Michael. Chalese as concerned mother went to the school to comfort her son
13 while she waited for Adam and then when he got there Chalese gave Michael to him.
14 Furthermore, the allegation that Chalese withheld information is flat lie. She did not
15 know the situation until she returned the school's call after they had called her. She was
16 not immediately aware of situation because she out of cell phone service as Michael's
17 school called her when she was returning from a drive to Mt. Charleston.

18
19 **Chalese has not neglected the Children's health**

20 Chalese has taken the children to healthcare providers on an emergency basis not
21 personal whims as the Plaintiff alleges. In regard Marie's broken tooth Chalese took her
22 to the dentist as soon as they opened because it was an emergency and then she notified
23 Adam when the situation was under control. Chalese did schedule the first available
24 surgery for to have Marie's tooth fixed; however, she also confirmed with Adam to make
25 sure that was okay.

26 The Plaintiff's allegation that Chalese neglected the children's health taking them
27 out to the desert while they had a fever is a stretch. While, the children did have a slight
28

1
2 temperature they showed no other issues or symptoms. The slight temperature of the
3 children persisted into Monday which precluded them from going to school as they must
4 be fever free for 24 hours before returning. Further, by Plaintiffs own admission the
5 children appeared fine to him which is hardly the health crisis the Plaintiff is trying to
6 allege.

7 The plaintiff further alleges that Chalese refused to provide him with copies of
8 Marie's medical records; however, Chalese states she gave him copies of everything
9 from the pediatrician. Further, Chalese did tell the Plaintiff the results of an test from the
10 emergency room late, but only because the Plaintiff did not ask.

11 The Plaintiff also alleges that Chalese did not fill a prescription for Marie
12 promptly, but Chalese called the pharmacy to see if the prescription was in stock and
13 was told to return the following day. Furthermore, there was some confusion the
14 following day with prescription because the doctor wrote down the wrong prescription.

15 **Joshua's Income**

16 While Plaintiff is alleging everything and the kitchen sink. Joshua's disability
17 payments have ceased as of April 8th making this point moot.

18 **Allegations of an Unsanitary Environment**

19 The Plaintiff alleges that the source of the children's sicknesses stems from an
20 unsanitary home environment; however, he ignores the fact that the children go to day
21 care and it is common place for children to catch contagious illnesses from there.
22

23 **Opposition to Motion for Modification of Child and Spousal Support**

24 Plaintiff primarily bases his motion for modification of child support and spousal
25 support on the theory that Chalese has obtained employment as a cosmetologist which is
26 a flat out lie. Additionally, they claim that Joshua receives \$3000 in disability; however,
27

1
2 that expired at the beginning of April. Finally, Plaintiff demands that Joshua pay rent;
3 however, Joshua already pays half of the utility cost of the home. The plaintiff on the
4 other hand has excess wealth to the point that he can hire private investigators to stalk
5 Chalese throughout the course of her day for numerous days.

6
7 **Opposition to Plaintiff's Motion for Attorney's Fees**

8 Similarly, due to Plaintiffs frivolous accusations and his violation by refusal to
9 pay for court ordered classes should be denied attorney's fees.

10
11 **Counter Motion for Sole Custody**

12 Adam is in possession of over 6000 animated child pornography videos making
13 him unsafe to be alone with any child especially his own young children. Studies show
14 that people in possession of animated child pornography have a 90% likelihood of
15 possessing live child pornography, which we have yet to discover but continue to look
16 for. These videos will be turned over to law enforcement the instant we discover them as
17 required as mandatory reporter. My inquiry with experts at the FBI informed that for
18 younger people that grew up gaming on computers have blurred lines of perception
19 between animation and reality. It is our belief that Adam is a danger to the children and
20 sole legal custody and primary psychical custody should be granted to Chalese on this
21 basis further we want supervised visitation for Adam with the children. We are also
22 asking for Adam to under psychiatric evaluation as we believe he present a clear and
23 present danger to the children. The 6000 videos are illegal; but not being prosecuted by
24 the Federal Government at this time while the issue is being fought through Circuit
25 Courts. A call to CPS confirms that CPS has grave concerns about animated child
26 pornography.

Legal Authority

Best interests of child: Joint physical custody; preferences; presumptions when court determines parent or person seeking custody is perpetrator of domestic violence or has committed act of abduction against child or any other child.

1. In any action for determining physical custody of a minor child, the sole consideration of the court is the best interest of the child. If it appears to the court that joint physical custody would be in the best interest of the child, the court may grant physical custody to the parties jointly.

2. Preference must not be given to either parent for the sole reason that the parent is the mother or the father of the child.

3. The court shall award physical custody in the following order of preference unless in a particular case the best interest of the child requires otherwise:

(a) To both parents jointly pursuant to NRS 125C.0025 or to either parent pursuant to NRS 125C.003. If the court does not enter an order awarding joint physical custody of a child after either parent has applied for joint physical custody, the court shall state in its decision the reason for its denial of the parent's application.

(b) To a person or persons in whose home the child has been living and where the child has had a wholesome and stable environment.

(c) To any person related within the fifth degree of consanguinity to the child whom the court finds suitable and able to provide proper care and guidance for the child, regardless of whether the relative resides within this State.

(d) To any other person or persons whom the court finds suitable and able to provide proper care and guidance for the child.

4. In determining the best interest of the child, the court shall consider and set forth its specific findings concerning, among other things:

1
2 (a) The wishes of the child if the child is of sufficient age and capacity to form an
3 intelligent preference as to his or her physical custody.

4 (b) Any nomination of a guardian for the child by a parent.

5 (c) Which parent is more likely to allow the child to have frequent associations and a
6 continuing relationship with the noncustodial parent.

7 (d) The level of conflict between the parents.

8 (e) The ability of the parents to cooperate to meet the needs of the child.

9 (f) The mental and physical health of the parents.

10 (g) The physical, developmental and emotional needs of the child.

11 (h) The nature of the relationship of the child with each parent.

12 (i) The ability of the child to maintain a relationship with any sibling.

13 (j) Any history of parental abuse or neglect of the child or a sibling of the child.

14 (k) Whether either parent or any other person seeking physical custody has engaged
15 in an act of domestic violence against the child, a parent of the child or any other person
16 residing with the child.

17 (l) Whether either parent or any other person seeking physical custody has
18 committed any act of abduction against the child or any other child.

19
20 5. Except as otherwise provided in subsection 6 or NRS 125C.210, a determination
21 by the court after an evidentiary hearing and finding by clear and convincing evidence
22 that either parent or any other person seeking physical custody has engaged in one or
23 more acts of domestic violence against the child, a parent of the child or any other person
24 residing with the child creates a rebuttable presumption that sole or joint physical
25 custody of the child by the perpetrator of the domestic violence is not in the best interest
26 of the child. Upon making such a determination, the court shall set forth:
27
28

1
2 (a) Findings of fact that support the determination that one or more acts of domestic
3 violence occurred; and

4 (b) Findings that the custody or visitation arrangement ordered by the court
5 adequately protects the child and the parent or other victim of domestic violence who
6 resided with the child.

7 6. If after an evidentiary hearing held pursuant to subsection 5 the court determines
8 that each party has engaged in acts of domestic violence, it shall, if possible, then
9 determine which person was the primary physical aggressor. In determining which party
10 was the primary physical aggressor for the purposes of this section, the court shall
11 consider:

12 (a) All prior acts of domestic violence involving either party;

13 (b) The relative severity of the injuries, if any, inflicted upon the persons involved in
14 those prior acts of domestic violence;

15 (c) The likelihood of future injury;

16 (d) Whether, during the prior acts, one of the parties acted in self defense; and

17 (e) Any other factors which the court deems relevant to the determination.

18 Ê In such a case, if it is not possible for the court to determine which party is the primary
19 physical aggressor, the presumption created pursuant to subsection 5 applies to both
20 parties. If it is possible for the court to determine which party is the primary physical
21 aggressor, the presumption created pursuant to subsection 5 applies only to the party
22 determined by the court to be the primary physical aggressor.

23 7. A determination by the court after an evidentiary hearing and finding by clear and
24 convincing evidence that either parent or any other person seeking physical custody has
25 committed any act of abduction against the child or any other child creates a rebuttable
26 presumption that sole or joint physical custody or unsupervised visitation of the child by
27 the perpetrator of the abduction is not in the best interest of the child. If the parent or
28

1
2 other person seeking physical custody does not rebut the presumption, the court shall not
3 enter an order for sole or joint physical custody or unsupervised visitation of the child by
4 the perpetrator and the court shall set forth:

5 (a) Findings of fact that support the determination that one or more acts of abduction
6 occurred; and

7 (b) Findings that the custody or visitation arrangement ordered by the court
8 adequately protects the child and the parent or other person from whom the child was
9 abducted.

10 8. For the purposes of subsection 7, any of the following acts constitute conclusive
11 evidence that an act of abduction occurred:

12 (a) A conviction of the defendant of any violation of NRS 200.310 to 200.340,
13 inclusive, or 200.359 or a law of any other jurisdiction that prohibits the same or similar
14 conduct;

15 (b) A plea of guilty or nolo contendere by the defendant to any violation of NRS
16 200.310 to 200.340, inclusive, or 200.359 or a law of any other jurisdiction that prohibits
17 the same or similar conduct; or

18 (c) An admission by the defendant to the court of the facts contained in the charging
19 document alleging a violation of NRS 200.310 to 200.340, inclusive, or 200.359 or a law
20 of any other jurisdiction that prohibits the same or similar conduct.

21
22 9. If, after a court enters a final order concerning physical custody of the child, a
23 magistrate determines there is probable cause to believe that an act of abduction has been
24 committed against the child or any other child and that a person who has been awarded
25 sole or joint physical custody or unsupervised visitation of the child has committed the
26 act, the court shall, upon a motion to modify the order concerning physical custody,

1
2 reconsider the previous order concerning physical custody pursuant to subsections 7 and
3 8.

4 10. As used in this section:

5 (a) "Abduction" means the commission of an act described in NRS 200.310 to
6 200.340, inclusive, or 200.359 or a law of any other jurisdiction that prohibits the same
7 or similar conduct.

8 (b) "Domestic violence" means the commission of any act described in NRS 33.018..

9
10 **ATTORNEY'S FEES**

11 CHALESE SHOULD BE AWARDED ATTORNEY'S FEES Chalese should be
12 awarded fees and costs. NRS 18.010 Award of attorney's fees. 1. The compensation
13 of an attorney and counselor for his services is governed by agreement, express or
14 implied, which is not restrained by law. 2. In addition to the cases where an allowance
15 is authorized by specific statute, the court may make an allowance of attorney's fees to a
16 prevailing party: (a) When he has not recovered more than \$20,000; or (b)
17 Without regard to the recovery sought, when the court finds that the claim, counterclaim,
18 cross-claim or third-party complaint or defense of the opposing party was brought
19 or maintained without. Further reasonable ground or to harass the prevailing party. The
20 court shall liberally construe the provisions of this paragraph in favor of
21 awarding attorney's fees in all appropriate situations. It is the intent of the Legislature
22 that the court award attorney's fees pursuant to this paragraph and impose sanctions
23 pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate situations
24 to punish for and deter frivolous or vexatious claims and defenses because such claims
25 and defenses overburden limited judicial resources, hinder the timely resolution of
26 meritorious claims and increase the costs of engaging in business and providing
27 professional services to the public. 3. In awarding attorney's fees, the court

1 may pronounce its decision on the fees at the conclusion of the trial or special
2 proceeding without written motion and with or without presentation of
3 additional evidence. 2. Subsections 2 and 3 do not apply to any action arising out of a
4 written instrument or agreement which entitles the prevailing party to an award of
5 reasonable attorney's fees. Chalese has unnecessarily incurred substantial fees to
6 bring forward this Motion, and Adam should be ordered to pay those fees. The
7 reasonableness of counsel's fees are assessed in light of the factors recited in Brunzell v.
8 Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31 (1969) and Miller v.
9 Wilfong, 121 Nev. 619, 119 P.3d 727 (2005). The factors include: Qualities of the
10 advocate; 1. Character of the work to be done; 1. Work actually performed by the lawyer;
11 and 2. The result. In this case, Chalese's attorney practices primarily in the area of Family
12 Law, and he is in good standing with the Nevada State Bar. It was necessary to file this
13 Motion because of the actions of the Plaintiff. In doing so, Counsel consulted with his
14 client, and did appropriate investigation and research to file the instant Motion.
15

16 17 **Conclusion**

18 Based on the foregoing, Chalese respectfully requests that this Honorable Court
19 grant the relief requested in this Motion, consisting of the following:

- 20 (1) Sole Legal and Primary Physical Custody of the children, with Adam having
21 supervised visitation
 - 22 (2) Denial of Plaintiff's motion for Modification of Child and Spousal Support
 - 23 (3) Denial of Plaintiff's motion for Attorney's fees and granting Attorney's fee to
24 Chalese; and
 - 25 (4) Any other relief the Court deems proper and just.
- 26
27
28

AFFIDAVIT OF CHALESE MARIE SOLINGER

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, CHALESE MARIE SOLINGER, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

1. I am the Defendant in the above entitled action, and I am above the age of majority and am competent to testify to the facts contained in this affidavit.

2. I make this affidavit in support of the foregoing Opposition to Plaintiff's Emergency Motion for an Emergency Change of Custody: Attorney's Fees and Costs and Related Relief and Counter Motion for Change of Custody for Primary Physical and Sole Legal Custody. Psychological Evaluation of the Plaintiff.

3. I have read said Opposition and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. I incorporate said facts into this Affidavit as though fully set herein.

FURTHER, AFFIDAVIT SAYETH NAUGHT.


CHALESE MARIE SOLINGER

Subscribed and sworn to before me
this 28th day of May, 2019.

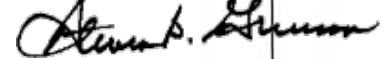

NOTARY PUBLIC

1
2
3 **CERTIFICATE OF SERVICE**

4 I hereby certify that I am an employee of Louis C. Schneider, Esq., and that on the 28th
5 Day of May, 2019, I served a true and correct copy of the above and forgoing **DEFENDANT'S**
6 **OPPOSITION TO PLAINTIFF'S EMERGENCY MOTION FOR A CHANGE OF**
7 **CUSTODY/SPOUSAL SUPPORT/CHILD SUPPORT, FOR ATTORNEY'S FEES**
8 **AND COSTS AND RELATED RELIEF. COUNTER MOTION FOR CHANGE**
9 **OF CUSTODY FOR PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY.**
10 **PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF.** That was filed
11 electronically with the Eighth Judicial District Court. Electronic Service of the foregoing
12 document shall be made in accordance with the Master Service List, pursuant to
13 NEFCR 9, as follows:
14

15 Vincent Mayo, Esq.
16 THE ABRAMS & MAYO LAW FIRM
17 6252 South Rainbow Blvd., Suite 100
18 Las Vegas, Nevada 89118
19 Ph: 702. 222-4021
20 Fax: 702.248-9750
21 Email: VMGroup@theabramslawfirm.com

21 /s/ Stacie Comerio
22 An Employee of Louis C. Schneider, Esq.
23
24
25
26
27
28



1 **EXMT**

Vincent Mayo, Esq.
2 Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
3 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
4 Tel: (702) 222-4021
Fax: (702) 248-9750
5 Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

6 Eighth Judicial District Court
Family Division
7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
9 Plaintiff,) Department: I
vs.)
10 CHALESE MARIE SOLINGER,)
11 Defendant.)

12
13 **EX PARTE MOTION FOR AN ORDER SHORTENING TIME**

14 COMES NOW Plaintiff, Adam Solinger, by and through his
15 attorney of record, Vincent Mayo, Esq., of The Abrams & Mayo Law
16 Firm, and hereby submits this Ex Parte Motion for an Order Shortening
17 Time pursuant to EDCR 2.26, requesting that this Court shorten the
18 time in which to hear his *Emergency Motion for an Emergency Change*
19 *of Custody; Attorney's Fees and Costs and Related Relief*, which is
20 scheduled to be heard on June 17, 2019, at 10:00 a.m.

21 ///

1 This Motion is based upon the pleadings and papers on file and the
2 Affidavit of Vincent Mayo, Esq., attached hereto.

3 DATED: Wednesday, June 05, 2019.

4 Respectfully Submitted,

5 THE ABRAMS & MAYO LAW FIRM

6 _____
7 Vincent Mayo, Esq.
8 Nevada State Bar Number: 8564
9 6252 South Rainbow Blvd., Suite 100
10 Las Vegas, Nevada 89118
11 Tel: (702) 222-4021
12 Fax: (702) 248-9750
13 Attorney for Plaintiff

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

1 **AFFIDAVIT OF VINCENT MAYO, ESQ.**

2 STATE OF NEVADA)
) ss:
3 COUNTY OF CLARK)

4 1. I am an attorney duly licensed to practice law in the State of
5 Nevada. I maintain offices located at THE ABRAMS & MAYO LAW
6 FIRM, 6252 South Rainbow Boulevard, Suite 100, Las Vegas, Nevada
7 89118, and am counsel of record for Plaintiff, Adam Solinger
8 (hereinafter referred to as "Adam"), in the above-entitled action. I have
9 personal knowledge of the facts contained herein and am competent to
10 testify thereto, except for those matters stated upon information and
11 belief, and as to those matters, I believe them to be true.

12 2. After Chalese callously ignored almost every single Order
13 this Court put into place to protect the children, Adam felt as though he
14 had no choice but to take action before one of the children got hurt due
15 to Chalese's poor judgment, defiant behavior and irresponsibility. He
16 therefore filed his *Emergency Motion for an Emergency Change of*
17 *Custody; Attorney's Fees and Costs and Related Relief*, which is
18 currently scheduled to be heard on June 17, 2019, at 10:00 a.m.

19 3. A particular order of importance relates to the transportation
20 of the minor children. This Court specifically barred Chalese from letting
21 Josh drive the party's children due to his criminal record, related

1 dependency concerns and his atrocious driving record. Despite this,
2 Chalese allowed Josh to drive the children on multiple occasions.

3 4. Josh also recently broke his right leg, which was confirmed
4 via a social media post. Hence, Josh cannot physically drive a vehicle.¹

5 5. Even more concerning, and in her Opposition filed on May
6 28, 2019, *Chalese admitted that she allows Josh to drive the*
7 *children and says it is for “safety reasons” because Chalese*
8 *must take her anti-anxiety medication – a medication that*
9 *precludes her from driving.*

10 6. *Chalese now wants to drive the children this*
11 *Friday, June 7th, on a 17-hour round trip to northern Utah*
12 *and southern Idaho this weekend, despite Adam’s obvious*
13 *objection to such a drive.* Chalese admits she is medically unable to
14 drive the children anywhere, much less a three-day trip out of state. Nor
15 can Josh drive as this Court specifically forbade it. Even if the court had
16 not, Josh has a broken right foot.

17 7. However, Adam’s concern extends past this out of state trip.
18 With both Chalese and Josh physically unable to drive the children, as
19 well as Josh being legally prevented from doing so, Adam must conclude
20 Chalese is driving the children while under the direct effects of drugs

21 ¹ See the social media post, attached as **Exhibit 1**.

1 that prevent her from doing so.

2 8. Adam is terrified of what will happen if Chalese, who tested
3 positive for marijuana and admits she takes medication that precludes
4 her from driving or Josh, who has a felony for possession of illegal drugs,
5 ten traffic citations over the last nine years, was spotted purchasing
6 marijuana while the kids were in Chalese's care, was ordered not to drive
7 the children and who recently fractured his foot, were to make such a
8 long, multi-day trip with such young children. Adam sincerely believes
9 the children will be in great danger if they are permitted to go to Utah
10 this weekend and is desperate to protect them – as well as every day
11 driving by Chalese in Nevada.

12 9. Adam respectfully requests that this matter be heard on an
13 Order Shortening Time to protect the children from being placed in this
14 dangerous situation and to address Chalese's reckless disregard for the
15 Orders of this Court and the safety of the minor children.

16 10. If the Court is unable to have the matter heard prior to this
17 Friday, then Adam would request a brief, telephonic hearing as this
18 matter is an emergency. Otherwise, Adam may be forced to take steps to
19 protect his children from Chalese's admitted and immediate threat of
20 harm.

21 ///

1 11. Based on the foregoing, and for good cause, it is respectfully
2 requested that Adam's motion be heard on shortened time.
3 FURTHER, AFFIANT SAYETH NAUGHT.

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21
VINCENT MAYO, ESQ.

SUBSCRIBED AND SWORN to before
me this 5th day of June, 2019.


NOTARY PUBLIC in and for said
County and State

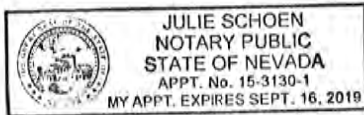


EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



Josh Lloyd

May 30 at 2:51 PM · 🌐

...

Fml



😱👍😭 7

24 Comments

👍 Like

➦ Share



Jack J Mallory Break it?

Like · 5d



Tana Lloyd Now what you go and do?

Like · 5d



Lonnie Wheeler Damn dude lol

Like · 5d

000427



Josh Lloyd Fracture break same thing

Like · 5d



1



Tana Lloyd Josh Lloyd yes it is so how did you do it

Like · 5d



Adam Gruszecki What happened bro

Like · 5d



Prince Gilly One time a gate fell on my foot and my shit looked the same it was hell 😞

Like · 5d



Crystal Hicks Nelson Oh damn

Like · 5d



Adam Moreno Wow cuz dam injury is out to get u

Like · 5d



Jennifer Girardot On shit sorry my friend hope you feel better

Like · 5d



Chad Hayes But look at that floor right there.
Wow, what an installer

Like · 5d



Josh Lloyd Chad Hayes u did that? Summerlin er?

Like · 5d



Chad Hayes There's a chance, but that was years ago.

Like · 5d



Josh Lloyd Chad Hayes that's why it looks like shit

Like · 5d




Josh Lloyd Lmfao

Like · 5d




Clayton Sterling You better slow your roll bro,u get my age those fractures and broken bones catch up to you 37 years old feelin like a 60 year old man 🤔🤔


Like · 5d · Edited

 **Josh Lloyd** Chad Hayes u did that? Summerlin er?

Like · 5d

 **Chad Hayes** There's a chance, but that was years ago.


Like · 5d

 **Josh Lloyd** Chad Hayes that's why it looks like shit

Like · 5d

 **Josh Lloyd** Lmfao

Like · 5d


 **Clayton Sterling** You better slow your roll bro,u get my age those fractures and broken bones catch up to you 37 years old feelin like a 60 year old man 🤔🤔

Like · 5d · Edited

 **Chad Hayes** Break a leg JR

Like · 5d




 **Oliver Larson** Well don't do whatever you did again. Boom, never have this problem again

Like · 4d




 **Ronald Empey** WHAT DID YOU DO ??


Like · 4d

 **Josh Lloyd** Ronald Empey stepped out onto some dirt and rolled my ankle

Like · 4d


 **Ronald Empey** bad sprain or broken??

Like · 4d

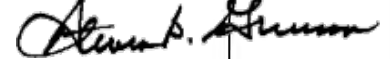
 **Josh Lloyd** Broken in 2 places 3 torn ligaments

Like · 4d



 **Ronald Empey** OUCH !! YA BETTER WATCH WHAT YOU DO!! THAT IS WHAT I MEAN WHEN I TELL YOU GUYS BE CAREFUL !!

Like · 4d



1 **RPLY**

2 Vincent Mayo, Esq.
3 Nevada State Bar Number: 8564
4 THE ABRAMS & MAYO LAW FIRM
5 6252 South Rainbow Blvd., Suite 100
6 Las Vegas, Nevada 89118
7 Tel: (702) 222-4021
8 Fax: (702) 248-9750
9 Email: VMGroup@theabramslawfirm.com
10 Attorney for Plaintiff

11 Eighth Judicial District Court
12 Family Division
13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
15 Plaintiff,)	Department: I
16 vs.)	
)	
17 CHALESE MARIE SOLINGER,)	Date of Hearing: June 17, 2019
)	Time of Hearing: 10:00 a.m.
18 Defendant.)	

19 **REPLY IN SUPPORT OF EMERGENCY MOTION FOR A**
20 **CHANGE OF CUSTODY; FOR ATTORNEY'S FEES AND COSTS**
21 **AND RELATED RELIEF AND OPPOSITION TO**
22 **COUNTERMOTION FOR CHANGE OF CUSTODY FOR**
23 **PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY,**
24 **PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF**

25 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
26 SOLINGER, by and through his attorney, Vincent Mayo, Esq., of The
27 Abrams & Mayo Law Firm, and hereby submits his *REPLY IN SUPPORT*
28 *OF EMERGENCY MOTION FOR AN EMERGENCY CHANGE OF*
29 *CUSTODY; ATTORNEY'S FEES AND COSTS AND RELATED RELIEF*
30 *AND OPPOSITION TO COUNTERMOTION FOR CHANGE OF*

1 *CUSTODY FOR PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY,*
2 *PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF.*

3 This Reply and Opposition is made and based upon the attached
4 Points and Authorities, the Appendix of Exhibits in support, all papers
5 and pleadings on file herein, and any oral argument adduced at the
6 hearing of this matter.

7 Dated Tuesday, June 11, 2019.

8 Respectfully Submitted,

9 THE ABRAMS & MAYO LAW FIRM

10 Vincent Mayo, Esq.
11 Nevada State Bar Number: 8564
12 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Attorney for Plaintiff

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 **I. INTRODUCTION**

15 Chalese seems incapable of being honest, even with this Court, and
16 her lies further show why she cannot be trusted with the children's care.
17 Chalese's inability to be truthful is extraordinarily troubling to Adam
18 and demonstrates how her Opposition & Countermotion is nothing more
19 than a fabrication. Chalese takes so many contradictory positions and
20 tells so many lies that it seems as if Chalese made random and reckless
21 blanket accusations to her attorney's staff without even reading her own

1 Opposition. The fact her supposed Affidavit does not bear a notary's seal
2 - so that her statements are not "under oath" – is very telling and is
3 likely intentional.

4 **II. REPLY & COUNTERMOTION**

5 **A. CHALESE HAS CONTINUOUSLY LIED TO AND** 6 **MISLED THIS COURT**

7 It is bad enough that Chalese continues to act in an irresponsible
8 and reckless manner, with her conduct threatening the safety of the
9 children, but now she is lying to the Court to try and hide her negligent
10 and harmful behavior.

11 **Chalese has Attempted to Enter into a Bigamous,** 12 **Common Law Marriage with Josh**

13 Chalese, for all intent and purposes, considers herself married to
14 Josh and doesn't care that she is still married to Adam. At the
15 commencement of this case, Adam stated that Chalese was obsessed
16 with Josh and that her obsession was keeping her from prioritizing the
17 needs of the children. In fact, it even blinded her to Josh's criminal and
18 abusive behavior. Sure enough, Chalese is so desperate to be with Josh
19 that she actually engaged in a wedding ceremony with Josh.

20 Realizing that she has been called out on her wedding ceremony,
21 Chalese now tries to deny it, claiming instead that it was "just a test" to
see if Adam was following her on Facebook. This is a blatant lie as

1 Chalese and Josh told friends and family on Facebook about the
2 ceremony, receiving congratulations from numerous people and never
3 correcting their representation on social media.¹ Further, Chalese
4 continues to refer to her, Josh and their children from prior marriages as
5 “their family” and she and Josh even put up a joint post stating, “We
6 aren’t step, we aren’t half, were just family.”²

7 Adam has also heard Michael, the parties’ son, state Chalese refers
8 to Josh as Michael’s “second dad.” Chalese states Michael chose to refer
9 to Josh as his second dad on his own but this is another lie as Michael
10 has only had Josh living with him for two months. No child would refer
11 to such an individual as a father in such a sort period of time unless told
12 to. The Court will notice that even if this were true, which it is not,
13 Chalese does not correct Michael and tell him Josh is not his father.
14 This is because Chalese actually believes Josh is Michael’s family now.

15 **Chalese Refuses to Take the UNLV High Conflict Class**

16 Chalese still has not taken the UNLV high conflict class, claiming it
17 is because Adam has refused to pay for the class. The truth is that in his
18 April 10th correspondence to Chalese’s counsel, Adam stated he was
19 ready and willing to pay for the class but Chalese needed to provide him

20 _____
21 ¹ See the April 7, 2019 Facebook post, attached as **Exhibit 22**.

² See the May 27, 2019 Facebook post, attached as **Exhibit 23**.

1 proof that she signed up for the class (as Adam did not want to spend
2 limited funds on a class Chalese would not follow through on).³ Chalese
3 never provided this information.

4 **Chalese Refuses to Provide Proof of her Employment**

5 Per the March 19th Order, Chalese was to provide Adam and his
6 counsel proof of her employment when she obtained same, including but
7 not limited to her date of hire, pay structure, etc. This was so family
8 support could be reassessed. Then on May 20th, Chalese admitted in a
9 text that she had obtained employment.⁴ She followed this with a text
10 dated May 28th – the same day she filed her Opposition – wherein
11 Chalese asked Adam to pick up the children from daycare because she
12 was just getting off work and didn't believe she would make it to the day
13 care in time.

14 Now knowing this information may result in Adam's support being
15 reduced, Chalese refuses to provide this information – and even lies
16 about the job. Chalese stated in her May 28th Opposition that Adam's
17 claim she is working doing hair is a "flat out lie." So, what is going on?
18 The answer is that Chalese admitted to working but does not want to
19 provide her financial information – as is required by the March 19th
20 Order – as she does not want the family support order revisited and

21 ³ See the April 10, 2019 correspondence, attached as **Exhibit 24**.

⁴ See the May 20, 2019 text, attached as **Exhibit 25**.

1 reduced.⁵

2 **Chalese Finally Admits that Josh is Contributing to Her**
3 **Expenses**

4 Chalese states Josh has no income as he went off of disability on
5 April 8th. This would mean that Josh has returned to work but Chalese
6 conveniently makes no mention of this. However, she does state Josh is
7 “already paying half of the utility cost of the home.” What Chalese
8 doesn’t do is state how much that is exactly (so Adam and the Court can
9 determine whether these sums are sufficient) nor provide an updated
10 FDF. It is of note that Chalese’s counsel represents Josh in his custody
11 case and represented to the judge in that case that Josh’s disability had
12 ended in April but that he was now on unemployment. Chalese’s counsel
13 should have disclosed this fact in this case.

14 Turning to Josh moving into the house, the operative question is
15 when Josh moved in because a reasonable person could conclude, based
16 upon the totality of untruths and lies in this case, that he had been living
17 there the entire time. Additionally, but for this motion, when would

18 ⁵ Further, being that Chalese told Adam she is working but told this Court she is not,
19 Adam was surprised to find out that Chalese had signed the verification to her
20 Opposition stating that she had reviewed the same and agreed with the factual
21 contentions contained within the Opposition – especially that she was not working.
So, the question then becomes whether she actually signed it, whether she actually
read the opposition, whether she’s lying by trying to convince the Court she is not
working – despite her messages to Adam, – or whether she is having her counsel
violate ethical rules by submitting untrue contentions to this Court. The bottom line
is that any of these questions and their requisite answers place a pallor over these
proceedings that cannot be ignored.

1 Adam have received notice that Josh was now living with his children
2 when they reside with Chalese?

3 Finally, Josh just posted some type of leg injury on Facebook and
4 when a friend asked him what happened, he responded that it was the
5 same thing as last time: some type of rolled ankle. So, Josh is now likely
6 on disability again. It appears that disability seems to be a frequent
7 occurrence for him despite the fact that he enjoys outdoor activities that
8 are antithetical to being disabled.

9 **Chalese Refuses to Admit She Obtained Another Vehicle**

10 Chalese alleges Adam took the only vehicle she had left. However,
11 Adam spoke to his father regarding the truck and Adam's father was not
12 agreeable to Chalese driving it anymore – regardless of the Court's
13 restrictions on its use – as he could not trust Chalese and the liability in
14 the event she violated the court's decision and the truck was involved in
15 an accident was too great. Being that Chalese continued to allow Josh to
16 drive the children, as witnessed by Adam's PI and in violation of this
17 Court's order, Adam's father made the right decision.

18 Regardless, Adam did offer that Chalese use \$7,000 in community
19 funds with which to purchase a vehicle. Chalese refused to do so.
20 Instead, she had her mother and stepfather in Florida provide her a
21 vehicle – Chalese does not disclose this fact.

1 **Chalese Forced Adam to Obtain a PI**

2 As Chalese's erratic behavior threatened the safety of the minor
3 children, Adam acted in the children's best interests to hire a PI. The
4 move was a smart move as the PI confirmed Chalese has been driving
5 the children while on medication she claims doesn't permit her to drive
6 and that she has permitted Josh to drive the children – directly in
7 violation of this Court's March 19th Order.⁶ At any rate, Adam's father
8 assisted in the cost of the PI.

9 **Josh's Criminal Behavior Threatens the Children's Safety**

10 Josh is presently involved in custody litigation in which the mother
11 of his child, Carmen Watson, has presented evidence that Josh is a
12 perpetrator of domestic violence and is unfit to have custody. This was
13 addressed by Adam in his Emergency Motion.

14 Josh claims Carmen voluntarily withdrew the TPO she has against
15 him and she will testify in his favor in the criminal case.⁷ However, in
16 her Motion filed June 7, 2019, Carmen denies this and at no point states
17 she would testify on behalf of Josh. Instead, she reiterates that Josh is an

18 ⁶ Further, the use of GPS tracking devices by a private investigator related to pending
19 litigation is legally permitted.

20 ⁷ Of even more interest, Chalese's counsel represents Josh as well in his custody case.
21 Defense Counsel affirmatively represented that Josh was only at the marital
residence occasionally when the PI established Josh is living at the community
home. Inquiring minds wonder what exactly Chalese's counsel knew and did not
disclose but was in an ethically conflicted position.

1 abusive addict. This has consisted of Josh striking Carmen for years,
2 including kicking her in the fact several times. ***Carmen also states***
3 ***Josh is addicted to Loratabs, has been drunk while watching***
4 ***the children and allowed her young son to see pornography***
5 ***while on a visit with him.***

6 **Chalese Continues to Allow Josh – an Alcoholic, User of**
7 **Marijuana and Abuser of Pain Medications – To Drive the**
8 **Children**

9 ***Chalese literally admits to violating the Court's order in***
10 ***her opposition by allowing Josh to drive the parties' children.***

11 Chalese' excuse is that she cannot drive due to anti-anxiety medications
12 she has been taking so Josh had to. Chalese could have simply asked
13 Adam to perform the transportation for the children though. Instead,
14 Chalese recklessly drove the children herself or had Josh do so.

15 It must be made clear that despite being on medications Chalese
16 admits bar her from driving that she has nevertheless been driving the
17 children. Adam's PI verified that, as well as the fact Chalese had Josh, a
18 drug addict the court specifically barred from driving the children, drive
19 the children.

20 Chalese embroils herself in another lie by claiming that she is on
21 anti-anxiety medications because of the PI but Chalese did not know
about the PI until recently and according to her and her counsel, she has

1 been on severe anti-anxiety medications for months.

2 Further, Chalese was caught in another lie when she asked to drive
3 the children up to northern Utah this past weekend. When Adam and his
4 counsel asked how she could drive if her severe anxiety medications
5 barred her from doing so and Josh was forbidden, Chalese stalled. She
6 eventually stated she could look into someone else driving but quickly
7 changed her mind and stated she had been off the medications for weeks
8 – even though her Opposition, filed May 28th, states she was still using
9 the medications at that time. Regardless, Adam stated Chalese had a
10 mandatory drug test coming up and asked Chalese to take the drug test
11 early to confirm the drugs were no longer in her system. Mr. Mayo also
12 asked this of Chalese' counsel. Not coincidentally, Chalese declined.

13 Finally, if her anxiety is that bad and requires that strong of a
14 medication, then she cannot adequately care of the children. Someone,
15 who cannot operate a motor vehicle while on the medication should not
16 be responsible for the lives and well-being of two small children who are
17 incapable of helping themselves. Not to mention, as set forth below,
18 Chalese absolutely has been using alcohol in addition to her anxiety
19 medication which is an extraordinarily bad combination that has led to
20 numerous driving deaths across the country. If she cannot safely drive
21 the children, then she cannot have joint custody of the children.

1 Chalese also admits to leaving Josh alone with Michael while she
2 took Marie to the emergency room. The Court should ask itself while
3 Chalese didn't first call Adam, Michael's father, to watch Michael instead
4 of her abusive addict boyfriend.

5 **Chalese Has Drank While Watching the Children in**
6 **Violation of the March 19th Order**

7 From the fact Chalese bought a case of beer when she picked up
8 the minor children for her visitation to photos of beer strewn about the
9 marital residence while the children were in Chalese's care, it is clear
10 Chalese is drinking while they are in her care. Otherwise, is Chalese
11 stating that the case of beer for the weekend was just for Josh? If so,
12 such a fact is frightening to Adam.

13 Additionally, Carmen sent Adam a picture she obtained from Josh
14 in the back yard of the marital residence. Clear in the picture is a little
15 girl playing and Chalese sitting down at a table with two empty beer
16 bottles in front of her.⁸

17 If neither Chalese nor Josh is supposed to drink twenty-four hours
18 before or while Chalese has the children, then why is a picture with
19 empty beer bottles in front of Chalese? Why is a beer run so important
20 on a weekend when they are responsible for the children? Josh had at
21 least 3 beers while watching his children play in the street and then later

⁸ See the photo of Chalese drinking beer, attached as **Exhibit 26**.

1 that same day he went to a grocery store, perhaps for more beer, after
2 having already had several beers and very possibly while drunk driving.

3 Turning to marijuana, as set forth in the previous filing, Josh went
4 to a dispensary and purchased marijuana. There is no reason for him to
5 have purchased marijuana, given that they cannot consume it with the
6 children.

7 **Blackmail Can be Added to Josh's List of Criminal**
8 **Behavior**

9 Josh attempted to extort and blackmail Adam. Josh threatened to
10 make false and salacious allegations regarding some type of
11 pornography against Adam to the media and the State Bar of Nevada.
12 Specifically, "Did you get my message? Pretty sure this wouldn't be good
13 for your job if your habits got out to the media or the bar." Under
14 Nevada law, a person is guilty of extortion if the person with the intent to
15 extort intended to affect any cause of action, whether or not the purpose
16 was accomplished, threatens directly or indirectly (1) to accuse any
17 person of a crime, (2) to publish or connive at publishing any libel, or (3)
18 to expose or impute to any person any deformity or disgrace is guilty of a
19 Category B felony and shall be punished by 1 to 10 years in state prison.

20 Adam, in an effort to protect his children made some very simple
21 requests, which this Court granted. He wanted his children not to be left

1 alone with Josh given his drug usage and convictions and not to be
2 driven by him because of his horrible and dangerous traffic citation
3 record. Josh then messaged Adam to ask him to lift these requests
4 because Chalese now had a job and it would be hard for her to care for
5 the children while working⁹, unless Josh assisted. Instead of being a
6 decent human being and just asking or trying to convince Adam that he
7 was a changed person and his prior criminal history is not reflective of
8 who he is as a person, he instead committed the crime of extortion by
9 threatening to lie about Adam to the media and the State Bar about
10 some contrived child porn allegation unless Adam “kept [Josh’s] name
11 out of his mouth.”

12 **Chalese Even Lies When It Comes to the Health of the** 13 **Children**

14 The situation with Marie’s teeth was not a medical emergency.
15 Indeed, when Adam spoke to the dentist, the original reason for taking
16 Marie to the dentist was to remove the black sealant from Marie’s teeth
17 for cosmetic reasons. When Adam found out, he vetoed the surgery due
18 to the risks associated with being put under at such a young age and
19 being so little. Magically, Marie now had a broken tooth that constituted
20 good cause to do the same exact surgery that was previously vetoed. In
21 candor, Adam acknowledges that the tooth could have been damaged at

⁹ This further adds to the confusion regarding when Chalese obtained employment.

1 the day care, but it also could have been damaged when Marie was in the
2 Chalese's care.

3 When the surgery was scheduled, Adam anticipated it going
4 forward. Leading up to the surgery, Adam called to the dental office to
5 pay for his half only to be told that it had been rescheduled by Chalese
6 with no notice or discussion because there was a pre-surgery visit that
7 Chalese failed to inform Adam he was required to do because Adam had
8 the children during the time frame of the required visit. If Adam would
9 have been given notice of ANY of these appointments, he would have
10 been there. Instead, Chalese tried to clumsily use gamesmanship to the
11 detriment of the children. When Adam regained the children on Monday
12 June 3, 2019, he noticed that one of Marie's front teeth was now severely
13 damaged and when he inquired what happened Chalese tried to deflect
14 by claiming that it happened before she had them. Yet, the last time
15 Chalese noticed a slight chip in the front tooth, she immediately asked
16 what had happened. So, her claim that it must have happened in Adam's
17 care seems disingenuous to say the least given that she didn't mention it
18 until Adam pointed it out.

19 The reason that the fever and quading weekend is so important is
20 because it demonstrates the outright lies to health care providers and
21 Adam by Chalese. On the Wednesday before the quading weekend,

1 Chalese claimed that Michael had a 101-degree fever and that she may
2 take him to the ER. Adam was out of the jurisdiction and asked to be
3 updated. There was no update until the following Monday when Adam
4 was informed the children were sick and had an antibiotic and that they
5 could not go to school the following day. When Adam called the
6 pediatrician, at the urging of the Emergency Room doctor, who he took
7 Marie to see on Monday night, he found out that Chalese claimed that
8 the Children had a high fever for the past three day and were coughing
9 and miserable. So, if the children were actually sick, then Michael had a
10 fever for nearly a week before Chalese sought medical care and delayed
11 seeking of the same until she had her fun in the desert. If the children
12 weren't sick, then Chalese is mentally ill and fabricating stories to either
13 make life difficult for Adam¹⁰ or because she is sick and twisted and
14 needs emergency psychiatric care. Either scenario is not good for the
15 children.

16 This gamesmanship is further demonstrated by the fact that
17 Defendant waited to tell Adam that the same test the emergency room
18 was doing on Marie that Monday night was already done during the day
19 by the pediatrician and came back negative. Defendant and her counsel's
20 response is that Adam didn't specifically ask. How that seems like an

21 ¹⁰ She made a point of asking on Tuesday who was watching the kids because she
wanted to see how Adam rearranged his schedule to accommodate the children.

1 appropriate response is baffling. Normal parents share information
2 about their children with each other.

3 With regards to the prescription, which was from a different
4 emergency room visit that Chalese took Marie to, there was no incorrect
5 prescription. Chalese provided Adam with the paperwork from the ER.
6 That paperwork had a prescription for “magic mouthwash,” which is
7 supposed to numb pain in the mouth due to fever induced mouth sores.
8 That’s the prescription that was filled and given to Adam. So how there
9 can be an incorrect prescription doesn’t make sense.

10 Additionally, when Defendant let Adam know about the ER and
11 what was going on, she claimed that she was disgusted with him and that
12 the doctor claimed that Marie must have been miserable and had a fever
13 for at least three days. She continued by saying she was so disgusted that
14 she was seeking sole custody because of it. When Adam pointed out that
15 if the fever allegation were true, then Marie would have had a fever that
16 preceding Wednesday, when Chalese was caring for the children.
17 Additionally, Adam’s mother Dianne Solinger, a retired physician, was in
18 town Thursday through Friday and spent ample time with Marie. She
19 would testify that Marie not only didn’t have a fever but that there was
20 nothing wrong with her in any way, shape, or form. Keeping up to speed
21 with the timeline, Chalese had already accused Adam of possessing child

1 pornography at this point. That didn't make her seek sole custody. But a
2 fabricated fever and misery did. However, when it was pointed out that it
3 was impossible and she was lying, she resorted to her same false
4 allegations of making things up to deflect from her own mental illness
5 and failed parenting. But to bring things back around to the claim that
6 the pharmacy didn't have the medication, if Marie was that miserable
7 and "neglected" in Chalese's eyes, then she would have found another
8 pharmacy that did have the medicine.

9 Adam would point out that Chalese claims that she had to leave
10 Michael with Josh to rush to the emergency room with Marie. But that
11 doesn't explain why she left both kids with Josh later THAT SAME DAY
12 to go on a beer run. Or why she didn't go to a pharmacy while she was
13 out getting said beer to get the medicine that Marie was prescribed.¹¹

14 **Chalese Continues to Demean and Berate Adam**

15 Chalese states in her Opposition that she no longer curses at Adam
16 in communications and is civil. In addition to the fact Chalese continues
17 to do so in person, she also continues to violate the behavior order in her
18 texts to Adam. In her May 17, 2019 text message, Chalese gives Adam the
19 middle finger emoji and then the comment, "Are you going to complain

20 _____
21 ¹¹ Which must not have been a big deal because she waited until the next day and
made four trips to get the medicine from the Pharmacy the next day just so that she
could ensure that it went with the kids to Plaintiff's house.

1 that I'm being mean to you again? Lmfao[.]” To be clear, Adam doesn't
2 care because he deals with much worse on a daily basis as a criminal
3 defense attorney. It's just important to note that he's not accused of
4 violating the behavior order that Chalese asked for and instead it's
5 Chalese that keeps violating the order she requested. She cannot even
6 abide by the order she requested from this Court.

7 **Chalese Continues to Discuss the Divorce to the Children**

8 Chalese picked up the kids from Adam on Monday May 27, 2019 at
9 about 5:41 P.M. per the regular custody schedule. After she picked up the
10 kids and she drove away with Josh in the passenger seat, she messaged
11 Adam to ask who had cut Michael's hair. Adam explained that when he
12 got the children, he noticed that Michael's hair cut was very choppy and
13 uneven. So, he took it upon himself to take him to a Supercuts where the
14 cosmetologist cut the hair to an even and uniform style. Adam then
15 inquired whether Chalese was texting and driving and she claimed that
16 Josh was using her phone to text at her behest. An argument then
17 ensued about whether Adam should have taken Michael to get his
18 haircut fixed given that Chalese had been the one to cut Michael's hair as
19 an audition to her current place of work. Adam was unaware that this
20 was how Michael's hair had been cut as he assumed Michael got access
21 to scissors and had cut his own hair. At some point, a nonsensical text

1 message came in and Adam inquired whether Chalese had been
2 drinking. Chalese then countered that she had not been drinking and it
3 was talk to text and an obvious error. Regardless, the point remains that
4 she was driving with the kids and arguing with Adam about Michael's
5 hair and the cutting thereof in front of them, whether it was talk to text
6 or her telling Josh what to say. This just serves as another example of
7 her inability to help herself and not violate the Court's orders.

8 **Chalese Continues to Show Aggressive and Nasty**
9 **Behavior by Yanking the Children Out of Someone's**
10 **Hands, Causing Another Scene at the Children's Daycare,**
11 **Yelling, "I Don't Give a Fuck!" in Front of the Children**
12 **and Then Recklessly Peeling Out of the Daycare Parking**
13 **Lot**

14 On Friday, May 31st, Adam's girlfriend got out of work early and
15 picked the children up from day care to take them swimming for a short
16 while. When Adam received a text from Chalese about the children, he
17 mentioned where the children were but that they would be back at the
18 day care shortly.

19 In response, Chalese flipped out, threatened to call the police and
20 generally sent many aggressive messages, despite the stipulation that the
21 parties have the children until the end of the school/daycare day. When
Chalese met up with the children at the day care, she proceeded to yank
and nearly drop Marie from Adam's girlfriend's arms and yanked

1 Michael by the wrist. This was all caught on video and recorded by
2 Adam's girlfriend's daughter who witnessed this behavior as well.
3 Concerned about who was driving, the video recording continued,
4 wherein Chalese rolled down the window and shouted, "I don't give a
5 fuck!!!" She then peeled out of the parking lot, losing traction briefly in
6 her truck. Chalese is completely and utterly unhinged, unfit, and this
7 behavior goes to show that she is abusing her medication.

8 **Chalese's Allegation of Child Pornography Against Adam**
9 **is the Most Ridiculous Allegation**

10 Chalese makes some very serious but ridiculous allegations. These
11 allegations are shown to be false based upon the evolution of the
12 Chalese's lie. As set forth in the original motion, Chalese's original claim
13 was that she had found child pornography on devices found in the
14 marital residence that she attributed to Adam – claiming it was located
15 in an Ipad and in bizarre fashion, on "a drone." Then, she claimed that
16 there are images as young as 9 years old. Then Chalese claimed she
17 would drop the issue of child pornography, which she then claimed
18 consisted of a "hand drawn child porn" in exchange for not having to
19 take ONE random drug test during the month of June 2019.

20 When Adam challenged Chalese's claim, she doubled down and
21 claimed that she never saw anything and that her "attorney['s] IT guy

1 was seeing what financials you were hiding and came across the porn.”
2 To date, and despite claiming Chalese would provide the proof directly
3 to Adam, as well as to the Court confidentially (via a left side filing) she
4 has failed to. Chalese’s claims are horrible and such a reckless and
5 irresponsible allegation cannot be condoned.

6 If Adam were a danger to the children, why on earth would Chalese
7 drop the whole allegation in exchange for not being subjected to ONE
8 drug test – one drug test that’s not even random as Chalese knows about
9 when it will be. That is the type of behavior that represents a clear and
10 present danger to the children: someone who is so addicted to
11 substances that she’s willing to let her children be around someone she
12 believes is a pedophile in exchange for the ability to forgo ONE drug test.
13 Or, the truth is that she knows there’s no truth to her claim and just
14 wants to leverage the lie for not having to take ONE drug. This makes
15 Chalese an even more dangerous person because it shows that she will
16 lie about ANYTHING to get what she wants and that she doesn’t care
17 about the consequences of her actions. The Court should remember that
18 Adam is an actual criminal defense attorney who handles these types of
19 cases and knows when someone is engaging in criminal and reckless
20 behavior when he sees it.

21 ///

1 Worse, Chalese's counsel appears to jump on Chalese's pack of lies
2 by stating the FBI are not willing to investigate while the issue is being
3 fought through the "Circuit Courts". This statement makes absolutely no
4 sense as there is no litigation in any court on this fabricated claim. To
5 Adam's knowledge, and Chalese's admission, not even the police, D.A.
6 nor CPS have been contacted.¹²

7 ///

8 ///

9 ///

10 ///

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14 ///

15 ///

16

17 ¹² Additionally, Adam is very concerned about Chalese's counsel's tactics. As the
18 Court recalls, at the last hearing, Chalese's counsel wanted his "IT guy" to stay in the
19 sealed hearing. Thereafter it was revealed that the "IT guy" was actually an IT boy,
20 being that he was just 16 years of age. So, if the allegations are to be understood
21 correctly, Chalese's counsel has a 16-year-old boy looking at alleged cartoon child
pornography and looking for actual child pornography. Such conduct could be
criminal in nature. At a minimum, it appears defense counsel has admitted to
contributing to the delinquency of a minor and the same type of conduct that cause
Ninth Circuit Court of Appeals Judge Alex Kozinski to step down. Or, the more likely
explanation is that this is all an utter fabrication on the part of the Defense to sling
mud to try to cover up for the cornucopia of wrong doings and failures on the
Defense behalf.

1 **III. CONCLUSION**

2 Based upon the foregoing, Adam respectfully requests that this
3 Honorable Court grant the relief requested in this Motion and deny
4 Defendant's requested relief in its entirety.

5 Dated Tuesday, June 11, 2019.

6 Respectfully Submitted:

7 THE ABRAMS & MAYO LAW FIRM

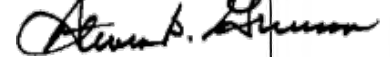
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13 Attorney for Plaintiff
14
15
16
17
18
19
20
21

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that the foregoing *REPLY IN SUPPORT OF*
3 *EMERGENCY MOTION FOR AN EMERGENCY CHANGE OF*
4 *CUSTODY; ATTORNEY'S FEES AND COSTS AND RELATED RELIEF*
5 *AND OPPOSITION TO COUNTERMOTION FOR CHANGE OF*
6 *CUSTODY FOR PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY,*
7 *PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF* was filed
8 electronically with the Eighth Judicial District Court in the above-
9 entitled matter, on Tuesday, June 11, 2019. Electronic service of the
10 foregoing document shall be made in accordance with the Master Service
11 List, pursuant to NEFCR 9, as follows:

12 Louis C. Schneider, Esq.
13 Attorney for Defendant

14 
15 _____
16 An Employee of The Abrams & Mayo Law Firm
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1 **EXH**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: VMGroup@theabramslawfirm.com

Attorney for Plaintiff

6 Eighth Judicial District Court

Family Division

7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D

9 Plaintiff,

) Department: I

10 vs.

11 CHALESE MARIE SOLINGER,

Defendant.

12 **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S**
13 **REPLY IN SUPPORT OF EMERGENCY MOTION FOR A**
14 **CHANGE OF CUSTODY; FOR ATTORNEY'S FEES AND COSTS**
15 **AND RELATED RELIEF AND OPPOSITION TO**
16 **COUNTERMOTION FOR CHANGE OF CUSTODY FOR**
17 **PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY,**
18 **PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF**

19 ///

20 ///

21 ///

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Exhibit	Description
22	April 7, 2019 Facebook post
23	May 27, 2019 Facebook post
24	April 10, 2019 correspondence
25	May 20, 2019 text
26	Photo of Chalese drinking beer

Dated Tuesday, June 11, 2019.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM

Vincent Mayo, Esq. (8564)
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF EMERGENCY MOTION FOR AN EMERGENCY CHANGE OF CUSTODY; ATTORNEY'S FEES AND COSTS AND RELATED RELIEF AND OPPOSITION TO COUNTERMOTION FOR CHANGE OF CUSTODY FOR PRIMARY PHYSICAL AND SOLE LEGAL CUSTODY, PSYCHOLOGICAL EVALUATION OF THE PLAINTIFF; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Tuesday, June 11, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Louis Schneider, Esq.
Attorney for Defendant

/s/ Chantel Wade
An Employee of The Abrams & Mayo Law Firm

EXHIBIT 22

EXHIBIT 22

EXHIBIT 22



Josh Lloyd is with Chalese Anderson.



Yesterday · 🌐 · 🌐



Married Chalese Anderson

Yesterday



2



Like



Share



Josh Lloyd is with Chalese Anderson.

April 7 at 8:25 PM · 🌐

#MYTEAM



👍❤️ 31

10 Comments



Like



Share



Crystal Hicks Nelson Wow now that's a clan love ya

Like · 2d



1



Josh Lloyd Love ya too

Like · 2d



Crystal Hicks Nelson Josh Lloyd I wasn't there but got to enjoy the pics and Videos which made me feel that I was with ya all

Like · 2d



2



Chalese Anderson That's the way we became the Brady Bunch!

Like · 2d



4



Josh Lloyd

Add Friend

Message



Timeline

About

Friends

Photos

More

DO YOU KNOW JOSH?

To see what he shares with friends, send him a friend request.

Add Friend

Intro

Lives in Las Vegas, Nevada

From Las Vegas, Nevada

Married to [Chalese Anderson](#)

Photos



Josh Lloyd
32 mins ·



Finally realized
I was never asking
for too much,

I was just asking

zuCoeAVktoWZ4VzAxkVvSoo1C97J POs2oDIW9I26zFOL2iVEDNiwOR1SaaCvNCCaa&timeline context item tveo=intro card relationship&timeline context item :

EXHIBIT 23

EXHIBIT 23

EXHIBIT 23

Event ▾

Add Friend



Chalese Anderson Lloyd

20 hrs · 🌐

...

Josh Lloyd 5/27/19, 11:41 AM





Chalese Anderson Lloyd is with [Josh Lloyd](#).

17 hrs · 🌐

...

"Families are the compass that guides us. They are the inspiration to reach great heights, and our comfort when we occasionally falter." –Brad Henry

Some people seem to be confused by who I claim as family. Family is love. Love is welcome in my family. Anyone have questions?

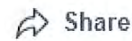


8

2 Comments



Like



Share



Rebecca Neese Love you sis

Like · 15h



1



Morgan Neese Evans ❤️ you!

Like · 14h



Chalese Anderson Lloyd is with [Josh Lloyd](#).

17 hrs · 🌐

...

Family isn't always blood. It's the people in your life who want you in theirs; the ones who accept you for who you are. The ones that would do anything to see you smile and who love you no matter what.

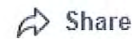


8

1 Comment



Like



Share



Catrina Jenkins You are ALL family that we love very much 🥰

Like · 16h

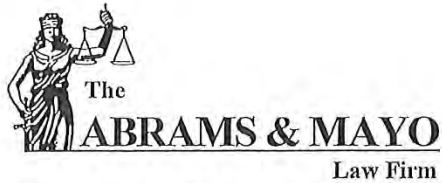


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EXHIBIT 24

EXHIBIT 24

EXHIBIT 24



† Jennifer V. Abrams, Esq.
† Vincent Mayo, Esq.
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
P. 702.222.4021 F. 702.248.9750
www.TheAbramsLawFirm.com

Wednesday, April 10, 2019

Louis C. Schneider, Esq.
430 S. 7th Street
Las Vegas, Nevada 89101

Re: Adam M. Solinger v. Chalese M. Solinger
Case Number: D-19-582245-D

Dear Mr. Schneider:

I am in receipt of your letter dated April 4, 2019 and we respond as follows to your client's numerous assertions.

Modification of the Temporary Custodial Arrangement

Attached is the Stipulation and Order modifying the timeshare to reflect the parties' current arrangement they are in agreement on and presently following. Please review, execute and return to my office.

Chalese's Vexatious Nature

Chalese could be civil and cooperate in effectuating the Court's orders. Instead, she chooses to be spiteful, oppositional and apathetic in following the court's orders. Chalese is achieving nothing by being this way, other than to unnecessarily incur attorney's fees on both sides and make it harder to settle this matter. A review of our responses below evidence Chalese's behavior, which we request you speak to her about and remedy.

Selection of Daycare

Regarding daycare, the parties said in court they wanted to utilize a less expensive daycare. After court and in the hallway, Chalese said in my presence that she was fine with Adam selecting the daycare and then forwarding her the information. That is what Adam did.

As for the location of the daycare, Chalese will be moving once the marital residence sells and it does not make sense to place the children in a daycare

† Board Certified Family Law Specialist
* Fellow of the American Academy of Matrimonial Lawyers; Admitted in Nevada, California, and Louisiana

The Abrams & Mayo Law Firm

half way between the parties' current residences when that location will change in the next few months, thereby necessitating another daycare. Such continuous transfers from daycare to daycare do not provide stability and therefore are not in any child's best interests.

Joint Bank Account

Your client's statement that Adam depleted community funds is entirely inaccurate. We have multiple text messages between the parties regarding the joint bank account and Adam's proposals on how either close it or remove his name. Chalese chose to instead hurl insults at Adam rather than to work amicably with Adam to resolve the issue. Regardless, the account was closed and Chalese received the entire amount of around \$8,000 from it. Chalese should have used those funds to purchase a vehicle – per our recommendation in our last letter.

The Two Dogs

Regrettably, Adam's present living situation does not allow for him to take the two dogs. Chalese's position that she cannot care for them for now seems insincere, especially since she chose to purchase during this divorce an expensive, pure breed boxer. Technically, the animals are community property and need to be maintained where they are for the time being. Chalese wanted to remain in the marital residence, which comes with the benefits and familiarity of doing so. However, along with that comes maintaining the residence and its contents, which includes the temporary care of the dogs. Adam simply cannot take them at this time. We hate to say it but if Chalese will not keep the dogs, they may need to be taken to a shelter.

Utilities

Chalese was on notice as early as March 19th she would need to switch the utilities into her own name as he would be terminating the service if she did not on April 1st. Adam even reminded her of it the next day on March 20th, as the attached text message demonstrates. The bills through the end of March were paid up and Chalese did not tell Adam she did not have sufficient funds to switch them over, nor did she ask for his assistance. Hence, if Chalese knew and chose to do nothing until after the utilities were switched off, thereby affecting the children, that is on her, not Adam. It is of note that this type of behavior, wherein Chalese is negligent in her responsibilities, makes it difficult for Adam to settle custody.

UNLV Cooperative Parenting Class

As for the UNLV Cooperative Parenting Class, once Chalese sends Adam the confirmation that she is signed up for the class, along with the dates and amount due, he will transfer the money to her.

The March 19, 2019 Order

In regard to your requested changes to the March 19, 2019 order:

- (1) I have changed his to her on page 2, line 16;
- (2) I have corrected the attorney's fees amounts;
- (3) I reviewed the video and corrected same in the Order; and
- (4) I reviewed the video and you are correct that the court did not order Chalese to commence keeping a diary at this time, but rather in three months' time if she does not have employment by that time. I have revised the Order to reflect same.

Payment of Mortgage

As both parties are obligated to contribute one-half of the mortgage and for simplicity purposes, Adam proposes he withhold Chalese's half of the mortgage from the support payments and Adam will in exchange pay the whole monthly mortgage. Please confirm if this is acceptable.

As always, should you have any questions or comments, please do not hesitate to call. Thank you for your time and attention to this matter.

Sincerely,

THE ABRAMS & MAYO LAW FIRM

Vincent Mayo, Esq.

CC: Mr. Adam Solinger

EXHIBIT 25

EXHIBIT 25

EXHIBIT 25

10:51



c_soli@icloud.com >

Mon, May 20, 2:35 PM

Since it's court ordered for me to tell you, I am working at cookie cutters in Silverado ranch area. Still working about hours and schedule.

Can we please get everything settled outside of court

Mon, May 20, 7:20 PM

I just got out of work. Can I please talk to the kids?

Tue, May 21, 7:17 AM

I feel the same way about settling, I will text you later tonight after work.

Tue, May 21, 4:23 PM

Can I come by this weekend to get my stuff?

Thought you were going out of town?



iMessage



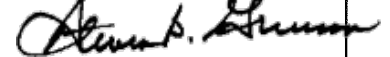
EXHIBIT 26

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EXHIBIT 26



000471



1 **MOT**

2 LOUIS C. SCHNEIDER, ESQ.
3 Nevada Bar No. 9683
4 430 South 7th, Street
5 Las Vegas, Nevada 89101
6 (702) 435-2121
7 Attorney for Defendant

8 **DISTRICT COURT**
9 **FAMILY DIVISION**
10 **CLARK COUNTY, NEVADA**

11 ADAM MICHAEL SOLINGER,)
12) Case No.: D-19-582245-D
13 Plaintiff,) Dept. No.: I
14)
15 vs.)
16)
17 CHALESE MARIE SOLINGER,)
18)
19 Defendant.)
20)
21)
22)

23 **MOTION FOR AN ORDER TO SHOW CAUSE RE: HOLD PLAINTIFF IN**
24 **CONTEMPT FOR FAILING TO ALLOW DEFENDANT'S VISITATION**
25 **WITH THE MINOR CHILD THE DEFENDANTS COURT HEARING HELD**
26 **OF MARCH 12TH, 2018 VIOLATION OF COURT ORDERS; DEFENDANT**
27 **SHOULD BE AWARDED ATTORNEY FEES AND COSTS FOR HAVING TO**
28 **FILE THIS MOTION FOR AN ORDER TO SHOW CAUSE**

COMES NOW, Defendant, CHALESE MARIE SOLINGER, by and through
her attorney, LOUIS C. SCHNEIDER, ESQ., and moves this Honorable Court for the
following relief:

1. An order holding Plaintiff in Contempt of Court for failing to allowing
visitation with the minor child to Defendant at the conclusion of her March 19th
2019 hearing.
2. An order requiring Plaintiff to allow Defendant visitation with the minor child.
3. Due to the ATTEMPTED Defendant's visitation with the minor children and
the fact that Plaintiff is not complying by the court orders Defendant is
requesting make up time, sanctions, and attorney's fees.
4. An award of attorney fees and costs for having to file this Motion for an Order
to Show Cause;
5. For any further relief that this Court deems just and equitable.

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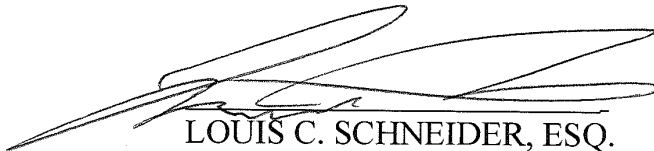
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1 This Motion is made and based on the papers and pleadings on file, the
2 Declaration of CHALESE MARIE SOLINGER, the Points and Authorities
3 submitted, and any arguments that may be adduced at the time of hearing on
4 this matter.
5

6
7 DATED this 12 day of June, 2019.

8 Respectfully Submitted By:

9
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LOUIS C. SCHNEIDER, ESQ.

Nevada Bar Number 9683

430 South Seventh Street

Las Vegas, Nevada 89101

(702) 435-2121

Attorney for Defendant

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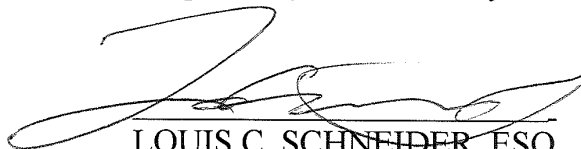
NOTICE OF MOTION

TO: ADAM MICHAEL SOLINGER, PLAINTIFF;
TO: VINCENT MAYO, ATTORNEY FOR PLAINTIFF.

You and each of you, please take notice that the foregoing motion will come on
for hearing before this court in department _____ on the _____ day of
_____, 2019, at the hour of _____ .m., or as soon
thereafter as counsel may be heard.

DATED this 2 day of June, 2019.

Respectfully Submitted By:



LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number 9683
430 South Seventh Street
Las Vegas, Nevada 89101
(702) 435-2121
Attorney for Defendant

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POINTS AND AUTHORITIES

CONTEMPT

NRS 1.210 provides, in pertinent part:

Every court shall have power:

(3) To compel obedience to its lawful judgments, orders and process, and to the lawful orders of its judge out of court in an action or proceeding pending therein.

NRS 22.010 provides, in pertinent part:

The following acts or omissions shall be deemed contempt's:

(3) Disobedience or resistance to any lawful writ, order, rule or process issued by the court or judge at chambers.

NRS 22.100 provides, in pertinent part:

(1) Upon the answer and evidence taken, the court or judge or jury, as the case may be, shall determine whether the person proceeded against is guilty of the contempt charged.

(2) Except as otherwise provided in NRS 22.110, if a person is found guilty of contempt, a fine may be imposed on him not exceeding \$500 or he may be imprisoned not exceeding 25 days, or both.

(3) In addition to the penalties provided in subsection 2, if a person is found guilty of contempt pursuant to subsection 3 of NRS 22.010, the court may require the person to pay to the party seeking to enforce the writ, order, rule or process the reasonable expenses, including, without limitation, attorney's fees, incurred by the party as a result of the contempt.

///

1 A.

2 **DEFENDANT SHOULD BE HELD IN CONTEMPT OF COURT FOR**
3 **FAILING TO RETURN THE MINOR CHILD AT THE CONCLUSION OF**
4 **THE DEFENDANTS COURT HEARING HELD OF MARCH 12ST, 2018**

5 On March 19th, 2019, the parties appeared before this Honorable Court for a
6 Case management Conference.

7
8 At the conclusion of the hearing, the Court ordered that Defendant shall have
9 temporary visitation from Friday until Sunday week on/week off visitation shall
10 resume. However, Mother refused to allow Defendant visitation with the minor
11 children.
12

13 B.

14
15 **PLAINTIFF SHOULD BE AWARDED ATTORNEY FEES AND COSTS FOR**
16 **HAVING TO FILE THIS MOTION FOR AN ORDER TO SHOW CAUSE**

17
18 Plaintiff should be awarded attorney fees and costs for giving to file this
19 Motion for an Order to Show Cause.

20 **CUSTODY**

21
22 Defendant should be allowed to have visitation with the children.

23 ///

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I.

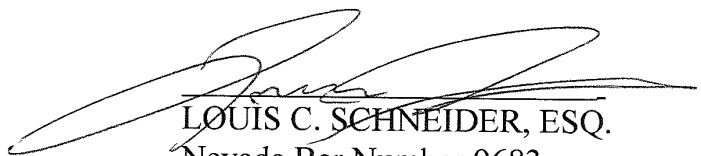
CONCLUSION

Plaintiff requests the following relief;

1. An order holding Plaintiff in Contempt of Court for failing to allow Defendant visitation with the minor children at the conclusion of March 19th, 2019 hearing.
2. An order requiring Plaintiff to allow visitation with the children. Mother failed to allowed visitation with the minor children as ordered by the courts hearing on March 19th, 2019.
3. An award of attorney fees and costs for having to file this Motion for an Order to Show Cause;

DATED this 2 day of June, 2019.

Respectfully Submitted By:



LOUIS C. SCHNEIDER, ESQ.
Nevada Bar Number 9683
430 South Seventh Street
Las Vegas, Nevada 89101
(702) 435-2121
Attorney for Defendant

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STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CHALESE MARIE SOLINGER, under penalties of perjury, deposes and says:

I am the Defendant in the above-entitled action. I have read the foregoing Motion and know the contents thereof; that the same is true of my own knowledge, except for those matters contained stated upon information and belief, and as to those matters, I believe them to be true.

On March 19th, 2019, a hearing for Case Management Conference was held.

At the conclusion of the above-mentioned hearing, the Court ordered that Defendant was to have visitation with the minor child on a 4-3-3-4 schedule Beginning March 24, 2019 starting with Defendant having visitation from Sunday at 6:00 p.m. to Thursday at 6:00 p.m.; However, Father refused to allow minor children to have visitation with their mother allegedly falsely that mother is incapable of driving.

See Exhibit “1”


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As a result, Defendant should be awarded attorney fees and costs for giving to
file this Motion for an Order to Show Cause.

I DECLARE UNDER PENALTIES OF PERJURY THAT THE FOREGOING
IS TRUE AND CORRECT.

DATED this ____ day of June, 2019.



CHALESE MARIE SOLINGER

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EXHIBIT "1"

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I, CHALESE MARIE SOLINGER, ESQ. do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

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1 7. That Adam Solinger is claiming it's too confusing to see each other at this
2 time.

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

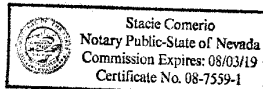
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6 FURTHER, AFFIDAVIT SAYETH NAUGHT.

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8 
CHALESE MARIE SOLINGER

9 Subscribed and sworn to before me

10 this 13th day of June, 2019.

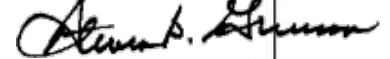
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12 NOTARY PUBLIC



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Vincent Mayo, Esq.
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1 **OPPC**

Vincent Mayo, Esq.
2 Nevada State Bar Number: 8564
THE ABRAMS & MAYO LAW FIRM
3 6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
4 Tel: (702) 222-4021
Fax: (702) 248-9750
5 Email: VMGroup@theabramslawfirm.com
Attorney for Plaintiff

6 Eighth Judicial District Court
Family Division
7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
9 Plaintiff,) Department: I
vs.)
10 CHALESE MARIE SOLINGER,)
11 Defendant.)

12 **OPPOSITION TO MOTION FOR AN ORDER TO SHOW CAUSE**
13 **RE: HOLD PLAINTIFF IN CONTEMPT FOR FAILING TO**
14 **ALLOW DEFENDANT'S VISITATION WITH THE MINOR**
15 **CHILD WITH DEFENDANTS COURT HEARING HELD ON OF**
16 **MARCH 12TH, 2018 VIOLATION OF COURT ORDERS;**
DEFENDANT SHOULD BE AWARDED ATTORNEY FEES AND
COSTS FOR HAVING TO FILE THIS MOTION FOR AN ORDER
TO SHOW CAUSE AND COUNTERMOTION FOR ATTORNEY'S
FEES AND COSTS

17 **NOW INTO COURT** comes Plaintiff, ADAM M. SOLINGER, by
18 and through his attorney of record, Vincent Mayo, Esq., of The Abrams
19 & Mayo Law Firm, and hereby submits his *Opposition and*
20 *Countermotion.*

21 ///

1 This *Opposition and Countermotion* is made and based upon the
2 attached Points and Authorities, the Affidavit of Plaintiff attached
3 hereto, all papers and pleadings on file herein, and any oral argument
4 adduced at the hearing of this matter.

5 Dated Thursday, June 27, 2019.

6 Respectfully Submitted,

7 THE ABRAMS & MAYO LAW FIRM

8 /s/ Vincent Mayo, Esq.

9 Vincent Mayo, Esq.

10 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

11 Las Vegas, Nevada 89118

Attorney for Plaintiff

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I. STATEMENT OF FACTS**

14 **Background**

15 Plaintiff, ADAM SOLINGER ("Adam") and Defendant, CHALESE
16 SOLINGER, were married on May 12, 2012 in Las Vegas, Nevada. There
17 are two (2) minor children of the marriage, to wit: Michael Adam
18 Solinger ("Michael"), born June 16, 2015 (3 years of age); and Marie
19 Leona Solinger ("Marie"), born August 28, 2017 (1 year of age). Adam is
20 30 years old and Chalese is 28 years old.

21 ///

1 **II. PROCEDURAL ISSUES**

2 The Motion filed by Defendant's counsel is astonishingly horrible.
3 Adam feels the need to point out the following issues as Chalese is
4 requesting attorney's fees and costs for this Motion. It is painfully clear
5 this Motion was thrown together in very little time and almost certainly
6 not proofread. The actual amount of time it took to prepare this Motion
7 is vital to note and compare to Chalese's counsel's actual billing time as
8 the Motion consisted of a declaration, a conclusion and only 26 lines
9 (even that is being generous) that do not appear to be copy and pasted
10 from the Nevada Revised Statutes. Sadly, much of those 26 lines are
11 incorrect and make no sense:

- 12 1. The title states "Hearing Held on March 12th, 2018" – aside
13 from the obvious grammar issues and fact that this case was not
14 even filed until 2019, there was no hearing on March 12th.
15 2. Chalese requests an Order holding Adam in contempt of Court
16 "for failing to allow[ing] visitation with the minor child to
17 Defendant at the conclusion of her March 19th 2019 hearing."¹
18 This statement, like many others made by Chalese and her
19 attorney, is a flat out lie. The parties exercised their visitation
20 up until June 6, 2019 when the danger Chalese and her

21

¹ Page 2 of Chalese's Motion, lines 1 to 5.

1 boyfriend, Josh, presented to the children became
2 unimaginable and Adam had no choice but to protect his
3 children. It is noteworthy to remember that Chalese withheld
4 Marie from Adam from the date of Marie's surgery until Adam
5 received the children back under the new custodial timeshare
6 on June 17, 2019.

7 3. Chalese states, "Due to the ATTEMPTED Defendant's visitation
8 with the minor children..." Attempted what? This sentence is
9 nonsensical.

10 4. "At the conclusion of the hearing, the Court ordered that
11 Defendant shall have temporary visitation from Friday until
12 Sunday week on/week off visitation shall resume. However,
13 Mother refused to allow Defendant visitation with the minor
14 children."² First, the parties never exercised week on/week off
15 visitation. The schedule stated here is entirely inaccurate.
16 Second, Mother is Chalese's counsel's client. Is he claiming his
17 own client refused to allow visitation? Finally, as stated above,
18 the parties followed the time share until June 6, 2019.

19 5. "Plaintiff should be awarded attorney fees and costs for giving
20 to file this Motion for an Order to Show Cause." Adam is

21

² Page 6 of Chalese's Motion, lines 8 to 12.

1 Plaintiff – is Chalese’s counsel stating Adam should be awarded
2 fees and costs for “giving” time to read this appalling Motion?
3 Although that would make more sense than Chalese’s counsel
4 attempting to collect fees, or even charge his client for this
5 insanely atrocious Motion, Adam doubts that is the case. It is
6 clear there was not even a quick scan of this document before
7 this was filed, or surely someone would have caught the word
8 “giving” where the word “having” should be.

- 9 6. Chalese’ Motion is also procedurally deficient in that it is not in
10 compliance with NRS 22.030(2), *Awad v. Wright*, 106 Nev.
11 407, 794 P.2d 713 (1990), nor EDCR 5.509. Under this law, “A
12 motion seeking an Order to Show Cause (OSC) for contempt
13 must be accompanied by a detailed affidavit complying with
14 NRS 22.030(2) that identifies the specific provisions, pages and
15 lines of the existing order(s) alleged to have been violated, the
16 acts or omissions constituting the alleged violation, any harm
17 suffered or anticipated, and the need for a contempt ruling,
18 which should be filed and served as any other motion.”
19 Chalese’s Affidavit is devoid of these details, specific references
20 to the governing Order or argument as to why contempt is
21 necessary. Hence, Chalese’s motion must be denied.

1 **III. OPPOSITION AND COUNTERMOTION**

2 **A. Adam Should Not be Held in Contempt**

3 This Court shared Adam's concerns and changed custody during
4 the June 17, 2019 hearing. Adam should not be held in contempt for
5 attempting to protect his children from Chalese's reckless conduct. This
6 Court also noted the lengths Adam went to in order to avoid having to
7 unilaterally protect the minor children:

8 (1) This Court specifically barred Chalese from letting Josh drive
9 the party's children due to his criminal record, related dependency
10 concerns and his atrocious driving record. Despite this, Chalese allowed
11 Josh to drive the children on multiple occasions.

12 (2) Josh also recently broke his right leg, which was confirmed
13 via a social media post. Hence, Josh cannot physically drive a vehicle.

14 (3) Even more concerning, and in her Opposition filed on May
15 28, 2019, Chalese admitted that she allows Josh to drive the children
16 and says it is for "safety reasons" because ***Chalese must take her***
17 ***anti-anxiety medication – a medication that precludes her***
18 ***from driving.***

19 (4) Chalese did not state in her Opposition that she only takes
20 the medications on occasion. Rather, Chalese stated she must take her
21 medication and that said medication precludes her from driving.

1 (5) Despite this, Chalese told Adam that she wanted to drive the
2 children Friday, June 7th, on a 17-hour round trip to northern Utah and
3 southern Idaho, despite Adam's obvious objection to such a drive.
4 Chalese admitted she was medically unable to drive the children
5 anywhere, much less a three-day trip out of state. Nor could Josh drive
6 as this Court specifically forbade it. Even if the court had not, Josh has a
7 broken right foot.

8 (6) However, Adam's concern extended past this out of state
9 trip. With both Chalese and Josh physically unable to drive the children,
10 as well as Josh being legally prevented from doing so, Adam was left
11 with the conclusion that Chalese was driving the children while under
12 the direct effects of drugs that prevented her from doing so.

13 (7) Adam was therefore understandably terrified of what could
14 happen if Chalese, who tested positive for marijuana (twice now) and
15 admitted she takes medication that precludes her from driving or Josh,
16 who has a felony for possession of illegal drugs, ten traffic citations over
17 the last nine years, was spotted purchasing marijuana while the kids
18 were in Chalese's care, was ordered not to drive the children and who
19 recently fractured his foot, were to regularly drive the children – much
20 less take such a long, multi-day trip with such young children.

21

1 (8) Adam, as a result, reached out to Chalese and told her his
2 concerns. Chalese, in response, essentially disregarded Adam's position.
3 Trying to be reasonable, Adam even suggested Chalese take a drug test
4 to prove she was no longer under the effects of the medication. Chalese
5 refused.

6 (9) Being proactive, Adam then had his counsel immediately
7 submit an Ex Parte Motion on June 5, 2019, to have his Emergency
8 Motion heard on an expedited basis, or at least a brief telephonic hearing
9 between counsel and the Court to resolve the matter. The Ex Parte
10 Motion stated that otherwise, and while he would be reluctant to do so,
11 Adam might have to take steps to protect the children from Chalese's
12 admitted and immediate threat of harm to the children. Unfortunately,
13 Adam's counsel was informed the court did not have any openings.

14 (10) Adam next had his counsel then try working with Chalese's
15 counsel directly to avoid Adam taking unilateral action. Chalese's
16 counsel first stated they would see if someone else could do the driving.
17 When this was not possible, Chalese's counsel stated Chalese had
18 informed him she stopped taking the medications "weeks ago."
19 However, this statement directly contradicted with Chalese's statement
20 in her May 29th Opposition that she was still on the medications. Adam's

21

1 counsel then suggested (again) that Chalese undergo a drug test to put
2 the matter to rest. Chalese refused.

3 (11) Therefore, and with no other option available, Adam
4 withheld Michael.

5 However, and as can be evidenced from the above facts, Adam did
6 not intend to willfully violate this Court's order. Willfulness is at the
7 heart of a criminal contempt proceeding and a defense to said contempt.
8 The Nevada Supreme Court in *Lewis v. Lewis* addressed how district
9 courts are to go about determining the character of a contempt
10 proceeding. Specifically, contempt is civil in nature if the court's
11 sanction attempts to coerce compliance with an order or the sanction
12 ordered can be characterized as "indeterminate or conditional."³ By
13 contrast, contempt is criminal in nature if it serves to punish the accused
14 for non-compliance in a determinate or unconditional manner as to the
15 punishment and duration.⁴

16 In this case, Chalese's motion clearly requests criminal contempt.
17 Chalese does not seek to coerce compliance with the Court's order
18
19

20 ³ *Lewis v. Lewis*, 132 Nev. Adv. Rep. 46, 373 P.3d 878 (2016). See also *Peterson v.*
21 *Eight Judicial Dist. Court of the State of Nevada*, 2016 Nev. Unpub. LEXIS 773, 385
P.3d 35 (2016); *Bohannon v. Eight Judicial Dist. Court of the State of Nevada*, 2017
Nev. Unpub. LEXIS 205 (2017).

⁴ *Id.*

1 (especially since the Court addressed custody on June 17, 2019).⁵ Rather,
2 Chalese wants Adam punished. This means that whether Adam was
3 willfully violating this Court's order is relevant to the Court's
4 determination. Adam sought out every possible course of action to
5 resolve the issue in order to avoid holding onto the minor children. In
6 contrast, if Adam intended to violate the Court Order, he would have
7 simply withheld the children without attempting to resolve the matter
8 directly with Chalese, without submitting an ex parte motion to the
9 court, without requesting a telephonic hearing and without having his
10 counsel try and resolve the matter with Chalese's counsel.

11 Adam's behavior was therefore proper, in good faith and designed
12 to protect the children. This was unlike Chalese, who withheld Marie
13 from Adam not because Adam was a threat to Marie but in retaliation to
14 Adam having Michael. Worse, Chalese lied to the police and CPS on
15 June 12, 2019 during Marie's dental appointment by claiming Adam had
16 struck Marie in an effort to have Adam arrested. Chalese did so even
17 though Marie's teeth were loose and bleeding due to an infection – as the
18 dentist diagnosed and the reason Marie had the dental procedure that
19 morning – not because Adam struck her.

20 ⁵ Even if Chalese's motion was intended to coerce Adam's compliance with the
21 Court's order, the Court's resolution of the matter at the June 17th hearing made
Chalese's motion moot. This means the only remaining remedy Chalese has in
continuing to proceed with the Motion is to punish Adam – which is clearly criminal
in nature.

1 Further, Adam's conduct was in the children's best interests – with
2 the children's best interest always governing in custodial matters. It
3 therefore cannot be said that Adam's conduct was in any way selfish or
4 malicious or that a holding of contempt is necessary to to protect the
5 children. Hence, there is no prima facia basis to proceed with Chalese's
6 motion.

7 **B. Adam Should be Awarded Attorney's Fees and Costs**

8 NRS 18.010 states:

9 1. The compensation of an attorney and counselor for his or
10 her services is governed by agreement, express or implied, which is
not restrained by law.

11 2. In addition to the cases where an allowance is authorized
by specific statute, the court may make an allowance of attorney's
fees to a prevailing party:

12 (a) When the prevailing party has not recovered more than
\$20,000; or

13 (b) Without regard to the recovery sought, when the court
14 finds that the claim, counterclaim, cross-claim or third-party
complaint or defense of the opposing party was brought or
15 maintained without reasonable ground or to harass the prevailing
party. The court shall liberally construe the provisions of this
16 paragraph in favor of awarding attorney's fees in all appropriate
situations. It is the intent of the Legislature that the court award
attorney's fees pursuant to this paragraph and impose sanctions
17 pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all
appropriate situations to punish for and deter frivolous or
18 vexatious claims and defenses because such claims and defenses
overburden limited judicial resources, hinder the timely resolution
19 of meritorious claims and increase the costs of engaging in
business and providing professional services to the public.

20 3. In awarding attorney's fees, the court may pronounce its
decision on the fees at the conclusion of the trial or special
21

1 proceeding without written motion and with or without
2 presentation of additional evidence.

3 4. Subsections 2 and 3 do not apply to any action arising out
4 of a written instrument or agreement which entitles the prevailing
5 party to an award of reasonable attorney's fees.

6 EDCR 7.60 states in relevant part:

7 (b) The court may, after notice and an opportunity to be
8 heard, impose upon an attorney or a party any and all sanctions
9 which may, under the facts of the case, be reasonable, including
10 the imposition of fines, costs or attorney's fees when an attorney or
11 a party without just cause:

12 (1) Presents to the court a motion or an opposition to a
13 motion which is obviously frivolous, unnecessary or unwarranted.

14 (2) Fails to prepare for a presentation.

15 (3) So multiplies the proceedings in a case as to increase
16 costs unreasonably and vexatiously.

17 (4) Fails or refuses to comply with these rules.

18 (5) Fails or refuses to comply with any order of a judge of
19 the court.

20 Chalese is wasting this Court's time and resources in pursuing a
21 Motion that is moot, deficient and unwarranted. Additionally, and
22 considering the poor quality of Chalese's Motion and considerable
23 deficiencies therein, Chalese shouldn't even be billed for it, meaning
24 there should be no fees to award. In contrast, Adam has had to incur fees
25 to defend against Chalese's Motion. Therefore, Adam should be awarded
26 attorney's fees and costs. If the Court is so inclined, Adam shall provide a
27 Memorandum of Fees and Costs.

28 ///

29 ///

1 **III. CONCLUSION**

2 Based on the foregoing, and in addition to this Honorable Court
3 denying the relief in Chalese's Motion, the Court should deny the relief
4 in Chalese's Motion and grant the relief requested in Adam's
5 Countermotion in its entirety.

6 Dated Thursday, June 27, 2019.

7 Respectfully Submitted,

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Vincent Mayo, Esq.

10 Vincent Mayo, Esq.

11 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

12 Las Vegas, Nevada 89118

Attorney for Plaintiff

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1 **AFFIDAVIT OF ADAM M. SOLINGER**

2 STATE OF NEVADA)
) ss:
3 COUNTY OF CLARK)

4 1. I, ADAM SOLINGER, do solemnly swear to testify herein to
5 the truth, the whole truth and nothing but the truth.

6 2. I am the Plaintiff in the above-entitled action, and above the
7 age of majority and am competent to testify to the facts contained in this
8 affidavit.

9 3. I make this affidavit in support of the foregoing *Opposition*
10 *and Countermotion*.

11 4. I have read said *Opposition and Countermotion* and hereby
12 certify that the facts set forth in the Points and Authorities attached
13 thereto are true of my own knowledge, except for those matters therein
14 contained stated upon information and belief, and as to those matters, I
15 believe them to be true. I incorporate said facts into this Affidavit as
16 though fully set forth herein.

17 FURTHER, AFFIANT SAYETH NAUGHT.

18 **To be supplemented**
 ADAM SOLINGER

19 SUBSCRIBED AND SWORN to before
20 me this ____ day of _____, 2019.

21 _____
NOTARY PUBLIC

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *OPPOSITION TO MOTION FOR AN ORDER TO SHOW CAUSE RE: HOLD PLAINTIFF IN CONTEMPT FOR FAILING TO ALLOW DEFENDANT'S VISITATION WITH THE MINOR CHILD WITH DEFENDANTS COURT HEARING HELD ON OF MARCH 12TH, 2018 VIOLATION OF COURT ORDERS; DEFENDANT SHOULD BE AWARDED ATTORNEY FEES AND COSTS FOR HAVING TO FILE THIS MOTION FOR AN ORDER TO SHOW CAUSE AND COUNTERMOTION FOR ATTORNEYS FEES AND COSTS* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Thursday, June 27, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Louis Schneider, Esq.
Attorney for Defendant

/s/ Julie Schoen
An Employee of The Abrams & Mayo Law Firm

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

PAUL WILLIAM NELSON
Plaintiff/Petitioner

v.
MARIANE WATKINS
Defendant/Respondent

Case No. D-18-569067-D

Dept. H

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

Step 1. Select either the \$25 or \$0 filing fee in the box below.

- ☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
- OR-
- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
- ☒ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
 - ☐ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
 - ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on _____.
 - ☐ Other Excluded Motion (must specify) _____.

Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
 - ☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
- OR-
- ☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
- OR-
- ☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

Step 3. Add the filing fees from Step 1 and Step 2.

The total filing fee for the motion/opposition I am filing with this form is:

☒ \$0 ☐ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

Party filing Motion/Opposition: Plaintiff/Petitioner Date 06/27/2019

Signature of Party or Preparer Julia Seher