

# IN THE SUPREME COURT OF THE STATE OF NEVADA

RONALD DAVID HARRIS,  
Appellant(s),

vs.

JENNIFER FIGUEROA,  
Respondent(s),

Electronically Filed  
Oct 11 2022 11:24 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Case No: D-20-606828-C

Docket No: 85333

# RECORD ON APPEAL VOLUME 1

**ATTORNEY FOR APPELLANT**  
RONALD HARRIS #584414,  
PROPER PERSON  
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MOUNTAIN CITY, TN 37683-5000

**ATTORNEY FOR RESPONDENT**  
JENNIFER FIGUEROA,  
PROPER PERSON  
3874 CALLE DE ESTE  
LAS VEGAS. NV 89121

D-20-606828-C      Jenniffer Figueroa, Plaintiff. vs. Ronald David Harris, Defendant.

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04/22/2020 12:49 pm



CLERK OF THE COURT

COMC

Your Name: JENNIFFER FIGUEROA

Address: 3874 Calle De Este

City, State, Zip: Las Vegas NV 89121

Phone: 702-412-2617

Email: jennfig1976@gmail.com

Self-Represented Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

JENNIFFER FIGUEROA

Plaintiff,

vs.

CASE NO.: D-20-606828-C

DEPT: \_\_\_\_\_

Ronald David Harris

Defendant.

## COMPLAINT FOR CUSTODY AND UCCJEA DECLARATION

Plaintiff (your name) JENNIFFER FIGUEROA is the (☒ check one) ☒ mother : ☐ father of the children named below, and respectfully states:

- Which parent has been a resident of the State of Nevada for at least six weeks prior to filing this Complaint? (☒ check one) ☒ Me ☐ Defendant.
- Have you ever been married to the other party? (☒ check one) ☒ Yes ☐ No.
- Children.** There are (number) 4 minor children at issue:

| Child's Name    | Date of Birth | State of Residence | How long child lived in the state | Disability |
|-----------------|---------------|--------------------|-----------------------------------|------------|
| Isabelle Harris | 2-25-2007     | NV                 | 3.5 years                         |            |
| Reagan Harris   | 9-19-2009     | NV                 | 3.5 years                         |            |
| Julian Harris   | 9-19-2009     | NV                 | 3.5 years                         |            |
| River Harris    | 10-13-2011    | NV                 | 3.5 years                         |            |
|                 |               |                    |                                   |            |

4. **UCCJEA Declaration.** Have the children lived in Nevada the last six months, or since birth? ( ☒ check all that apply)

☒ Yes, the child(ren) have lived in Nevada for the past six months, or since birth.

☐ No, the child(ren) have NOT lived in Nevada for the past six months.

- a. **Living Arrangements Last 5 Years.** The children have lived with the following persons in the following places within the last five years:

| Time Period<br>(mo/yr – mo/yr) | Name of Person the<br>Child(ren) Lived With: | City and State | Child's Name (if<br>not all children) |
|--------------------------------|--|----------------|---------------------------------------|
| 10/2016 - present              | Jennifer Figueroa                            | Las Vegas, NV  | ALL                                   |
| 03/2015 – 09/2016              | Jennifer Figueroa and Ronald Harris          | La Vergne TN   | ALL                                   |
|                                |  |                |                                       |
|                                |  |                |                                       |
|                                |  |                |                                       |

The names and current addresses of each non-parent the children lived with during the last five years are: Juan and Juanita Figueroa 4585 Lancer Way Las Vegas NV 89121, Rebecca & Sara Fix 3874 Calle De Este Las Vegas NV 8912

- b. **Participation in Other Cases.** Have you ever participated in any case concerning these children as a party, witness, or in some other capacity? ( ☒ check one)

☐ No.

☒ Yes, I have participated in the following cases concerning these children (provide all specifics including the state, the court name, children involved, the case number and the date of the child custody order, if any):

Case #D-17-547582-D in District Court Clark County NV regarding divorce. No Custody orders done.

- c. **Knowledge of Other Cases.** Do you know of any other case that could affect this case, such as other custody cases, domestic violence cases, protection order cases, or adoptions/terminations? ( ☒ check one)

☒ No.

☐ Yes, the following cases that could affect this case (give all specifics including the state, the court name, the parties involved, the case number and the type of case):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**d. Person(s) Who Claim Custody / Visitation.** Is there anyone other than yourself or other parties to this case who has custody of the children or who can claim a right to custody or visitation with the children? (☒ *check one*)

☒ No.

☐ Yes, the following people have custody or can claim custody/visitation of the children: *(list names and addresses of anyone who claims custody/visitation rights)*: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**5. Paternity.** Paternity is not disputed. Plaintiff believes that the father of the children is *(father's name)* Ronald David Harris because (☒ *check all that apply*):

☒ **Birth Certificate.** The man named above is the father listed on the birth certificate(s).

☐ **Court Order.** Paternity was already established by a court order through *(name of court)* \_\_\_\_\_ in case number *(case number)* \_\_\_\_\_ on *(date)* \_\_\_\_\_.

☐ **DNA Test.** A DNA test shows who is the biological father; a copy is attached.

☐ **Parents Lived Together.** The parties lived together at least 6 months before conception and lived together through the period of conception.

☐ **Admission.** The man named above openly holds out the child as his own and has accepted the child into his home.

**6. Legal Custody.** *Legal custody refers to the ability to access information and make major decisions about the children, such as medical care, education, and religious upbringing.* (☒ *check one*)

☐ The parties should share joint legal custody of the child(ren).

☒ Plaintiff should have sole legal custody of the child(ren).

☐ Defendant should have sole legal custody of the child(ren).

7. **Physical Custody.** *Physical custody refers to the amount of time the child spends with each parent. (☒ check one)*

☐ **Joint Custody.** The parties should share joint physical custody of the child(ren) (each parent must have the child(ren) roughly 40% of the time, or 146 days per year). A proposed parenting timeshare and holiday schedule is attached as Exhibit 1.

☐ **Primary Custody.** The (☒ check one) ☐ Plaintiff / ☐ Defendant should have primary physical custody of the child(ren). A proposed parenting timeshare and holiday schedule is attached as Exhibit 1.

☒ **Sole Custody.** The (☒ check one) ☒ Plaintiff / ☐ Defendant should have sole physical custody of the child(ren).

8. **Other Considerations.** The Court should consider the following issues in determining custody: (☒ check all that apply)

☐ Domestic Violence

☐ State of Residency

☐ CPS Involvement

☒ Other: Defendant is in prison as a sex offender.  
Pled guilty to B-felonies.  
30 years in Prison.

☐ Military Deployment

9. **Public Assistance.** Has either party ever received public assistance? (☒ check one)

☐ No, the parties in this case have never received public assistance.

☒ Yes, one or more parties now receives or has received public assistance.

10. **Parties' Incomes.** *The court needs to know both parties' gross monthly incomes to make sure child support is set correctly.*

Gross monthly income includes money received from work, social security, unemployment, pension/retirement, interest/investments, veteran's benefits, military allowances, etc.

It does not include SSI, SNAP, TANF, cash benefits from the county, or child support received.

My gross monthly income is (insert amount): \$ 4200 / OR ☐ unknown.

The other parent's gross monthly income is (insert amount): \$ \_\_\_\_\_ / OR ☒ unknown.



**11. Child Support.** Use the attached worksheet to figure out how much child support the court should order. Complete the worksheet before filling out this section. (☒ check one)

☒ Child support should be paid by (name of parent who should pay child support)

Ronald David Harris in the amount of \$ \_\_\_\_\_ per month.

This is based on: (☒ check one)

☐ The Child Support Worksheet calculation attached.

☐ The amount already established by the District Attorney, Family Support Division, case (insert case number) R \_\_\_\_\_.

☐ No child support is requested. (Explain why not): \_\_\_\_\_

☒ I'm not sure how much child support should be paid, and ask the court to set support.  
- He receives song royalties quarterly. His mom is Power of Attorney receives them for him. I ask they be sent to us, or that she pays us based on court order.

**12. Wage Withholding.** Should child support be paid through a wage garnishment? (☒ check one)

☒ Yes, a wage withholding order should be entered to secure payment of support.

☐ No, a wage withholding order should not be entered.

**13. Back Child Support.** Should back child support ("arrear") be ordered? (☒ check one)

☒ No, no back child support or arrears are requested.

☐ Child support arrears are being handled by the District Attorney, Family Support Division, case (insert case number) R \_\_\_\_\_ and should continue as ordered in that case.

☐ Yes, back child support should be paid by (name of parent who should pay back child support) \_\_\_\_\_ from (date back child support should begin) \_\_\_\_\_ to present.

**14. Child Care.** Are there child care expenses? (☒ check one)

☒ No, there are no child care costs for either parent.

☐ Yes, the monthly child care costs for the child(ren) are: \$ \_\_\_\_\_. This amount should be paid by ☐ me only ☐ the other parent only ☐ both parents equally.

**15. Medical Coverage.** Medical support (medical, vision, and/or dental) must be provided for the child(ren). How will the children get medical support/insurance?

☒ Medicaid.

☐ Private / Employer Insurance. The monthly premium should be paid by ☐ me only  
☐ the other parent only ☐ both parents equally.

☐ Other: \_\_\_\_\_

**16. Unreimbursed Medical Expenses.** How will medical expenses get paid if insurance does not cover a medical cost? (☒ *check one*)

☒ Any expenses not covered by insurance should be paid equally by both parties.

☐ Any expenses not covered by insurance should be paid by *(name of parent)*

\_\_\_\_\_ due to the following extraordinary circumstances:  
*(explain)* \_\_\_\_\_

**17. "30/30 Rule."** The "30/30 Rule" provides that if a parent pays a medical or dental expense for a child that is not paid by insurance, that parent must send proof of payment of the expense to the other parent within 30 days of paying the expense. The other parent then has 30 days to reimburse the paying parent ½ the cost. Do you want the 30/30 rule ordered in your case? (☒ *check one*)

☐ Yes, the Court should order the 30/30 Rule for payment of all unreimbursed medical / dental expenses.

☒ No, the Court should not order the 30/30 Rule for payment of unreimbursed medical / dental expenses.

**18. Tax Deduction.** *IRS rules state that the custodial parent usually has the right to claim the child on their taxes. The custodial parent can waive this right by filling out IRS Form 8332. Talk to a tax professional if you are not sure what to do.* (☒ *check all that apply*)

☒ The Plaintiff should claim the following children as dependents for tax purposes every year: *(insert child(ren)'s names):* Isabelle, Reagan, Julian, River Harris

☐ The Defendant should claim the following children as dependents for tax purposes every year: *(insert child(ren)'s names):* \_\_\_\_\_

☐ The tax deduction should alternate, with Plaintiff claiming the child(ren) in (☒ *check one*) ☐ even / ☐ odd years, and Defendant claiming the child(ren) the other years.

☐ The tax deduction should be allocated per federal law.

**19. Birth Certificate / Name Change.** (☒ check all that apply)

- ☒ The child's birth certificate should not be changed.
- ☐ The child's birth certificate should be changed to state that the father of the minor child is *(name of father)* \_\_\_\_\_.
- ☐ The child's name should be changed to *(write the complete first, middle, and last name the child should have)* \_\_\_\_\_  
because *(explain why you want to change the child's name)* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The child has not been convicted of a felony. Any child age 14 or older will file a separate consent agreeing to the requested name change. The other parent's name is *(name of the other parent)* \_\_\_\_\_ and I believe he/she lives at *(other parent's address)* \_\_\_\_\_  
This request is made pursuant to NRS 41.298

**20.** If Plaintiff is able to hire counsel, attorney's fees and costs are requested.

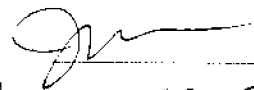
**Plaintiff requests:**

1. That the Court grant the relief requested in this Complaint; and
2. For such other relief as the Court finds to be just and proper.

DATED *(month)* April *(day)* 22, 2020.

Submitted By: *(your signature)* ▶ /s/

*(print your name)*

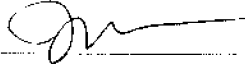
  
JENNIFER Figueroa

### VERIFICATION

Under penalty of perjury, I declare that I am the Plaintiff in the above-entitled action; that I have read the foregoing Complaint and UCCJEA Declaration and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

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

DATED (month) April (day) 22, 20 20.

Submitted By: (your signature) ▶ /s/   
(print your name) Jennifer Figueroa

## EXHIBIT 1: Parenting Timeshare and Holiday Schedule

☒ No Visitation Requested Because: (explain) Defendant (father) in prison as a sex offender in TN

|   |  |
|---|--|
| <p>Regular Schedule:<br/> <i><b>Be very specific. Include the times and days of the week for each parent's timeshare.</b></i><br/>         (ex.: Mom: Saturday 7pm<br/>                   Wednesday 3pm,<br/>         Dad: Wednesday 3pm –<br/>                   Saturday 7pm)</p> | <p>N/A - Ronald Harris is a Sex offender who pleaded guilty to B felonies. He was sentenced to 30 years in a Prison in TN. I would like the children have no contact w/their father as the person he sexually abused for 3 years was the defendants step daughter, the childrens half sister, who was 12 when abuse started.</p>   |
| <p>Summer Schedule:</p>   | <p><input type="checkbox"/> Same as the regular schedule.<br/> <input type="checkbox"/> Other: _____</p>   |
| <p>Mother's Day and Mother's Birthday:</p>  | <p><input type="checkbox"/> Mother every year from 9am – 7pm.<br/> <input type="checkbox"/> Other: _____</p>   |
| <p>Father's Day and Father's Birthday:</p>  | <p><input type="checkbox"/> Father every year from 9am - 7pm.<br/> <input type="checkbox"/> Other: _____</p>   |
| <p>Child's Birthday:</p>  | <p><input type="checkbox"/> <u>Even years</u> with (parent) _____<br/> <u>Odd years</u> with (parent) _____<br/>         *Time shall be from 9am – 7pm.*<br/> <input type="checkbox"/> Other: _____</p>  |
| <p>3 Day Weekends:</p>  | <p><input type="checkbox"/> <u>Even Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____,<br/>         President's Day, Independence Day, Nevada Admissions Day with the other parent.<br/> <u>Odd Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____,<br/>         President's Day, Independence Day, Nevada Admissions Day with the other parent.<br/>         *Time begins when school lets out the day before the holiday weekend (or 3pm if no school), and ends the day following the holiday weekend when school resumes (or 9am).*<br/>         **If Independence Day falls on a Tuesday, Wednesday, or Thursday, the time shall be from July 3 at 9am until July 5 at 9am.**<br/> <input type="checkbox"/> Other: _____</p> |

|                           |   |
|---------------------------|---|
| Easter / Spring Break:    | <input type="checkbox"/> Even years with <i>(parent)</i> _____<br>Odd years with the other parent.<br>*Time shall begin the day school lets out until noon the day before school resumes.*<br><input type="checkbox"/> Other: _____   |
| Thanksgiving:             | <input type="checkbox"/> Odd years with <i>(parent)</i> _____<br>Even years with the other parent.<br>*Time shall begin the day school lets out until noon the day before school resumes.*<br><input type="checkbox"/> Other: _____   |
| Winter Break / Christmas: | <input type="checkbox"/> Segment 1 (Christmas) consists of the day school lets out until December 26 at noon.<br>Segment 2 (New Year's) consists of December 26 at noon until noon the day before school resumes.<br><u>Even years:</u> segment 1 with <i>(parent)</i> _____<br>segment 2 with the other parent.<br><u>Odd years:</u> segment 1 with <i>(parent)</i> _____<br>segment 2 with the other parent.<br><input type="checkbox"/> Other: _____   |
| Other Holidays:           |   |
| Vacation:                 | <input type="checkbox"/> The parents will not establish a formal vacation plan, and will instead mutually agree on vacation days and times with the child(ren).<br><input type="checkbox"/> Each parent may have up to <i>(number)</i> _____ vacation days per year with the child(ren). The parent shall notify the other parent of the vacation and provide a general vacation itinerary at least <i>(number)</i> _____ days before the planned vacation.<br><b>Vacation time is not allowed during a holiday allotted to the other parent.</b> |

# Child Support Worksheet

## ① The Other Parent's Information

**How much money does the other parent make every month?** (Estimate if you do not know. A GMI worksheet is attached if you need help.)

*Figure out the other parent's gross monthly income. This includes money received from employment, social security, unemployment, pension/retirement, interest/investments, etc.*

*It does not include SSI, SNAP, TANF, cash benefits from the county, or child support received.*

I believe the other parent makes \$ 150 per month (this is "Gross Monthly Income")

*\*If this number is more than \$6000, STOP. This worksheet will not apply.*

Visit [nycchildsupportguidelines.org/calculation/using-websites.aspx](http://nycchildsupportguidelines.org/calculation/using-websites.aspx) to find the appropriate amount.

**Determine what the other parent's child support obligation would be:**

Gross Monthly Income (from above)  $\times$  .16 (for 1 child)  
\$ 150  $\times$  .22 (for 2 children) =  
.26 (for 3 children)  
.28 (for 4 children)  
Add .02 for each additional child

**Regular Child Support:**

\$ 42

**Does this parent earn less than \$1595 per month?**

☐ No. (skip to ②)

☒ Yes. The court may use the low-income child support schedule instead. (check the attached chart to find the right number to enter. Use this number in steps ③④ & ⑤)

**Low Income Child Support:**

\$ \_\_\_\_\_

## ② Your Information (complete this section even if you expect the other parent to pay child support)

**How much money do you make every month?** (A GMI worksheet is attached if you need help.)

*Include money you get from employment, social security, unemployment, pension/retirement, interest / investments, etc. Do not include SSI, SNAP, TANF, cash benefits from the county, or child support received.*

I make \$ 4200 per month (this is "Gross Monthly Income")

*\*If this number is more than \$6000, STOP. This worksheet will not apply.*

Visit [nycchildsupportguidelines.org/calculation/using-websites.aspx](http://nycchildsupportguidelines.org/calculation/using-websites.aspx) to find the appropriate amount.

**Determine what your child support obligation would be:**

Gross Monthly Income (from above)  $\times$  .16 (for 1 child)  
\$ 4200  $\times$  .22 (for 2 children) =  
.26 (for 3 children)  
.28 (for 4 children)  
Add .02 for each additional child

**Regular Child Support:**

\$ 1176

**Do you earn less than \$1595 per month?**

☒ No. (skip to ③)

☐ Yes. The court may use the low-income child support schedule instead. (check the attached chart to find the right number to enter. Use this number in steps ③④ & ⑤)

**Low Income Child Support:**

\$ \_\_\_\_\_

- ③ **Joint Custody.** Only fill out this section if you are asking for Joint Physical Custody.  
Skip to ④ if you are asking for primary custody, sole custody, or visitation only.

**Subtract** the lower earning parent's amount of child support from the higher earning parent's amount.

|                    |   |                   |   |   |         |  |
|--------------------|---|-------------------|---|---|---------|--|
| Higher<br>\$ _____ | - | Lower<br>\$ _____ | = | Child Support Obligation<br>\$ 0.00 _____ | paid by | Name of higher income parent:<br>_____ |
|--------------------|---|-------------------|---|---|---------|--|

④ **Adjustments.**

- If you want primary or sole physical custody, the court uses the number in ① as the standard amount of child support the other parent would pay.
- If you want the other parent to have primary or sole physical custody, the court uses the number in ② as the standard amount of child support you would pay.
- If you want both parents to have joint physical custody, the court uses the number in ③ as the standard amount of child support.

You can ask for more or less child support than the amount in ① ② or ③ if you think any of the following factors apply. (☒ check all that apply, or skip to ⑤ if none of these reasons apply)

- |   |  |
|---|--|
| <input type="checkbox"/> Special educational needs                          | <input type="checkbox"/> Cost of transportation to and from visitation             |
| <input type="checkbox"/> A parent's legal responsibility to support others  | <input type="checkbox"/> The relative income of both households                    |
| <input type="checkbox"/> The value of services contributed by either parent | <input type="checkbox"/> Any other necessary expenses for the benefit of the child |
| <input type="checkbox"/> Public assistance paid to support the child        | <input checked="" type="checkbox"/> The obligor's ability to pay                   |

◆ Explain: Defendant was a successful songwriter and receives song royalties that can range from \$200 quarterly to \$1000's. His mother receives the checks. I've attached a statement as an example. ~~attached~~

⑤ **Final Child Support Amount Requested:**

\$ 45 paid by (name) Ronald David Harris



## TO DETERMINE A PARENT'S GROSS MONTHLY INCOME ("GMI") FROM EMPLOYMENT

|                             |         |
|-----------------------------|---------|
| <b>Annual Income</b>        | \$      |
| ÷ by 12 months = <b>GMI</b> | \$ 0.00 |

|                             |         |
|-----------------------------|---------|
| <b>Biweekly Income</b>      | \$      |
| X 26 pay periods per year   | 0.00    |
| ÷ by 12 months = <b>GMI</b> | \$ 0.00 |

|                             |         |
|-----------------------------|---------|
| <b>Weekly Income</b>        | \$      |
| X 52 pay periods per year   | 0.00    |
| ÷ by 12 months = <b>GMI</b> | \$ 0.00 |

|  |         |
|--|---------|
| <b>Hourly Wage</b>                           | \$      |
| # of hours worked per week                   |         |
| Subtotal = hourly wage X # of hours per week | \$ 0.00 |
| X 52 pay periods per year                    | 0.00    |
| ÷ by 12 months = <b>GMI</b>                  | \$ 0.00 |

## LOW INCOME CHILD SUPPORT SCHEDULE FOR PARENTS WHO EARN LESS THAN \$1595 PER MONTH

Child Support Obligation of Low-Income Payers  
at 75% to 150% of the 2020 Federal Poverty Guidelines

|                      | One Child |                      | Two Children |                      | Three Children |                      | Four Children |                      | Five Children |                      |
|----------------------|-----------|----------------------|--------------|----------------------|----------------|----------------------|---------------|----------------------|---------------|----------------------|
| Monthly Income Up To |           | Child Support Amount |              | Child Support Amount |                | Child Support Amount |               | Child Support Amount |               | Child Support Amount |
| \$798                |           | \$84                 |              | \$116                |                | \$137                |               | \$147                |               | \$158                |
| \$826                |           | \$89                 |              | \$122                |                | \$144                |               | \$155                |               | \$167                |
| \$854                |           | \$94                 |              | \$129                |                | \$152                |               | \$164                |               | \$175                |
| \$883                |           | \$98                 |              | \$135                |                | \$160                |               | \$172                |               | \$184                |
| \$911                |           | \$103                |              | \$142                |                | \$168                |               | \$181                |               | \$194                |
| \$940                |           | \$108                |              | \$149                |                | \$176                |               | \$190                |               | \$203                |
| \$968                |           | \$114                |              | \$156                |                | \$185                |               | \$199                |               | \$213                |
| \$997                |           | \$119                |              | \$163                |                | \$193                |               | \$208                |               | \$223                |
| \$1,025              |           | \$124                |              | \$171                |                | \$202                |               | \$217                |               | \$233                |
| \$1,054              |           | \$130                |              | \$178                |                | \$211                |               | \$227                |               | \$243                |
| \$1,082              |           | \$135                |              | \$186                |                | \$220                |               | \$237                |               | \$254                |
| \$1,111              |           | \$141                |              | \$194                |                | \$229                |               | \$247                |               | \$264                |
| \$1,139              |           | \$147                |              | \$202                |                | \$239                |               | \$257                |               | \$275                |
| \$1,168              |           | \$153                |              | \$210                |                | \$248                |               | \$267                |               | \$287                |
| \$1,196              |           | \$159                |              | \$218                |                | \$258                |               | \$278                |               | \$298                |
| \$1,225              |           | \$165                |              | \$227                |                | \$268                |               | \$289                |               | \$309                |
| \$1,253              |           | \$171                |              | \$236                |                | \$278                |               | \$300                |               | \$321                |
| \$1,282              |           | \$178                |              | \$244                |                | \$289                |               | \$311                |               | \$333                |
| \$1,310              |           | \$184                |              | \$253                |                | \$299                |               | \$322                |               | \$345                |
| \$1,339              |           | \$191                |              | \$262                |                | \$310                |               | \$334                |               | \$358                |
| \$1,367              |           | \$197                |              | \$272                |                | \$321                |               | \$346                |               | \$370                |
| \$1,396              |           | \$204                |              | \$281                |                | \$332                |               | \$358                |               | \$383                |
| \$1,424              |           | \$211                |              | \$290                |                | \$343                |               | \$370                |               | \$396                |
| \$1,453              |           | \$218                |              | \$300                |                | \$355                |               | \$382                |               | \$409                |
| \$1,481              |           | \$225                |              | \$310                |                | \$366                |               | \$395                |               | \$423                |
| \$1,510              |           | \$233                |              | \$320                |                | \$378                |               | \$407                |               | \$436                |
| \$1,538              |           | \$240                |              | \$330                |                | \$390                |               | \$420                |               | \$450                |
| \$1,567              |           | \$248                |              | \$340                |                | \$402                |               | \$433                |               | \$464                |
| \$1,595              |           | \$255                |              | \$351                |                | \$415                |               | \$447                |               | \$479                |

SUMM

Plaintiff's Name: Jennifer Figueroa

Address: 3874 Calle De Este

Las Vegas, NV 89121

Telephone: 702-412-2617

Email Address: jennfig1976@gmail.com

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Jennifer Figueroa**

Plaintiff,

vs.

**Ronald David Harris**

Defendant.

CASE NO.: D-20-606828-C

DEPT: \_\_\_\_\_

**SUMMONS**

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND IN WRITING WITHIN 21 DAYS. READ THE INFORMATION BELOW VERY CAREFULLY.**

To the Defendant named above:

The Plaintiff has filed a civil complaint or petition against you. Read that document (or get a copy at the court listed above) to find out the specific relief requested. The subject of this case is: (☒ *check one*)

☐ Divorce.

☐ Annulment.

☐ Legal Separation.

☒ Custody, Paternity, Visitation, and/or Child Support.

☐ Other: \_\_\_\_\_

1       **If you want to defend this lawsuit, you must do all of the following within 21** days after  
2 this summons is served on you (not counting the day of service):

- 3       1. File a formal written answer to the complaint or petition with the Clerk of Court (*whose*  
4       *address is listed below*).
- 5       2. Pay the required filing fee to the court, or request a fee waiver by filing an Application  
6       to Proceed *In Forma Pauperis*.
- 7       3. Serve a copy of your answer on the Plaintiff whose name and address is shown below.

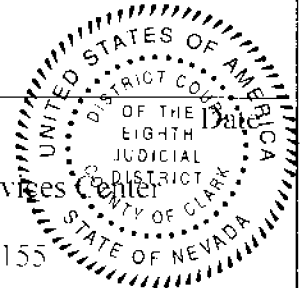
8       If you do not respond, Plaintiff can request a default against you. The court can then enter  
9 a judgment against you for the relief demanded in the complaint or petition.

10                               STEVEN D. GRIERSON  
11                               CLERK OF COURT

April 24, 2020

12                               By: /s/ I Fumo  
13                               Deputy Clerk

14                               Family Courts and Services Center  
15                               601 North Pecos Road  
16                               Las Vegas, Nevada 89155



17                               Regional Justice Center   **CERTIFIED COPY**  
18                               200 Lewis Avenue       **ELECTRONIC SEAL (NRS 1.190(3))**  
19                               Las Vegas, Nevada 89155

20 Issued on Behalf of Plaintiff:

21 Plaintiff's Name: Jenniffer Figueroa

22 Address: 3874 Calle De Este

23 City, State, Zip Las Vegas, NV 89121

24

Forms are available, free of charge, at the Family Law Self-Help  
Center at the Family Courts and Services Center, 601 N. Pecos Road,  
Las Vegas, Nevada, and on the center's website at  
[www.familylawselfhelpcenter.org](http://www.familylawselfhelpcenter.org).

COURT CODE: EXMT

Your Name: JENNIFER FIGUEROA

Address: 3874 Calle De Este Las Vegas NV 89121

Telephone: 702-412-2617

Email Address: jennfig1976@gmail.com

Electronically Filed

04/22/2020 12:49 pm



CLERK OF THE COURT

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

JENNIFER Figueroa  
Plaintiff.

vs.

Ronald David Harris

Defendant.

CASE NO.: D-20-606828-C

DEPT: \_\_\_\_\_

**EX PARTE MOTION FOR ALTERNATE SERVICE**

I, (your name) Jennifer Figueroa, respectfully state:

1. I am the Plaintiff. I have not been able to serve Defendant personally because: (☒ *check all that apply*)
  - ☐ I do not know Defendant's current address.
  - ☐ Defendant will not tell me where he/she lives.
  - ☐ I know where Defendant lives and someone tried to serve Defendant. However, Defendant will not open the door to accept papers.
  - ☒ Defendant is not working or cannot be served at work.
2. The information required by NRCP 4.4(b)(2)(ii) is in the attached declaration.
3. The information required by NRCP 4.4(b)(2)(i) will be provided in a separate declaration.

4. I would like the court to allow me to serve the Defendant in the following ways:

(☒ *check all options that could be used to send the documents to Defendant*)

☒ Mail the complaint and summons to Defendant's last known address.

☐ Post a copy of the complaint and summons on Defendant's door. I know where Defendant lives but Defendant has refused to accept the papers.

☐ Email the complaint and summons to Defendant.

☐ Text a copy of the complaint and summons to Defendant's phone number.

☐ Send a copy of the complaint and summons to Defendant through Facebook Messenger.

☒ Other: In Tennessee. Defendant is in prison. I spoke w/ the Warden that said he could give it to him, if I mail it to his attention.

The options above are the methods most reasonably calculated to give Defendant notice of this court case. I do not have any other way to locate or contact Defendant.

5. I request the Court to sign an Order directing that Defendant be served by the alternate methods above.

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

DATED April 22nd, 2020.

Submitted By: (your signature) /s/

(print your name)

Jennifer Figueroa

### DECLARATION

I declare, under penalty of perjury:

1. I have read this motion, and the statements it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true. The statements contained in this motion are incorporated here as if set forth in full.

2. **Defendant's Last Known Address:** *You will be expected to send a copy of the complaint and summons to the address listed below.*

NECX P.O. Box 5000  
Defendant's Last Known Street Address

Mtn City, TN 37683-5000  
City, State, Zip Code

Does Defendant live there now? ☒ Yes ☐ No

Defendant lived there from (date Defendant started living there) 9-16-2017  
to (date Defendant left, or "present" if Defendant still lives there) present

3. **Defendant's Contact Information:** *You will be expected to send a copy of the complaint and summons to any sources listed below.*

Telephone Numbers: N/A

Email Addresses: N/A

Social Media Accounts:

☐ Facebook User Name: \_\_\_\_\_

☐ Other: \_\_\_\_\_

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

DATED April 22, 20 20

Submitted By: (your signature) /s/ [Signature]  
(print your name) Jenniffer Figueroa

04/22/2020 12:49pm

*Heather S. Levin*

CLERK OF THE COURT

EXHS

Name: Jennifer Figueroa

Address: 3874 Calle de Este

Las Vegas NV 89121

Telephone: 702 412 2617

Email Address: Jennfig1976@gmail.com

In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff.

vs.

Ronald David Harris  
Defendant.

D-20-606828-C

CASE NO.: \_\_\_\_\_

DEPT: \_\_\_\_\_

DATE OF HEARING: \_\_\_\_\_

TIME OF HEARING: \_\_\_\_\_

**EXHIBIT APPENDIX**

(your name) JENNIFER FIGUEROA, the (check one ☒ ☐) ☒ Plaintiff  
/ ☐ Defendant, submits the following exhibits in support of my (title of motion / opposition you  
filed that these exhibits support) Child Custody Case. I understand that  
these are not considered substantive evidence in my case until formally admitted into evidence.

**Table of Contents:**

1. B-Felony Judgements against Ronald Harris; Plead Guilty. (30 yr. Sentence)
2. BMI Music Royalty Statement example - Ronald Harris
3. Jennifer Figuerod's Pay Stubs
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_
9. \_\_\_\_\_
10. \_\_\_\_\_

11. \_\_\_\_\_
12. \_\_\_\_\_
13. \_\_\_\_\_
14. \_\_\_\_\_
15. \_\_\_\_\_
16. \_\_\_\_\_
17. \_\_\_\_\_
18. \_\_\_\_\_
19. \_\_\_\_\_
20. \_\_\_\_\_

DATED (month) April (day) 22, 2020.

Submitted By: (your signature)   
 (print your name) JENNIFER FIGUEROA

### CERTIFICATE OF MAILING

I, (your name) \_\_\_\_\_ declare under penalty of perjury under the law of the State of Nevada that on (month) \_\_\_\_\_ (day) \_\_\_\_\_, 20\_\_\_\_, I served this ***Exhibit Appendix*** by depositing a copy in the U.S. Mail in the State of Nevada, postage prepaid, addressed to:

Name of Person Served: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City, State, Zip \_\_\_\_\_

DATED (month) \_\_\_\_\_ (day) \_\_\_\_\_, 20\_\_\_\_.

Submitted By: (your signature) ► \_\_\_\_\_



# **EXHIBIT 1**

# IN THE CRIMINAL JUSTICE COURT FOR RUTHERFORD COUNTY, TENNESSEE

Case Number: F-76831 Count: 14 Counsel for the State: SHARON L. REDDICK  
 Judicial District: 16<sup>th</sup> Judicial Division: 2 Counsel for the Defendant: Russell Nixon  
 State of Tennessee ☒ Retained ☐ Pub Def Appt ☐ Private Atty Appt  
 vs. ☐ Counsel Waived ☐ Pro Se

Defendant: RONALD DAVID HARRIS Alias: \_\_\_\_\_ Date of Birth: 02/25/1971 Sex: Male  
 Race: White SSN: 366-86-2536 Driver License #: 086313073 Issuing State: TN  
 State ID #: \_\_\_\_\_ County Offender ID # (if applicable): \_\_\_\_\_ TOMIS/TDOC #: \_\_\_\_\_  
 Relationship to Victim: Stepfather Victim's Age: 15  
 State Control #: 750001148326 Arrest Date: 08/22/2016 Indictment Filing Date: 01/09/2017

## JUDGMENT

☒ Original ☐ Amended ☐ Corrected

Come the parties for entry of judgment.

On the 15<sup>th</sup> day of September, 2017, the defendant:

|   |  |
|---|--|
| <input checked="" type="checkbox"/> Pled Guilty <input type="checkbox"/> Dismissed/Nolle Prosequi<br><input type="checkbox"/> Pled Nolo<br><input type="checkbox"/> Pled Guilty - Certified Question Findings Incorporated by Reference<br><br>Is found: <input checked="" type="checkbox"/> Guilty <input type="checkbox"/> Not Guilty<br><input type="checkbox"/> Jury Verdict <input type="checkbox"/> Not Guilty by Reason of<br><input type="checkbox"/> Bench Trial | Indictment: Class (circle one) 1 <sup>st</sup> A <u>B</u> C D E <input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor<br>Indicted Offense Name AND TCA §: <u>39-17-1005 - ESPECIALLY AGGRAVATED SEXUAL EXPLOITATION OF A</u><br>Amended Offense Name AND TCA §: _____<br>Offense Date: <u>June 2016</u> County of Offense: <u>RUTHERFORD</u><br>Conviction Offense Name AND TCA §: <u>above</u><br>Conviction: Class (circle one) 1 <sup>st</sup> A <u>B</u> C D E <input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor<br>Is this conviction offense methamphetamine related? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>Sentence Imposed Date: <u>9/15/17</u> |
|---|--|

After considering the evidence, the entire record, and in the case of sentencing, all factors in Tennessee Code Annotated Title 40, Chapter 35, all of which are incorporated by reference herein, it is ORDERED and ADJUDGED that the conviction described above is imposed hereby and that a sentence and costs are imposed as follows:

| Offender Status (Check One)   | Release Eligibility (Check One)  | Concurrent with:  | Pretrial Jail Credit Period(s):  |
|---|--|---|--|
| <input type="checkbox"/> Mitigated<br><input checked="" type="checkbox"/> Standard<br><input type="checkbox"/> Multiple<br><input type="checkbox"/> Persistent<br><input type="checkbox"/> Career | <input type="checkbox"/> Mitigated 20%<br><input type="checkbox"/> Mitigated 30%<br><input type="checkbox"/> Standard 30%<br><input type="checkbox"/> Multiple 35%<br><input type="checkbox"/> Persistent 45%<br><input type="checkbox"/> Career 60%<br><input type="checkbox"/> Agg Rob 85%<br><input checked="" type="checkbox"/> 40-35-501(i) 100%<br><input type="checkbox"/> 39-13-518 100% | <input type="checkbox"/> Agg Rob w/Prior 100%<br><input type="checkbox"/> Multiple Rapist 100%<br><input type="checkbox"/> Child Rapist 100%<br><input type="checkbox"/> Child Predator 100%<br><input type="checkbox"/> Agg Rapist 100%<br><input type="checkbox"/> Mult 39-17-1324 100%<br><input type="checkbox"/> 39-17-1324(a), (b) 100%<br><input type="checkbox"/> Agg Assault w/Death 75%<br><input type="checkbox"/> Att 1 <sup>st</sup> Degree Murder w/SB1 85% | From <u>8/22/16</u> to <u>9/15/17</u><br>From _____ to _____<br>From _____ to _____<br>From _____ to _____ |

Sentenced To: ☒ TDOC ☐ County Jail ☐ Workhouse  
 Sentence Length: 10 Years \_\_\_\_\_ Months \_\_\_\_\_ Days \_\_\_\_\_ Hours ☐ Life ☐ Life w/out Parole ☐ Death  
 Mandatory Minimum Sentence Length: \_\_\_\_\_ 39-17-417, 39-13-513, 39-13-514, or 39-17-432 in Prohibited Zone or \_\_\_\_\_ 55-10-401 DU14<sup>th</sup> Offense  
 or \_\_\_\_\_ 39-17-1324 Possession/Employment of Firearm or \_\_\_\_\_ 40-39-208, -211 Violation of Sex Offender Registry or \_\_\_\_\_ Meth (39-17-434, -417, -418)  
 Period of incarceration to be served prior to release on probation or Community Corrections: \_\_\_\_\_ Months \_\_\_\_\_ Days \_\_\_\_\_ Hours  
 Minimum service prior to eligibility for work release, furlough, trusty status and rehabilitative programs: \_\_\_\_\_ % (Misdemeanor Only)  
 Alternative Sentence: ☐ Sup Prob ☐ Unsup Prob ☐ Comm Corr (CHECK ONE BOX) \_\_\_\_\_ Years \_\_\_\_\_ Months \_\_\_\_\_ Days Effective: \_\_\_\_\_  
 WAS DRUG COURT ORDERED AS A CONDITION OF THE ALTERNATIVE SENTENCE? ☒ No ☐ Yes

|   |   |
|---|---|
| <b>Court Ordered Fees and Fines:</b><br>\$ _____ Court Costs <input checked="" type="checkbox"/> Defendant <input type="checkbox"/> State<br>\$ _____ Fine Assessed<br>\$ _____ Traumatic Brain Injury Fund (68-55-301 et seq.)<br>\$ _____ Drug Testing Fund (TN Drug Control Act)<br>\$ _____ CICC \$ _____ Sex Offender Tax<br>\$ _____ Other: _____ | <b>Restitution:</b> Victim Name _____<br>Address _____<br>Total Amount \$ _____<br><input type="checkbox"/> Unpaid Community Service: _____ Hours _____ Days _____ Weeks _____ Months |
|---|---|

- ☒ The Defendant having been found guilty is rendered infamous and ordered to provide a biological specimen for the purpose of DNA analysis.  
☒ Pursuant to 39-13-521 the defendant is ordered to provide a biological specimen for the purpose of HIV testing.  
☐ Pursuant to 39-13-524 the defendant is sentenced to community supervision for life following sentence expiration.  
☐ Pursuant to Title 68, Chapter 11, Part 10, the clerk shall forward this judgment to the Department of Health.

### Special Conditions

Dismiss counts 1-13 & 17-27; plea agreement conditioned upon defendant pleading guilty to 1 count of Rape of a Child in Wilson County to be served concurrently w/ this sentence; failure to enter said plea may result in the set aside of this plea at the State's election

DAVID BRAGG Judge's Name Sharon L. Reddick Judge's Signature Ronald D. Harris Date of Entry of Judgment 9-15-17  
 Counsel for State/Signature (optional) Defendant/Defendant's Counsel/Signature (optional)

I \_\_\_\_\_, clerk, hereby certify that, before 09/14/2017 copy of this judgment was made available to the party or parties who did not provide a signature above.

DA, AOL, CR, TBI

# IN THE CRIMINAL/CIVIL COURT FOR RUTHERFORD COUNTY, TENNESSEE

Case Number: F-76831 Count: 15 Counsel for the State: SHARON L. REDDICK  
 Judicial District: 16<sup>th</sup> Judicial Division: 2 Counsel for the Defendant: Russell Nixon  
 State of Tennessee ☒ Retained ☐ Pub Def Appt ☐ Private Atty Appt  
 vs. ☐ Counsel Waived ☐ Pro Se

Defendant: RONALD DAVID HARRIS Alias: \_\_\_\_\_ Date of Birth: 02/25/1971 Sex: Male  
 Race: White SSN: 366-86-2536 Driver License #: 086313073 Issuing State: \_\_\_\_\_  
 State ID #: \_\_\_\_\_ County Offender ID # (if applicable): \_\_\_\_\_ TOMIS/TDOC #: \_\_\_\_\_  
 Relationship to Victim: Stepfather Victim's Age: 15  
 State Control #: \_\_\_\_\_ Arrest Date: 08/22/2016 Indictment Filing Date: 01/09/2017

## JUDGMENT

☒ Original ☐ Amended ☐ Corrected

Come the parties for entry of judgment.

On the 15 day of September, the defendant:

☒ Pled Guilty ☐ Dismissed/Nolle Prosequi  
☐ Pled Nolo  
☐ Pled Guilty - Certified Question Findings Incorporated by Reference

Is found: ☐ Guilty ☐ Not Guilty  
☐ Jury Verdict ☐ Not Guilty by Reason of  
☐ Bench Trial

Indictment: Class (circle one) 1<sup>st</sup> A **B** C D E ☒ Felony ☐ Misdemeanor  
 Indicted Offense Name AND TCA §: 39-17-1005 - ESPECIALLY AGGRAVATED SEXUAL EXPLOITATION OF A  
 Amended Offense Name AND TCA §: \_\_\_\_\_  
 Offense Date: June 2016 County of Offense: RUTHERFORD  
 Conviction Offense Name AND TCA §: above  
 Conviction: Class (circle one) 1<sup>st</sup> A **B** C D E ☒ Felony ☐ Misdemeanor  
 Is this conviction offense methamphetamine related? ☐ Yes ☐ No  
 Sentence Imposed Date: 9/15/17

After considering the evidence, the entire record, and in the case of sentencing, all factors in Tennessee Code Annotated Title 40, Chapter 35, all of which are incorporated by reference herein, it is ORDERED and ADJUDGED that the conviction described above is imposed hereby and that a sentence and costs are imposed as follows:

| Offender Status (Check One)   | Release Eligibility (Check One)  | Concurrent with:  | Pretrial Jail Credit Period(s):   |
|---|--|---|---|
| <input type="checkbox"/> Mitigated<br><input checked="" type="checkbox"/> Standard<br><input type="checkbox"/> Multiple<br><input type="checkbox"/> Persistent<br><input type="checkbox"/> Career | <input type="checkbox"/> Mitigated 20%<br><input type="checkbox"/> Mitigated 30%<br><input type="checkbox"/> Standard 30%<br><input type="checkbox"/> Multiple 35%<br><input type="checkbox"/> Persistent 45%<br><input type="checkbox"/> Career 60%<br><input type="checkbox"/> Agg Rob 85%<br><input checked="" type="checkbox"/> 40-35-501(i) 100%<br><input type="checkbox"/> 39-13-518 100% | <input type="checkbox"/> Agg Rob w/Prior 100%<br><input type="checkbox"/> Multiple Rapist 100%<br><input type="checkbox"/> Child Rapist 100%<br><input type="checkbox"/> Child Predator 100%<br><input type="checkbox"/> Agg Rapist 100%<br><input type="checkbox"/> Mult 39-17-1324 100%<br><input type="checkbox"/> 39-17-1324(a), (b) 100%<br><input type="checkbox"/> Agg Assault w/Death 75%<br><input type="checkbox"/> Att 1 <sup>st</sup> Degree Murder w/SBI 85% | <input type="checkbox"/> 1 <sup>st</sup> Degree Murder<br><input type="checkbox"/> Drug Free Zone<br><input type="checkbox"/> Gang Related<br><input type="checkbox"/> Repeat Violent Off<br><input type="checkbox"/> Agg Child Neg/En 70%<br><input type="checkbox"/> Agg Child Neg/En 85%<br><input type="checkbox"/> Meth 100% |
|   |  | Consecutive to: <u>Count 14</u>   | From _____ to _____<br>From _____ to _____<br>From _____ to _____<br>From _____ to _____  |

Sentenced To: ☒ TDOC ☐ County Jail ☐ Workhouse  
 Sentence Length: 10 Years \_\_\_\_\_ Months \_\_\_\_\_ Days \_\_\_\_\_ Hours ☐ Life ☐ Life w/out Parole ☐ Death  
 Mandatory Minimum Sentence Length: \_\_\_\_\_ 39-17-417, 39-13-513, 39-13-514, or 39-17-432 in Prohibited Zone or \_\_\_\_\_ 55-10-401 DUI 4<sup>th</sup> Offense  
 or \_\_\_\_\_ 39-17-1324 Possession/Employment of Firearm or \_\_\_\_\_ 40-39-208, -211 Violation of Sex Offender Registry or \_\_\_\_\_ Meth (39-17-434, -417, -418)  
 Period of incarceration to be served prior to release on probation or Community Corrections: \_\_\_\_\_ Months \_\_\_\_\_ Days \_\_\_\_\_ Hours  
 Minimum service prior to eligibility for work release, furlough, trusty status and rehabilitative programs: \_\_\_\_\_ % (Misdemeanor Only)  
 Alternative Sentence: ☐ Sup Prob ☐ Unsup Prob ☐ Comm Corr (CHECK ONE BOX) \_\_\_\_\_ Years \_\_\_\_\_ Months \_\_\_\_\_ Days Effective: \_\_\_\_\_  
 WAS DRUG COURT ORDERED AS A CONDITION OF THE ALTERNATIVE SENTENCE? ☒ No

|  |   |
|--|---|
| Court Ordered Fees and Fines:<br>\$ _____ Court Costs <input checked="" type="checkbox"/> Defendant <input type="checkbox"/> State<br>\$ _____ Fine Assessed<br>\$ _____ Traumatic Brain Injury Fund (68-55-301 et seq.)<br>\$ _____ Drug Testing Fund (TN Drug Control Act)<br>\$ _____ CICF \$ _____ Sex Offender Tax<br>\$ _____ Other: _____ | Restitution: Victim Name _____<br>Address _____<br>Total Amount \$ _____ Per Month \$ _____<br><input type="checkbox"/> Unpaid Community Service: _____ Hours _____ Days _____ Weeks _____ Months |
|--|---|

☒ The Defendant having been found guilty is rendered infamous and ordered to provide a biological specimen for the purpose of DNA analysis.  
☒ Pursuant to 39-13-521 the defendant is ordered to provide a biological specimen for the purpose of HIV testing.  
☐ Pursuant to 39-13-524 the defendant is sentenced to community supervision for life following sentence expiration.  
☐ Pursuant to Title 68, Chapter 11, Part 10, the clerk shall forward this judgment to the Department of Health.

Special Conditions

DAVID BRAGG

Judge's Name

Counsel for State/Signature (optional)

Judge's Signature

Defendant/Defendant's Counsel/Signature (optional)

Date of Entry of Judgment

I, \_\_\_\_\_, clerk, hereby certify that, before entry by the court, a copy of this judgment was made available to the party or parties who did not provide a signature above.

# IN THE CRIMINAL/JUDICIAL COURT FOR RUTHERFORD COUNTY, TENNESSEE

Case Number: F-76831 Count: 16 Counsel for the State: SHARON L. REDDICK  
 Judicial District: 16<sup>th</sup> Judicial Division: 2 Counsel for the Defendant: Russell Nixon  
 State of Tennessee ☒ Retained ☐ Pub Def Appt ☐ Private Atty Appt  
 vs. ☐ Counsel Waived ☐ Pro Se  
 Defendant: RONALD DAVID HARRIS Alias: \_\_\_\_\_ Date of Birth: 02/25/1971 Sex: Male  
 Race: White SSN: 366-86-2536 Driver License #: 086313073 Issuing State: TN  
 State ID #: \_\_\_\_\_ County Offender ID # (if applicable): \_\_\_\_\_ TOMIS/TDOC #: \_\_\_\_\_  
 Relationship to Victim: stepfather Victim's Age: 15  
 State Control #: \_\_\_\_\_ Arrest Date: 08/22/2016 Indictment Filing Date: 01/09/2017

## JUDGMENT

☒ Original ☐ Amended ☐ Corrected

Come the parties for entry of judgment.

On the 15 day of September, \_\_\_\_\_, the defendant:

☒ Pled Guilty ☐ Dismissed/Nolle Prosequi  
☐ Pled Nolo  
☐ Pled Guilty - Certified Question Findings Incorporated by Reference

Is found: ☐ Guilty ☐ Not Guilty  
☐ Jury Verdict ☐ Not Guilty by Reason of  
☐ Bench Trial

Indictment: Class (circle one) 1<sup>st</sup> A **B** C D E ☒ Felony ☐ Misdemeanor  
 Indicted Offense Name AND TCA §: 39-17-1005 - ESPECIALLY AGGRAVATED SEXUAL EXPLOITATION OF A  
 Amended Offense Name AND TCA §: \_\_\_\_\_  
 Offense Date: June 2016 County of Offense: RUTHERFORD  
 Conviction Offense Name AND TCA §: above  
 Conviction: Class (circle one) 1<sup>st</sup> A B C D E ☐ Felony ☐ Misdemeanor  
 Is this conviction offense methamphetamine related? ☐ Yes ☐ No  
 Sentence Imposed Date: \_\_\_\_\_

After considering the evidence, the entire record, and in the case of sentencing, all factors in Tennessee Code Annotated Title 40, Chapter 35, all of which are incorporated by reference herein, it is ORDERED and ADJUDGED that the conviction described above is imposed hereby and that a sentence and costs are imposed as follows:

| Offender Status<br>(Check One)  | Release Eligibility<br>(Check One)   | Concurrent with:  | Pretrial Jail Credit Period(s):  |
|---|--|---|--|
| <input type="checkbox"/> Mitigated<br><input checked="" type="checkbox"/> Standard<br><input type="checkbox"/> Multiple<br><input type="checkbox"/> Persistent<br><input type="checkbox"/> Career   | <input type="checkbox"/> Mitigated 20%<br><input type="checkbox"/> Mitigated 30%<br><input type="checkbox"/> Standard 30%<br><input type="checkbox"/> Multiple 35%<br><input type="checkbox"/> Persistent 45%<br><input type="checkbox"/> Career 60%<br><input type="checkbox"/> Agg Rob 85%<br><input checked="" type="checkbox"/> 40-35-501(i) 100%<br><input type="checkbox"/> 39-13-518 100% | <input type="checkbox"/> 1 <sup>st</sup> Degree Murder<br><input type="checkbox"/> Drug Free Zone<br><input type="checkbox"/> Gang Related<br><input type="checkbox"/> Repeat Violent Off | From _____ to _____<br>From _____ to _____<br>From _____ to _____<br>From _____ to _____ |
| <input type="checkbox"/> Agg Rob w/Prior 100%<br><input type="checkbox"/> Multiple Rapist 100%<br><input type="checkbox"/> Child Rapist 100%<br><input type="checkbox"/> Child Predator 100%<br><input type="checkbox"/> Agg Rapist 100%<br><input type="checkbox"/> Mult 39-17-1324 100%<br><input type="checkbox"/> 39-17-1324(a), (b) 100%<br><input type="checkbox"/> Agg Assault w/Death 75%<br><input type="checkbox"/> Att 1 <sup>st</sup> Degree Murder w/SBI 85% | <input type="checkbox"/> 1 <sup>st</sup> Degree Murder<br><input type="checkbox"/> Drug Free Zone<br><input type="checkbox"/> Gang Related<br><input type="checkbox"/> Repeat Violent Off<br><input type="checkbox"/> Agg Child Neg/En 70%<br><input type="checkbox"/> Agg Child Neg/En 85%<br><input type="checkbox"/> Meth 100%  | Concurrent with:<br><br>Consecutive to:<br><u>count 15</u>  |  |

Sentenced To: ☒ TDOC ☐ County Jail ☐ Workhouse  
 Sentence Length: 10 Years \_\_\_\_\_ Months \_\_\_\_\_ Days \_\_\_\_\_ Hours ☐ Life ☐ Life w/out Parole ☐ Death  
 Mandatory Minimum Sentence Length: \_\_\_\_\_ 39-17-417, 39-13-513, 39-13-514, or 39-17-432 in Prohibited Zone or \_\_\_\_\_ 55-10-401 DUI 4<sup>th</sup> Offense  
 or \_\_\_\_\_ 39-17-1324 Possession/Employment of Firearm or \_\_\_\_\_ 40-39-208, -211 Violation of Sex Offender Registry or \_\_\_\_\_ Meth (39-17-434, -417, -418)  
 Period of incarceration to be served prior to release on probation or Community Corrections: \_\_\_\_\_ Months \_\_\_\_\_ Days \_\_\_\_\_ Hours  
 Minimum service prior to eligibility for work release, furlough, trusty status and rehabilitative programs: \_\_\_\_\_ % (Misdemeanor Only)  
 Alternative Sentence: ☐ Sup Prob ☐ Unsup Prob ☐ Comm Corr (CHECK ONE BOX) \_\_\_\_\_ Years \_\_\_\_\_ Months \_\_\_\_\_ Days Effective: \_\_\_\_\_

WAS DRUG COURT ORDERED AS A CONDITION OF THE ALTERNATIVE SENTENCE? ☒ No ☐ Yes

Court Ordered Fees and Fines: Costs to be Paid by  
 \$ \_\_\_\_\_ Court Costs ☒ Defendant ☐ State  
 \$ \_\_\_\_\_ Fine Assessed  
 \$ \_\_\_\_\_ Traumatic Brain Injury Fund (68-55-301 et seq.)  
 \$ \_\_\_\_\_ Drug Testing Fund (TN Drug Control Act)  
 \$ \_\_\_\_\_ CICEF \$ \_\_\_\_\_ Sex Offender Tax  
 \$ \_\_\_\_\_ Other: \_\_\_\_\_

Restitution: Victim Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Total Amount \$ \_\_\_\_\_ Per Month \$ \_\_\_\_\_  
☐ Unpaid Community Service: \_\_\_\_\_ Hours \_\_\_\_\_ Days \_\_\_\_\_ Weeks \_\_\_\_\_ Months

☒ The Defendant having been found guilty is rendered infamous and ordered to provide a biological specimen for the purpose of DNA analysis.  
☒ Pursuant to 39-13-521 the defendant is ordered to provide a biological specimen for the purpose of HIV testing.  
☐ Pursuant to 39-13-524 the defendant is sentenced to community supervision for life following sentence expiration.  
☐ Pursuant to Title 68, Chapter 11, Part 10, the clerk shall forward this judgment to the Department of Health.

Special Conditions

total effective sentence 30 yrs @ 100% release eligibility

DAVID BRAGG  
 Judge's Name Sharon L. Reddick  
 Counsel for State/Signature (optional)

9-15-17  
 Judge's Signature Ronald D. Harris Date of Entry of Judgment  
 Defendant/Defendant's Counsel/Signature (optional)

I, \_\_\_\_\_, clerk, hereby certify that, before entry by the court, a copy of this judgment was made available to the party or parties who did not provide a signature above.

## **EXHIBIT 2**



New York Writer/Publisher Relations Office  
7 World Trade Center, 250 Greenwich Street  
New York, NY 10007-0030

Nashville Writer/Publisher Relations Office  
10 Music Square East  
Nashville, TN 37203

Los Angeles Writer/Publisher Relations Office  
8730 Sunset Blvd, Third Floor West  
Los Angeles, CA 90069

London Writer/Publisher Relations Office  
84 Harley House, Marylebone Road  
London NW1 5HN, England

Atlanta Writer/Publisher Relations Office  
3340 Peachtree Road NE, Suite 570  
Atlanta, GA 30326

Miami Writer/Publisher Relations  
(305) 673-5148

## Royalty Statement

Page 1 of 2

**Affiliate:** HARRIS RONALD DAVID  
**Account No:** 000421262

**IP No:** 00236.61.29.71

**Distribution Date:** September 14, 2018

**U.S. Performance Period:** 1ST QUARTER 2018  
**International:** 161ST ACCOUNTING

### Summary of Current Royalty Earnings

| Description      | U.S.    | Admin Services | International | Total    |
|------------------|---------|----------------|---------------|----------|
| Current Earnings | \$62.79 | \$0.00         | \$40.65       | \$103.44 |
| Amount Paid      | \$62.79 | \$0.00         | \$40.65       | \$103.44 |
|                  |         |                |               |          |
|                  |         |                |               |          |
|                  |         |                |               |          |
|                  |         |                |               |          |
|                  |         |                |               |          |
|                  |         |                |               |          |

### Summary of Year to Date Royalties as of September 14, 2018

| Description    | Payments        | Adjustments   | Applied to Balance Due | Withheld      |
|----------------|-----------------|---------------|------------------------|---------------|
| U.S.           | \$62.79         | \$0.00        | \$0.00                 | \$0.00        |
| International  | \$40.65         | \$0.00        | \$0.00                 | \$0.00        |
|                |                 |               |                        |               |
|                |                 |               |                        |               |
|                |                 |               |                        |               |
|                |                 |               |                        |               |
| <b>Totals:</b> | <b>\$103.44</b> | <b>\$0.00</b> | <b>\$0.00</b>          | <b>\$0.00</b> |

**Questions About Your Statement? Call: (310) 659-9109 or visit bmi.com**

BMI's Next Distribution Will Occur During: **January 2019**

Moving? Visit bmi.com to change your address

| Account Number | Check Number  | Check Date |
|----------------|---------------|------------|
| 000421262      | 12249885      | 2018-09-14 |
| Period         | Check Amount  |            |
| 20181-161ST    | *****\$103.44 |            |

RONALD DAVID HARRIS  
503 CLOVERHILL LANE  
LEBANON TN 37090

Mother's Address who has  
Power of Attorney over him & his  
royalty payments from BMI.  
Mother's name Linda Reilly

# **EXHIBIT 3**

**Nevada Rise Academy Inc**  
2525 Emerson Ave  
Las Vegas, NV 89121

**paylocity**

Direct Deposit Advice

**Check Date**  
April 15, 2020

**Voucher Number**  
692

|                        |  |  |  | Direct Deposits              | Type | Account | Amount          |
|------------------------|--|--|--|------------------------------|------|---------|-----------------|
| Direct Deposit Voucher |  |  |  | BAXTER                       | C    | ***3305 | 1,585.85        |
|                        |  |  |  | CREDIT                       |      |         |                 |
|                        |  |  |  | UNION                        |      |         |                 |
|                        |  |  |  | <b>Total Direct Deposits</b> |      |         | <b>1,585.85</b> |

49417 9930-105-99999 8 692 559 A

**Jennifer Figueroa**  
3874 Calle De Este  
Las Vegas, NV 89121

**Non Negotiable - This is not a check - Non Negotiable**

**Nevada Rise Academy Inc**

**Jennifer Figueroa**

**Earnings Statement**

|             |                |                     |          |                  |                |                |          |
|-------------|----------------|---------------------|----------|------------------|----------------|----------------|----------|
| Employee ID | 8              | Fed Taxable Income  | 1,946.44 | Check Date       | April 15, 2020 | Voucher Number | 692      |
| Location    | 9930-105-99999 | Fed Filing Status   | S-24     | Period Beginning | April 1, 2020  | Net Pay        | 1,585.85 |
| Salary      | \$2,101.67     | State Filing Status |          | Period Ending    | April 15, 2020 |                |          |

| Earnings              | Rate  | Hours | Amount          | YTD              |
|-----------------------|-------|-------|-----------------|------------------|
| NPERS ER              | 15.25 |       | 320.50          | 2,243.50         |
| SALARY                |       |       | 2,101.67        | 14,711.69        |
| <b>Gross Earnings</b> |       |       | <b>2,101.67</b> | <b>14,711.69</b> |

| Taxes        | Amount       | YTD           |
|--------------|--------------|---------------|
| FTW          | 0.00         | 0.00          |
| MED          | 28.22        | 198.83        |
| NV           | 0.00         | 0.00          |
| <b>Taxes</b> | <b>28.22</b> | <b>198.83</b> |

| Deductions        | Amount        | YTD             |
|-------------------|---------------|-----------------|
| Allac Post Tax    | 11.87         | 59.35           |
| Allac Pretax      | 43.82         | 219.10          |
| DENTAL 125        | 10.31         | 72.17           |
| MEDICAL INS       | 98.82         | 691.74          |
| NPERS EL          | 320.50        | 2,243.50        |
| VISION 125        | 2.28          | 15.96           |
| <b>Deductions</b> | <b>487.60</b> | <b>3,301.82</b> |

| Direct Deposits              | Type | Account | Amount          |
|------------------------------|------|---------|-----------------|
| BAXTER                       | C    | ***3305 | 1,585.85        |
| CREDIT                       |      |         |                 |
| UNION                        |      |         |                 |
| <b>Total Direct Deposits</b> |      |         | <b>1,585.85</b> |

| Time Off       | Used | Available |
|----------------|------|-----------|
| Families First | 0.00 | 1,939.93  |



**Nevada Rise Academy Inc**  
2525 Emerson Ave  
Las Vegas, NV 89121

**paylocity**

Direct Deposit Advice

**Check Date**  
March 31, 2020

**Voucher Number**  
669

| Direct Deposits              | Type | Account | Amount          |
|------------------------------|------|---------|-----------------|
| BAXTER CREDIT UNION          | C    | ***3305 | 1,585.85        |
| <b>Total Direct Deposits</b> |      |         | <b>1,585.85</b> |

Direct Deposit Voucher

49417 9930-105-99999 8 669 540 A

**Jennifer Figueroa**  
3874 Calle De Este  
Las Vegas, NV 89121

**Non Negotiable - This is not a check - Non Negotiable**

**Nevada Rise Academy Inc**

**Jennifer Figueroa**

**Earnings Statement**

|             |                |                     |          |                  |                |                |          |
|-------------|----------------|---------------------|----------|------------------|----------------|----------------|----------|
| Employee ID | 8              | Fed Taxable Income  | 1,946.44 | Check Date       | March 31, 2020 | Voucher Number | 669      |
| Location    | 9930-105-99999 | Fed Filing Status   | S-24     | Period Beginning | March 16, 2020 | Net Pay        | 1,585.85 |
| Salary      | \$2,101.67     | State Filing Status |          | Period Ending    | March 31, 2020 |                |          |

| Earnings              | Rate  | Hours | Amount          | YTD              |
|-----------------------|-------|-------|-----------------|------------------|
| NPERS ER              | 15.25 |       | 320.50          | 1,923.00         |
| SALARY                |       |       | 2,101.67        | 12,610.02        |
| <b>Gross Earnings</b> |       |       | <b>2,101.67</b> | <b>12,610.02</b> |

| Taxes        | Amount       | YTD           |
|--------------|--------------|---------------|
| FTW          | 0.00         | 0.00          |
| MED          | 28.22        | 170.61        |
| NV           | 0.00         | 0.00          |
| <b>Taxes</b> | <b>28.22</b> | <b>170.61</b> |

| Deductions        | Amount        | YTD             |
|-------------------|---------------|-----------------|
| Aflac Post Tax    | 11.87         | 47.48           |
| Aflac Pretax      | 43.82         | 175.28          |
| DENTAL 125        | 10.31         | 61.86           |
| MEDICAL INS       | 98.82         | 592.92          |
| NPERS EE          | 320.50        | 1,923.00        |
| VISION 125        | 2.28          | 13.68           |
| <b>Deductions</b> | <b>487.60</b> | <b>2,814.22</b> |

| Direct Deposits              | Type | Account | Amount          |
|------------------------------|------|---------|-----------------|
| BAXTER CREDIT UNION          | C    | ***3305 | 1,585.85        |
| <b>Total Direct Deposits</b> |      |         | <b>1,585.85</b> |

**Time Off**      **Used**      **Available**  
Families First      0.00      1,939.93

**Nevada Rise Academy Inc**  
2525 Emerson Ave  
Las Vegas, NV 89121

paylocity

Direct Deposit Advice

Check Date  
March 13, 2020

Voucher Number  
646

| Direct Deposits       | Type | Account | Amount   |
|-----------------------|------|---------|----------|
| BAXTER CREDIT UNION   | C    | ***3305 | 1,585.85 |
| Total Direct Deposits |      |         | 1,585.85 |

Direct Deposit Voucher

49417 9930-105-99999 8 646 521 A

**Jenniffer Figueroa**  
3874 Calle De Este  
Las Vegas, NV 89121

**Non Negotiable - This is not a check - Non Negotiable**

**Nevada Rise Academy Inc**

**Jenniffer Figueroa**

**Earnings Statement**

|             |                |                     |          |                  |                |                |          |
|-------------|----------------|---------------------|----------|------------------|----------------|----------------|----------|
| Employee ID | 8              | Fed Taxable Income  | 1,946.44 | Check Date       | March 13, 2020 | Voucher Number | 646      |
| Location    | 9930-105-99999 | Fed Filing Status   | S-24     | Period Beginning | March 1, 2020  | Net Pay        | 1,585.85 |
| Salary      | \$2,101.67     | State Filing Status |          | Period Ending    | March 15, 2020 |                |          |

| Earnings              | Rate  | Hours | Amount          | YTD              |
|-----------------------|-------|-------|-----------------|------------------|
| NPERS ER              | 15.25 |       | 320.50          | 1,602.50         |
| SALARY                |       |       | 2,101.67        | 10,508.35        |
| <b>Gross Earnings</b> |       |       | <b>2,101.67</b> | <b>10,508.35</b> |

| Taxes        | Amount       | YTD           |
|--------------|--------------|---------------|
| FITW         | 0.00         | 0.00          |
| MED          | 28.22        | 142.39        |
| NV           | 0.00         | 0.00          |
| <b>Taxes</b> | <b>28.22</b> | <b>142.39</b> |

| Deductions        | Amount        | YTD             |
|-------------------|---------------|-----------------|
| Aflac Post Tax    | 11.87         | 35.61           |
| Aflac Pretax      | 43.82         | 131.46          |
| DENTAL 125        | 10.31         | 51.55           |
| MEDICAL INS       | 98.82         | 494.10          |
| NPERS EE          | 320.50        | 1,602.50        |
| VISION 125        | 2.28          | 11.40           |
| <b>Deductions</b> | <b>487.60</b> | <b>2,326.62</b> |

| Direct Deposits       | Type | Account | Amount   |
|-----------------------|------|---------|----------|
| BAXTER CREDIT UNION   | C    | ***3305 | 1,585.85 |
| Total Direct Deposits |      |         | 1,585.85 |

| Time Off       | Used | Available |
|----------------|------|-----------|
| Families First | 0.00 | 1,939.93  |



CNNDCA

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jenniffer Figueroa, Plaintiff.

D-20-606828-C

vs.

Department N

Ronald David Harris, Defendant.

**CLERK'S NOTICE OF NONCONFORMING DOCUMENT AND CURATIVE ACTION**

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is hereby provided that the following electronically filed document does not conform to the applicable filing requirements:

|  |                                  |
|--|----------------------------------|
| Title of Nonconforming Document:               | <u>Family court coversheet</u>   |
| Party Submitting Document for Filing:          | <u>Jennifer Figueroa</u>         |
| Date and Time Submitted for Electronic Filing: | <u>April 22, 2020 at 12:49pm</u> |

**Reason for Nonconformity Determination:**

- ☐ The case caption and/or case number on the document does not match the case caption and/or case number of the case that it was filed into. In accordance with the Administrative Order 19-5, the document has been reprocessed by removing it from the incorrect case and entering it into the case identified by the case number and caption on the document. This Notice has been filed in the case where the document was removed.
- ☐ The document initiated a new civil action and the case type designation does not match the cause of action identified in the document. In accordance with Administrative Order 19-5, the case type designation in the case management system has been modified to match the cause of action identified in the document.
- ☒ The submitted document initiated a new civil action and was made up of multiple documents submitted together. In accordance with the Administrative Order 19-5, the document has been reprocessed by separating the single document into multiple documents and filing each document individual

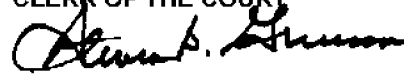
Dated this: 24th day of April, 2020

By: /s/ Irmina Fumo  
Deputy District Court Clerk

**CERTIFICATE OF SERVICE**

I hereby certify that on April 24, 2020, I concurrently filed and served a copy of the foregoing Clerk's Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court's Electronic Filing and Service System.

By: /s/ Irmina Fumo  
Deputy District Court Clerk



AOS

Your Name: Jennifer Figueroa

Address: 3874 Calle De Este Las Vegas, NV 89121

Telephone: 702-412-2617

Email Address: Jennfig1976@gmail.com

Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa

Plaintiff

vs.

CASE NO.: D-20-606828-C

DEPT:

N

Ronald David Harris #584414

Defendant

**AFFIDAVIT OF SERVICE**

*A copy of the filed documents can be **personally served** on another party.*

*A neutral person who is 18 or older and not involved in this case or related to the parties can personally serve a summons and complaint directly to the person (NRC P 4.1(c)(3)). If that is not possible, the server can personally serve the summons and complaint on someone of suitable age and discretion who lives with the person (NRC P 4.2(a)(2)).*

**Family members and significant others cannot serve papers.**

*Whoever serves the documents must complete this form. **File this completed form at court.***

I, (name of person who served the documents)



Jerry Gentry

do declare

**(complete EVERY SECTION below):**

1. I am not a party to or interested in this action and I am over 18 years of age.
2. I was asked to serve legal documents by (name of the party who asked you to serve the documents) JENNIFER FIGUEROA. (Check one)  
☐ I know this person because (describe how you know the person, for example, "we work together," "roommates," etc.)  
☒ I do not know the person above.

3. **What Documents You Served:** I served a copy of the (Check all that apply)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Complaint for Custody | <input type="checkbox"/> Joint Preliminary Injunction |
| <input checked="" type="checkbox"/> Summons               | <input checked="" type="checkbox"/> Other: Exhibits   |

4. **Who You Served.** I served the (check one)

- ☐ Plaintiff  
☒ Defendant

5. **When You Served.** I personally served the documents on (date you served the documents) (month) April (day) 30, 2020 at the hour of (time) 2 : 00 a.m. X p.m.

6. **Where You Served.** I personally delivered and left the documents with (check one)

- ☒ **The Party to the Case.** I served the documents on the party at the location below. (complete the details below)

Ronald David Harris #584414

Name of Person Served

5249 HWY 67 West PO BOX 5000

Address Where Served

MTN CITY TN 37683-5000

City, State, Zip Code

- ☐ **A Person Who Lives with the Party.** This is a person of suitable age and discretion who lives with the party. (complete the details below)

Name of Person Served

Address Where Served

City, State, Zip Code

7. I am not a licensed process server; I am a natural person serving legal process without compensation, not more than three times per year, on behalf of a litigant who is a natural person, and therefore I am not required to be licensed pursuant to NRS 648.063(2) (2017 Nevada Laws Ch. 126 (A.B. 128)).

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

DATED (month) April (day) 30, 2020

Server's Signature: Jerry Gentry

Server's Printed Name: Jerry Gentry

Residential Business Address: NECX P.O. Box 5000

City, State, Zip: Mountain City, TN 37683

Server's Phone Number: 423-727-7387

*[Signature]*  
CLERK OF THE COURT

EXHS

Name: Jennifer FigueroaAddress: 3874 Calle de Este  
Las Vegas NV 89121Telephone: 702 412 2617Email Address: Jennfig1976@gmail.com

In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff

vs.

Ronald David Harris  
Defendant.

D-20-606828-C

CASE NO.:  
DEPT: N

DATE OF HEARING:  
TIME OF HEARING:

**EXHIBIT APPENDIX**

(your name) JENNIFER FIGUEROA, the (check one ☒ Plaintiff  
☐ Defendant, submits the following exhibits in support of my (title of motion / opposition you  
filed that these exhibits support) Child Custody Case. I understand that  
these are not considered substantive evidence in my case until formally admitted into evidence.

**Table of Contents:**

1. B-Felony Judgements against Ronald Harris; Plead Guilty. (30 yr. Sentence)
2. BMI MUSIC Royalty Statement example - Ronald Harris
3. Jennifer Figueroa's Pay Stubs
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
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16. \_\_\_\_\_
17. \_\_\_\_\_
18. \_\_\_\_\_
19. \_\_\_\_\_
20. \_\_\_\_\_

DATED (month) April (day) 22, 2020.

Submitted By: (your signature)   
(print your name) JENNIFER FIGUEROA

### CERTIFICATE OF MAILING

I, (your name) Jennifer Figueroa declare under penalty of perjury under the law of the State of Nevada that on (month) April (day) 27, 2020, I served this **Exhibit Appendix** by depositing a copy in the U.S. Mail in the State of Nevada, postage prepaid, addressed to:

Name of Person Served: Ronald Harris  
Address: PO Box 5000  
City, State, Zip: Mtn City TN 37683

DATED (month) April (day) 30, 2020.

Submitted By: (your signature) 



**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
37 - 40  
WILL FOLLOW VIA  
U.S. MAIL**

05/21/2020

*Heather Hemin*  
CLERK OF THE COURT

CERT

Name: Ronald Harris #584414Address: NECXPO BOX 5000 Mountain City, TN 37683Telephone:                     Email Address:                     

In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa

Plaintiff,

vs.

Ronald D. Harris

Defendant.

CASE NO.: D-20-606828-CDEPT: N**CERTIFICATE OF MAILING**

I, (name of person who mailed the document) Ronald D. Harris,  
declare under penalty of perjury under the law of the State of Nevada that the following is true  
and correct. That on (month) \_\_\_\_\_ (day) \_\_\_\_\_, 20\_\_\_\_, service of the:

(☒ check all that apply)

☐ Motion☒ Answer☐ Financial Disclosure Form☐ Opposition☐ Reply☐ Notice of Entry of Judgment / Order / Decree☐ Other: \_\_\_\_\_

was made pursuant to NRCP 5(b) by depositing a copy in the U.S. Mail in the State of ~~Nevada~~ Tennessee  
postage prepaid, addressed to:

(Print the name and address of the person you mailed the document to)

Jenn Figueroa3874 Calle De EsteLas Vegas, NV. 89121DATED this 11 day of May, 2020**RECEIVED**

(Signature)

MAY 18 2020

**CLERK OF THE COURT**

Certificate of Mailing

  
CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

JENNIFFER FIGUEROA, PLAINTIFF.  
VS.  
RONALD DAVID HARRIS,  
DEFENDANT.

CASE NO: D-20-606828-C

DEPARTMENT N

DEFENDANT'S ANSWER

Submitted by:

PREPARED BY THE CLERK

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

Case # D-20-606828-C

Dept N

RECEIVED

MAY 18 2020

CLERK OF THE COURT

This is my answer to Ms. Figueroa's Custody Complaint. I'll try and be as brief as possible. First I'd like the court to know this is the third time that Ms. Figueroa has pulled this move. On both occasions Judge Hartel denied her motions. See Case # D-17547582-D (Dept. N) As I mentioned in that 2017 answer to her complaint, Ms. Figueroa absconded to Las Vegas from Tennessee. At the time I was not convicted of any crime. She and I had joint legal custody at that time, and unless the court changes that, I still have joint legal custody. Ms. Figueroa was legally required to get a court's permission to leave the state of TN with my kids. Not only did she fail to do that, she never even tried to do that. For nearly six months she never even gave me an address to write my kids. I spoke to my kids for the first time after my arrest 14 months later. From October, 2017 until February, 2019 I spoke to my kids religiously. I called every Sunday evening. The only time I missed is if I had no money on my phone account. Ms. Figueroa "allowed" me to speak to my kids, even though I had joint legal custody and the right to speak to them. I never had an inappropriate conversation with my kids, she usually had me on speaker phone anyway. I never said a bad or negative word about

their mother. In early 2019 I told Ms. Figveroa not to cut off my contact with my children because this post conviction petition could lead to her arrest or serious legal issues. Doing so would be vindictive and retaliatory. She said, "I'd never stoop that low." I reminded her that our kids were innocent and that they loved us both. She proved me correct. After a heated discussion with her on February 3, 2019, one where she dropped "F"-bombs all over the place, I told her then that I will bring her to justice. Not only for her part in my case, but also for extortion against me, but also for the \$20,000 that she stole (embezzled) from our 501 c-3 non-profit charity to benefit needy children in the Nashville area. After that discussion she cut off my contact with my children. I still called for months (and still do occasionally) but to no avail. She would not answer the phone (cell). I have not spoken to my kids for 15 months. I would also like the court to know that the evidence against Ms. Figveroa is extremely solid. In my post conviction petition one of the claims that I made is that I was selectively prosecuted and that my 14<sup>th</sup> Amendment rights were violated for "equal protection under the law." When you make a claim in post conviction relief you have to prove it or it gets tossed. I not only have the evidence but I'm also using her own words, the words of her two oldest daughters (my step-daughters) against her from their 3 separate interviews with law enforcement. They all 3 unknowingly implicated her. The female Asst. D.A. deliberately looked the other way on Ms. Figveroa. I will be calling that A.D.A. and two detectives

to the stand under oath. The questions they answer, if they tell the truth, will jeopardize Ms. Figueroa's freedom. The video interviews alone will force all 3 to tell the truth. At this point the D.A. proper will have no choice but to indict Ms. Figueroa on several charges. If by some unbelievable chance she is not charged then my lawyer will present the evidence to the grand jury himself. TN law allows any citizen to appear before the grand jury with evidence of a crime for indictment consideration. My lawyer is one of the best in TN and is also a professor of law at MTSU and is extremely confident indictments will be issued or returned. Ms. Figueroa has also defrauded the IRS on a 2016 Tax Return. They are looking into that. Let me now address her child support claim and the issues around that. First of all I adore my children and I have no problem helping to provide for them. But has been out of my control for the longest time. I'll explain. My songwriting royalties of recent times have been paw/try and almost non-existent. Last year a long dormant 17 year incentive - clause in a contract I signed with my co-writer, and well-known recording artist, was activated when the song we co-wrote was used partially in a #1 song. My total royalty claim to that #1 hit came to 1.1% out of 100%. I am now a credited writer on both songs but at this exact moment I have<sup>45</sup> not received anything yet

because it's a process. No one expected this to happen. There are several publishers and songwriters involved and 2 record labels involved. Not to mention I've set up 2 publishing companies to receive those royalties. One company is called "Made By Kenrico." Which is one that I've created for my children and to benefit them only. Not me, and certainly not Ms. Figueroa. Last year a song that I co-wrote with two well established artists took our song to #2 on the charts. That song's royalties have not been issued yet. The way it works in the industry is royalties have to accrue and be collected. It's usually a 9 month - 12 month process. My writing credit is approx 14% out of 100%. There are 7 of us on that credit. "Made By Kenrico's" publishing interest is 5%. That company (Made By Kenrico) is managed by me. I have the experience in this industry. I know how to negotiate deals and to put the songs in the best spot to generate income. Ms. Figueroa does not have that experience and should never be involved in any decisions whatsoever. If she were to ever gain control over any publishing company I manage I will close it down and make the songs to another one that she has no control of. Ms. Figueroa is extremely materialistic and cannot be trusted to use this or any money from me for our kids. In fact, when and if you rule on child support I'd like an order from the court that requires Ms. Figueroa to provide a monthly accounting of where the money for our children has gone. She has the computer skills to create worksheets, etc, for this exact purpose. Let me state that <sup>46</sup>last year I was blessed and

humbled to have co-written <sup>two</sup> ~~top~~ #1 songs. The  
aforementioned that came by way of my credit from  
a previous that was interpolated into the song, and  
one that I co-wrote outright. Those songs belong  
to the publishing company "My Sara Songs." Over 100  
songs are slated for that company's catalog. Most  
recently a song that I co-wrote with and for Harry  
Styles went to #6, and I currently have a charity  
single that I co-wrote for the Covid-19 pandemic it  
is climbing the charts for Twenty-One Pilots. All  
of the publishing interests in those songs, and  
several others, belong to My Sara Songs. I am not  
the owner of that company. I set it up in the  
name of Sara Fix. She is an adult woman and  
the inspiration of every song in that catalog. I am  
only the administrator and manager. I make  
all decisions for that publishing company. Ms. Fix  
is only a silent owner. She has zero authority  
to make any decisions or to even fire me. I  
can only resign. Her ownership is protected  
and non-~~transferable~~ transferrable. If Ms. Fix  
ever decides to give up ownership of this company  
it is defaulted to an IRS approved non-profit  
501 c3 charity organization with the strict  
stipulation that it's not one owned or operated  
by Ms. Figueroa who 100% embezzled \$20,000  
from the one we owned. That evidence<sup>47</sup> is 100%



irrefutable and will be shown in my post-conviction case. So the income on these songs are accruing now and will start to be paid very soon. The first indication will be when Ms. Fix starts to receive checks. Again, the songs from the "My Sara Songs" catalog are off limits to me. I do not receive one dime from it. The "Made By Kenrico" songs are in a trust for our 4 children. I'll never be able to ever predict any amount of a royalty check. Songs are paid by performance or usage. That varies from quarter to quarter and year to year. A song could go dormant for years and get re-recorded by someone 15 years later and generate income. I'll never have an accurate amount of money to generate a fair and accurate child support formula. Lastly, I'd like to address two more things. First, the royalty check Ms. Figueroa used in exhibit 2 was acquired illegally. Judge Hartel granted her a divorce from me in July, 2017. She has no more claim to anything of mine. <sup>2018 OK</sup> When I was arrested Ms. Figueroa took over all of my accounts. Facebook, Twitter, Gmail, Windows passwords, PayPal and my BMI music royalty accounts. She promptly changed all of my passwords and locked me out of everything and everything that was mine. I to this day cannot get into my BMI account. She's locked me out. I cannot see my works, or payments, or anything. The printed ~~my BMI~~ ~~royalty~~ ~~payment~~ that she has submitted as an exhibit, was printed by her only. She's seized control of this account <sup>48</sup> when she's legally not allowed.

This is who she is and what she does. She has also embezzled money from my BMI royalties and also from my music based royalties from my Paypal account for my production company, Murdock Ent. I have 100% proof of that and I will use it in my PCR case. I also plan on filing charges against ~~her~~<sup>her</sup> here in TN. I'm trying to demonstrate to this court that Ms. Figueroa should not be casting stones at me while living in her own glass house. Lastly, I'd like this court to know that I took a best interest plea. My lawyer was ineffective, and was not helping me. He was a paid attorney. I also knew that the Asst. D.A. who selectively targeted me had committed prosecutorial misconduct, (Brady violations, defied court orders, etc) and even in her responses to the court to my post conviction claims, she lied on paper to the court and I'll prove that easily. She will be asked to answer on the stand some of the claims that she made in that answer to the court when she's on the stand. She will not be able to back those answers. I do believe my case will be overturned. I also took a plea to protect the dignity and privacy of my step-daughter so that videos of her would not be shown to jurors, reporters, etc. I am not guilty of everything they alleged. Ms. Figueroa wants to paint me in a terrible light to this court in order to gain an advantage over me in this case. I will gladly provide this court with a complete transcript

of my PCR hearing. You can read the detectives and the Asst D.A.'s answers, as well as my ex-atty and my answers. IF everyone is truthful under penalty of perjury, you will see that Ms. Figueroa has ZERO business bringing this Custody case before this Court. Because if she is arrested and brought back to TN someone else will be caring for our kids. In fact, my kids were mainly raised in TN (our youngest was born there). If she is arrested I will petition this court or a TN court to have my kids returned to TN to be raised by parents or sister here in TN. Ms. Figueroa absconded to Las Vegas with our kids in an effort to avoid prosecution if I were able to show her crimes. Fortunately for her the Asst. D.A. did not even attempt to listen to me and thus Ms. Figueroa has eluded justice so far. Those days are numbered in my strong opinion once I reveal and prove in open Court at my PCR hearing. Again, she left TN without a Court order or permission. The next page is the relief that I'd like to seek.

Thank you for your time and consideration. Please see this for what it is. She's using my kids as a weapon of revenge against me. There <sup>are</sup> ~~is~~ NO (zero) exigent circumstances to decide custody at this time. Her timing is very suspect. Deny her petition or delay a decision until after my PCR hearing, please.

Thank you,  
Rumard Harris

P.S. Exhibit 2 was extracted by her in 5/2019 (date says 2018) we were divorced <sup>IN</sup> 2017.

1. That this court once again deny Ms. Figueroa sole custody as it's done on the two previous occasions in. Case # D-17-547582-D.
2. That an order is made to allow me contact with my 4 innocent children who have NO DOG in this fight. They are not involved in my case in TN at all and never will be. I did nothing to them. Ms. Figueroa has shown a precedent by allowing me to speak to my children weekly from Oct 2017 — Feb 2019. She only stopped when she knew of my intentions to bring her to justice. It had nothing to do with any of my innocent children who love their daddy. There is no telling what she's told them the last 15 months. I've missed b-days and holidays.
3. I'd like the court to order that she allow my kids to write me, and for her to send me pictures of my children every 3-4 months. She hasn't sent me a picture or a letter from my kids since Father's Day 2018, two years ago. I have literally no clue what my kids look like now. Or what their voices sound like now. :-
4. I'd like an order for her to keep me updated on their health and schooling. As someone who has joint LEGAL custody of my kids still, she is making decisions for my kids without consulting me or allowing me <sup>51</sup>any suggestions, etc.

This is unacceptable. Our youngest child, 8 year old River, survived a rare disease and needs his heart checked every couple of years. I don't know if she's doing that or no updates on his health. I don't know how they are doing in school. The names of their teachers, favorite subject, nothing. I don't know if they have ~~Coronas~~ or if they are home-schooled now. This woman is a disgrace. And is playing God with my Contact.

5. I'd like a court order for her to return all of my social media accounts back to me, my PayPal acct and my BMI music royalty acct back to me with passwords so that I may change them and keep her out.

6. I'd like a visitation order for my kids to come to TN once a year, summertime, to stay with my mom or sister and so that they can visit me once a year.

7. I believe we can amicably workout child support but as of right now the income is not there yet and the wages will fluctuate for a while.

8. I ask that this court delay it's custody decision, should it choose to entertain Ms. Figueroa's request; until after my PCR hearing this month, so that we can see what her legal fate might be. If the court rules in her favor and she's indicted I will file a motion to change custody because she will be no better than me.

9. I ask the court to delay this motion because not only is it meritless, there is no pending rush or emergency. Nothing has occurred or changed since the court last denied her motion in March, 201~~9~~<sup>52</sup>. She's doing this now

because she knows my PCR hearing is this month and that her freedom will more than likely be compromised.

10. For the Court to see this motion for what it is and her actions of cutting off my access and relationship to my 4 young children (ages 8, 10, <sup>TWINS</sup> 13) when I still maintain joint legal custody. She is doing this as revenge for me seeking justice against her. It's about the money. That's all it's ever been about for her, money. After my arrest she quickly created a GoFundMe page telling the public about this case (in graphic detail). She introduced her own daughter (by name not initials like courts do) to possible ridicule by telling everything in public (Facebook, Twitter, and GoFundMe.) I had literally 1000's of "friends" and followers and she posted this all to them. All in an effort to make money. She made almost \$2000 before law enforcement said to stop because it could hurt the case. This is who she is. A thief, embezzler, liar, plays on people's emotions and sympathy. She even tried to participate in her deceased ex-husband's family effort to raise money for his funeral and medical expenses. I have no clue if she created that GoFundMe page and pocketed some of that money. They were not friends. Little did the poor souls know (the ones who donated to Ms. Figueroa's personal GFM about my case) that she already had the \$20,000 embezzled money from our non-profit while asking for money for plane tickets (7 tickets) to Vegas.

No responsible, "grieving" Mother would try and solicit money from people and give vivid details about this sort of family "tragedy" in a public forum. She did it to ruin me, my career, my contacts, friendships, etc and as a way to get sympathy and money. It's disgusting and disgraceful. Her GoFundMe is still posted. Go to GoFundMe, search for: "Jenniffer Harris Starting Over Time To Heal" or Google all of that in quotations. She spells Jenniffer with 2 (two) "F's"

Thank you for your time,

R. David Harris

Or Google "Ronald David Harris Tennessee." I believe it's the third choice on Google Search. It'll say GoFundMe though.

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
55 - 56  
WILL FOLLOW VIA  
U.S. MAIL**





DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

Jenniffer Figueroa, Plaintiff.  
vs.  
Ronald David Harris, Defendant.

CASE NO.: D-20-606828-C  
Department N

Date: July 16, 2020  
Time: 3:30 PM

**NOTICE OF ORDER OF APPEARANCE FOR:**  
**NRCP 16.205 CASE MANAGEMENT CONFERENCE**  
**PATERNITY OR CUSTODY ACTIONS BETWEEN UNMARRIED PERSONS**

**THE PARTIES ARE HEREBY PUT ON NOTICE TO PLEASE REVIEW THIS ORDER IN DETAIL AS EACH DEPARTMENT TREATS THESE NRCP 16.205 CONFERENCES DIFFERENTLY. AS THIS PROCEDURE IS MANDATORY, THE PARTIES MAY NOT STIPULATE TO MODIFY THE REQUIRED PORTIONS WITHOUT EXPRESS PERMISSION BY THE COURT.**

All parties are expected to comply with every aspect of these rules. (*See prior NRCP 16.2(g)*). "We have repeatedly stated that we expect all [court actions] to be pursued in a manner meeting high standards of diligence, professionalism, and competence." *Cuzdey v. State*, 103 Nev. 575, 578, 747 P.2d 233 (1987). *Pro se* litigants may seek assistance by contacting LACSN for classes on trial preparation.

**NRCP 16.205(b) states this Court *may* exempt any parts of the rules.** Attached is a full copy of NRCP 16.205. The required portions are reiterated in bold. Any modifications or additions to the rule will be underlined.

**WHEREFORE, the parties are put on NOTICE that they shall comply with all parts of this mandatory rule (attached hereto in full as though fully incorporated by reference herein) or be subject to the enumerated sanctions.**

**WHEREFORE, the parties are also put on NOTICE that an Order for Family Mediation Center Services shall be sent to them along with this Notice if children are involved.**

/s/ Mark Fernandez

Mark Fernandez  
Judicial Executive Assistant  
Department N

**CERTIFICATE OF MAILING**

I hereby certify that on the above file stamp date:

☒ I hereby certify that I electronically served, faxed, emailed, or placed in the appropriate attorney folder located in the Clerk of the Court's Office, a copy of the Notice of Case Management Conference to:

Jennifer Figueroa

Ronald David Harris

☐ I mailed, via first class mail, postage fully prepaid, the foregoing Notice of Case Management Conference to:

Jennifer Figueroa  
3874 Calle De Este  
Las Vegas, NV 89121

Ronald David Harris  
NECX PO BOX 5000  
#584414  
Mountain City, TN 37683

By: /s/ Mark Fernandez  
Mark Fernandez  
Judicial Executive Assistant  
Department N

**Rule 16.205. Mandatory Prejudgment Discovery Requirements in Paternity or Custody Actions Between Unmarried Person** \*Effective 03/01/2019

(a) Applicability. This rule replaces Rules 16.1 and 16.2 in all paternity and custody actions between unmarried parties. Nothing in this rule precludes a party from conducting discovery under any other of these rules.

(b) Exemptions.

(1) Either party may file a motion for exemption from all or a part of this rule.

(2) The court may, *sua sponte* at the case management conference, exempt all or any portion of a case from application of this rule, in whole or in part, upon a finding of good cause, so long as the exemption is contained in an order of the court.

(c) Financial Disclosure Forms.

(1) General Financial Disclosure Form. In all actions governed by this rule, **each party must complete, file, and serve the cover sheet, income schedule and expense schedule of the General Financial Disclosure Form (GFDF), Form 4 in the Appendix of Forms, within 30 days of service of the summons and complaint**, unless a Detailed Financial Disclosure Form (DFDF), Form 5 in the Appendix of Forms, is required in accordance with Rule 16.205(c)(2) or the court orders the parties at the case management conference to complete the DFDF.

(2) Detailed Financial Disclosure Form.

(A) The plaintiff, concurrently with the filing of the complaint, or the defendant, concurrently with the filing of the answer, but no later than 14 days after the filing of the answer, may file a Request to Opt-in to Detailed Financial Disclosure Form and Complex Litigation Procedure, Form 6 in the Appendix of Forms, certifying that:

(i) either party's individual gross income, or the combined gross income of the parties, is more than \$250,000 per year; or

(ii) either party is self-employed or the owner, partner, managing or majority shareholder, or managing or majority member of a business.

(B) Within 45 days of service of a Request to Opt-in, each party must file the DFDF unless otherwise ordered by the court or stipulated by the parties.

(C) If a Request to Opt-in is filed, the case is subject to the following complex divorce litigation procedure. Each party must prepare a complex divorce litigation plan that must be filed and served as part of the early case conference report. The plan must include, in addition to the requirements of Rule 16.205(j), any and all proposals concerning the time, manner, and place for needed discovery, proposed conferences and anticipated hearings with the court, and any other special arrangements focused on prompt settlement, trial, or resolution of the case.

(d) **Mandatory Initial Disclosures.**

(1) Initial Disclosure Requirements.

(A) Concurrently with the filing of the financial disclosure form, **each party must, without awaiting a discovery request, serve upon the other party written and signed disclosures containing the information listed in Rule 16.205(d)(2) and (3).**

(B) A party must make these initial disclosures based on the information then reasonably available to that party and is not excused from making the disclosures because:

(i) the party has not fully completed an investigation of the case;

(ii) the party challenges the sufficiency of another party's disclosures; or

(iii) another party has not made the required disclosures.

(C) **For each item set forth in Rule 16.205(d)(3), if the disclosing party is not in**

**possession of the documents, the disclosing party must identify each such asset or debt that exists and disclose where information pertaining to each asset or debt may be found.** If no such asset or debt exists, the disclosing party must specifically so state.

(2) Evidence Supporting Financial Disclosure Form. For each line item on the GFDF or DFDF, if not already evidenced by the other initial disclosures required herein, **a party must provide the financial statement(s), document(s), receipt(s), or other information or evidence relied upon to support the figure represented on the form.** If no documentary evidence exists, a party must provide an explanation in writing of how the figure was calculated.

(3) Evidence of Income and Earnings as to Both Parties.

(A) Bank, Investment, and Other Periodic Statements. A party must provide copies of all monthly or periodic bank, checking, savings, brokerage, investment, cryptocurrency, security account, or other statements evidencing income from interest, dividends, royalties, distributions, or any other income for the period commencing 6 months before the service of the summons and complaint through the date of the disclosure.

(B) Insurance Policies. A party must provide copies of all policy statements and evidence of costs of premiums for health and life insurance policies covering either party or any child of the relationship.

(C) Tax Returns. A party must provide copies of all personal and business tax returns, balance sheets, profit and loss statements, and all documents that may assist in identifying or valuing any business or business interest for the last 3 completed calendar or fiscal years with respect to any business or entity in which any party has or had an interest within the past 12 months.

(D) Proof of Income. A party must provide proof of income of the party from all sources, specifically including W-2, 1099, and K-1 forms, for the past 2 completed calendar years, and year-to-date income information (paycheck stubs, etc.) for the period commencing 6 months before the service of the summons and complaint through the date of the disclosure.

(E) Exhibits. A party must provide a copy of every other document or exhibit, including summaries of other evidence, that a party expects to offer as evidence at trial in any manner.

(e) Additional Discovery and Disclosures.

(1) Obtaining Discovery. Any party may obtain discovery by one or more methods provided in Rules 26 through 36, commencing 30 days after service of the summons and complaint.

(2) Additional Discovery. Nothing in the minimum requirements of this rule provides a basis for objecting to relevant additional discovery in accordance with these rules.

(3) Disclosure of Expert Witness and Testimony.

(A) A party **must** disclose the identity of any person who may be used at trial to present evidence under NRS 50.275, 50.285, and 50.305. These disclosures must be made within 90 days after the initial financial disclosure form is required to be filed and served under Rule 16.205(c) or, if the evidence is intended solely to contradict or rebut evidence on the same subject matter identified by another party, within 21 days after the disclosure made by the other party. The parties must supplement these disclosures when required under Rule 26(e)(1).

(B) Except as otherwise stipulated or directed by the court, a party who retains or specially employs a witness to provide expert testimony in the case, or whose duties as an employee of the party regularly involve giving expert testimony, must deliver to the opposing party a written report prepared and signed by the witness within 60 days of the close of

discovery. The court, upon good cause shown or by stipulation of the parties, may extend the deadline for exchange of the expert reports or relieve a party of the duty to prepare a written report in an appropriate case. The report must contain a complete statement of all opinions to be expressed and the basis and reasons therefor, the data or other information considered by the witness in forming the opinions, any exhibits to be used as a summary of or support for the opinions, and the qualifications of the witness.

(4) Nonexpert Witness. A party **must** disclose the name and, if known, the address and telephone number of each individual who has information or knowledge relevant to the claims or defenses set forth in the pleadings, or who may be called as a witness, at any stage of the proceedings, including for impeachment or rebuttal, identifying the subjects of the information and a brief description of the testimony for which the individual may be called. Absent a court order or written stipulation of the parties, a party must not be allowed to call a witness at trial who has not been disclosed **at least 45 days before trial, and the list must be filed with the Clerk of the Court.**

(5) Authorizations for Discovery. If a party believes it necessary to obtain information within the categories under Rule 16.205(d)(3) from an individual or entity not a party to the action, the party seeking the information may present to the other party a form of authorization, permitting release, disclosure, and production of the information. The party who was requested to sign the authorization must do so within 14 days of receipt of the authorization form. If the party who was requested to sign the authorization refuses to sign the authorization without good cause, a motion to compel may be filed. If the court or discovery commissioner finds that the objecting party is without legitimate factual or legal objection to the signing of the authorization, a motion to compel must be granted and the objecting party must be made to pay reasonable attorney fees and costs.

(f) Continuing Duty to Supplement and Disclose. The duty described in this rule is a continuing duty, and each party **must** make additional or amended disclosures whenever new or different information is discovered or revealed. Such additional or amended disclosures, including corrections to a party's financial disclosure form, must be made not more than 14 days after the party acquires additional information or otherwise learns that in some material respect the party's disclosure is incomplete or incorrect. However, if a hearing, deposition, case management conference, or other calendared event is scheduled less than 14 days from the discovery date, then the update must be filed and served within 24 hours of the discovery of new information.

(g) Failure to File or Serve Financial Disclosure Form or to Produce Required Disclosures.

(1) If a party fails to timely file or serve the appropriate financial disclosure form required by this rule, or the required information and disclosures under this rule, the court must impose an appropriate sanction upon the party, the party's attorney, or both, unless specific affirmative findings of fact are made that the violating party has proven:

(A) either good cause for the failure by a preponderance of the evidence or that the violating party would experience an undue hardship if the penalty is applied; and

(B) that other means fully compensate the nonviolating party for any losses, delays, and expenses suffered as a result of the violation.

(2) Sanctions may include an order finding the violating party in civil contempt of court, an order requiring the violating party to timely file and serve the disclosures, to pay the opposing party's reasonable expenses, including attorney fees and costs incurred as a result of the failure, and **any other sanction** [*see* EDCR 7.60] the court deems just and proper.

(3) Sanctions may additionally include an order refusing to allow the violating party to support or oppose designated claims or defenses, or prohibiting that party from introducing designated matters in evidence, and/or any other sanction the court deems just and proper. These discretionary sanctions are encouraged for repeat or egregious violations.

(h) Failure to Accurately Report Income.

(1) If a party intentionally fails to accurately report income, the court must impose an appropriate sanction upon the party or the party's attorney, or both, if the other party establishes by a preponderance of the evidence that there is not good cause for the failure.

(2) Sanctions may include an order finding the violating party in civil contempt of court, an award of reasonable attorney fees and costs to the nonviolating party, and any other sanction the court deems just and proper.

(3) These discretionary sanctions are encouraged for repeat or egregious violations.

(i) Objections to Authenticity or Genuineness. Any objection to the authenticity or genuineness of documents **must be made in writing and filed with the Clerk of the Court within 21 days of the date the receiving party receives them.** Absent such an objection, the documents must be presumed authentic and genuine and may not be excluded from evidence on these grounds.

(j) Case Management Conferences.

(1) Attendance at Early Case Conference. Within 45 days after service of an answer, the parties and the attorneys for the parties **must** confer for the purpose of complying with Rule 16.205(d). The plaintiff may designate the time and place of each meeting, which must be held in the county where the action was filed, unless the parties agree upon a different location. The parties may submit a stipulation and order to continue the time for the case conference for an additional period of not more than 60 days, which the court may, for good cause shown, enter. Absent compelling and extraordinary circumstances, neither the court nor the parties may extend the time to a day more than 90 days after service of the answer. The time for holding a case conference with respect to a defendant who has filed a motion under Rule 12(b)(2)-(4) is tolled until entry of an order denying the motion.

(2) Early Case Conference Report. Within 14 days after each case conference, but not later than 7 days before the scheduled case management conference, the parties **must file a joint early case conference report, or if the parties are unable to agree upon the contents of a joint report, each party must serve and file an early case conference report, which, either as a joint or individual report, must contain:**

(A) a statement of jurisdiction;

(B) a brief description of the nature of the action and each claim for relief or defense;

(C) a proposed custodial timeshare and a proposed holiday, special day, and vacation schedule;

(D) a written list of all documents provided at or as a result of the case conference, together with any objection that the document is not authentic or genuine **or any other reason under the Rules of Evidence and filed with the Clerk of the Court within 21 days of the date the receiving party receives them. The failure to file an objection to a document constitutes a waiver of such objection at a subsequent hearing or trial.** The failure to state any objection to the authenticity or genuineness of a document constitutes a waiver of such objection at a subsequent hearing or trial. For good cause, the court may permit the withdrawal of a waiver and the assertion of an objection;

(E) a written list of all documents not provided under Rule 16.205(d), together with

the explanation as to why each document was not provided;

(F) for each issue in the case, a statement of what information and/or documents are needed, along with a proposed plan and schedule of any additional discovery;

(G) the list of witnesses exchanged in accordance with Rule 16.205(e)(3) and (4);

(H) identification of each specific issue preventing immediate global resolution of the case along with a description of what action is necessary to resolve each issue identified;

(I) a litigation budget; and

(J) proposed trial dates.

(3) Attendance at Case Management Conference. The court **must** conduct a case management conference with counsel and the parties within 90 days after the filing of the answer. The court, for good cause shown, may continue the time for the case management conference. Absent compelling and extraordinary circumstances, neither the court nor the parties may extend the time to a day more than 120 days after filing of the answer.

(A) At the case management conference, the court, counsel, and the parties **must**:

(i) confer and consider the nature and basis of the claims and defenses, the possibilities for a prompt settlement or resolution of the case, and whether orders should be entered setting the case for settlement conference and/or for trial;

(ii) make or arrange for the disclosures required under this rule and to develop a discovery plan, which may include limitations on discovery or changes in the timing of discovery requirements required in this rule; and

(iii) recite stipulated terms on the record under local rules.

(B) The court should also:

(i) enter interim orders sufficient to keep the peace and allow the case to progress;

(ii) for matters that are claimed to be in contest, give direction as to which party will have which burden of proof;

(iii) discuss the litigation budget and its funding; and

(iv) enter a scheduling order.

(C) In the event a party fails to attend the case management conference and the court believes that some or any actions cannot be taken in the absence of the missing party, the court **must** reschedule the case management conference and may order the nonappearing party to pay the complying party's attorney fees incurred to appear at the case management conference.

(4) Case Management Order.

(A) Within 30 days after the case management conference, the court must enter an order that contains:

(i) a brief description of the nature of the action;

(ii) the stipulations of the parties, if any;

(iii) any interim orders made by the court, including those pertaining to discovery and burdens of proof;

(iv) any changes to the timelines of this rule as stipulated by the parties and/or ordered by the court;

(v) a deadline on which discovery will close;

(vi) a deadline beyond which the parties will be precluded from filing motions to amend the pleadings or to add parties unless by court order;

(vii) a deadline by which dispositive motions must be filed; and

(viii) any other orders the court deems necessary during the pendency of the action, including interim custody and child support orders.

**(B) If the court orders one of the parties to prepare the foregoing case management order, that party must submit the order to the other party for signature within 14 days after the case management conference.** The order must be submitted to the court for entry within 21 days after the case management conference.

(k) Automatic Referral of Discovery Disputes. Where available and unless otherwise directed by the court, **all discovery disputes made upon written motion must first be heard by the discovery commissioner** under Rule 16.3. [END]





DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Jenniffer Figueroa, Plaintiff.  
vs.  
Ronald David Harris, Defendant.

Case No.: D-20-606828-C

Department N

ORDER FOR FAMILY MEDIATION  
CENTER SERVICES

**IT IS HEREBY ORDERED** that the parties participate in the MANDATORY MEDIATION PROGRAM pursuant to EDCR 5.303 and NRS 3.475. In the spirit of preserving the parents' right to make decisions about the future best interest of their child(ren), the above-named parties shall make every attempt to resolve their disputes.

**IT IS FURTHER ORDERED** that, if a Court Interpreter is needed, it is the parties responsibility to pay the interpreter at the time services are rendered, and the language needed is: \_\_\_\_\_.

**IT IS FURTHER ORDERED** by the Court that, regarding the child(ren) at issue, the Family Mediation Center (FMC) shall:

☒ Provide Confidential Mediation \_\_\_\_\_  
(When telephone mediation is ordered, one or both parties must reside out-of-state)

☐ Include a Domestic Violence Protocol

☐ Interview Child(ren) \_\_\_\_\_

Issues: \_\_\_\_\_  
\_\_\_\_\_

☐ Reunify Parent/Child(ren) \_\_\_\_\_

**IT IS FURTHER ORDERED** that the cost of mediation will be assessed using a sliding scale based on each litigant's individual financial status.

**IT IS FURTHER ORDERED** that the parties and/or their attorneys must report to the Family Mediation Center at 601 N. Pecos Road, Las Vegas, NV 89101, phone (702) 455-4186.

DATED this 22nd day of May, 2020.

This matter is reset for

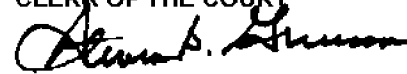
Date: July 16, 2020 Time: 3:30 PM

Attorney for Plaintiff: Jenniffer Figueroa

Attorney for Defendant: Ronald David Harris



HONORABLE MATHEW HARTER  
DISTRICT COURT JUDGE



**EMWM**

Your Name: Jennifer Figueroa  
Address: 3874 Calle De Este  
Las Vegas, NV 89121  
Telephone: 702-412-2617  
Email Address: Jennfig1976@gmail.com  
Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff.

vs.

Ronald David Harris #584414  
Defendant.

CASE NO.: D-20-606828-C

DEPT: N

**EX PARTE MOTION TO WAIVE MEDIATION AT FAMILY MEDIATION CENTER**

I, (your name) Jennifer Figueroa, respectfully request that the Court exempt the parties from attending mediation at the Family Mediation Center. I request an exemption from mediation because (☒ check all that apply):

☒ There is a history of child abuse. (Explain. Include information about any involvement with CPS) The defendant sexually abused Ms. Figueroa's daughter  
(defendant step daughter) from the age of 11 - 15. She was 5 when he became her stepdad.  
He is serving 30 years in prison which he pled to for the abuse that was all on video and pictures.

☐ There is a history of domestic violence. (Explain. Include information about any TPOs) \_\_\_\_\_

☐ The parties are participating in private mediation.

☒ One of the parties lives outside of Nevada. Prison in Tennessee

☒ Other: (explain why mediation should be waived) Mr. Harris harrasses Ms. Figueroa

by demanding to speak or get in contact with her daughter he abused and is serving prison time for.

He uses speaking to his children in this case as a ploy to still try and contact his victim. In the beginning I did allow Mr. Harris

to speak to his children, but then his true colors were shown and he began demanding to speak to my daughter (his victim)

by sending her letters, and asking our kids about her.

This request is made pursuant to NRS 3.475(2)(b) and EDCR 5.303(b)(4).

DATED June 2nd, 2020.

Submitted By: (your signature) ▶

(print your name)

Jennifer Figueroa

### DECLARATION IN SUPPORT OF EX PARTE MOTION

I declare, under penalty of perjury:

1. I have personal knowledge of the facts contained in this Motion and in this Declaration and I am competent to testify to the same.
2. The statements in this Motion and Declaration are true and correct to the best of my knowledge.
3. Additional facts to support my request includes (explain anything else the judge should consider in making a decision): Mr. Harris and I will not be able to mediate because he wants to control us.

He is using our kids to keep control over me, and over my daughter he abused. I have hundreds of letters from him

demanding I make my daughter contact him. He has snuck notes to her in our childrens letters which thankfully I found.

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

DATED June 2nd, 2020.

Submitted By: (your signature) ▶

(print your name)

Jennifer Figueroa

**EXPR**

Your Name: JENNIFER FIGUEROA  
Address: 3874 Calle De Este  
LAS VEGAS NV 89121  
Telephone: 702-412-2617  
Email Address: jennfig1976@gmail.com  
Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff.

vs.

Ronald David Harris  
Defendant.

CASE NO.: D-20-606828-C

DEPT: N

**EX PARTE ORDER REGARDING MEDIATION**


The Court having reviewed the ex parte motion to waive mediation, IT IS HEREBY ORDERED: *(the judge will check one box)*

- ☐ **The request is GRANTED.** This case shall be exempt from the mandatory mediation requirement pursuant to NRS 3.475(2)(b) and EDCR 5.303(b)(3).
- ☐ **The request is DENIED.** Mediation shall be provided as follows: *(the judge will check one or more boxes)*
- ☐ **Standard Protocol.** Mediation shall be provided without any special procedures.
  - ☐ **Shuttle Mediation.** The parties shall be in different rooms and the mediator will move between rooms to talk to each party separately.
  - ☐ **Support Person.** The parties shall be allowed to have a support person present.

☐ **Telephonic / Video Participation.** The parties shall be allowed to participate by phone or video.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
DISTRICT COURT JUDGE

Submitted By: (your signature) ▶   
(print your name) Jenniffer Figueroa



**EMWM**

Your Name: Jennifer Figueroa  
Address: 3874 Calle De Este  
Las Vegas, NV 89121  
Telephone: 702-412-2617  
Email Address: Jennfig1976@gmail.com  
Self-Represented                     

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff,

vs.

Ronald David Harris #584414  
Defendant.

CASE NO.: D-20-606828-C

DEPT: N

**EX PARTE MOTION TO WAIVE MEDIATION AT FAMILY MEDIATION CENTER**

I, (your name) Jennifer Figueroa, respectfully request that the Court exempt the parties from attending mediation at the Family Mediation Center. I request an exemption from mediation because (☒ check all that apply):

☒ There is a history of child abuse. (Explain. Include information about any involvement with CPS) The defendant sexually abused Ms. Figueroa's daughter  
(defendant step daughter) from the age of 11 - 15. She was 5 when he became her stepdad.  
He is serving 30 years in prison which he pled to for the abuse that was all on video and pictures.

☐ There is a history of domestic violence. (Explain. Include information about any TPOs) \_\_\_\_\_

☐ The parties are participating in private mediation.

☒ One of the parties lives outside of Nevada, Prison in Tennessee

☒ Other: (explain why mediation should be waived) Mr. Harris harrasses Ms. Figueroa

by demanding to speak or get in contact with her daughter he abused and is serving prison time for.

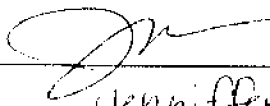
He uses speaking to his children in this case as a ploy to still try and contact his victim. In the beginning I did allow Mr. Harris

to speak to his children, but then his true colors were shown and he began demanding to speak to my daughter (his victim)

by sending her letters, and asking our kids about her.

This request is made pursuant to NRS 3.475(2)(b) and EDCR 5.303(b)(4).

DATED June 2nd, 2020.

Submitted By: (your signature) ▶ 

(print your name) Jennifer Figueroa

#### DECLARATION IN SUPPORT OF EX PARTE MOTION

I declare, under penalty of perjury:

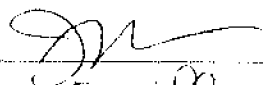
1. I have personal knowledge of the facts contained in this Motion and in this Declaration and I am competent to testify to the same.
2. The statements in this Motion and Declaration are true and correct to the best of my knowledge.
3. Additional facts to support my request includes (explain anything else the judge should consider in making a decision): Mr. Harris and I will not be able to mediate because he wants to control us.

He is using our kids to keep control over me, and over my daughter he abused. I have hundreds of letters from him

demanding I make my daughter contact him. He has snuck notes to her in our childrens letters which thankfully I found.

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

DATED June 2nd, 2020.

Submitted By: (your signature) ▶ 

(print your name) Jennifer Figueroa



CNND

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa, Plaintiff.

D-20-606828-C

vs.

Department N

Ronald David Harris, Defendant.

**CLERK'S NOTICE OF NONCONFORMING DOCUMENT**

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is hereby provided that the following electronically filed document does not conform to the applicable filing requirements:

|   |   |
|---|---|
| Title of Nonconforming Document:                  | Ex Parte Motion to Waive<br>Mediation at Family Mediation<br>Center, Order (Bundled Filing) |
| Party Submitting Document for Filing:             | Jennifer Figueroa   |
| Date and Time Submitted for Electronic<br>Filing: | 06/02/2020 at 2:14pm  |

**Reason for Nonconformity Determination:**

- ☐ The document filed to commence an action is not a complaint, petition, application, or other document that initiates a civil action. *See* Rule 3 of the Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5, the submitted document is stricken from the record, this case has been closed and designated as filed in error, and any submitted filing fee has been returned to the filing party.
- ☐ The document initiated a new civil action and a cover sheet was not submitted as required by NRS 3.275.
- ☐ The document was not signed by the submitting party or counsel for said party.
- ☒ The document filed was a court order that did not contain the signature of a judicial officer. In accordance with Administrative Order 19-5, the submitted order has been furnished to the department to which this case is assigned.



☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation “Hearing Requested” or “Hearing Not Requested” in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code “**Conforming Filing – CONFILE.**” Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 2nd day of June, 2020

By: /s/ Tracy George  
Deputy District Court Clerk

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 02, 2020, I concurrently filed and served a copy of the foregoing Clerk's Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court's Electronic Filing and Service System.

By: /s/ Tracy George  
Deputy District Court Clerk



EXPR

Your Name: JENNIFER FIGUEROA  
Address: 3874 Calle De Este  
LAS VEGAS NV 89121  
Telephone: 702-412-2617  
Email Address: Jennfig1976@gmail.com  
Self-Represented

DISTRICT COURT  
CLARK COUNTY, NEVADA

Jennifer Figueroa  
Plaintiff.

vs.

Ronald David Harris  
Defendant.

CASE NO.: D-20-606828-C

DEPT: N

EX PARTE ORDER REGARDING MEDIATION

The Court having reviewed the ex parte motion to waive mediation, IT IS HEREBY ORDERED: *(the judge will check one box)*

☒ **The request is GRANTED.** This case shall be exempt from the mandatory mediation requirement pursuant to NRS 3.475(2)(b) and EDCR 5.303(b)(3).

☐ **The request is DENIED.** Mediation shall be provided as follows: *(the judge will check one or more boxes)*

☐ **Standard Protocol.** Mediation shall be provided without any special procedures.

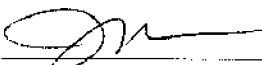
☐ **Shuttle Mediation.** The parties shall be in different rooms and the mediator will move between rooms to talk to each party separately.

☐ **Support Person.** The parties shall be allowed to have a support person present.

☐ **Telephonic / Video Participation.** The parties shall be allowed to participate by phone or video.

DATED this 3rd day of June, 2020.

  
DISTRICT COURT JUDGE

Submitted By: (your signature) ▶   
(print your name) Jennifer Figueroa

*Steven D. Grierson*

NEJ

Name: Jennifer Figueroa  
Address: 3874 Calle De Este Las Vegas NV 89121

Telephone: 702-412-2617  
Email Address: jennfig1976@gmail.com  
Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa

Plaintiff.

vs.

Ronald David Harris

Defendant.

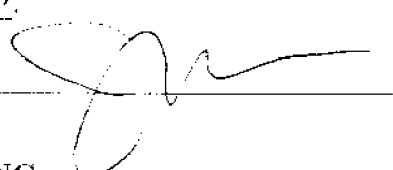
CASE NO.: D-20-606828-C

DEPT: N

**NOTICE OF ENTRY  
OF ORDER / JUDGMENT**

PLEASE TAKE NOTICE that an Order and/or Judgment was entered in this matter on  
(date order was filed-on the upper right corner of the order) June 3rd, 2020,  
a copy of which is attached.

DATED (today's date) June 3rd, 2020.

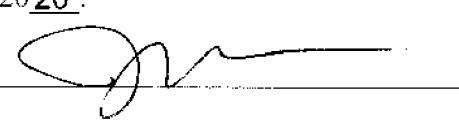
Submitted By: (Your signature) ▶ /s/ 

**CERTIFICATE OF MAILING**

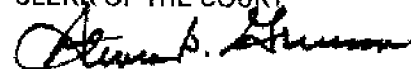
I, (your name) Jennifer Figueroa declare under penalty of perjury  
under the law of the State of Nevada that I served this *Notice of Entry of Order/Judgment* on  
(date of mailing: month) June (day) 12, 2020, by depositing a copy  
in the U.S. Mail in the State of Nevada, postage prepaid, addressed to:

Name of Person Served: Ronald David Harris #584414  
Address: NECX PO BOX 5000  
City, State, Zip: Mtn City TN 37683

DATED (today's date) June 12th, 2020.

Submitted By: (Your signature) ▶ /s/ 

**ATTACH A FILED COPY OF THE COURT'S ORDER TO THIS NOTICE**



EXPR

Your Name: JENNIFER FIGUEROA

Address: 3874 Calle De Este  
LAS VEGAS NV 89121

Telephone: 702-412-2617

Email Address: Jennfig1976@gmail.com

Self-Represented

DISTRICT COURT  
CLARK COUNTY, NEVADA

Jennifer Figueroa  
Plaintiff.

vs.

Ronald David Harris  
Defendant.

CASE NO.: D-20-606838-C

DEPT: N

EX PARTE ORDER REGARDING MEDIATION

The Court having reviewed the ex parte motion to waive mediation, IT IS HEREBY ORDERED: *(the judge will check one box)*

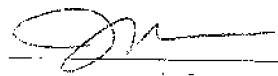
- ☒ The request is GRANTED. This case shall be exempt from the mandatory mediation requirement pursuant to NRS 3.475(2)(b) and EDCR 5.303(b)(3).
- ☐ The request is DENIED. Mediation shall be provided as follows: *(the judge will check one or more boxes)*
- ☐ Standard Protocol. Mediation shall be provided without any special procedures.
  - ☐ Shuttle Mediation. The parties shall be in different rooms and the mediator will move between rooms to talk to each party separately.
  - ☐ Support Person. The parties shall be allowed to have a support person present.

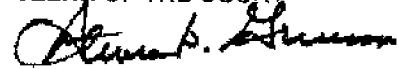
☐ **Telephonic / Video Participation.** The parties shall be allowed to participate by phone or video.

DATED this 3rd day of June, 2020.

  
DISTRICT COURT JUDGE

MS

Submitted By: (your signature) >   
(print your name) Jennifer Figueroa



EMWM

Your Name: Jennifer Figueroa

Address: 3874 Calle De Este

Las Vegas, NV 89121

Telephone: 702-412-2617

Email Address: Jennfig1976@gmail.com

Self-Represented

DISTRICT COURT  
CLARK COUNTY, NEVADA

Jennifer Figueroa

Plaintiff.

vs.

Ronald David Harris #584414

Defendant.

CASE NO.: D-20-606828-C

DEPT: N

EX PARTE MOTION TO WAIVE MEDIATION AT FAMILY MEDIATION CENTER

I, (your name) Jennifer Figueroa, respectfully request that the Court exempt the parties from attending mediation at the Family Mediation Center. I request an exemption from mediation because (☒ check all that apply):

☒ There is a history of child abuse. (Explain. Include information about any involvement with CPS) The defendant sexually abused Ms. Figueroa's daughter  
(defendant step daughter) from the age of 11 - 15. She was 5 when he became her stepdad.  
He is serving 30 years in prison which he pled to for the abuse that was all on video and pictures.

☐ There is a history of domestic violence. (Explain. Include information about any TPOs) \_\_\_\_\_

☐ The parties are participating in private mediation.



☒ One of the parties lives outside of Nevada. Prison in Tennessee

☒ Other: (explain why mediation should be waived) Mr. Harris harrasses Ms. Figueroa

by demanding to speak or get in contact with her daughter he abused and is serving prison time for.

He uses speaking to his children in this case as a ploy to still try and contact his victim. In the beginning I did allow Mr. Harris

to speak to his children, but then his true colors were shown and he began demanding to speak to my daughter (his victim)

by sending her letters, and asking our kids about her.

This request is made pursuant to NRS 3.475(2)(b) and EDCR 5.303(b)(4).

DATED June 2nd, 2020.

Submitted By: (your signature) >

(print your name)

Jennifer Figueroa

#### DECLARATION IN SUPPORT OF EX PARTE MOTION

I declare, under penalty of perjury:

1. I have personal knowledge of the facts contained in this Motion and in this Declaration and I am competent to testify to the same.
2. The statements in this Motion and Declaration are true and correct to the best of my knowledge.
3. Additional facts to support my request includes (explain anything else the judge should consider in making a decision): Mr. Harris and I will not be able to mediate because he wants to control us.

He is using our kids to keep control over me, and over my daughter he abused. I have hundreds of letters from him

demanding I make my daughter contact him. He has snuck notes to her in our childrens letters which thankfully I found.

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

DATED June 2nd, 2020.

Submitted By: (your signature) >

(print your name)

Jennifer Figueroa

*Heather L. Smith*  
CLERK OF THE COURT

CERT  
Name: Ronald Harris #584414  
Address: NECX  
PO BOX 5000 Mountain City, TN 37683  
Telephone:                       
Email Address:                       
In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff,

vs.

Ronald D. Harris  
Defendant.

CASE NO.: D-20-606828-C  
DEPT: N

**CERTIFICATE OF MAILING**

I, (name of person who mailed the document) Ronald D. Harris,  
declare under penalty of perjury under the law of the State of Nevada that the following is true  
and correct. That on (month) June (day) 17, 2020, service of the:

(☒ check all that apply)

☐ Motion ☒ Answer ☐ Financial Disclosure Form  
☐ Opposition ☐ Reply ☐ Notice of Entry of Judgment / Order / Decree

☒ Other: Answer to order regarding Mediation

was made pursuant to NRCP 5(b) by depositing a copy in the U.S. Mail in the State of ~~Nevada~~, Tennessee  
postage prepaid, addressed to:

(Print the name and address of the person you mailed the document to)

Jenn Figueroa  
3874 Calle De Este  
Las Vegas, NV. 89121

DATED this 17 day of June, 2020.

R. D. Harris  
(Signature)

**RECEIVED**

Certificate of Mailing

JUN 30

CLERK OF THE COURT



CNND

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jenniffer Figueroa, Plaintiff.

D-20-606828-C

vs.

Department N

Ronald David Harris, Defendant.

**CLERK'S NOTICE OF NONCONFORMING DOCUMENT**

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is hereby provided that the following electronically filed document does not conform to the applicable filing requirements:

|  |                           |
|--|---------------------------|
| Title of Nonconforming Document:               | <u>Custody Decree</u>     |
| Party Submitting Document for Filing:          | <u>Jenniffer Figueroa</u> |
| Date and Time Submitted for Electronic Filing: | <u>7/17/20 at 1:15pm</u>  |

**Reason for Nonconformity Determination:**

- ☐ The document filed to commence an action is not a complaint, petition, application, or other document that initiates a civil action. *See* Rule 3 of the Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5, the submitted document is stricken from the record, this case has been closed and designated as filed in error, and any submitted filing fee has been returned to the filing party.
- ☐ The document initiated a new civil action and a cover sheet was not submitted as required by NRS 3.275.
- ☐ The document was not signed by the submitting party or counsel for said party.
- ☒ The document filed was a court order that did not contain the signature of a judicial officer. In accordance with Administrative Order 19-5, the submitted order has been furnished to the department to which this case is assigned.

☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation “Hearing Requested” or “Hearing Not Requested” in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code “**Conforming Filing – CONFILE.**” Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 21st day of July, 2020

By: /s/ Stephen Mislan  
Deputy District Court Clerk

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By: /s/ Stephen Mislan  
Deputy District Court Clerk



DECC

Your Name: Jennifer Figueroa

Address: 3874 Calle De Este

City, State, Zip: Las Vegas NV 89121

Phone: 702-412-2617

Email: jennfig1976@gmail.com

Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa

Plaintiff,

vs.

Ronald David Harris #584414

Defendant.

CASE NO.: D-20-606828-C

DEPT: N

DATE OF HEARING: \_\_\_\_\_

TIME OF HEARING: \_\_\_\_\_

**CUSTODY DECREE**

This Decree was submitted (☒ *check one*) ☒ after a hearing ☐ without a hearing before the above-entitled court, and after a review of the pleadings and papers on file and the testimony given, if any, this Court finds as follows:

1. That Plaintiff or Defendant is now and has been an actual bona fide resident of the State of Nevada and has been actually domiciled in the State of Nevada for more than six weeks immediately prior to the commencement of this action.
2. That Plaintiff and Defendant have (*number*) 4 minor children in common:

| Child's Name:   | Date of Birth |
|-----------------|---------------|
| Isabelle Harris | 02/25/2007    |
| Reagan Harris   | 09/19/2009    |
| Julian Harris   | 09/19/2009    |
| River Harris    | 10/13/2011    |

3. **Child Residency.** (☒ *check one*)

- ☒ The children are residents of Nevada and have lived here for at least the past 6 months. Nevada is the habitual residence of the child, and this Court has the necessary UCCJEA jurisdiction to enter orders regarding custody and visitation.
- ☐ The children are not residents of Nevada or have not lived here for at least the past 6 months. The children live in (state) \_\_\_\_\_ which is the habitual residence of the child, and this Court does not have the necessary UCCJEA jurisdiction to enter orders regarding custody and visitation.

4. That any custody and visitation orders made herein are in the best interest of the children.
5. That the amount of child support ordered herein is in compliance with the guidelines established by the Administrator of the Division of Welfare and Supportive Services or has been stipulated to by the parties with the required certifications and disclosures required by the guidelines.
6. That any other necessary findings of fact are attached and incorporated herein.

**NOW THEREFORE, IT IS HEREBY ORDERED** that (☒ *check one*) ☐ Plaintiff /

☒ Defendant is the legal father of the children listed on page 1.

**IT IS FURTHER ORDERED** that (☒ *check one*)

- ☐ The parties are granted joint legal custody of the minor child(ren).
- ☒ The Plaintiff is granted sole legal custody of the minor child(ren).
- ☐ The Defendant is granted sole legal custody of the minor child(ren).

**IT IS FURTHER ORDERED** that (☒ *check one*)

- ☐ The parties shall share joint physical custody of the minor child(ren). The parties shall exercise a regular and/or holiday timeshare as outlined in Exhibit 1 which is incorporated herein.
- ☐ Primary physical custody of the minor child(ren) shall be awarded to (☒ *check one*) ☐ Plaintiff / ☐ Defendant. The parties shall exercise a regular and/or holiday timeshare as outlined in Exhibit 1 which is incorporated herein.
- ☒ Sole physical custody of the minor child(ren) shall be awarded to (☒ *check one*) ☒ Plaintiff / ☐ Defendant.

**COURT FINDS** that Plaintiff's gross monthly income is \$\_\_\_\_\_ and Defendant's gross monthly income is \$\_\_\_\_\_. Under the guidelines, child support would be paid by *(parent name)* \_\_\_\_\_ in the amount of \$ 0.00 per month. (☒ *check one*)

☐ Child support should be set at the above amount that complies with the guidelines established by the Administrator of the Division of Welfare and Supportive Services.

☒ Court finds that child support should be set at \$ 0.00 based on the following adjustments from the guidelines: Judge states plaintiff must file child support case with the D.A. in the State of Tennessee, as Tennessee is where the defendant/father resides and therefore TN has jurisdiction regarding Child Support.

**ACCORDINGLY, IT IS HEREBY ORDERED** that child support is set at (☒ *check one*)

☒ \$0 per month / ☐ \$ \_\_\_\_\_ per month paid by *(parent who will pay)*

\_\_\_\_\_ based on: (☒ *check one*)

☐ The worksheet calculation and/or the guidelines established by the Administrator of the Division of Welfare and Supportive Services.

☐ The amount already established by the District Attorney, Family Support Division, case *(insert case number)* R \_\_\_\_\_.

☐ The amount determined by the court.

**IT IS FURTHER ORDERED** that (☒ *check one*)

☐ A wage withholding is entered against the obligor parent to secure payment of child support.

☒ A wage withholding is not entered against the obligor parent, as good cause exists to postpone the withholding of income for child support.



1 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 2 ☐ There are no child support arrearages or the entitled custodial parent waived his/her
- 3 right to child support arrearages.
- 4 ☐ Child support arrears are being handled by the District Attorney, Family Support
- 5 Division, case (*insert case number*) R \_\_\_\_\_ and shall continue as
- 6 ordered in that case.
- 7 ☐ Back child support shall be paid by (*name of parent who will pay back child*
- 8 *support*) \_\_\_\_\_ in the total amount of
- 9 \$\_\_\_\_\_, which amount is reduced to judgment.

10 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 11 ☒ There are no child care costs for either parent.
- 12 ☐ The monthly child care costs for the child(ren) are: \$\_\_\_\_\_. The monthly
- 13 amount should be paid by ☐ Plaintiff ☐ Defendant ☐ both parents equally.
- 14

15 **IT IS FURTHER ORDERED** that medical support for the child(ren) shall be provided

16 through(☒ *check one*)

- 17 ☒ Medicaid.
- 18 ☐ Private / Employer insurance. The monthly premium should be paid by ☐ Plaintiff
- 19 ☐ Defendant ☐ both parents equally.
- 20 ☐ Other: \_\_\_\_\_
- 21

22 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 23 ☐ Any medical expenses not covered by insurance shall be paid equally by both
- 24 parties.
- 25 ☐ Any medical expenses not covered by insurance shall be paid by (*name of parent*)
- 26 \_\_\_\_\_ due to the following extraordinary
- 27 circumstances (*explain*): \_\_\_\_\_
- 28

1 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 2 ☐ The 30/30 Rule shall apply to all unreimbursed medical and dental expenses.<sup>1</sup>
- 3 ☒ The 30/30 Rule shall NOT apply to unreimbursed medical and dental expenses.
- 4

5 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 6 ☒ The Plaintiff shall claim the following children as dependents for tax purposes every
- 7 year: *(insert child(ren)'s names)*: Isabelle Harris, Reagan Harris, Julian Harris, River Harris
- 8 ☐ The Defendant shall claim the following children as dependents for tax purposes
- 9 every year: *(insert child(ren)'s names)*: \_\_\_\_\_
- 10 ☐ The tax deduction shall alternate, with Plaintiff claiming the child(ren) in (☒ *check*
- 11 *one*) ☐ even / ☐ odd years, and Defendant claiming the child(ren) the other years.
- 12 ☐ The tax deduction shall be allocated per federal law.

13 *\*IRS rules state that the custodial parent usually has the right to claim the child on their*

14 *taxes regardless of what the Decree says. The custodial parent can waive this right by*

15 *filling out IRS Form 8332. Talk to a tax professional if you are not sure what to do.*

16 **IT IS FURTHER ORDERED** that (☒ *check all that apply*)

- 17 ☒ The child's birth certificate shall not be changed.
- 18 ☐ The child's birth certificate shall be amended to state that *(father's full name)*
- 19 \_\_\_\_\_ is the father of the child.
- 20 ☐ The child's name shall be changed to *(child's new first, middle, and last name)*
- 21 \_\_\_\_\_ and the birth
- 22 certificate shall be amended to reflect the new name.

23 **IT IS FURTHER ORDERED** that each party shall submit the information required in

24 NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the

25 Welfare Division of the Department of Human Resources within ten days from the date this

26 Decree is filed. Such information shall be maintained by the Clerk in a confidential manner and

27 not part of the public record. The parties shall update the information filed with the Court and

28 the Welfare Division of the Department of Human Resources within ten days should any of that

information become inaccurate.

<sup>1</sup> The "30/30 Rule:" If a parent pays a medical or dental expense for a child that is not paid by insurance, that parent must send proof of the expense to the other parent within 30 days of incurring the expense. The other parent then has 30 days to reimburse the paying parent ½ the cost.

1 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125C.0045(6):

2 **PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR**  
3 **DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A**  
4 **CATEGORY D FELONY AS PROVIDED IN NRS 193.130.** NRS 200.359 provides that  
5 every person having a limited right of custody to a child or any parent having no right of  
6 custody to the child who willfully detains, conceals or removes the child from a parent,  
7 guardian or other person having lawful custody or a right of visitation of the child in  
8 violation of an order of this court, or removes the child from the jurisdiction of the court  
9 without the consent of either the court or all persons who have the right to custody or  
10 visitation is subject to being punished for a category D felony as provided in NRS 193.130.

11 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,  
12 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply  
13 if a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on  
14 notice of the following provision of NRS 125C.0045(8):

15 If a parent of the child lives in a foreign country or has significant commitments in a foreign  
16 country:

17 (a) The parties may agree, and the court shall include in the order for custody of the  
18 child, that the United States is the country of habitual residence of the child for the purposes  
19 of applying the terms of the Hague Convention as set forth in subsection 7.

20 (b) Upon motion of one of the parties, the court may order the parent to post a bond if  
21 the court determines that the parent poses an imminent risk of wrongfully removing or  
22 concealing the child outside the country of habitual residence. The bond must be in an  
23 amount determined by the court and may be used only to pay for the cost of locating the  
24 child and returning him to his habitual residence if the child is wrongfully removed from or  
25 concealed outside the country of habitual residence. The fact that a parent has significant  
26 commitments in a foreign country does not create a presumption that the parent poses an  
27 imminent risk of wrongfully removing or concealing the child.

28 **NOTICE IS HEREBY GIVEN** that the parties are subject to the relocation requirements  
of NRS 125C.006 & NRS 125C.0065. If joint or primary physical custody has been established  
pursuant to an order, judgment or decree of a court and one parent intends to relocate his or her  
residence to a place outside of this State or to a place within this State that is at such a distance  
that would substantially impair the ability of the other parent to maintain a meaningful  
relationship with the child, and the relocating parent desires to take the child with him or her,  
the relocating parent shall, before relocating: (a) attempt to obtain the written consent of the  
non-relocating parent to relocate with the child; and (b) if the non-relocating parent refuses to  
give that consent, petition the court for permission to move and/or for primary physical custody  
for the purpose of relocating. A parent who desires to relocate with a child has the burden of  
proving that relocating with the child is in the best interest of the child. 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 without  
having reasonable grounds for such refusal, or for the purpose of harassing the relocating  
parent. A parent who relocates with a child pursuant to this section without the written consent  
of the other parent or the permission of the court is subject to the provisions of NRS 200.359.

1       **NOTICE IS HEREBY GIVEN** that the parties are subject to the provisions of NRS  
2 31A and 125.007 regarding the collection of delinquent child support payments.

3       **NOTICE IS HEREBY GIVEN** that either party may request a review of child support  
4 every three years pursuant to NRS 125B.145.

5       **NOTICE IS HEREBY GIVEN** that if you want to adjust the amount of child support  
6 established in this order, you must file a motion to modify the order with or submit a stipulation  
7 to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the  
8 child support obligation established in this order will continue until such time as all children  
9 who are the subject of this order reach 18 years of age or, if the youngest child who is subject to  
10 this order is still in high school when he or she reaches 18 years of age, when the child  
11 graduates from high school or reaches 19 years of age, whichever comes first. Unless the  
12 parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify  
13 the order will be effective as of the date the motion was filed.

14                       22nd  
15 DATED this X day of July, 2020.

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DISTRICT COURT JUDGE

Respectfully Submitted By:

▶ Jennifer Figueroa  
(Plaintiff's signature)

Jennifer Figueroa  
(Plaintiff's printed name)

▶ \_\_\_\_\_  
(Defendant's signature)

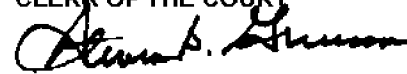
\_\_\_\_\_  
(Defendant's printed name)

## EXHIBIT 1: Parenting Timeshare and Holiday Schedule

☒ No Visitation Requested Because: (explain) Defendant is a sex offender in Prison.

|   |   |
|---|---|
| Regular Schedule:<br><i><b>Be very specific. Include the times and days of the week for each parent's timeshare.</b></i><br>(ex.: <u>Mom: Saturday 7pm – Wednesday 3pm,</u><br><u>Dad: Wednesday 3pm – Saturday 7pm</u> ) |   |
| Summer Schedule:  | <input type="checkbox"/> Same as the regular schedule.<br><input type="checkbox"/> Other: _____   |
| Mother's Day and Mother's Birthday:   | <input type="checkbox"/> Mother every year from 9am – 7pm.<br><input type="checkbox"/> Other: _____   |
| Father's Day and Father's Birthday:   | <input type="checkbox"/> Father every year from 9am – 7pm.<br><input type="checkbox"/> Other: _____   |
| Child's Birthday:   | <input type="checkbox"/> <u>Even years</u> with (parent) _____.<br><u>Odd years</u> with (parent) _____.<br>*Time shall be from 9am – 7pm.*<br><input type="checkbox"/> Other: _____  |
| 3 Day Weekends:   | <input type="checkbox"/> <u>Even Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____, President's Day, Independence Day, Nevada Admissions Day with the other parent.<br><u>Odd Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____, President's Day, Independence Day, Nevada Admissions Day with the other parent.<br>*Time begins when school lets out the day before the holiday weekend (or 3pm if no school), and ends the day following the holiday weekend when school resumes (or 9am).*<br>**If Independence Day falls on a Tuesday, Wednesday, or Thursday, the time shall be from July 3 at 9am until July 5 at 9am.**<br><input type="checkbox"/> Other: _____ |

|                           |   |
|---------------------------|---|
| Easter / Spring Break:    | <input type="checkbox"/> Even years with <i>(parent)</i> _____.<br>Odd years with the other parent.<br>*Time shall begin the day school lets out until noon the day before school resumes.*<br><input type="checkbox"/> Other: _____  |
| Thanksgiving:             | <input type="checkbox"/> Odd years with <i>(parent)</i> _____.<br>Even years with the other parent.<br>*Time shall begin the day school lets out until noon the day before school resumes.*<br><input type="checkbox"/> Other: _____  |
| Winter Break / Christmas: | <input type="checkbox"/> Segment 1 (Christmas) consists of the day school lets out until December 26 at noon.<br>Segment 2 (New Year's) consists of December 26 at noon until noon the day before school resumes.<br><u>Even years:</u> segment 1 with <i>(parent)</i> _____,<br>segment 2 with the other parent.<br><u>Odd years:</u> segment 1 with <i>(parent)</i> _____,<br>segment 2 with the other parent.<br><input type="checkbox"/> Other: _____<br>_____  |
| Other Holidays:           | _____<br>_____<br>_____<br>_____  |
| Vacation:                 | <input type="checkbox"/> The parents will not establish a formal vacation plan, and will instead mutually agree on vacation days and times with the child(ren).<br><input type="checkbox"/> Each parent may have up to <i>(number)</i> _____ vacation days per year with the child(ren). The parent shall notify the other parent of the vacation and provide a general vacation itinerary at least <i>(number)</i> _____ days before the planned vacation.<br><b>Vacation time is not allowed during a holiday allotted to the other parent.</b> |



NEJ

Name: Jennifer Figueroa

Address: 3874 Calle De Este Las Vegas NV 89121

Telephone: 702-412-2617

Email Address: jennfig1976@gmail.com

Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa

Plaintiff,

vs.

Ronald David Harris #584414

Defendant.

CASE NO.: D-20-606828-C

DEPT: N

**NOTICE OF ENTRY  
OF ORDER / JUDGMENT**

PLEASE TAKE NOTICE that an Order and/or Judgment was entered in this matter on  
(date order was filed-on the upper right corner of the order) July 22, 2020,  
a copy of which is attached.

DATED (today's date) July 22, 2020.

Submitted By: (Your signature) ▶ Jennifer Figueroa

**CERTIFICATE OF MAILING**

I, (your name) Jennifer Figueroa declare under penalty of perjury  
under the law of the State of Nevada that I served this *Notice of Entry of Order/Judgment* on  
(date of mailing: month) July (day) 22, 2020, by depositing a copy  
in the U.S. Mail in the State of Nevada, postage prepaid, addressed to:

Name of Person Served: Ronald David Harris #584414

Address: PO BOX 5000

City, State, Zip: Mtn City TN 37683

DATED (today's date) July 22, 2020.

Submitted By: (Your signature) ▶ Jennifer Figueroa

**ATTACH A FILED COPY OF THE COURT'S ORDER TO THIS NOTICE**



1 DECC

2 Your Name: Jennifer Figueroa

3 Address: 3874 Calle De Este

4 City, State, Zip: Las Vegas NV 89121

5 Phone: 702-412-2617

6 Email: jennfig1976@gmail.com

7 Self-Represented

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa

Plaintiff,

vs.

Ronald David Harris #584414

Defendant.

CASE NO.: D-20-606828-C

DEPT: N

DATE OF HEARING: 7/16/2020

TIME OF HEARING: 3:30p

**CUSTODY DECREE**

This Decree was submitted (☒ *check one*) ☒ after a hearing ☐ without a hearing before the above-entitled court, and after a review of the pleadings and papers on file and the testimony given, if any, this Court finds as follows:

1. That Plaintiff or Defendant is now and has been an actual bona fide resident of the State of Nevada and has been actually domiciled in the State of Nevada for more than six weeks immediately prior to the commencement of this action.
2. That Plaintiff and Defendant have (*number*) 4 minor children in common:

| Child's Name:   | Date of Birth |
|-----------------|---------------|
| Isabelle Harris | 02/25/2007    |
| Reagan Harris   | 09/19/2009    |
| Julian Harris   | 09/19/2009    |
| River Harris    | 10/13/2011    |



1       3. **Child Residency.** (☒ *check one*)

2           ☒ The children are residents of Nevada and have lived here for at least the past 6  
3           months. Nevada is the habitual residence of the child, and this Court has the  
4           necessary UCCJEA jurisdiction to enter orders regarding custody and visitation.

5           ☐ The children are not residents of Nevada or have not lived here for at least the  
6           past 6 months. The children live in (*state*) \_\_\_\_\_ which is  
7           the habitual residence of the child, and this Court does not have the necessary  
8           UCCJEA jurisdiction to enter orders regarding custody and visitation.

9       4. That any custody and visitation orders made herein are in the best interest of the children.

10      5. That the amount of child support ordered herein is in compliance with the guidelines  
11      established by the Administrator of the Division of Welfare and Supportive Services or  
12      has been stipulated to by the parties with the required certifications and disclosures  
13      required by the guidelines.

14      6. That any other necessary findings of fact are attached and incorporated herein.

15      **NOW THEREFORE, IT IS HEREBY ORDERED** that (☒ *check one*) ☐ Plaintiff /

16      ☒ Defendant is the legal father of the children listed on page 1.

17      **IT IS FURTHER ORDERED** that (☒ *check one*)

18           ☐ The parties are granted joint legal custody of the minor child(ren).

19           ☒ The Plaintiff is granted sole legal custody of the minor child(ren).

20           ☐ The Defendant is granted sole legal custody of the minor child(ren).

21      **IT IS FURTHER ORDERED** that (☒ *check one*)

22           ☐ The parties shall share joint physical custody of the minor child(ren). The parties  
23           shall exercise a regular and/or holiday timeshare as outlined in Exhibit 1 which is  
24           incorporated herein.

25           ☐ Primary physical custody of the minor child(ren) shall be awarded to (☒ *check one*)

26           ☐ Plaintiff / ☐ Defendant. The parties shall exercise a regular and/or holiday  
27           timeshare as outlined in Exhibit 1 which is incorporated herein.

28           ☒ Sole physical custody of the minor child(ren) shall be awarded to (☒ *check one*)

☒ Plaintiff / ☐ Defendant.

1 **COURT FINDS** that Plaintiff's gross monthly income is \$ \_\_\_\_\_ and Defendant's  
2 gross monthly income is \$ \_\_\_\_\_. Under the guidelines, child support would be  
3 paid by (*parent name*) \_\_\_\_\_ in the amount  
4 of \$0.00 per month. (☒ *check one*)

5 ☐ Child support should be set at the above amount that complies with the guidelines  
6 established by the Administrator of the Division of Welfare and Supportive  
7 Services.

8 ☒ Court finds that child support should be set at \$ 0.00 based on the  
9 following adjustments from the guidelines: Judge states plaintiff must file  
10 -child support case with the D.A. in the State of Tennessee, as Tennessee  
11 is where the defendant/father resides and therefore TN has jurisdiction regarding  
12 Child Support.

13  
14 **ACCORDINGLY, IT IS HEREBY ORDERED** that child support is set at (☒ *check one*)

15 ☒ \$0 per month / ☐ \$ \_\_\_\_\_ per month paid by (*parent who will pay*)

16 \_\_\_\_\_ based on: (☒ *check one*)

17 ☐ The worksheet calculation and/or the guidelines established by the Administrator  
18 of the Division of Welfare and Supportive Services.

19 ☐ The amount already established by the District Attorney, Family Support  
20 Division, case (*insert case number*) R \_\_\_\_\_.

21 ☐ The amount determined by the court.

22  
23 **IT IS FURTHER ORDERED** that (☒ *check one*)

24 ☐ A wage withholding is entered against the obligor parent to secure payment of child  
25 support.

26 ☒ A wage withholding is not entered against the obligor parent, as good cause exists to  
27 postpone the withholding of income for child support.

1 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 2 ☐ There are no child support arrearages or the entitled custodial parent waived his/her
- 3 right to child support arrearages.
- 4 ☐ Child support arrears are being handled by the District Attorney, Family Support
- 5 Division, case (*insert case number*) R \_\_\_\_\_ and shall continue as
- 6 ordered in that case.
- 7 ☐ Back child support shall be paid by (*name of parent who will pay back child*
- 8 *support*) \_\_\_\_\_ in the total amount of
- 9 \$ \_\_\_\_\_, which amount is reduced to judgment.

10

11 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 12 ☒ There are no child care costs for either parent.
- 13 ☐ The monthly child care costs for the child(ren) are: \$ \_\_\_\_\_. The monthly
- 14 amount should be paid by ☐ Plaintiff ☐ Defendant ☐ both parents equally.

15 **IT IS FURTHER ORDERED** that medical support for the child(ren) shall be provided

16 through(☒ *check one*)

- 17 ☒ Medicaid.
- 18 ☐ Private / Employer insurance. The monthly premium should be paid by ☐ Plaintiff
- 19 ☐ Defendant ☐ both parents equally.
- 20 ☐ Other: \_\_\_\_\_

21

22 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 23 ☐ Any medical expenses not covered by insurance shall be paid equally by both
- 24 parties.
- 25 ☐ Any medical expenses not covered by insurance shall be paid by (*name of parent*)
- 26 \_\_\_\_\_ due to the following extraordinary
- 27 circumstances (*explain*): \_\_\_\_\_
- 28

1 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 2 ☐ The 30/30 Rule shall apply to all unreimbursed medical and dental expenses.<sup>1</sup>
- 3 ☒ The 30/30 Rule shall NOT apply to unreimbursed medical and dental expenses.
- 4

5 **IT IS FURTHER ORDERED** that (☒ *check one*)

- 6 ☒ The Plaintiff shall claim the following children as dependents for tax purposes every
- 7 year: *(insert child(ren)'s names):* Isabelle Harris, Reagan Harris, Julian Harris, River Harris
- 8 ☐ The Defendant shall claim the following children as dependents for tax purposes
- 9 every year: *(insert child(ren)'s names):* \_\_\_\_\_
- 10 ☐ The tax deduction shall alternate, with Plaintiff claiming the child(ren) in (☒ *check*
- 11 *one*) ☐ even / ☐ odd years, and Defendant claiming the child(ren) the other years.
- 12 ☐ The tax deduction shall be allocated per federal law.

13 *\*IRS rules state that the custodial parent usually has the right to claim the child on their*

14 *taxes regardless of what the Decree says. The custodial parent can waive this right by*

15 *filling out IRS Form 8332. Talk to a tax professional if you are not sure what to do.*

16 **IT IS FURTHER ORDERED** that (☒ *check all that apply*)

- 17 ☒ The child's birth certificate shall not be changed.
- 18 ☐ The child's birth certificate shall be amended to state that *(father's full name)*
- 19 \_\_\_\_\_ is the father of the child.
- 20 ☐ The child's name shall be changed to *(child's new first, middle, and last name)*
- 21 \_\_\_\_\_ and the birth
- 22 certificate shall be amended to reflect the new name.

23 **IT IS FURTHER ORDERED** that each party shall submit the information required in

24 NRS 125B.055, NRS 125.130 and NRS 125.230 on a separate form to the Court and the

25 Welfare Division of the Department of Human Resources within ten days from the date this

26 Decree is filed. Such information shall be maintained by the Clerk in a confidential manner and

27 not part of the public record. The parties shall update the information filed with the Court and

28 the Welfare Division of the Department of Human Resources within ten days should any of that

information become inaccurate.

<sup>1</sup> The "30/30 Rule:" If a parent pays a medical or dental expense for a child that is not paid by insurance, that parent must send proof of the expense to the other parent within 30 days of incurring the expense. The other parent then has 30 days to reimburse the paying parent ½ the cost.

1 **NOTICE IS HEREBY GIVEN** of the following provision of NRS 125C.0045(6):

2 **PENALTY FOR VIOLATION OF ORDER:** THE ABDUCTION, CONCEALMENT OR  
3 **DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A**  
4 **CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359** provides that  
5 every person having a limited right of custody to a child or any parent having no right of  
6 custody to the child who willfully detains, conceals or removes the child from a parent,  
7 guardian or other person having lawful custody or a right of visitation of the child in  
8 violation of an order of this court, or removes the child from the jurisdiction of the court  
9 without the consent of either the court or all persons who have the right to custody or  
10 visitation is subject to being punished for a category D felony as provided in NRS 193.130.

11 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of October 25,  
12 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply  
13 if a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on  
14 notice of the following provision of NRS 125C.0045(8):

15 If a parent of the child lives in a foreign country or has significant commitments in a foreign  
16 country:

17 (a) The parties may agree, and the court shall include in the order for custody of the  
18 child, that the United States is the country of habitual residence of the child for the purposes  
19 of applying the terms of the Hague Convention as set forth in subsection 7.

20 (b) Upon motion of one of the parties, the court may order the parent to post a bond if  
21 the court determines that the parent poses an imminent risk of wrongfully removing or  
22 concealing the child outside the country of habitual residence. The bond must be in an  
23 amount determined by the court and may be used only to pay for the cost of locating the  
24 child and returning him to his habitual residence if the child is wrongfully removed from or  
25 concealed outside the country of habitual residence. The fact that a parent has significant  
26 commitments in a foreign country does not create a presumption that the parent poses an  
27 imminent risk of wrongfully removing or concealing the child.

28 **NOTICE IS HEREBY GIVEN** that the parties are subject to the relocation requirements  
of NRS 125C.006 & NRS 125C.0065. If joint or primary physical custody has been established  
pursuant to an order, judgment or decree of a court and one parent intends to relocate his or her  
residence to a place outside of this State or to a place within this State that is at such a distance  
that would substantially impair the ability of the other parent to maintain a meaningful  
relationship with the child, and the relocating parent desires to take the child with him or her,  
the relocating parent shall, before relocating: (a) attempt to obtain the written consent of the  
non-relocating parent to relocate with the child; and (b) if the non-relocating parent refuses to  
give that consent, petition the court for permission to move and/or for primary physical custody  
for the purpose of relocating. A parent who desires to relocate with a child has the burden of  
proving that relocating with the child is in the best interest of the child. 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 without  
having reasonable grounds for such refusal, or for the purpose of harassing the relocating  
parent. A parent who relocates with a child pursuant to this section without the written consent  
of the other parent or the permission of the court is subject to the provisions of NRS 200.359.

1       **NOTICE IS HEREBY GIVEN** that the parties are subject to the provisions of NRS  
2 31A and 125.007 regarding the collection of delinquent child support payments.

3       **NOTICE IS HEREBY GIVEN** that either party may request a review of child support  
4 every three years pursuant to NRS 125B.145.

5       **NOTICE IS HEREBY GIVEN** that if you want to adjust the amount of child support  
6 established in this order, you must file a motion to modify the order with or submit a stipulation  
7 to the court. If a motion to modify the order is not filed or a stipulation is not submitted, the  
8 child support obligation established in this order will continue until such time as all children  
9 who are the subject of this order reach 18 years of age or, if the youngest child who is subject to  
10 this order is still in high school when he or she reaches 18 years of age, when the child  
11 graduates from high school or reaches 19 years of age, whichever comes first. Unless the  
12 parties agree otherwise in a stipulation, any modification made pursuant to a motion to modify  
13 the order will be effective as of the date the motion was filed.

14       22nd

15 DATED this X day of July, 2020.

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
  
DISTRICT COURT JUDGE

Respectfully Submitted By:

MS

16       ▶ Jenniffer Figueroa  
17       (Plaintiff's signature)

▶ \_\_\_\_\_  
(Defendant's signature)

18       Jenniffer Figueroa  
19       (Plaintiff's printed name)

\_\_\_\_\_  
(Defendant's printed name)

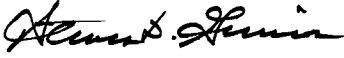
## EXHIBIT 1: Parenting Timeshare and Holiday Schedule

☒ No Visitation Requested Because: (*explain*) Defendant is a sex offender in Prison.

|  |   |
|--|---|
| <p>Regular Schedule:<br/> <i><b>Be very specific. Include the times and days of the week for each parent's timeshare.</b></i><br/> <i>(ex.: Mom: Saturday 7pm – Wednesday 3pm,<br/> Dad: Wednesday 3pm – Saturday 7pm)</i></p> |   |
| <p>Summer Schedule:</p>  | <input type="checkbox"/> Same as the regular schedule.<br><input type="checkbox"/> Other: _____   |
| <p>Mother's Day and Mother's Birthday:</p>   | <input type="checkbox"/> Mother every year from 9am – 7pm.<br><input type="checkbox"/> Other: _____   |
| <p>Father's Day and Father's Birthday:</p>   | <input type="checkbox"/> Father every year from 9am – 7pm.<br><input type="checkbox"/> Other: _____   |
| <p>Child's Birthday:</p>   | <input type="checkbox"/> <u>Even years</u> with (parent) _____<br><u>Odd years</u> with (parent) _____<br>*Time shall be from 9am – 7pm.*<br><input type="checkbox"/> Other: _____  |
| <p>3 Day Weekends:</p>   | <input type="checkbox"/> <u>Even Years</u> : MLK Jr. Day, Memorial Day, Labor Day with (parent) _____<br>President's Day, Independence Day, Nevada Admissions Day with the other parent.<br><u>Odd Years</u> : MLK Jr. Day, Memorial Day, Labor Day with (parent) _____<br>President's Day, Independence Day, Nevada Admissions Day with the other parent.<br>*Time begins when school lets out the day before the holiday weekend (or 3pm if no school), and ends the day following the holiday weekend when school resumes (or 9am).*<br>**If Independence Day falls on a Tuesday, Wednesday, or Thursday, the time shall be from July 3 at 9am until July 5 at 9am.**<br><input type="checkbox"/> Other: _____ |

|                           |   |
|---------------------------|---|
| Easter / Spring Break:    | <input type="checkbox"/> Even years with <i>(parent)</i> _____<br>Odd years with the other parent.<br>*Time shall begin the day school lets out until noon the day before school resumes.*<br><input type="checkbox"/> Other: _____   |
| Thanksgiving:             | <input type="checkbox"/> Odd years with <i>(parent)</i> _____<br>Even years with the other parent.<br>*Time shall begin the day school lets out until noon the day before school resumes.*<br><input type="checkbox"/> Other: _____   |
| Winter Break / Christmas: | <input type="checkbox"/> Segment 1 (Christmas) consists of the day school lets out until December 26 at noon.<br>Segment 2 (New Year's) consists of December 26 at noon until noon the day before school resumes.<br><u>Even years:</u> segment 1 with <i>(parent)</i> _____,<br>segment 2 with the other parent.<br><u>Odd years:</u> segment 1 with <i>(parent)</i> _____,<br>segment 2 with the other parent.<br><input type="checkbox"/> Other: _____<br>_____  |
| Other Holidays:           | _____<br>_____<br>_____<br>_____  |
| Vacation:                 | <input type="checkbox"/> The parents will not establish a formal vacation plan, and will instead mutually agree on vacation days and times with the child(ren).<br><input type="checkbox"/> Each parent may have up to <i>(number)</i> _____ vacation days per year with the child(ren). The parent shall notify the other parent of the vacation and provide a general vacation itinerary at least <i>(number)</i> _____ days before the planned vacation.<br><b>Vacation time is not allowed during a holiday allotted to the other parent.</b> |



  
CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

JENNIFFER FIGUEROA, PLAINTIFF.  
VS.  
RONALD DAVID HARRIS,  
DEFENDANT.

CASE NO: D-20-606828-C

DEPARTMENT N

DEFT'S APPEAL LETTER

Dear Clerk of Court or deputies,

8-3-20

Time is of the essence for me to appeal the Court's decision on case # D-20-606828-C Dept N. I feel that I did not get a fair chance due to the fact that I'm out of state and incarcerated. I'm trying to prove my innocence in my case. My children are my world. My ex-wife is using them as a weapon against me and as a tax refund. Please, please get me these forms so I can appeal. Please don't judge me. I'm fighting to prove that I'm not guilty. I've read Rules 3, Rule 3 E, and Rule 4. Can you please send me the following forms and any others you might feel I need. Thank you very much! I hope I name the correct forms.

### Appendix of Forms

Form 1 - Notice of Appeal ?

Form 2 - Case Appeal Statement ?

Forms 6 & 7 - Verification ?

Form 13 - Fast Track Response ?

Form 15 - Certificate of Delivery ?

Form 17 - Transcript Request Form ?

Form 3 or 11, too

RECEIVED

AUG 05 2020

CLERK OF THE COURT

Send to :

Ronald Harris # 584414  
NECX  
P.O. Box 5000  
Mountain City, TN.

I have until 8-22-20 to file

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
107 - 108  
WILL FOLLOW VIA  
U.S. MAIL**

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
109 - 111  
WILL FOLLOW VIA  
U.S. MAIL**

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
112 - 113  
WILL FOLLOW VIA  
U.S. MAIL**

*Alvin S. Levin*  
CLERK OF THE COURT

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

JENNIFFER FIGUEROA, PLAINTIFF,  
VS.  
RONALD DAVID HARRIS,  
DEFENDANT.

CASE NO: D-20-606828-C  
DEPARTMENT N

EXHIBIT

# **EXHIBIT 1**

WESTLAW

2019 Tennessee House Bill No. 2567, Tennessee One Hundred Eleventh General Assembly - Second Regular Session  
2019 TN H B 2567 (NS) February 5, 2020 (Approx. 3 pages)

2019 Tennessee House Bill No. 2567, Tennessee One Hundred Eleventh General Assembly -  
Second Regular Session

TENNESSEE BILL TEXT

TITLE: Children - As introduced, enacts the "Parents' Bill of Rights". - Amends TCA  
Title 36; Title 37; Title 49; Title 63 and Title 68.

VERSION Filed  
February 05, 2020

Faison

 Image 1 within document in PDF format

SUMMARY: AN ACT to amend Tennessee Code Annotated, Title 36; Title 37, Title 49, Title  
63 and Title 68, relative to children

TEXT:

HOUSE BILL 2567

By Faison

AN ACT to amend Tennessee Code Annotated, Title 36, Title 37, Title 49, Title 63 and Title  
68, relative to children.

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF TENNESSEE:

SECTION 1. This act shall be known and may be cited as the "Parents' Bill of Rights."

SECTION 2. Tennessee Code Annotated, Title 37, Chapter 10, is amended by adding the  
following language as a new part:

T.C.A. →

37-10-601

(a) All parental rights are reserved to the parent of a minor child without obstruction or  
interference from this state, any political subdivision of this state, any other governmental  
entity, or any other institution, including, but not limited to, the following rights:

- ✓ (1) The right to direct the education of the minor child;
- ✓ (2) All rights of parents identified in title 36 and title 49, including the right to access and  
review all school records relating to the minor child;
- ✓✓ (3) The right to direct the upbringing of the minor child.
- ✓ (4) The right to direct the moral or religious training of the minor child.
- ✓✓ (5) The right to make healthcare decisions for the minor child, unless otherwise prohibited by  
law.
- (6) The right to make post-birth preference decisions, including delayed cord clamping, skin-  
to-skin contact, and the right to opt-out of post-birth practices, including antibiotic eye  
ointment, vitamin K injection, delayed bathing, and Hepatitis B vaccine;
- (7) The right to access and review all medical records of the minor child unless otherwise  
prohibited by law, or the parent is the subject of an investigation of a crime committed  
against the minor child and a law enforcement official or department of children's services  
employee requests that the information not be released,
- (8) The right to consent in writing before a biometric scan of the minor child is made, stored,  
or shared,
- (9) The right to consent in writing before any record of the minor child's blood or  
deoxyribonucleic acid (DNA) is created, stored, or shared, except as required by § 24-7-112  
or unless authorized by court order;
- (10) The right to consent in writing before any governmental entity makes a video or voice  
recording of the minor child, unless the video or voice recording is made during or as part of  
a court proceeding, by law enforcement officials during or as part of a law enforcement

EXHIBIT 1



investigation, during or as part of a forensic interview in a criminal or department of children's services investigation, or to be used solely for any of the following:

(A) Safety demonstrations, including the maintenance of order and discipline in the common areas of a school or on student transportation vehicles;

(B) A purpose related to a legitimate academic or extracurricular activity;

(C) A purpose related to regular classroom instruction;

(D) Security or surveillance of buildings or grounds, or

(E) A photo identification card; and

(11) The right to be notified promptly if an employee of this state or any political subdivision of this state suspects that a criminal offense has been committed against the minor child by someone other than a parent, unless the incident has first been reported to law enforcement officials and notification of the parent would impede a law enforcement or department of children's services investigation. This subdivision (a)(11) does not create any new obligation for LEAs or charter schools to report misconduct between students at school, such as fighting or aggressive play, that is routinely addressed as a student disciplinary matter by the school.

(b) This section does not:


(1) Authorize or allow a parent to engage in conduct that is unlawful or to abuse or neglect a child in violation of the laws of this state,

(2) Prohibit courts, law enforcement officers, or employees of a governmental agency responsible for child welfare from acting in their official capacity within the reasonable and prudent scope of their authority; or

(3) Prohibit a court from issuing an order that is otherwise permitted by law.

(c) Any attempt to encourage or coerce a minor child to withhold information from the minor child's parent is grounds for discipline of an employee of this state, any political subdivision of this state, or any other governmental entity, except for law enforcement personnel.

(d) Unless legally waived or terminated, a parent has inalienable rights that are more comprehensive than those listed in this part.

(e) Unless otherwise required by law, the rights of parents of a minor child must not be limited or denied. 

(f) This part does not apply to a parental action or decision that would end the life of the minor child.

(g) This part does not prescribe all rights of parents.

37-10-602.

(a)

(1) Except as otherwise provided by law, no person may procure, solicit to perform, arrange for the performance of, or perform surgical procedures or a physical examination upon a minor child, or prescribe any prescription drugs to a minor child without first obtaining the written consent of the parent of the minor child.

(2) Notwithstanding subdivision (a)(1), if the parent of a minor child provides written consent to a school district for assessment or treatment, the consent is effective for the school year in which the consent is granted and must be renewed each subsequent school year. If an assessment or treatment is performed through telemedicine at a school site and a current consent has been provided by the parent of the minor child, the health professional is not required to verify that the parent of the minor child is at the school site.

(b) A hospital, as defined by § 68-11-201, may not permit surgical procedures to be performed upon a minor child at the hospital's facilities without first having obtained the written consent of a parent of the minor child.

(c) This section does not apply when it has been determined by a physician that an emergency exists and that it is necessary to perform such surgical procedures for the

treatment of an injury or drug abuse, or to save the life of the minor child, or when the minor child's parent cannot be located or contacted after a reasonably diligent search.

(d) This section does not apply to an abortion, which is governed by the provisions of title 37, chapter 10, part 3, and title 39, chapter 15, part 2.

(e) A violation of this section is a Class A misdemeanor.

SECTION 3 This act shall take effect July 1, 2020, the public welfare requiring it.

End of  
Document

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14 The only reservation I have about  
15 accepting all these guilty pleas is that, you  
16 know, I still want to be a father to my seven  
17 children that are biologically mine. So, you  
18 know, I'm hoping that I can still somehow have a  
19 relationship with them.

10:13:52 20 But I mainly -- I mainly have pled today  
21 to these charges to protect Sarah. I didn't want  
22 her to have to go through a trial. I think she's  
23 been put through enough. And I just wanted, you  
24 know, to have her dignity and privacy not  
25 compromised by a trial. I'll always care for her.

EXHIBIT '2

ACCREDITED COURT REPORTING

**EXHIBIT** 1

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
120 - 120  
WILL FOLLOW VIA  
U.S. MAIL**

*Steven D. Hermin*

Form 1. Notice of Appeal to the Supreme Court From a Judgment or Order of a District Court

CLERK OF THE COURT

No. D-20-606828-C

Dept. No. N

IN THE 8<sup>th</sup> JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA IN AND FOR  
THE COUNTY OF CLARK

~~A.B.~~, Plaintiff } Jennifer Figueroa  
v. }  
~~C.D.~~, Defendant } Ronald Harris

NOTICE OF APPEAL

Ronald Harris,

Notice is hereby given that ~~C.D.~~, defendant above named, hereby appeals to the Supreme Court of Nevada (from the final judgment) (from the order (describing it)) entered in this action on the 16 day of July, 20 20

/s/ Ronald Harris  
~~Attorney for C.D.~~ Pro se

Address Ronald Harris # 584414  
NECX  
PO Box 5000  
Mountain City, TN.

37683

Notice of Appeal (Form 1)  
No: D-20-606828-C

(A) Plaintiff - Jennifer Figueroa  
Defendant - Ronald Harris

(B) I'm appealing the judgement that gives Ms. Figueroa sole "legal" Custody, not sole physical Custody. Just "legal" Custody only. I want to continue having a say in my children's health care, education, religion, etc. I've always had this and I contend there was no valid reason for that part to be modified or changed. I do not feel the best interest standard was applied here, nor a change in Circumstances to warrant this decision; (pg. 2 of custody order) and jurisdiction

(C) July 16, 2020

\* Note \* I do not have the ability to type any of this paperwork. I'm currently incarcerated in TN. I'm pro se and I'm so confused on how to do this paperwork. Any help in helping me to present this properly is appreciated. I believe I have made this paperwork in time to file this timely appeal. I received the notice of judgement from Ms. Figueroa on 7-27-20. It's also sent before the 30 days if you refer to the 7-22-20 file date.

RECEIVED

AUG 24 2020

CLERK OF THE COURT

*Steven S. Gustin*  
CLERK OF THE COURT

Form 2. Case Appeal Statement

No. D-20-606828-C

Dept. No. N

IN THE 8th JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA IN AND FOR  
THE COUNTY OF CLARK

A. B., Plaintiff

C. D., Defendant

Jennifer Figueroa  
Ronald Harris (Appellant)

CASE APPEAL STATEMENT

1. Name of appellant filing this case appeal statement: Ronald Harris
2. Identify the judge issuing the decision, judgment, or order appealed from:
3. Identify each appellant and the name and address of counsel for each appellant:
4. Identify each respondent and the name and address of appellate counsel, if known, for each respondent (if the name of a respondent's appellate counsel is unknown, indicate as such and provide the name and address of that respondent's trial counsel):
5. Indicate whether any attorney identified above in response to question 3 or 4 is not licensed to practice law in Nevada and, if so, whether the district court granted that attorney permission to appear under SCR 42 (attach a copy of any district court order granting such permission):
6. Indicate whether appellant was represented by appointed or retained counsel in the district court:
7. Indicate whether appellant is represented by appointed or retained counsel on appeal:
8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the date of entry of the district court order granting such leave:
9. Indicate the date the proceedings commenced in the district court (e.g., date complaint, indictment, information, or petition was filed):
10. Provide a brief description of the nature of the action and result in the district court, including the type of judgment or order being appealed and the relief granted by the district court:
11. Indicate whether the case has previously been the subject of an appeal to or original writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket number of the prior proceeding:
12. Indicate whether this appeal involves child custody or visitation:
13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

Dated this 18 day of August, 2020

\_\_\_\_\_  
(Signature of Attorney)

\_\_\_\_\_  
(Nevada Bar Identification No.)

\_\_\_\_\_  
(Law Firm)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
(Telephone Number)

## Form 2 Case Appeal Statement (answers + info)

1. Ronald Harris
2. Judge Mathew Harter
3. Ronald Harris pro-se (Ronald Harris #584414 NECX PO BOX 5000 Mountain City TN 37683)
4. Jenniffer Figueroa pro-se 3874 Calle de Este Las Vegas 89121
5. N/A - neither party has counsel. Both pro se
6. No counsel hired or appointed in dist. court
7. No representation. Appellant has filed for forma pauperis <sup>with</sup> appeal
8. No decision yet for leave of forma pauperis
9. July 16, 2020 3:30 pm
10. See "Question 10 answer" pages
11. Never the subject of any case on appeal.
12. Yes, it involves child custody
13. I'm willing to try and reach an amicable solution with Ms. Figueroa.

### ★ ★ NOTE ★ ★

Nevada Law says that when the appellant is not presented by counsel, the dist. court clerk shall complete and sign the Case appeal Statement. Rule 3 (f) (2)

I hope this is true. Thank you



# Question 10 Answer

I will try to keep this as brief as possible. The reason or reasons I'm appealing Judge Harter's ruling are as follows:

1. Jurisdiction - Twice under case # D-17-547582-D my ex-wife, Ms. Figueroa, tried to change or modify custody. In 2017, and again in 2019. Judge Harter refused to rule and rejected her Motion Citing lack of jurisdiction. In fact, in his 2019 ruling or response he said, "This court has made it quite clear it will not rule on this motion." (something to that effect) He seemed rather annoyed by Ms. Figueroa's 2<sup>nd</sup> attempt. She provided the same info in her March 2019 request as she did in her April 2020 motion. However, this time the court granted her motion. I contend that nothing had changed from his March 2019, and July 2017 denials of her motions. I also contend that he does not have jurisdiction over this matter. How could he decline to grant her two previous motions with the same information as the one he granted in July 2020 because he felt this is a Tennessee matter? He did deny her child support since my incarceration is in TN and said it's a TN matter. I'm not sure if the rules of comity apply here in my case or appeal. I've included TN law that is, (Exhibit 1.) in my opinion Controlling. Please review it. I'd like for this court, or any court, to...

Would've asked to participate in the hearing via telephonically or through video participation. That happens to be an option on the ex-parte motion/order regarding mediation. My prison marks and tracks any legal mail that comes and goes. I'm 100% sure that Ms. Figueroa, the Clerk of Courts, and the Court cannot produce any proof of the hearing date or time of this custody issue being sent to me or notifying me. I'm under the impression that since it was a hearing that Ms. Figueroa was present and able to tell her side while I was not afforded the same opportunity to be heard. My prison allows telephonic and/or video participation in legal matters. This is unfair and I was at a total and complete disadvantage. And it probably made it appear that I did not care enough to fight for my rights to be in the lives of my children who love me. This is unacceptable, and unfair.

3. I'd like for this court to know that Ms. Figueroa did not notify me that she was filing an ex-parte motion. I would have filed a response if it were allowed. Instead all I got from her was an order allowing the case to proceed without any sort of mediation attempts. Ms. Figueroa

misted the Court in her reason for trying to forego Mediation. She listed, under child abuse, the crime I pled to against my step-daughter. Pleading and being found guilty are 2 different animals. Sometimes a plea is entered to spare someone the humiliation and trauma you have of a trial and a Circus atmosphere. Sometimes it's because you are afraid to trust a jury or your own lawyer to fight hard for you. I was not found guilty by a jury and I still maintain my innocence on several of the charges. However, what Ms. Figueroa did not really reveal to the Court is the fact that none of the charges or prison time had nothing to do with my 4 children with her. There is NO history of child abuse with my 4 children or my 3 children from a previous Marriage. Ms. Figueroa also stated that I slip letters to my step-daughter into letters to my kids. It's a lie and she can't offer any proof of that claim. I do not talk about my step-daughter or my ex-wife with my children. I'd never ask them to get involved or pass letters to my step-daughter. Not to mention they are too young to even know what's going on. Ms. Figueroa misted the Court. As much as I deplore her I would have attempted mediation with Ms. Figueroa especially via telephonic or Video Conference with a mediator involved. She knew I could make a compelling argument so she thwarted my chance to be heard at this ex-parte, or by a mediator.

④ There was no exigent circumstance to even file a motion for Child Custody. The event that led to Ms. Figueroa's March, 2019 motion to re-open case # D-17-547582-D, which the court quickly denied, as he had done originally in July, 2017, was because of a contentious discussion between Ms. Figueroa and myself on February 3, 2019. During that conversation I let it be known to Ms. Figueroa that I would no longer protect her for her crimes (involving) from the case I pled guilty to, the one involving my step-daughter (her daughter). I let her know that I will bring her to justice not only through TCA 39-11-402 "Conduct of Another" aka Criminal Responsibility (TN Law) but also for her extortion of me, theft of \$20,000 from our non-profit children's charity, and ID theft (mine). She promptly ceased allowing me contact (phone calls, letters) with my 4 children. I have missed their birthdays, Christmas, Thanksgiving and other holidays when I had free reign to talk to them. She had "allowed" me to talk to them for the previous 16 mos (twice a month, and later w/ly) and due to my bringing her to justice in Tennessee Movement, she as a source of revenge has cut off any and all contact with my kids. It's been almost 19 months since I've spoken to my children. There was no TN or NV court order barring me

From speaking to my Kids, they are not my so-called victims. They have no dog in this fight. They love me and miss me and are victims of Ms. Figueroa's power, Control, and revenge antics. She's using my Kids as weapons of revenge on me. They are innocent and have nothing to do with any crime I may or may not have committed. They ask about me I'm sure. God knows what she tells them about why they can't speak to me.

5) I don't think Judge Harter applied the "best interest Standard" to this case, nor was there any "change of Circumstances" in this case to even warrant a change in custody. He denied her twice before. Nothing has changed. Ms. Figueroa only filed this motion as a last act for control and revenge. She knows that through my post-conviction case (which I'm about to go to court for) her crimes and responsibility will be revealed. My lawyer in my TN case plans to invoke TCA 40-12-104, giving any citizen (including inmates or their counsel) to appear before the grand jury, without involvement or intrusion from any court or DA's office, to present a case for indictment if they have proof of a crime or crimes. We do not trust the DA's in my case so we're going that route and we do 100% have the proof. Some of that proof comes from the mouths of Ms. Figueroa and my step-daughter from their recorded interviews with law enforcement. The grand jury is a separate govt entity.

⑥ Lastly, I feel the Section that I want to have overturned on appeal is simple and reasonable. I'd like the "sole legal" custody returned to what it was originally... joint legal custody. All I want is to be able to have a legal say in my children's lives about health care, schooling, religion, and their well-being. I know **NOTHING** about them anymore. Do they have Covid-19? How are they doing in school? Who are their friends? What TV shows or movies do they like? Or something as simple as me calling on a Sunday and asking them, "How was your week?" I don't know what they look like anymore, what their voices sound like. Ms. Figueroa and I are not on speaking terms. I'm not so sure once my kids are grown that I'd even throw her a life raft on a sinking ship, but we have children and we both should be able to make the best decisions for our kids. Just because I'm in prison doesn't mean I'm a bad father, or uncaring. I adore and love and miss and cry over my kids weekly. They are my life. They are not a victim of any crime I've pled to, or any crime whatsoever. So what if Ms. Figueroa and I have to talk once and a blue moon? It'll be about the well-being of our children and it'll be a cordial discussion. However, in all honesty I do expect Ms. Figueroa to be arrested and extradited to TN to face her

Crimes, and that's another reason I'd like my rights to be restored. She only wants sole custody (legal) so that she doesn't have to allow me contact with my kids. She can't erase me. I've included Exhibit 2. It's a transcript of my plea hearing. You'll see that I mentioned that I want a relationship with my 7 kids. I have 3 from a prior marriage and 4 with Ms. Figueroa. And you'll also see one reason that I pled guilty. Out of love and respect for my step-daughter. I couldn't bear the thought of her being attacked by any lawyer or images or videos of her compromising her privacy and dignity, even her body. Something her own mother failed to do in my opinion. I'm praying for relief.

### Issues

1. Jurisdiction - ? (I feel my rights in TN overrule. <sup>NV.</sup> she failed to get permission)
2. Not notified about ex-parte motion, unable to participate.
3. Not notified of the hearing date for custody. It appears Ms. Figueroa was allowed to participate or to testify. I was not able to participate at all and had no knowledge of a hearing until I got a copy of the ruling & order from her.
4. No reason to even entertain this twice-rejected motion. Nothing had changed, no exigent circumstances, or change in circumstances.
5. Was the best interest standard even applied?

*Steven S. Gemin*

CLERK OF THE COURT

Form 3. Transcript Request Form

IN THE SUPREME COURT OF THE STATE OF NEVADA

A. B., Appellant  
v.  
C. D., Respondent

Ronald Harris  
Jennifer Figueroa

No. D-20-606828 C

REQUEST FOR TRANSCRIPT OF PROCEEDINGS

TO: [Court Reporter Name] Unknown

Appellant requests preparation of a transcript of the proceedings before the district court, as follows:

Judge or officer hearing the proceeding: Mathew Harter

Specific individual dates of proceedings for which transcripts are being requested (a range of dates is not acceptable): 7-16-20

Specific portions of the transcript being requested (e.g., suppression hearing, trial, closing argument, etc.): entire hearing

Number of copies required: one

I hereby certify that on the 20 day of August, 2020 I ordered the transcript(s) listed above from the court reporter named above, and paid the required deposit on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Ronald Harris  
(Signature of Attorney) Pro Se

(Nevada Bar Identification No.)

(Law Firm)

(Address)

(Telephone Number)

Ronald Harris # 584414  
NECX  
PO Box 5000  
Mantam City, TN.  
37683-5000

I'm indigent. Incarcerated in TN.  
I believe my ex-wife attended this hearing.  
I was not informed of the date of the hearing  
Nor did I have the chance to participate  
Since she did not inform me. This is unfair.  
I need this for my appeal, if the court approves it.





1 ASTA

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5  
6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**  
7 **STATE OF NEVADA IN AND FOR**  
8 **THE COUNTY OF CLARK**

9  
10 JENNIFFER FIGUEROA,

11 Plaintiff(s)

12 vs.

13 RONALD DAVID HARRIS,

14 Defendant(s),

Case No: D-20-606828-C

Dept No: N

15  
16  
17 **CASE APPEAL STATEMENT**

18 1. Appellant(s): Ronald Harris

19 2. Judge: Mathew Harter

20 3. Appellant(s): Ronald Harris

21 Counsel:

22 Ronald Harris #584414  
23 NECX  
24 P.O. Box 5000  
Mountain City, TN 37683

25 4. Respondent (s): Jenniffer Figueroa

26 Counsel:

27 Jenniffer Figueroa  
28 3874 Calle De Este

Las Vegas, NV 89121

5. Appellant(s)'s Attorney Licensed in Nevada: N/A  
Permission Granted: N/A

Respondent(s)'s Attorney Licensed in Nevada: Yes  
Permission Granted: N/A

6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

8. Appellant Granted Leave to Proceed in Forma Pauperis: Yes, May 22, 2020

Appellant Filed Application to Proceed in Forma Pauperis: Yes,  
Date Application(s) filed: September 2, 2020

9. Date Commenced in District Court: April 22, 2020

10. Brief Description of the Nature of the Action: DOMESTIC - Child Custody

Type of Judgment or Order Being Appealed: Misc. Order

11. Previous Appeal: No

Supreme Court Docket Number(s): N/A

12. Case involves Child Custody and/or Visitation: Custody and Visitation  
Appeal involves Child Custody and/or Visitation: Custody and Visitation

13. Possibility of Settlement: Unknown

Dated This 3 day of September 2020.

Steven D. Grierson, Clerk of the Court

/s/ Amanda Hampton

Amanda Hampton, Deputy Clerk  
200 Lewis Ave  
PO Box 551601  
Las Vegas, Nevada 89155-1601  
(702) 671-0512

cc: Ronald Harris



1 ASTA

2  
3  
4  
5  
6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**  
7 **STATE OF NEVADA IN AND FOR**  
8 **THE COUNTY OF CLARK**

9  
10 JENNIFFER FIGUEROA,

11 Plaintiff(s)

12 vs.

13 RONALD DAVID HARRIS,

14 Defendant(s),

Case No: D-20-606828-C

Dept No: N

15  
16  
17 **CASE APPEAL STATEMENT**

18 1. Appellant(s): Ronald Harris

19 2. Judge: Mathew Harter

20 3. Appellant(s): Ronald Harris

21 Counsel:

22 Ronald Harris #584414  
23 NECX  
24 P.O. Box 5000  
Mountain City, TN 37683

25 4. Respondent (s): Jenniffer Figueroa

26 Counsel:

27 Jenniffer Figueroa  
28 3874 Calle De Este

Las Vegas, NV 89121

5. Appellant(s)'s Attorney Licensed in Nevada: N/A  
Permission Granted: N/A

Respondent(s)'s Attorney Licensed in Nevada: Yes  
Permission Granted: N/A

6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

8. Appellant Granted Leave to Proceed in Forma Pauperis: Yes, May 22, 2020

Appellant Filed Application to Proceed in Forma Pauperis: Yes,  
Date Application(s) filed: September 2, 2020

9. Date Commenced in District Court: April 22, 2020

10. Brief Description of the Nature of the Action: DOMESTIC - Child Custody

Type of Judgment or Order Being Appealed: Misc. Order

11. Previous Appeal: No

Supreme Court Docket Number(s): N/A

12. Case involves Child Custody and/or Visitation: Custody and Visitation  
Appeal involves Child Custody and/or Visitation: Custody and Visitation

13. Possibility of Settlement: Unknown

Dated This 3 day of September 2020.

Steven D. Grierson, Clerk of the Court

/s/ Amanda Hampton

Amanda Hampton, Deputy Clerk  
200 Lewis Ave  
PO Box 551601  
Las Vegas, Nevada 89155-1601  
(702) 671-0512

cc: Ronald Harris



Lance J. Hendron  
Nevada Bar No. 11151  
Hendron Law Group, LLC  
625 S. Eighth Street  
Las Vegas, NV 89101  
Telephone: (702) 710-5555  
Facsimile: (702) 718-5555  
Attorney for Plaintiff

**IN THE FAMILY DIVISION  
IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR CLARK COUNTY**

JENNIFER FIGUEROA,

Plaintiff,

vs.

RONALD DAVID HARRIS,

Defendant.

Case No: D-20-606828-C

Dept. No.: Z

Nev. Supreme Court Case No. 81746

**DEFENDANT'S TRANSCRIPT ORDER REQUEST**

Defendant RONALD DAVID HARRIS, by and through his attorney of record, LANCE J. HENDRON, HENDRON LAW GROUP, LLC, hereby requests transcripts of the proceedings before this Court on **July 16, 2020**, to be used in Nevada Supreme Court case number 81746.

Undersigned counsel represents Defendant Ronald David Harris in the Nevada Supreme Court in case number 81746. Defendant Harris' appeal was referred by the Nevada Supreme Court to the Nevada Appellate Pro Bono Program and undersigned counsel entered her appearance after Appellant Harris was deemed qualified to receive pro bono legal services.

Having reviewed the record, undersigned counsel believes the requested transcripts are necessary and helpful to the representation and judicial review.

1 Because Defendant Harris is indigent and receiving legal aid by pro bono counsel, the  
2 transcripts should be provided at the expense of the county pursuant to NRS 12.015(3). Mr.  
3 Harris is indigent for purposes of NRS 12.015 because he qualified for legal aid and is being  
4 represented pro bono by undersigned counsel as part of the Nevada Appellate Pro Bono  
5 Program.

6  
7 Respectfully submitted this the 9<sup>th</sup> day of March, 2021

8 Respectfully submitted,

9 /s/ Anne R. Traum  
10 ANNE R. TRAUM  
11 UNLV Thomas & Mack Legal Clinic  
12 PO Box 71075  
13 Las Vegas, NV 89170  
14 Tel: (702) 895-2080 Fax: (702) 895-2081  
15 E-mail: anne.traum@unlv.edu  
16 *Attorney for Defendant Shaun Herzog*

17  
18 **CERTIFICATE OF SERVICE**

19 Pursuant to NRCP 5(b), I certify that I am an employee of the Hendron Law Group, LLC  
20 625 S. Eighth Street, Las Vegas, NV 89101, and that on the 9<sup>th</sup> day of March, 2021, I caused the  
21 foregoing document to be sent by transmitting a copy of the document in the format to be used  
22 for attachments to the electronic-mail address designated by the attorney or the party who has  
23 filed a written consent for such manner of service:

24 Denisse Ramos, Esq.  
25 The Ramos Law Firm  
26 719 S. Sixth Street  
27 Las Vegas, Nevada 89101  
28 Email: d.ramos@ramoslawnv.com

DATED: March 9, 2021

/s/ Lance J. Hendron  
LANCE J. HEDNRON

FILED

MAR 22 2021

*Anna L. Johnson*  
CLERK OF COURT

EOT

# ORIGINAL

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

JENNIFER FIGUEROA, )  
Plaintiff, )  
vs. )  
RONALD DAVID HARRIS, )  
Petitioner. )  
\_\_\_\_\_ )

CASE NO. D-20-606828-C  
DEPT. Z  
APPEAL NO. 81746

## ESTIMATED COST of TRANSCRIPT(S)

The office of Transcript Video Services received a request for transcripts estimate, for purposes of appeal, from Lance Hendron, Esq., on March 18, 2021, for the following proceedings in the above-captioned case:

JULY 16, 2020

for original transcript and one copy.

The estimated (reduced rate) cost of the transcripts is \$13.75. Payment in the amount of \$13.75 payable to Clerk of Court, must be presented to the Transcript Video Services Office prior to work commencing on the transcripts. The clerk accepts cashier's check, money order, MasterCard/Visa or exact cash.

DATED this 22nd day of March, 2021.

*Sherry Justice*  
SHERRY JUSTICE  
Transcript Video Services

Transcript ESTIMATE amount of \$ \_\_\_\_\_ Check# \_\_\_\_\_ CC \_\_\_\_\_ Cash \_\_\_\_\_ Clerk \_\_\_\_\_

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

This is only an estimate. Upon completion of transcript(s), a balance may be due, or you may receive a refund of your deposit if overpayment is greater than \$15.00.

NOTE: STATUTORY FEES ARE SUBJECT TO CHANGE PER LEGISLATIVE SESSION.

ITEMS LEFT BEYOND NINETY DAYS ARE SUBJECT TO DISPOSAL WITHOUT REFUND.

COUNTY RETENTION POLICY APPROVED BY INTERNAL AUDIT.

1 TRANS

FILED

APR 22 2021

*Thomas A. Hoffman*  
CLERK OF COURT

2 ORIGINAL

5 EIGHTH JUDICIAL DISTRICT COURT

6 FAMILY DIVISION

7 CLARK COUNTY, NEVADA

9 JENNIFER FIGUEROA, ) CASE NO. D-20-606828-C  
10 Plaintiff, ) DEPT. Z  
11 vs. ) APPEAL NO. 81746  
12 RONALD DAVID HARRIS, )  
13 Defendant. )

16 BEFORE THE HONORABLE MATHEW HARTER  
17 TRANSCRIPT RE: ALL PENDING MOTIONS  
18 THURSDAY, JULY 16, 2020

19 APPEARANCES:

20 The Plaintiff: JENNIFER FIGUEROA  
21 For the Plaintiff: Pro Se

22 The Defendant: RONALD DAVID HARRIS  
23 For the Defendant: Pro Se



1 LAS VEGAS, NEVADA

THURSDAY, JULY 16, 2020

2 PROCEEDINGS

3 (THE PROCEEDING BEGAN AT 03:59:58.)

4 THE CLERK: We're on the record.

5 THE COURT: Ms. Figueroa, can you hear me?

6 MS. FIGUEROA: Yes, I can.

7 THE COURT: All right. This will be case D606828,  
8 Figueroa versus Harris. This is a custody action that was  
9 filed in April of 2020. Give me one second because I know  
10 there's a related case. The -- the divorce case was file --  
11 was back in -- the related case is D547528.

12 In that case, the Court could only grant a divorce  
13 because Ms. Figueroa had not established jurisdiction in the  
14 state of Nevada at that point. She has now filed a custody  
15 action indicating that the children have been here now for  
16 3.5 years, which the Court would have jurisdiction. Was  
17 there ever a custody case filed back in Tennessee, Ms.  
18 Figueroa?

19 MS. FIGUEROA: No, there was not.

20 THE COURT: All right. I assumed that from yours and  
21 his. I don't know if you got a copy of what he filed with  
22 the Court.

23 MS. FIGUEROA: His response, I did receive.

24 THE COURT: All right. Let me -- first of all, I'm  
25 going to, clearly under the circumstance, given his crimes,

1 given the fact that he's gonna be incarcerated for a long  
2 period of time, I will go ahead and grant your request of  
3 sole legal sole physical custody of the four minor children.  
4 Here...

5 MS. FIGUEROA: Okay.

6 THE COURT: Here is the tricky part, though. I know in  
7 your request, you asked for child support based on the fact  
8 that he apparently gets or will get some sort of royalties on  
9 some sort of song writing stuff?

10 MS. FIGUEROA: Yes.

11 THE COURT: I don't have juris- I don't have jur- I have  
12 jurisdiction over custody. But since he's remained in the  
13 state of Tennessee, Tennessee has jurisdiction over child  
14 custody -- or I'm sorry, child -- child support. That  
15 doesn't mean you can't get it or start the process.

16 What you need to do is contact a district attorney  
17 family support division. Let them know that you have the  
18 custody order from Nevada, that you have sole legal sole  
19 physical custody but the jurisdiction of child support is in  
20 Tennessee because that's where he is a resident from. And  
21 then they...

22 MS. FIGUEROA: Okay.

23 THE COURT: And then they will have the ability and  
24 opportunity to tap into those record royalties.

25 MS. FIGUEROA: Okay. I'll do that.

1 THE COURT: Okay?

2 MS. FIGUEROA: Okay.

3 THE COURT: So I will -- I will grant your order. If  
4 you need -- you need to submit an order whereby it shows that  
5 you have sole legal sole physical custody of the four  
6 children, that this Court does not have jurisdiction over  
7 child support under NRS Chapter 130. The state of Tennessee,  
8 given the fact that the defendant remains in the state of  
9 Tennessee, never submitted himself to the jurisdiction of  
10 Tennes- or the state of Nevada. And then again, you can go  
11 forward with trying to get into those resources.

12 Just -- just from my own -- I don't -- I read  
13 through most of his and fairly quickly. What -- what artist  
14 did he write a song for?

15 MS. FIGUEROA: I mean, he's written with people, like,  
16 Fernandi (ph), with Julian Lennon and Rick Springfield. And  
17 even Rob Thomas from Matchbox Twenty. So he has a background  
18 in that, he's claiming in the letters that he has sent cause  
19 he sends me bunches of contracts and stuff like that just to  
20 prove it. I don't know if he's faking them. I don't know.  
21 I don't know how that works. He's saying that he wrote a  
22 song with Justin Timberlake and Harry Styles and just a bunch  
23 of different current artists. So I don't have any way of  
24 getting that information now.

25 THE COURT: Well, I'm certainly -- see, what will happen

1 is the district attorney here will get in contact with  
2 whatever child support agency it is in the state of Tennessee  
3 and the -- the good thing about going through that process is  
4 they have federal powers, which I as a state court don't  
5 have.

6           So they'll -- they'll be able to find out if he's  
7 receiving money. Obviously they'll be able to intercept any  
8 tax returns. They'll find out if any money's coming to his  
9 social security. You know, they'll trace it by social  
10 security number. So that's gonna be your best bet for child  
11 support.

12       MS. FIGUEROA: Okay. I -- I'll contact them.

13       THE COURT: All right. Again, your -- your order that  
14 your submitting for this and again it will close out this  
15 case, is simply that your granted sole legal sole physical  
16 custody, given the fact that it's -- I guess I should cite  
17 probably Hayes versus Gallagher as my reason why because it's  
18 -- it's physically impossible for him to have any custody  
19 rights due to the fact that he is serving a prison sentence,  
20 an extended prison sentence in the state of Tennessee.

21       MS. FIGUEROA: Does that mean that I have control as far  
22 as, like, he, you know, he's demanding to speak with them and  
23 things like that and...

24       THE COURT: You can do...

25       MS. FIGUEROA: ...(indiscernible).

1 THE COURT: ...whatever you would like. You -- he has  
2 no...

3 MS. FIGUEROA: Okay.

4 THE COURT: ...rights to them right now whatsoever.

5 MS. FIGUEROA: Okay. Thank you so much.

6 THE COURT: All right. You have a good day. Stay safe  
7 and healthy.

8 MS. FIGUEROA: Thank you. Thank you. You, too.

9 (THE PROCEEDING ENDED AT 04:05:35.)

10

11

\* \* \* \* \*

12

13 ATTEST: I do hereby certify that I have truly and  
14 correctly transcribed the video proceedings in the above-  
15 entitled case to the best of my ability.

16

17

  
SHERRY JUSTICE,  
Transcriber II

18

19

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21

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24

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ORIGINAL

FILED

APR 22 2021

*Sharon A. Hoffman*  
CLERK OF COURT

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

JENNIFFER FIGUEROA, ) CASE NO. D-20-606828-C  
Plaintiff, ) DEPT. Z  
)  
vs. ) NV SUPREME CT. APPEAL NO. 81746  
)  
RONALD DAVID HARRIS, )  
Defendant. )

**CERTIFICATION OF TRANSCRIPTS NOTIFICATION OF COMPLETION**

The Office of Transcript Video Services received a request for transcript and one copy, for the purposes of appeal from Lance Hendron on March 18, 2021 for the following proceedings in the above-captioned case:

**JULY 16, 2020**

I do hereby certify that copies of the transcript requested in the above-captioned case were submitted to be filed with the Eighth Judicial District Court on April 22, 2021, and ordering party was notified April 22, 2021.

DATED this 22<sup>nd</sup> day of April, 2021.

*Maria Balagtas*  
Maria Balagtas, Law Office Assistant II  
Transcription Video Services

EIGHTH JUDICIAL DISTRICT COURT - TRANSCRIPT VIDEO SERVICES  
601 N. Pecos Road, Las Vegas, Nevada 89101 (702) 455-4977

IN THE SUPREME COURT OF THE STATE OF NEVADA

RONALD DAVID HARRIS,  
Appellant,  
vs.  
JENNIFER FIGUEROA,  
Respondent.

Supreme Court No. 81746  
District Court Case No. D606828

**FILED**

DEC - 1 2021

*Elizabeth A. Brown*  
CLERK OF COURT

CLERK'S CERTIFICATE

STATE OF NEVADA, ss.

I, Elizabeth A. Brown, the duly appointed and qualified Clerk of the Supreme Court of the State of Nevada, do hereby certify that the following is a full, true and correct copy of the Judgment in this matter.

JUDGMENT

The court being fully advised in the premises and the law, it is now ordered, adjudged and decreed, as follows:

"ORDER the judgment of the district court REVERSED in part AND REMAND this matter to the district court for proceedings consistent with this order."

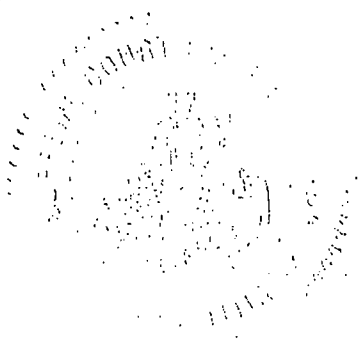
Judgment, as quoted above, entered this 5th day of November, 2021.

IN WITNESS WHEREOF, I have subscribed  
my name and affixed the seal of the Supreme  
Court at my Office in Carson City, Nevada this  
November 30, 2021.

Elizabeth A. Brown, Supreme Court Clerk

By: Rory Wunsch  
Deputy Clerk

D-20-606828-C  
CCJR  
NV Supreme Court Clerks Certificate/Judgm  
4975299



IN THE COURT OF APPEALS OF THE STATE OF NEVADA

RONALD DAVID HARRIS,  
Appellant,  
vs.  
JENNIFFER FIGUEROA,  
Respondent.

No. 81746-COA

**FILED**

NOV 05 2021

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
*S. J. J. J.*  
DEPUTY CLERK

*ORDER REVERSING IN PART AND REMANDING*

Ronald David Harris appeals from a child custody decree. Eighth Judicial District Court, Clark County; Mathew Harter, Judge.

Harris was once married to Jenniffer Figueroa, who moved to Nevada and obtained a divorce in 2017.<sup>1</sup> Harris subsequently pleaded guilty to sexually abusing Figueroa's daughter from a previous marriage—the half-sister to Harris's own four children with Figueroa.

Figueroa brought the underlying child custody action in April 2020. Figueroa filed a complaint pro se, requesting sole legal and sole physical custody of all four children plus child support. Regarding custody, Figueroa asserted in the complaint that the district court should consider that “[d]efendant is in prison as a sex offender. Pled guilty to B-felonies—30 years in prison.” She also asserted, “I would like the children have no contact w/ their father as the person he sexually abused for 3 years was the defendants [sic] step daughter, the childrens [sic] half-sister, who was 12 when abuse started.”

Figueroa served Harris by sending that complaint via certified mail, plus exhibits and a summons, to Harris at the PO Box for his prison in Tennessee. Harris timely filed a 12-page answer pro se, admitting he was incarcerated, but contesting Figueroa's request for sole legal custody. In his

<sup>1</sup>We do not recount the facts except as necessary to our disposition.



answer, Harris expressed an unwavering desire to be part of the children's lives. And he indicated that he should have joint legal custody because he had never made inappropriate remarks to *these* children or spoke ill of Figueroa in their presence.

In May 2020, the district court's judicial executive assistant signed an order and notice to appear for an NRCP 16.205 case management conference, and sent it to Harris (the certificate of mailing contains a box that is checked indicating electronic service, fax or email). At the conference, Figueroa appeared by video, but Harris did not appear for unexplained reasons. The district court sua sponte granted sole legal and sole physical custody to Figueroa in Harris's absence. According to the hearing transcript, the court stated that it would be "impossible" for Harris to exercise his custodial rights because he will be serving a prison sentence in Tennessee for the foreseeable future. The district court did not grant child support because it concluded it had no jurisdiction to do so.<sup>2</sup> Following the hearing, the district court signed a form custody decree from the Clark County Family Law Self-Help Center, completed by Figueroa pro se. Harris now appeals the issue of legal custody only.<sup>3</sup>

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<sup>2</sup>The child support issue is not part of this appeal; however, we note that this conclusion is likely incorrect. See NRS 125B.014. In a proceeding to establish a support order, a Nevada district court may exercise personal jurisdiction over a nonresident if the nonresident submits to the jurisdiction of this state by filing a responsive document, thereby waiving any contest to personal jurisdiction. NRS 130.201(1)(b). Harris waived personal jurisdiction when he filed his answer to the custody complaint without asserting personal jurisdiction as a defense. See NRCP 12(b)(2); see also NAC 425.115 (stating that once the court makes a custody determination, it also must determine the obligor's child support obligation).

<sup>3</sup>Neither party had counsel up to this point. However, both parties have been represented by counsel since the brief writing stage of this appeal.

*Whether the district court violated Harris's due process rights*

Harris argues that the district court violated his due process rights by awarding Figueroa sole legal custody of the parties' children without providing him proper notice or an opportunity to be heard. Figueroa counters that the NRCP 16,205 notice gave Harris sufficient notice and that Harris had an opportunity to be heard by way of the answer he filed with the court, given that Figueroa did not present any arguments regarding custody at the case management conference. We agree with Harris.

The district court has broad discretion in determining child custody. *Rivero v. Rivero*, 125 Nev. 410, 428, 216 P.3d 213, 226 (2009). However, substantial evidence must support the district court's findings. *Id.* Substantial evidence is "evidence that a reasonable person may accept as adequate to sustain a judgment." *Id.* (quoting *Ellis v. Carucci*, 123 Nev. 145, 149, 161, P.3d 239, 242 (2007)). Also, "a court may not use changes of custody as a sword to punish parental misconduct." *Wiese v. Granata*, 110 Nev. 1410, 1412, 887 P.2d 744, 746 (1994) (quoting *Dagher v. Dagher*, 103 Nev. 26, 28 n.3, 731 P.2d 1329, 1330 n.3 (1987)).

First, due process requires that a district court give a parent notice before affecting custodial rights. *See id.* at 1412, 887 P.2d at 745-46. General notice that there will be a hearing is not enough. *See Dagher*, 103 Nev. at 28, 731 P.2d at 1330. Rather, the parent must have "prior specific notice" that, at the hearing, the court may make the custody determination that it ultimately does make. *See id.* (reversing a custody determination made at a hearing because a parent did not receive "prior specific notice" that the particular hearing might involve a change in custody); *see also Micone v. Micone*, 132 Nev. 156, 159, 368 P.3d 1195, 1197 (2016) (holding the court's award of custody to paternal grandparents violated due process where the parents had notice that custody was at issue, but did not have notice that the

court was considering that particular custody option).

Here, the district court issued a final custody decree immediately following the case management conference without either party requesting that the court take such action. Harris had notice that legal custody would be at issue in the case because Figueroa served him with her complaint seeking sole legal and sole physical custody. Also, the notice setting hearing is titled as a notice to appear for an NRCP 16.205 case management conference involving paternity or custody actions between unmarried persons. However, this notice did not advise the parties that a final custodial arrangement could be addressed and resolved at the case management conference, a point Figueroa conceded at oral argument. The NRCP 16.205 notice makes no reference to disposing of custody and the rule attached to the notice only indicates that the court may enter "interim" orders or orders setting the case for a settlement conference or trial. Therefore, we conclude that the district court did not provide Harris with prior specific notice sufficient to satisfy due process before entering a final custody decree.

Further, even if Harris received notice, due process requires more. *Wiese*, 110 Nev. at 1412-13, 887 P.2d at 746. "Litigants in a custody battle have the right to a full and fair hearing concerning the ultimate disposition of a child." *Id.* (quoting *Moser v. Moser*, 108 Nev. 572, 576, 836 P.2d 63, 66 (1992)). And a party "threatened with the loss of parental rights must be given the opportunity to disprove the evidence presented." *Id.* (quoting *Moser*, 108 Nev. at 577, 836 P.2d at 66).

Here, Harris did not attend the case management conference, there is no explanation on the record or in the decree as to why, and the district court never explained the impact of his non-appearance. And, even if he had attended, the hearing lasted less than six-minutes, and Figueroa presented no witnesses and no evidence on the custody issue at all. In fact,

the first action the district court took after its introductory comments was to grant Figueroa sole legal and physical custody. Figueroa had made no arguments regarding any subject at that point. She only had stated that she had received the answer to her complaint. Furthermore, Figueroa made virtually no statements about custody throughout the hearing. And in response to a question at the end of the hearing, the court told Figueroa that she could do whatever she wanted with the children because Harris now has no rights. As such, Harris had no opportunity to foresee the nature of the proceeding, challenge the court's legal determinations, or present or disprove evidence on the factual issues. Therefore, the district court deprived Harris of a full and fair hearing.

Additionally, "[a] district court may not elevate promptness and efficiency over fairness and due process by entering summary judgment before claims are properly before it for decision." *See Renown Reg'l Med. Ctr. v. Second Judicial Dist. Court*, 130 Nev. 824, 828, 335 P.3d 199, 202 (2014) (internal quotations omitted). As such, the district court may not sua sponte enter summary judgment without "giving the losing party notice that it must defend its claim." *See id.* (holding that the district court erred by granting summary judgment without briefing, argument, or notice).

Here, the district court's actions at the case management conference were tantamount to entering summary judgment sua sponte on the pleadings, similar to *Renown*. Neither Harris nor Figueroa filed motions or briefs asking the court to dispose of the custody issue—or any issue for that matter—at the case management conference. The court heard no arguments at the conference regarding custody. And, as stated above, the parties received no notice that the court could or would make a final custody determination without an evidentiary hearing. Yet the court disposed of the entire case at the conference. Therefore, we conclude that the district court

violated Harris's due process rights when it awarded Figueroa sole legal custody at the case management conference.

*Whether the district court abused its discretion in awarding Figueroa sole custody*

Harris also argues that the district court abused its discretion in issuing the custody decree because substantial evidence did not support the district court's conclusion that it would be impossible for Harris to exercise legal custodial rights from prison. Figueroa counters that, in issuing the custody decree, the district court acted within its broad discretion to decide what is in the best interest of the children. We address this issue because it will be presented to the district court again upon remand.

The district court has broad discretionary power to determine child custody, and we will not disturb custody determinations absent a clear abuse of discretion. *Ellis*, 123 Nev. at 149, 161 P.3d at 241. However, deference is not owed to legal error "or to findings so conclusory they may mask legal error." *Davis v. Ewalefo*, 131 Nev. 445, 450, 352 P.3d 1139, 1142 (2015).

"Legal custody involves having basic legal responsibility for a child and making major decisions regarding the child, including the child's health, education, and religious upbringing." *Rivero*, 125 Nev. at 420, 216 P.3d at 221. Joint legal custody is presumed to be in the children's best interest if certain conditions are met. NRS 125C.002. However, this presumption is overcome when the court finds that the parents are unable to communicate, cooperate, and compromise in the best interest of the children. *See Rivero*, 125 Nev. at 420, 216 P.3d at 221.<sup>4</sup>

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<sup>4</sup>We have already interpreted *Rivero* to stand for this proposition in *Doucettperry v. Doucettperry*, No. 80114-COA, 2020 WL 6445845 (Nev. Ct.

Here, the district court signed a preprinted custody decree from the self-help center submitted by Figueroa, ordering that “[t]he plaintiff is granted sole legal custody of the minor children.” The decree recites, “this Court finds . . . [t]hat any custody and visitation orders made herein are in the best interest of the children.” But this decree does not address the NRS 125C.002 presumption or how Figueroa overcame the allegations in Harris’s answer that he never made inappropriate remarks to *these* children or spoke ill of Figueroa in their presence. The district court made no findings as to Harris and Figueroa’s ability, or lack thereof, to cooperate, communicate, or compromise in the best interest of their children. And there is otherwise no reference to the children’s best interest or the court’s findings or reasons for awarding Figueroa sole legal custody.

The district court therefore abused its discretion by failing to tie specific best interest findings to its conclusion that Figueroa should have sole legal custody in the decree.<sup>5</sup> *See Davis*, 131 Nev. at 451, 352 P.3d at 1143 (“Crucially, the decree or order must tie the child’s best interest, as informed by specific, relevant findings . . . to the custody determination made.”); *Arcella v. Arcella*, 133 Nev. 868, 872, 407 P.3d 341, 346 (2017) (citing the *Davis* standard as applicable in the legal custody context). And while we normally defer to the district court’s ultimate custody determination, without specific findings in the decree, “this court cannot say with assurance that the

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App. Nov. 2, 2020) (Order Affirming in Part, Reversing in Part, and Remanding).

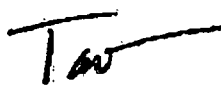
<sup>5</sup>The district court’s oral pronouncement that Figueroa was entitled to sole legal and sole physical custody based upon Harris’s crimes and length of incarceration is a compelling factor, but it does not rise to the level where no further findings are necessary as instructed in *Davis*. *See Rust v. Clark Cty. Sch. Dist.*, 103 Nev. 686, 689, 747 P.2d 1380, 1382 (1987).


custody determination was made for appropriate legal reasons." *Davis*, 131 Nev. at 452, 352 P.3d at 1143.

Additionally, deciding which custody arrangement is in the children's best interest necessarily involves resolving disputed questions of fact in this case. Indeed, the parties clearly dispute whether Harris's behavior with his stepdaughter renders him unable to participate in important legal decisions for his four children. Therefore, the district court should have held an evidentiary hearing on the issue of legal custody. See *Nev. Power Co. v. Fluor Ill.*, 108 Nev. 638, 646, 837 P.2d 1354, 1360 (1992) (concluding that the district court abused its discretion in failing to hold an evidentiary hearing to determine disputed questions of fact). Accordingly, we

ORDER the judgment of the district court REVERSED in part,  
AND REMAND for proceedings consistent with this order.

  
\_\_\_\_\_, C.J.  
Gibbons

  
\_\_\_\_\_, J.  
Tao

  
\_\_\_\_\_, J.  
Bulla

cc: Hon. Mathew Harter, District Judge  
Lance J. Hendron, Attorney at Law, LLC  
The Ramos Law Firm  
Barbara Buckley  
Snell & Wilmer/Kelly Dove  
Anne Traum  
Eighth District Court Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

RONALD DAVID HARRIS,  
Appellant,  
vs.  
JENNIFER FIGUEROA,  
Respondent.

Supreme Court No. 81746  
District Court Case No. D606828

**REMITTITUR**

TO: Steven D. Grierson, Eighth District Court Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.  
Receipt for Remittitur.

DATE: November 30, 2021

Elizabeth A. Brown, Clerk of Court

By: Rory Wunsch  
Deputy Clerk

cc (without enclosures):

Hon. Mathew Harter, District Judge  
Lance J. Hendron, Attorney at Law, LLC  
The Ramos Law Firm

**RECEIPT FOR REMITTITUR**

Received of Elizabeth A. Brown, Clerk of the Supreme Court of the State of Nevada, the  
REMITTITUR issued in the above-entitled cause, on DEC - 1 2021.

HEATHER UNGERMANN

Deputy District Court Clerk

RECEIVED  
APPEALS

DEC - 1 2021

CLERK OF THE COURT





DISTRICT COURT  
CLARK COUNTY, NEVADA

\* \* \* \*

JENNIFFER FIGUEROA, PLAINTIFF.  
VS.  
RONALD DAVID HARRIS,  
DEFENDANT.

CASE NO.: D-20-606828-C  
DEPARTMENT N

**NOTICE OF DEPARTMENT REASSIGNMENT**

NOTICE IS HEREBY GIVEN that the above-entitled action has been reassigned to Judge Mathew Harter.

- ☐ This reassignment follows the filing of Peremptory Challenge of Judge .
- ☐ This reassignment is due to the recusal of Judge MATHEW HARTER. See minutes in file.
- ☒ This reassignment is due to: Presiding Judge Assignment.

ANY TRIAL DATE IS VACATED AND WILL BE RESET BY THE NEW DEPARTMENT.

PLEASE INCLUDE THE NEW DEPARTMENT NUMBER ON ALL FUTURE FILINGS.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Joshua Raak  
Deputy Clerk of the Court

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☐ I mailed, via first-class mail, postage fully prepaid, the foregoing Clerk's Notice Department of Reassignment to:

Ronald David Harris  
NECX PO BOX 5000  
#584414  
Mountain City, TN 37683

Jennifer Figueroa  
Ronald David Harris

/s/ Joshua Raak  
Deputy Clerk of the Court

*Matthew Harter*  
CLERK OF THE COURT

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

Jenniffer Figueroa, Plaintiff.  
vs.  
Ronald David Harris, Defendant.

D-20-606828-C

**NOTICE OF HEARING  
AND ORDER REGARDING PROCEDURES**

You are hereby put on NOTICE that a hearing has been set before the **Honorable MATHEW HARTER**. A hearing has been scheduled on **December 21, 2021 at 1:30 PM.**

Pursuant to Administrative Order 21-04, all lawyers and self-represented litigants are REQUIRED to register for electronic service, and to update any change of email address with the Court. This Court intends on maintaining this instruction pursuant to EDCR 8.02(a). You are hereby ORDERED to register to receive electronic service for your case within the next ten (10) days at

<http://www.clarkcountycourts.us/departments/clerk/electronic-filing>

You may electronically file documents via that website, and view the instructions on how to do so there as well. If you experience technical difficulties, please contact Tyler Technologies for assistance. Their number can be found on the e-filing website.

Additionally, you are hereby ORDERED to ensure your current email address and telephone number-of-record are up-to-date. Information may be updated by filing a "Notice of Change of Address" into your case. You may find this template, as well as other templates, at [www.FamilyLawSelfHelpCenter.org](http://www.FamilyLawSelfHelpCenter.org).

This Court is currently conducting hearings via BlueJeans video conference pursuant to Administrative Order 21-04. You are expected to be available for at least one (1) hour after your scheduled court hearing time. This Court will join the video conference within that hour to address the hearing. Should the Court contact you telephonically, the court

number will begin with (702) 455-xxxx. Failure to answer the phone call will be deemed as a non-appearance.

Pursuant EDCR 5.517, you are REQUIRED TO APPEAR at the time and date set for hearing, including hearings held by telephonic or audiovisual means. You are hereby PUT ON NOTICE that pursuant to EDCR 7.60(a): "If without just excuse or because of failure to give reasonable attention to the matter, no appearance is made on behalf of a party . . . the court may order any one or more of the following:

(1) Payment by the delinquent attorney or party of costs, in such amount as the court may fix, to the clerk or to the adverse party.

(2) Payment by the delinquent attorney or party of the reasonable expenses, including attorney's fees, to any aggrieved party.

(3) Dismissal of the complaint, cross-claim, counter-claim or motion, or the striking of the answer and entry of judgment by default, or the granting of the motion.

(4) Any other action it deems appropriate, including, without limitation, imposition of fines."

You will receive an emailed hyperlink from BlueJeans with the meeting information in the week prior to the hearing. Please contact this Court's Judicial Executive Assistant the Friday prior to your hearing if you have not received your BlueJeans invitation link. You are ORDERED to have the application downloaded and be prepared to proceed via video conference at least one day prior to your scheduled hearing date. You may find information regarding the application and instructions at:

[www.ClarkCountyCourts.us/Virtual](http://www.ClarkCountyCourts.us/Virtual). Failure to be present and available when the Court initiates the hearing will be deemed as a non-appearance and you may be subjected to the aforementioned penalties. Furthermore, to comply with Administrative Order 21-04, Department N has a "General Session" on BlueJeans for members of the public who wish to view hearings. The general session hyperlink is <https://bluejeans.com/654522367/6056>. Any individuals who join that link are instructed to inform the Court's Courtroom Clerk of the case in which they wish to view.

1 Pursuant to Administrative Order 20-10, exhibits will need to be filed electronically. In  
2 order to initiate the electronic evidence submission request for a trial or evidentiary  
3 hearing, you must send an email to [FCEvidence@ClarkCountyCourts.us](mailto:FCEvidence@ClarkCountyCourts.us). Upon the email  
4 request, you will receive a link with instructions as to how and where to upload the  
5 evidence (the link will only be available for 24 hours).

6 The parties are PUT ON NOTICE that, pursuant to SCR 229(2)(b), **the use of cameras,**  
7 **cellular phones, or other electronic devices to photograph or record courtroom**  
8 **proceedings without the express permission of the judge is PROHIBITED.** Parties  
9 may request a copy of their video record by emailing [VideoA@ClarkCountyCourts.us](mailto:VideoA@ClarkCountyCourts.us).  
10 Parties may request copies of documents filed into their case by emailing  
11 [RecordsRequest@ClarkCountyCourts.us](mailto:RecordsRequest@ClarkCountyCourts.us). Parties registered to receive electronic service  
12 will automatically be emailed a copy of this Court's filings.

13 Finally, in accordance with Administrative Order 21-04, you are hereby ORDERED to  
14 electronically submit any documents requiring Judge Harter's signature. Documents  
15 requiring Judge Harter's signature must be emailed to  
16 [DeptNInbox@ClarkCountyCourts.us](mailto:DeptNInbox@ClarkCountyCourts.us). You will be emailed back either the signed and  
17 filed Order or a rejection memorandum once the Court has made a determination on the  
18 Order. You may view case status at [www.ClarkCountyCourts.us](http://www.ClarkCountyCourts.us). Any documents not  
19 requiring Judge Harter's signature must be electronically filed by you at  
20 [www.ClarkCountyCourts.us](http://www.ClarkCountyCourts.us) for the Court's review.

1 **SUMMARY**

- 2
- 3 1. Ensure you are registered to receive electronic service.
- 4 2. Ensure email and telephonic information are current.
- 5 3. Ensure you are available for your telephonic or audio-visual hearing.
- 6 4. Email Orders requiring Judge Harter's signature.

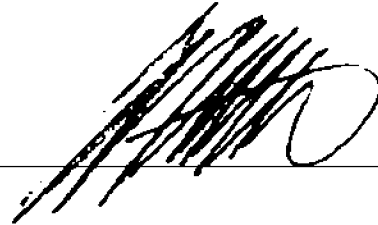
7 **IT IS YOUR RESPONSIBILITY TO ENSURE YOUR INFORMATION IS**

8 **CONSISTENTLY UPDATED DURING THE PENDENCY OF YOUR CASE.**

9

10

11 **HONORABLE MATHEW P. HARTER**  
Dated this 6th day of December, 2021

12 

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16 **E4B BA3 3283 A77F**  
**Mathew Harter**  
**District Court Judge**

17

18

19

20 **CERTIFICATE OF SERVICE**

21 I hereby certify that on the above file stamped date I submitted this Notice of Hearing and

22 Order of Procedures so that each party will be either electronically served, emailed, faxed,

23 or mailed a copy of this Notice of Hearing and Order Regarding Procedures.

24

25 /s/ Mark Fernandez

26 Mark Fernandez  
Judicial Executive Assistant  
Department N

27

28

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4  
5  
6 Jenniffer Figueroa, Plaintiff.

CASE NO: D-20-606828-C

7 vs.

DEPT. NO. Department N

8 Ronald David Harris, Defendant.  
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 12/6/2021

15 Jenniffer Figueroa

jennfig1976@gmail.com

16  
17 If indicated below, a copy of the above mentioned filings were also served by mail  
18 via United States Postal Service, postage prepaid, to the parties listed below at their last  
known addresses on 12/7/2021

19 Ronald Harris

NECX PO BOX 5000

#584414

20 Mountain City, TN, 37683  
21  
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*Matthew Harter*  
CLERK OF THE COURT

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

Jenniffer Figueroa, Plaintiff.  
vs.  
Ronald David Harris, Defendant.

D-20-606828-C

**NOTICE OF RESCHEDULING OF HEARING  
AND ORDER REGARDING PROCEDURES**

You are hereby put on NOTICE that a hearing has been reset before the **Honorable MATHEW HARTER**. The **Further Proceedings hearing** has been scheduled on **December 21, 2021 at 11:00 AM. The hearing will be conducted via BlueJeans audio-visual program.** Disregard any notices from the Clerk's Office stating otherwise. The BlueJeans invitation will be sent by Friday prior to your hearing.

Pursuant to Administrative Order 21-04, all lawyers and self-represented litigants are REQUIRED to register for electronic service, and to update any change of email address with the Court. This Court intends on maintaining this instruction pursuant to EDCR 8.02(a). You are hereby ORDERED to register to receive electronic service for your case within the next ten (10) days at

<http://www.clarkcountycourts.us/departments/clerk/electronic-filing>

You may electronically file documents via that website, and view the instructions on how to do so there as well. If you experience technical difficulties, please contact Tyler Technologies for assistance. Their number can be found on the e-filing website.

Additionally, you are hereby ORDERED to ensure your current email address and telephone number-of-record are up-to-date. Information may be updated by filing a "Notice of Change of Address" into your case. You may find this template, as well as other templates, at [www.FamilyLawSelfHelpCenter.org](http://www.FamilyLawSelfHelpCenter.org).

This Court is currently conducting hearings via BlueJeans video conference pursuant to Administrative Order 21-04. You are expected to be available for at least one (1) hour after your scheduled court hearing time. This Court will join the video conference within



1 that hour to address the hearing. Should the Court contact you telephonically, the court  
2 number will begin with (702) 455-xxxx. Failure to answer the phone call or be present in  
3 the BlueJeans video conference will be deemed as a non-appearance.

4 Pursuant EDCR 5.517, you are REQUIRED TO APPEAR at the time and date set for  
5 hearing, including hearings held by telephonic or audiovisual means. You are hereby PUT  
6 ON NOTICE that pursuant to EDCR 7.60(a): "If without just excuse or because of failure  
7 to give reasonable attention to the matter, no appearance is made on behalf of a party . . .  
8 the court may order any one or more of the following:

9 (1) Payment by the delinquent attorney or party of costs, in such amount as the court may  
10 fix, to the clerk or to the adverse party.

11 (2) Payment by the delinquent attorney or party of the reasonable expenses, including  
12 attorney's fees, to any aggrieved party.

13 (3) Dismissal of the complaint, cross-claim, counter-claim or motion, or the striking of the  
14 answer and entry of judgment by default, or the granting of the motion.

15 (4) Any other action it deems appropriate, including, without limitation, imposition of  
16 fines."

17 You will receive an emailed hyperlink from BlueJeans with the meeting information in the  
18 week prior to the hearing. Please contact this Court's Judicial Executive Assistant the  
19 Friday prior to your hearing if you have not received your BlueJeans invitation link. You  
20 are ORDERED to have the application downloaded and be prepared to proceed via video  
21 conference at least one day prior to your scheduled hearing date. You may find  
22 information regarding the application and instructions at:

23 [www.ClarkCountyCourts.us/Virtual](http://www.ClarkCountyCourts.us/Virtual). Failure to be present and available when the Court  
24 initiates the hearing will be deemed as a non-appearance and you may be subjected to the  
25 aforementioned penalties. Furthermore, to comply with Administrative Order 21-04,  
26 Department N has a "General Session" on BlueJeans for members of the public who wish  
27 to view hearings. The general session hyperlink is <https://bluejeans.com/654522367/6056>.  
28 Any individuals who join that link are instructed to inform the Court's Courtroom Clerk of  
the case in which they wish to view.

1 You are further REMINDED that formal decorum applies during the audio-visual  
2 conferences. The Court expects you to keep your camera steady and stationary. You must  
3 ensure you are in a quiet location so that the Court can easily hear you. Behaviors such as  
4 refraining from smoking and wearing appropriate attire as if you were in the courtroom  
5 still apply.

6 Pursuant to Administrative Order 20-10, exhibits will need to be filed electronically. In  
7 order to initiate the electronic evidence submission request for a trial or evidentiary  
8 hearing, you must send an email to [FCEvidence@ClarkCountyCourts.us](mailto:FCEvidence@ClarkCountyCourts.us). Upon the email  
9 request, you will receive a link with instructions as to how and where to upload the  
10 evidence (the link will only be available for 24 hours).

11 The parties are PUT ON NOTICE that, pursuant to SCR 229(2)(b), **the use of cameras,**  
12 **cellular phones, or other electronic devices to photograph or record courtroom**  
13 **proceedings without the express permission of the judge is PROHIBITED.** Parties  
14 may request a copy of their video record by emailing [VideoA@ClarkCountyCourts.us](mailto:VideoA@ClarkCountyCourts.us).  
15 Parties may request copies of documents filed into their case by emailing  
16 [RecordsRequest@ClarkCountyCourts.us](mailto:RecordsRequest@ClarkCountyCourts.us). Parties registered to receive electronic service  
17 will automatically be emailed a copy of this Court's filings.

18 Finally, in accordance with Administrative Order 21-04, you are hereby ORDERED to  
19 electronically submit any documents requiring Judge Harter's signature. Documents  
20 requiring Judge Harter's signature must be emailed to  
21 [DeptNInbox@ClarkCountyCourts.us](mailto:DeptNInbox@ClarkCountyCourts.us). You will be emailed back either the signed and  
22 filed Order or a rejection memorandum once the Court has made a determination on the  
23 Order. You may view case status at [www.ClarkCountyCourts.us](http://www.ClarkCountyCourts.us). Any documents not  
24 requiring Judge Harter's signature must be electronically filed by you at  
25 [www.ClarkCountyCourts.us](http://www.ClarkCountyCourts.us) for the Court's review.  
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1 **SUMMARY**

- 2
- 3 1. Ensure you are registered to receive electronic service.
- 4 2. Ensure email and telephonic information are current.
- 5 3. Ensure you are available for your telephonic or audio-visual hearing.
- 6 4. Email Orders requiring Judge Harter's signature.

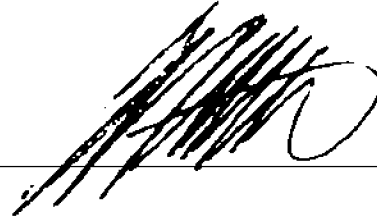
7 **IT IS YOUR RESPONSIBILITY TO ENSURE YOUR INFORMATION IS**

8 **CONSISTENTLY UPDATED DURING THE PENDENCY OF YOUR CASE.**

9

10

11 **HONORABLE MATHEW P. HARTER**  
Dated this 20th day of December, 2021

12 

13

14

15

16 **B7B 288 27C6 521E**  
**Mathew Harter**  
**District Court Judge**

17

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19

20 **CERTIFICATE OF SERVICE**

21 I hereby certify that on the above file stamped date I submitted this Notice of Hearing and

22 Order of Procedures so that each party will be either electronically served, emailed, or

23 mailed a copy of this Notice of Hearing and Order Regarding Procedures.

24

25 /s/ Mark Fernandez

26 Mark Fernandez  
Judicial Executive Assistant  
Department N

27

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1 **CSERV**

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3 **DISTRICT COURT**  
4 **CLARK COUNTY, NEVADA**

5  
6 **Jenniffer Figueroa, Plaintiff.**

**CASE NO: D-20-606828-C**

7 **vs.**

**DEPT. NO. Department N**

8 **Ronald David Harris, Defendant.**  
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

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

15 **Service Date: 12/20/2021**

16 **Jenniffer Figueroa**

**jennfig1976@gmail.com**

17 If indicated below, a copy of the above mentioned filings were also served by mail  
18 via United States Postal Service, postage prepaid, to the parties listed below at their last  
19 known addresses on 12/21/2021

20 **Ronald Harris**

**NECX PO BOX 5000**

**#584414**

**Mountain City, TN, 37683**  
21  
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DISTRICT COURT  
CLARK COUNTY, NEVADA

\* \* \*

Jenniffer Figueroa, Plaintiff.

Case No: D-20-606828-C

vs.

Department N

Ronald David Harris, Defendant.

**NOTICE OF EVIDENTIARY HEARING ON LEGAL CUSTODY**

Pursuant to an Order Reversing in Part and Remanding ("OR") from the Court of Appeals of the State of Nevada entered on 11/05/2021, the Court directed that this Court hold an evidentiary hearing in this case *solely on the issue of legal custody*.<sup>1</sup> OR, p.8; See NRS 125C.002; *Rivero v. Rivero*, 125 Nev. 410, 420-21, 216 P.3d 213 (2009).

The evidentiary hearing will be held on **04/26/2022 at 3:00 p.m.** (Pacific Standard Time). Obviously, given Defendant's out-of-state incarceration status, he will be unable to be personally present. Regardless, the hearing will be held by audio/visual means. If Defendant can arrange to appear by audio/visual means through the Tennessee Department of Corrections, he is to set it up at least 1 day prior by calling 702-455-1330. Both parties will have the opportunity to submit a Trial Brief and any other evidence relevant to the issue at hand. A copy of the OR is accompanying this Notice to reiterate procedural and substantive specifics. Any Briefs or evidence will be **due no later than 04/22/2022 at 12:00 p.m.** (Pacific Standard Time). Any witnesses with relevant testimony can either appear via audio/visual means by calling the number above. Alternatively, they can submit relevant evidence/testimony in the form of affidavits. See *Adoption of Edmond*, 50 Mass.App.Ct. 526, 50 Mass.App.Ct. 526, 739 N.E.2d 274, 739 N.E.2d 274 (2000) (no right for incarcerated parent to be present, only need meaningful opportunity to be heard and respond to the allegations, noting incarcerated parent could file affidavits and/or consider using video/telephonic equipment). If Defendant files nothing further in this case, this Court will consider Defendant's "12-page answer pro se" as noted by the Court. OR, p. 1, 3.

<sup>1</sup> It is noted that all other issues have been transferred to Department Z. Pursuant to a Minute Order entered on 12/06/2021 by the Presiding Judge, the transfer back to this Court is *only temporary for this limited issue* until the aforementioned evidentiary hearing has been held. Any other issues should be directed to Department Z.

1 After the evidentiary hearing, this Court will take the matter under submission and issue a  
2 written decision. EDCR 1.90.

3  
4 **CERTIFICATE OF SERVICE**

5 I hereby certify that on the above file stamped date I submitted this Notice so that  
6 Plaintiff will be electronically served. A copy of this Notice will be electronically served to  
7 Warden Jerry Gentry of the Tennessee Northeast Correction Complex, who will effectuate  
8 service upon Defendant.

9 /s/ Mark Fernandez

10 Mark Fernandez  
11 Judicial Executive Assistant  
12 Department N  
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IN THE COURT OF APPEALS OF THE STATE OF NEVADA

RONALD DAVID HARRIS,  
Appellant,  
vs.  
JENNIFFER FIGUEROA,  
Respondent.

No. 81746-COA

**FILED**

NOV 05 2021

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

**ORDER REVERSING IN PART AND REMANDING**

Ronald David Harris appeals from a child custody decree. Eighth Judicial District Court, Clark County; Mathew Harter, Judge.

Harris was once married to Jenniffer Figueroa, who moved to Nevada and obtained a divorce in 2017.<sup>1</sup> Harris subsequently pleaded guilty to sexually abusing Figueroa's daughter from a previous marriage—the half-sister to Harris's own four children with Figueroa.

Figueroa brought the underlying child custody action in April 2020. Figueroa filed a complaint pro se, requesting sole legal and sole physical custody of all four children plus child support. Regarding custody, Figueroa asserted in the complaint that the district court should consider that "[d]efendant is in prison as a sex offender. Pled guilty to B-felonies—30 years in prison." She also asserted, "I would like the children have no contact w/ their father as the person he sexually abused for 3 years was the defendants [sic] step daughter, the childrens [sic] half-sister, who was 12 when abuse started."

Figueroa served Harris by sending that complaint via certified mail, plus exhibits and a summons, to Harris at the PO Box for his prison in Tennessee. Harris timely filed a 12-page answer pro se, admitting he was incarcerated, but contesting Figueroa's request for sole legal custody. In his

<sup>1</sup>We do not recount the facts except as necessary to our disposition.

answer, Harris expressed an unwavering desire to be part of the children's lives. And he indicated that he should have joint legal custody because he had never made inappropriate remarks to *these* children or spoke ill of Figueroa in their presence.

In May 2020, the district court's judicial executive assistant signed an order and notice to appear for an NRCP 16.205 case management conference, and sent it to Harris (the certificate of mailing contains a box that is checked indicating electronic service, fax or email). At the conference, Figueroa appeared by video, but Harris did not appear for unexplained reasons. The district court sua sponte granted sole legal and sole physical custody to Figueroa in Harris's absence. According to the hearing transcript, the court stated that it would be "impossible" for Harris to exercise his custodial rights because he will be serving a prison sentence in Tennessee for the foreseeable future. The district court did not grant child support because it concluded it had no jurisdiction to do so.<sup>2</sup> Following the hearing, the district court signed a form custody decree from the Clark County Family Law Self-Help Center, completed by Figueroa pro se. Harris now appeals the issue of legal custody only.<sup>3</sup>

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<sup>2</sup>The child support issue is not part of this appeal; however, we note that this conclusion is likely incorrect. See NRS 125B.014. In a proceeding to establish a support order, a Nevada district court may exercise personal jurisdiction over a nonresident if the nonresident submits to the jurisdiction of this state by filing a responsive document, thereby waiving any contest to personal jurisdiction. NRS 130.201(1)(b). Harris waived personal jurisdiction when he filed his answer to the custody complaint without asserting personal jurisdiction as a defense. See NRCP 12(b)(2); *see also* NAC 425.115 (stating that once the court makes a custody determination, it also must determine the obligor's child support obligation).

<sup>3</sup>Neither party had counsel up to this point. However, both parties have been represented by counsel since the brief writing stage of this appeal.



*Whether the district court violated Harris's due process rights*

Harris argues that the district court violated his due process rights by awarding Figueroa sole legal custody of the parties' children without providing him proper notice or an opportunity to be heard. Figueroa counters that the NRCP 16.205 notice gave Harris sufficient notice and that Harris had an opportunity to be heard by way of the answer he filed with the court, given that Figueroa did not present any arguments regarding custody at the case management conference. We agree with Harris.

The district court has broad discretion in determining child custody. *Rivero v. Rivero*, 125 Nev. 410, 428, 216 P.3d 213, 226 (2009). However, substantial evidence must support the district court's findings. *Id.* Substantial evidence is "evidence that a reasonable person may accept as adequate to sustain a judgment." *Id.* (quoting *Ellis v. Carucci*, 123 Nev. 145, 149, 161, P.3d 239, 242 (2007)). Also, "a court may not use changes of custody as a sword to punish parental misconduct." *Wiese v. Granata*, 110 Nev. 1410, 1412, 887 P.2d 744, 746 (1994) (quoting *Dagher v. Dagher*, 103 Nev. 26, 28 n.3, 731 P.2d 1329, 1330 n.3 (1987)).

First, due process requires that a district court give a parent notice before affecting custodial rights. *See id.* at 1412, 887 P.2d at 745-46. General notice that there will be a hearing is not enough. *See Dagher*, 103 Nev. at 28, 731 P.2d at 1330. Rather, the parent must have "prior specific notice" that, at the hearing, the court may make the custody determination that it ultimately does make. *See id.* (reversing a custody determination made at a hearing because a parent did not receive "prior specific notice" that the particular hearing might involve a change in custody); *see also Micone v. Micone*, 132 Nev. 156, 159, 368 P.3d 1195, 1197 (2016) (holding the court's award of custody to paternal grandparents violated due process where the parents had notice that custody was at issue, but did not have notice that the

court was considering that particular custody option).

Here, the district court issued a final custody decree immediately following the case management conference without either party requesting that the court take such action. Harris had notice that legal custody would be at issue in the case because Figueroa served him with her complaint seeking sole legal and sole physical custody. Also, the notice setting hearing is titled as a notice to appear for an NRCP 16.205 case management conference involving paternity or custody actions between unmarried persons. However, this notice did not advise the parties that a final custodial arrangement could be addressed and resolved at the case management conference, a point Figueroa conceded at oral argument. The NRCP 16.205 notice makes no reference to disposing of custody and the rule attached to the notice only indicates that the court may enter "interim" orders or orders setting the case for a settlement conference or trial. Therefore, we conclude that the district court did not provide Harris with prior specific notice sufficient to satisfy due process before entering a final custody decree.

Further, even if Harris received notice, due process requires more. *Wiese*, 110 Nev. at 1412-13, 887 P.2d at 746. "Litigants in a custody battle have the right to a full and fair hearing concerning the ultimate disposition of a child." *Id.* (quoting *Moser v. Moser*, 108 Nev. 572, 576, 836 P.2d 63, 66 (1992)). And a party "threatened with the loss of parental rights must be given the opportunity to disprove the evidence presented." *Id.* (quoting *Moser*, 108 Nev. at 577, 836 P.2d at 66).

Here, Harris did not attend the case management conference, there is no explanation on the record or in the decree as to why, and the district court never explained the impact of his non-appearance. And, even if he had attended, the hearing lasted less than six-minutes, and Figueroa presented no witnesses and no evidence on the custody issue at all. In fact,

the first action the district court took after its introductory comments was to grant Figueroa sole legal and physical custody. Figueroa had made no arguments regarding any subject at that point. She only had stated that she had received the answer to her complaint. Furthermore, Figueroa made virtually no statements about custody throughout the hearing. And in response to a question at the end of the hearing, the court told Figueroa that she could do whatever she wanted with the children because Harris now has no rights. As such, Harris had no opportunity to foresee the nature of the proceeding, challenge the court's legal determinations, or present or disprove evidence on the factual issues. Therefore, the district court deprived Harris of a full and fair hearing.

Additionally, "[a] district court may not elevate promptness and efficiency over fairness and due process by entering summary judgment before claims are properly before it for decision." *See Renown Reg'l Med. Ctr. v. Second Judicial Dist. Court*, 130 Nev. 824, 828, 335 P.3d 199, 202 (2014) (internal quotations omitted). As such, the district court may not sua sponte enter summary judgment without "giving the losing party notice that it must defend its claim." *See id.* (holding that the district court erred by granting summary judgment without briefing, argument, or notice).

Here, the district court's actions at the case management conference were tantamount to entering summary judgment sua sponte on the pleadings, similar to *Renown*. Neither Harris nor Figueroa filed motions or briefs asking the court to dispose of the custody issue—or any issue for that matter—at the case management conference. The court heard no arguments at the conference regarding custody. And, as stated above, the parties received no notice that the court could or would make a final custody determination without an evidentiary hearing. Yet the court disposed of the entire case at the conference. Therefore, we conclude that the district court

violated Harris's due process rights when it awarded Figueroa sole legal custody at the case management conference.

*Whether the district court abused its discretion in awarding Figueroa sole custody*

Harris also argues that the district court abused its discretion in issuing the custody decree because substantial evidence did not support the district court's conclusion that it would be impossible for Harris to exercise legal custodial rights from prison. Figueroa counters that, in issuing the custody decree, the district court acted within its broad discretion to decide what is in the best interest of the children. We address this issue because it will be presented to the district court again upon remand.

The district court has broad discretionary power to determine child custody, and we will not disturb custody determinations absent a clear abuse of discretion. *Ellis*, 123 Nev. at 149, 161 P.3d at 241. However, deference is not owed to legal error "or to findings so conclusory they may mask legal error." *Davis v. Ewalefo*, 131 Nev. 445, 450, 352 P.3d 1139, 1142 (2015).

"Legal custody involves having basic legal responsibility for a child and making major decisions regarding the child, including the child's health, education, and religious upbringing." *Rivero*, 125 Nev. at 420, 216 P.3d at 221. Joint legal custody is presumed to be in the children's best interest if certain conditions are met. NRS 125C.002. However, this presumption is overcome when the court finds that the parents are unable to communicate, cooperate, and compromise in the best interest of the children. *See Rivero*, 125 Nev. at 420, 216 P.3d at 221.<sup>4</sup>

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<sup>4</sup>We have already interpreted *Rivero* to stand for this proposition in *Doucettperry v. Doucettperry*, No. 80114-COA, 2020 WL 6445845 (Nev. Ct.

Here, the district court signed a preprinted custody decree from the self-help center submitted by Figueroa, ordering that "[t]he plaintiff is granted sole legal custody of the minor children." The decree recites, "this Court finds . . . [t]hat any custody and visitation orders made herein are in the best interest of the children." But this decree does not address the NRS 125C.002 presumption or how Figueroa overcame the allegations in Harris's answer that he never made inappropriate remarks to *these* children or spoke ill of Figueroa in their presence. The district court made no findings as to Harris and Figueroa's ability, or lack thereof, to cooperate, communicate, or compromise in the best interest of their children. And there is otherwise no reference to the children's best interest or the court's findings or reasons for awarding Figueroa sole legal custody.

The district court therefore abused its discretion by failing to tie specific best interest findings to its conclusion that Figueroa should have sole legal custody in the decree.<sup>5</sup> See *Davis*, 131 Nev. at 451, 352 P.3d at 1143 ("Crucially, the decree or order must tie the child's best interest, as informed by specific, relevant findings . . . to the custody determination made."); *Arcella v. Arcella*, 133 Nev. 868, 872, 407 P.3d 341, 346 (2017) (citing the *Davis* standard as applicable in the legal custody context). And while we normally defer to the district court's ultimate custody determination, without specific findings in the decree, "this court cannot say with assurance that the

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App. Nov. 2, 2020) (Order Affirming in Part, Reversing in Part, and Remanding).


<sup>5</sup>The district court's oral pronouncement that Figueroa was entitled to sole legal and sole physical custody based upon Harris's crimes and length of incarceration is a compelling factor, but it does not rise to the level where no further findings are necessary as instructed in *Davis*. See *Rust v. Clark Cty. Sch. Dist.*, 103 Nev. 686, 689, 747 P.2d 1380, 1382 (1987).


custody determination was made for appropriate legal reasons." *Davis*, 131 Nev. at 452, 352 P.3d at 1143.

Additionally, deciding which custody arrangement is in the children's best interest necessarily involves resolving disputed questions of fact in this case. Indeed, the parties clearly dispute whether Harris's behavior with his stepdaughter renders him unable to participate in important legal decisions for his four children. Therefore, the district court should have held an evidentiary hearing on the issue of legal custody. See *Nev. Power Co. v. Fluor Ill.*, 108 Nev. 638, 646, 837 P.2d 1354, 1360 (1992) (concluding that the district court abused its discretion in failing to hold an evidentiary hearing to determine disputed questions of fact). Accordingly, we

ORDER the judgment of the district court REVERSED in part, AND REMAND for proceedings consistent with this order.

  
\_\_\_\_\_, C.J.  
Gibbons

  
\_\_\_\_\_, J.  
Tao

  
\_\_\_\_\_, J.  
Bulla

cc: Hon. Mathew Harter, District Judge  
Lance J. Hendron, Attorney at Law, LLC  
The Ramos Law Firm  
Barbara Buckley  
Snell & Wilmer/Kelly Dove  
Anne Traum  
Eighth District Court Clerk



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\* \* \*

Jenniffer Figueroa, Plaintiff

Case No: D-20-606828-C

vs.

Department N

Ronald David Harris, Defendant.

**PROOF OF SERVICE**

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## **Fernandez, Mark**

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**To:** Jerry W. Gentry  
**Subject:** RE: Jennifer Figueroa v. Ronald Harris, D-20-606828-C

**From:** Jerry W. Gentry [<mailto:Jerry.W.Gentry@tn.gov>]  
**Sent:** Tuesday, January 4, 2022 11:48 AM  
**To:** Fernandez, Mark  
**Subject:** RE: Jennifer Figueroa v. Ronald Harris, D-20-606828-C

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

I served Inmate Ronald Harris this at 2:05 PM today 1/4/2022

**From:** Fernandez, Mark <[fernandezm@clarkcountycourts.us](mailto:fernandezm@clarkcountycourts.us)>  
**Sent:** Monday, January 3, 2022 8:08 PM  
**To:** Jerry W. Gentry <[Jerry.W.Gentry@tn.gov](mailto:Jerry.W.Gentry@tn.gov)>  
**Subject:** [EXTERNAL] RE: Jennifer Figueroa v. Ronald Harris, D-20-606828-C

Good afternoon Jerry!

I submitted the Notice to be electronically served to your email address via our e-filing system. I know the system forces individuals to download the automated links, so I have attached a copy of the Notice to this email for convenience. Would you please provide an email written confirmation once service has been effectuated upon Ronald David Harris so I can file it as proof of service into our case?

Thanks again for the assistance and hope you're having a great New Year!

Sincerely,

**Mark Fernandez | Judicial Executive Assistant**

1100 Lexington Mall, Suite 200, Nashville, TN 37203

Phone: 615-253-2200 | Fax: 615-253-2201 | Email: [fernandezm@clarkcountycourts.us](mailto:fernandezm@clarkcountycourts.us)

Website: [www.clarkcountycourts.us](http://www.clarkcountycourts.us)

Twitter: [ClarkCountyTN](https://twitter.com/ClarkCountyTN)

Facebook: [ClarkCountyTN](https://www.facebook.com/ClarkCountyTN)

Instagram: [ClarkCountyTN](https://www.instagram.com/ClarkCountyTN)

[FERNANDEZM@CLARKCOUNTYCOURTS.US](mailto:FERNANDEZM@CLARKCOUNTYCOURTS.US)





*Steven S. Levin*  
CLERK OF THE COURT

EXHS  
Name: Ronald David Harris #584414  
Address: NECX - PO Box 5000  
Mountain City, TN 37683  
Telephone: \_\_\_\_\_  
Email Address: N/A  
In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Jennifer Figueroa  
Plaintiff,  
vs.  
Ronald D Harris  
Defendant.

CASE NO.: D-20-606828-C  
DEPT: \_\_\_\_\_  
DATE OF HEARING: \_\_\_\_\_  
TIME OF HEARING: \_\_\_\_\_

**EXHIBIT APPENDIX**

(your name) Ronald David Harris, the (check one ☒ Plaintiff  
☒ Defendant) submits the following exhibits in support of my (title of motion / opposition you  
filed that these exhibits support) Harris Exhibits. I understand that  
these are not considered substantive evidence in my case until formally admitted into evidence.

**Table of Contents:**

1. La Vergne Police Reports from Det. Fracker
2. Transcripts from Post Conviction Hearing
3. Harris v Harris Divorce Complaint from TN.
4. Go Fund Me Social Media from Ms. Figueroa
5. 2016 Tax Return
6. Mr. Harris' response/answer to Ms. Figueroa's previous Exhibits
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DATED (month) January (day) 6, 2022  
Submitted By: (your signature) [Signature]  
(print your name) Ronald David Harris

#### CERTIFICATE OF MAILING

I, (your name) Ronald D. Harris declare under penalty of perjury  
under the law of the State of Nevada that on (month) January (day) 6<sup>th</sup>,  
2022, I served this **Exhibit Appendix** by depositing a copy in the U.S. Mail in the State of  
Nevada, postage prepaid, addressed to:

Name of Person Served: Jennifer Figueroa  
Address: 3874 Calle De Este  
City, State, Zip: Las Vegas, NV. 89121

DATED (month) January (day) 6<sup>th</sup>, 2022  
Submitted By: (your signature) [Signature]

**EXHIBIT 1**

## Harris EXHIBIT 1

These are from the Detective who interviewed Ms. Figueroa (aka Mrs. Harris). One is an Activity Report and one is a probable cause for a warrant. Both documents include statements from Ms. Figueroa that she found nude photos of her minor daughters a few years prior to Mr. Harris' arrest. Not only does Ms. Figueroa do nothing about these alleged "found" sexually explicit photos, no law enforcement, no moving out, etc - but she claims Mr. Harris told her that her underage daughters wanted him to take these photos for their boyfriends. Not only is it absurd to even believe such a thing - Ms. Figueroa appears to have no issue, if true, with these photos going to boyfriends or even being produced. Probably because Ms. Figueroa has a history of making sex videos with her adult boyfriend when she herself was a minor. Mr. Harris denies taking these photos and saying such a ridiculous thing. If Ms. Figueroa stands by her statement let the record reflect she did nothing about it and alleged sexual exploitation continued to occur for years. Also, Ms. Figueroa was NEVER suspicious of Mr. Harris & her daughter. She knew how close they were. All of the 8 remaining children always saw Mr. Harris & her daughter hanging out, watching movies, running errands together. Some of Mr. Harris' kids were even jealous over it.

## Activity Report

|  |                   |                            |
|--|-------------------|----------------------------|
| Case Number<br>16-024006                     | Date<br>8/22/2016 | Time<br>11:28 a.m.         |
| Title<br>Agg. Sexual Exploitation of a Minor |                   | Investigator<br>M. Fracker |
| Activity                                     |                   |                            |

1. On August 22, 2016 a Mrs. Jennifer Harris came to the La Vergne Police Department to report that her husband, Mr. Ronald D. Harris has been having a sexual relationship with her 15 year old daughter, Sara Fix.

2. Sara is Mrs. Harris' biological daughter and Mr. Harris' step-daughter.

3. Mrs. Harris stated that she has been suspicious of her husband and her daughter's relationship because they had become very close.

4. Mrs. Harris stated approximately two years ago, while living in Lebanon, Tn, she found a camera that had nude photos of her two juvenile daughters, Sara and Rebecca Fix. When she confronted Mr. Harris over these photos he told her that he took the photographs at the request of the daughters so they could send them to their boyfriends.

5. On August 21, 2016 Mrs. Harris stated she was doing laundry and went into her husband's room to put up some clothes. Mrs. Harris advised she and Mr. Harris are currently separated, but living in the same residence. While putting some clothes into Mr. Harris' dresser drawer she felt something hard in a pair of swimming trunks.

6. Mrs. Harris stated that she found an external hard drive in the pocket of the swimming trunks. Mrs. Harris took the hard drive out and accessed it from her computer. Mrs. Harris found numerous nude images of Sara. Mrs. Harris also found videos of Mr. Harris and Sara engaged in sexual activity.

7. Mrs. Harris copied some of the files from that hard drive onto her hard drive to bring in to the police to file a report.

8. Mrs. Harris provided the La Vergne Police Department with her hard drive and I was able to view its contents. I observed numerous nude pictures of a female, and videos of a male and female engaged in sexual intercourse. The female was identified as Sara Fix by her mother. The male was identified as Mr. Ronald D. Harris by Mrs. Harris, and by Mr. Harris' Tennessee driver license.

seizure and examination of electronic storage media for the aforesaid evidence. This examination will be conducted by computer evidence recovery specialists.

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**Statement of Facts In Support of Probable Cause**

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This affidavit is made by Detective Matt Fracker of the La Vergne Police Department, La Vergne, Tennessee. Your Affiant has worked in the field of law enforcement for approximately five (5) years and is currently assigned to the criminal investigations division. Your Affiant testifies that the information contained herein, unless otherwise stated, is based upon personal knowledge or information received from other law enforcement officers that your Affiant believes to be true.

1. On August 22, 2016 a Mrs. Jennifer Harris came to the La Vergne Police Department to report that her husband, Mr. Ronald D. Harris has been having a sexual relationship with her 15 year old daughter, Sara Fix.
2. Sara is Mrs. Harris' biological daughter and Mr. Harris' step-daughter.
3. Mrs. Harris stated that she has been suspicious of her husband and her daughter's relationship because they had become very close.
4. Mrs. Harris stated approximately two years ago, while living in Lebanon, Tn, she found a camera that had nude photos of her two juvenile daughters, Sara and Rebecca Fix. When she confronted Mr. Harris over these photos he told her that he took the photographs at the request of the daughters so they could send them to their boyfriends.
5. On August 21, 2016 Mrs. Harris stated she was doing laundry and ~~went into her husband's room~~ to put up some clothes. Mrs. Harris advised ~~she and Mr. Harris are currently separated~~ but living in the same residence. While putting some clothes into Mr. Harris' dresser drawer she felt something hard in a pair of swimming trunks.
6. Mrs. Harris stated that she found an external hard drive in the pocket of the swimming trunks. Mrs. Harris took the hard drive out and accessed it from her computer. Mrs. Harris found numerous nude images of Sara. Mrs. Harris also found videos of Mr. Harris and Sara engaged in sexual activity.

**EXHIBIT 2**

## Harris EXHIBIT 2

These are court transcripts from Mr. Harris' Post Conviction Relief hearing. All witnesses were under oath. This includes Mr. Harris and Mr. Russell Nixon who was Mr. Harris' defense attorney in his criminal case. The following is a list of names of the parties on the record:

1. Colston - Darwin Colston - Mr. Harris' current PCR Atty.
2. Nixon - Russell Nixon - Mr. Harris' original trial lawyer
3. Harris - Mr. Harris
4. Reddick - Asst. D.A. Reddick

These transcripts are presented as an effort to show the family court that not only did Ms. Figueroa have years (plural) worth of knowledge that sex photos, videos, alleged sexual encounters were occurring between Mr. Harris and his step-daughter - she did nothing about it. No cops, no moving out, continued to live with Mr. Harris. Extorted Mr. Harris, stole and embezzled \$20,000 from their non-profit children's based Charity.

See breakdown of pages 1-12



Breakdown Page 1 - Mr. Harris knew for a 100% fact that Ms. Figueroa had at least one <sup>alleged</sup> sex video of her daughter and Mr. Harris saved on her laptop. He believed she had much more. Ms. Figueroa also had other so-called "dirt" on Mr. Harris on her laptop too. Ms. Figueroa would use this "dirt" and the sex video she claimed to have "found" in April 2016 (4 months before Mr. Harris' arrest) to extort Mr. Harris into doing things ~~for~~ her or to control him to do things her way. Including a threat to turn him in to the police if he tried to fight for custody of their 4 children or stop her from moving to Las Vegas with the kids. Mr. Nixon, Mr. Harris' trial lawyer, testified that early on he tried to report Ms. Figueroa's crimes, and her involvement and culpability in his case.

Breakdown Page 2 - Mr. Colston, Mr. Harris' PCR attorney, asked Atty Nixon if he remembered watching Ms. Figueroa's daughter's forensic interview with DCS and Police. He testified that he did. Mr. Nixon was then asked if the alleged victim in this case, Ms. Figueroa's daughter, told authorities and DCS that Ms. Figueroa knew that sexual contact, including videos, and other sex crimes were allegedly occurring but Ms. Figueroa was giving Mr. Harris a chance.

Mr. Nixon confirmed that he heard and saw Ms. Figueroa's daughter say, "yes." - Proof that Ms. Figueroa knew things were going on, did nothing about it, used this as leverage or control over Mr. Harris and was handing out "chances." Yet Ms. Figueroa wants to not let Mr. Harris have contact with his children.

Breakdown Page 3 - Mr. Harris testifies about Ms. Figueroa's extortion and using the alleged sexual relationship between her daughter and Mr. Harris to strong arm a move out of state with the kids. Mr. Harris was able to secretly record Ms. Figueroa in early April 2016 using the sex video she said she had "found" as leverage. This recording also proves that Ms. Figueroa had knowledge of this alleged crime, but that she had possessed child pornography and was using it to extort Mr. Harris. Mr. Harris told his trial lawyer, Mr. Nixon where the recording could be found. That recording and an email from Ms. Figueroa regarding a sex video, and her knowledge of it has been archived and secured. Time and date stamped.

Breakdown Pages 4-6 - More testimony from Mr. Harris about Ms. Figueroa's knowledge and lack of doing anything. Mr. Harris quotes the Detective's reports including an interview with Ms. Figueroa's oldest daughter who also confirmed that her mom had knowledge of photos (sexual) and alleged events occurring. Ms. Figueroa photographed her daughters and Mr. Harris side by side nude on a few occasions.

[ Breakdown Pages 7-12 - Mr. Harris and the Asst. D.A. spare over Ms. Figueroa's crimes, her knowledge of crimes, failure to act, giving Mr. Harris chances, Ms. Figueroa's culpability, etc. Not once did the A.D.A. defend Ms. Figueroa. She didn't even want to address the issue, often trying to change the subject. The A.D.A. did not answer Mr. Harris' question about what kind of mother gives anyone a chance if sexual acts are occurring with their minor child. In fact, the A.D.A. tried to acknowledge Ms. Figueroa's crimes by diverting the attention and duty to another jurisdiction. A County that Ms. Figueroa also is guilty of crimes. Lastly on page 12 Mr. Harris confirms that Ms. Figueroa would control the content of Mr. Harris' letters in an effort to admit to crimes he didn't commit or he would not be allowed to speak to his 4 children.

1 exactly the wording.

2 Colston Q. All right. And, so, that Court -- that  
3 order ordered that a mirror image of Ms. Harris's  
4 computer be obtained by the State?

5 NIXON A. Correct.

6 Colston Q. Okay. And you had ample opportunity, as  
7 you have described, to meet with Mr. Harris. Did  
8 he -- what did he tell you that was so special  
9 about that computer that he wanted you to get  
10 ahold of it?

11 NIXON A. I don't remember the exact description, so  
12 forgive if I don't use the same language he may  
13 have used. But, essentially, I believe it was his  
14 contention that the items or the files that were  
15 discovered on the hard drive located in his top  
16 drawer in his bedroom were put there via the use  
17 of one of those devices that I subpoenaed.

18 Colston Q. Did he ever make any allegations to you  
19 that Ms. Harris was involved in all this goings  
20 on?

21 NIXON A. Yes. He made several allegations.

22 Colston Q. Okay. And was that one of the reasons  
23 that he was adamant about getting a copy of her  
24 computer?

25 NIXON A. Yes. I believe he thought that that would

1 Q. Okay.

2 NIXON A. I do, of course, remember the interview  
3 with the alleged victim in this case.

4 Colston Q. Okay. And did you remember, she testified  
5 that this had been going on for years, is that  
6 correct?

7 NIXON A. Yes.

8 Colston Q. Okay. Even when the family lived in  
9 Wilson County?

14:14:24 10 NIXON A. Yes.

11 Colston Q. All right. And do you remember saying --  
12 or do you remember her testifying that mom had  
13 known about this, but she was giving dad a chance,  
14 do you remember that?

15 NIXON A. I do, yes.

16 Colston MR. COLSTON: Okay. So, that was in that  
17 interview. Okay. That would be my questions,  
18 Your Honor.

19 THE COURT: Questions on cross  
20 examination.

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22 CROSS EXAMINATION

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24 QUESTIONS BY GENERAL REDDICK:

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14:41:52

[REDACTED]

Harris : I told him that there was a recording I had of her that she said if I don't let her move to Las Vegas with my kids that she would turn me in. And that was in April of 2016, four months before my arrest. I told him about that recording and where it could be found.

MR. COLSTON: Your Honor, I have got a document from the discovery that I didn't realize we were going to need. I would like to make a copy of it. If I could get the court reporter -- I thought I had copies of everything we were going to need.

Fracker, Detective Fracker.

Colston Q. And on number -- Paragraph 4, to  
paraphrase, does that state that your wife told  
Detective Fracker that she had known about things  
going -- improper things going on for  
years?

Harris A. That is correct. She said  
years ago while living in Lebanon, she found  
some photos on a camera. Nude photos of her  
daughters on a camera.

Colston Q. And, so, is that one of the things that  
forms your basis of the Fourteenth Amendment  
Violation?

Harris A. Yes. Because everyone wants to -- I think  
Ms. Reddick and them, they want to say she wasn't  
directly involved. I'm talking about her being  
involved through conduct of another. 39-11-402.

Colston Q. Okay. And you understand that does not  
lessen your culpability in this?

Harris A. No, it doesn't. But that's still  
selective prosecution. The evidence was there to  
charge her. And I'll explain more evidence. And  
part of this is that evidence.

Q. Okay.

A. But it could have also -- as you and I had

1 discovered what he thought was maybe another  
2 victim, which would be Rebecca, the older sister.  
3 So, he sent Detective Fracker a photo. And I  
4 guess he sent it to my ex-wife, and she goes, yes,  
5 that's Rebecca.

6 So, then Fracker -- Detective Fracker  
7 called Rebecca for an interview and asked her  
8 about these pictures. And he says -- this is a  
9 direct quote from his report -- I asked Rebecca if  
10 these were the photos that Ms. Harris had found a  
11 couple of years ago on the camera, and she stated  
12 that they were.

13 When Mr. Harris -- sorry -- when Ms.  
14 Harris informed me at the beginning of this  
15 investigation that she had found nude photos of  
16 her daughters, she neglected to mention that Mr.  
17 Harris was also nude in these photos.

18 He had found -- Detective Smith had found  
19 a picture of Rebecca and I nude side-by-side. And  
14:48:12 20 I'm in the picture. And I did not take that  
21 picture.

22 So, once again, he confirms through  
23 Rebecca that my wife had knowledge. And she left  
24 out a key detail that I was nude in these pictures  
25 with Rebecca.



1 THE COURT: That's fine.

2 THE WITNESS: That's all right.

3 MR. COLSTON: It is just the one. That's  
4 may fault. Okay.

5 THE COURT: It will be marked as Exhibit  
6 11.

7 THE CLERK: 10.

8 THE COURT: 10. Thank you. I'll have to  
9 write that down now. Thank you.

10

11 (Exhibit No. 10 -- Report by Detective Fracker)

12

13 THE COURT: Your questions.

14 Q. BY MR. COLSTON: And the second one is  
15 another activity report by Mr. Fracker, is that  
16 correct?

17 *Harris* - A. Yes. It's about six weeks later. The one  
18 that just went into evidence or as an exhibit,  
19 ~~rather, was the day of my arrest. This is about~~

14:47:02 20 six weeks later, October 5th of 2016. They were  
21 living in Las Vegas at this point.

22 *colston* Q. And it just reiterated what was on the  
23 other page, is that correct?

24 *Harris* A. Well, sort of. What happened here is  
25 Detective Smith, who was here earlier, he

## CROSS EXAMINATION

### QUESTIONS BY GENERAL REDDICK:

Q. BY GENERAL REDDICK: Mr. Harris, the report that you just testified about wherein Detective Fracker notes that years ago, while your family was living in Lebanon, Tennessee, she saw some pictures?

Harris A. Yes.

Reddick Q. Is it your testimony that that is the criminal offense that Ms. Harris should have been charged with, failing to report?

Harris A. It's more than failing to report. It's that she had a duty under Section 3 of 39-11-402 to stop the crime. She benefited from it as well. She benefited with having domain over me. She benefited by taking the \$20,000 embezzled from our children's charity.

Yes, she used that information for several years. There should have been no reason why I shouldn't have been arrested or kicked out of the house.

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Reddick Q. And you understand that failure to report child abuse, child sex abuse is a misdemeanor?

14:57:34 10

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Harris A. I know that's what you said in our meeting. You said it's an A Misdemeanor, and you said what's the big deal. I'm talking about conduct of another, having knowledge of a crime while it had been going on.

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Reddick Q. Mr. Harris, I assume you are referring to our meeting that you requested where you requested a male D.A., and Mr. Westmoreland was also present?

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14:57:50 20

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Harris A. I only wanted -- first of all, I don't remember that it had to be a male. I just wanted to speak to someone other than you, because I thought you were protecting my ex-wife, yes. I am referring to that meeting.

24

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Reddick Q. And do you remember being asked, either by myself or Mr. Westmoreland, what crime Ms. Harris

1 committed that you wanted prosecuted, and you told  
2 us that she had failed to report when she learned  
3 of it.

4 Harris A. I said, she had knowledge.

5  
6 Reddick Q. And at that point, I think either I or Mr.  
7 Westmoreland explained that failure to report is a  
8 misdemeanor --

9 Harris A. That's not what I was saying though.

10 Reddick Q. -- with a statute of limitations of 11  
11 months and 29 days?

12 Harris A. I was saying she was culpable. Yeah, you  
13 did say that. I do remember that, Ms. Reddick.  
14 But I was talking about her having knowledge for  
15 years.

16 Look, in her interview, okay, that one of  
17 the -- I guess Detective Fracker didn't remember  
18 -- and that's why I'm glad those interviews are  
19 now a part of the record. In that interview, she  
20 said, I had been looking for that hard drive for  
21 years. Okay. That means she's keeping me in the  
22 house for years so she can find this hard drive?  
23 She literally said that. So, it will be in that  
24 statement in her interview.

25 And then my stepdaughter, Sarah, said

1 separately in her forensic interview that mom was  
2 giving him a chance. Well, okay, that means she  
3 also had knowledge. She's admitting her mother  
4 had knowledge that stuff was going on. So, my  
5 question would be, if I'm asking the question, is  
6 what kind of mom gives someone a chance.

Reddick Q. You're really -- well, let me ask you this  
question before we move on. You understand that  
Lebanon, Tennessee is another jurisdiction, and  
it's not Rutherford County? You understand that?

Harris A. Yeah, but the chance that she's giving me  
apparently happened in Rutherford County.

Reddick Q. So --

14 Harris A. Plus she sent me an email in April of 2016  
15 that says I found another video of you and Sarah.

16

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That email exists in evidence. It can  
be found on my laptop.

15:00:00 20

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So, why does it take her four more months  
to put me in prison or in jail?

I can go back. Look, Sarah's words -- in  
her own words show that she had knowledge. Mom

1 was given him a chance. That means she knows  
2 something sexual, crazy stuff is going on. And  
3 then, you know -- and then I have been looking for  
4 that hard drive for years. There's no way out of  
5 conduct of another, period.

6 Reddick Q. I want to go back to your statement on  
direct about your decision to waive the  
preliminary hearing was that you were still trying  
to protect your stepdaughter. What do you mean by  
that, Mr. Harris?

13 Harris A. I mean that -- you know, and that's been  
part of the reason for, you know, a lot of things.  
You know, I cared about her. I still care about  
her. You know, it's a big deal for someone to be  
unclothed and seen and viewed by -- you know, I  
didn't know -- I had never been in trouble before,  
so, I didn't know what that process meant.

And I know when this case was going on, I  
~~believe Russ and you and me and possibly even the~~  
Judge here were worried about how we were going to  
present that evidence, you know, videos or  
whatever had we gone to trial. So, yeah, you know  
-- but you have got to understand, my Public  
Defender didn't even show up. So, this guy just  
fills in.

1 don't deny it?

2 Harris A. Correct. But I would also stipulate,  
3 those letters, a lot of them my wife made me write  
4 or she would cut off contact with me and my  
5 children. She -- I don't know what you guys -- in  
6 my opinion, you had some -- you didn't have  
7 evidence in Wilson County or something.

8 But there were certain things that she  
9 would make me allude to in those letters, or I  
10 would not talk to my children. And I don't  
11 believe there's anything in there where I'm  
12 admitting to you or your boss that I had sex with  
13 her at age 12.

14 Reddick Q. Did you also file a petition for post  
15 conviction relief in Wilson County?

16 Harris A. I did.

17 Reddick Q. On what basis?

18 Harris A. A lot of the same here. Ineffective  
19 assistance of counsel, not having discovery. You  
20 know, I think I'll do well on appeal if it's  
21 denied.

22 Reddick Q. Has that been heard?

23 Harris A. It has.

24 Reddick Q. I assume it was denied?

25 Harris A. It was denied. But it's currently in

## EXHIBIT 3



### Harris EXHIBIT 3

This exhibit is the divorce paperwork filed by Ms. Figueroa in TN. As you can see she had plenty of chances to disparage Mr. Harris. Plenty of chances to accuse him of sex crimes. She had already allegedly found sexual pictures of her daughters years prior and supposedly "caught" Mr. Harris and his step-daughter acting "Weird" when she opened the bedroom door a year prior and she had sent Mr. Harris an email about "finding" a sex video time stamped in April 2016. The April 2016 recorded conversation about turning Mr. Harris ~~into~~ into the police (extortion attempt) existed too. Yet she mentions nothing. Never once claims Mr. Harris is a terrible father who should have no contact with his kids, etc. Yet ever since Mr. Harris mentioned that she needs to be brought to justice he's all of a sudden unfit and should not have rights or contact with his kids. She is certainly unfit herself and is in no position to cut contact off between Mr. Harris and his kids. Kids who are not a victim to any alleged crimes Mr. Harris may have committed with his step-daughter a non-blood relative. However Ms. Figueroa's alleged crimes were committed against her own flesh and blood. Her daughter is her victim.

*Circuit*

|  |                                  |                             |
|--|----------------------------------|-----------------------------|
| Chancery Court<br>Rutherford County,<br>Tennessee              | <b>COMPLAINT FOR<br/>DIVORCE</b> | Case Number<br>71647        |
| Jennifer Harris vs. Ronald David Harris<br>Plaintiff Defendant |                                  | <b>FILED</b><br>JUL 27 2016 |

1. WIFE

O'CLOCK M  
 MELISSA HARRELL, CLERK  
*mc*  
 DEPUTY CLERK

Full Name (*First, Middle, MAIDEN, Last*): Jennifer Figueroa Harris  
 Mailing Address: 307 Clearlake Court La Vergne Tn 37086  
 Length of Time Wife Has Lived in Tennessee: 5 Years  
 Race or Color: Hispanic  
 Date and Place of Birth: 06/07/1976 Santurce, Puerto Rico  
 Number of Previous Marriages: 1  
 Active Member of the Armed Services of the United States? ☐ Yes ☒ No  
 Employer and Address: Unemployed

2. HUSBAND

Full Name (*First, Middle, Last*): Ronald David Harris  
 Mailing Address: 307 Clearlake Court La Vergne Tn 37086  
 Length of Time Husband Has Lived in Tennessee: 5 years  
 Race or Color: Caucasian  
 Date and Place of Birth: 02/25/1971 Glasgow Kentucky  
 Number of Previous Marriages: 2  
 Active Member of the Armed Services of the United States? ☐ Yes ☒ No  
 Employer and Address:

3. THE MARRIAGE

Husband and wife were married on (*date*): 09/22/2007  
 The place of the marriage (*city or county plus state or country*) was Los Angeles County, California  
 Husband and wife separated on or about (*date*): October 1st 2015  
 The last place husband and wife lived together was 307 Clearlake Court La Vergne Tn 37086  
 (*city or county plus state or country*).

The children of this marriage who are under age 18 or disabled and dependent on the parents are:

| Child's Full Name                             | Birth Date         |
|---|--------------------|
| Isabelle Grace Harris                         | 02/25/2007         |
| Reagan McCartney Harris & Julian David Harris | 09/19/2009 (Twins) |
| River Harbaugh Harris                         | 10/13/2011         |

The child or children presently reside with Both Parents  
 307 Clearlake Court La Vergne Tn 37086 (*persons and address*).

During the last five years, the child or children have resided with Both Parents  
307 Clearlake Court La Vergne Tn 37086 (persons, addresses, and dates).

Could another court case affect custody of a child? ☐ Yes ☒ No (If yes, attach copy.)

Does one spouse have an Order of Protection against the other? ☐ Yes ☒ No (If yes, attach copy.)

The wife is ☐ pregnant ☒ not pregnant.

#### 4. THE COURT

*Specify one or more of the following:*

This court has jurisdiction over the Defendant because:

☒ the Plaintiff or the Defendant resided in Tennessee for the six months before the filing of the Complaint.

☐ the grounds for the divorce occurred while the Plaintiff was a resident of Tennessee.

*Specify one or more of the following:*

The Plaintiff has filed the Complaint in this county because:

☒ the parties resided in this county at the time of their separation.

☐ the Defendant resides in this county.

☐ the Plaintiff resides in this county, and the Defendant is a nonresident of Tennessee or is incarcerated.

#### 5. GROUNDS FOR DIVORCE

The husband and wife have irreconcilable differences or in the alternative the Defendant is guilty of inappropriate marital conduct toward the Plaintiff.

#### 6. PROPERTY

*Select one of the following:*

☐ Husband and wife now own, either alone or together, property which should be divided by the court.

☐ The property of the parties has been divided by them. (Caution: The court may review the fairness of the division.)

☒ The parties have no property.

#### 7. DEBTS

*Select one of the following:*

☐ Husband and wife now have, either alone or together, debts that should be divided by the court.

☒ The debts of the parties have been divided by them. (Caution: The court may review the fairness of the division.)

☐ The parties have no debts.

#### 8. ALIMONY

Select one of the following:

- ☒ Alimony is not requested.  
☐ The Plaintiff needs alimony, and the Defendant has the ability to pay it.

9. RESTRAINING ORDERS AND INJUNCTIONS

Select one of the following:

- ☒ No restraining order or injunction is needed.  
☐ A restraining order or injunction is needed because of the following behavior by Defendant:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Select one of the following:

- ☐ A Statutory Injunction against Both Parties will be in effect because irreconcilable differences are not the sole ground for the divorce. It is being filed with this Complaint.  
☒ A Statutory Injunction against Both Parties will not be in effect because irreconcilable differences are the sole ground for the divorce.

10. OTHER MATTERS (State here any special circumstances.)

She says nothing at all.  
Sex Crimes? Unfit parent? - Nothing at all.  
Nude pics, sex videos? Nothing.

RELIEF REQUESTED

The Plaintiff requests that the court enter a Final Decree of Divorce and grant any other relief to which the Plaintiff may be entitled, including orders that will:

If a Marital Dissolution Agreement has been signed, select all that apply:

- ☒ Approve the Marital Dissolution Agreement between the parties.  
☒ Approve the Permanent Parenting Plan.  
☒ Divide the court costs as follows: ☒ equally ☐ husband only ☐ wife only  
☐ Change the name of the \_\_\_\_\_ to \_\_\_\_\_

If a Marital Dissolution has not been signed, select all that apply:

- ☐ Issue service of process on the Defendant.  
☐ Restrain or enjoin the Defendant because of the behavior described above. THIS IS THE FIRST REQUEST FOR EXTRAORDINARY RELIEF.  
☐ Provide alimony for the Plaintiff temporarily and permanently.  
☐ Approve the Plaintiff's Temporary and Permanent Parenting Plans, including child support.

- ☐ Divide fairly the property and debts of the parties.
- ☐ Change the name of the Plaintiff to \_\_\_\_\_
- ☐ Compel the Defendant to pay Plaintiff's attorney fees, other professional fees and costs.
- ☐ Make the Defendant pay the court costs.
- ☐ Other: Nothing. Silence.

### SIGNATURE AND VERIFICATION

I declare under penalty of perjury under the laws of the State of Tennessee that the facts stated in this Complaint are true to the best of my knowledge and belief for the causes mentioned in it. The Complaint is not made out of levity or in collusion with the Defendant.

Signed at UPS Store Smyrna on 7/25/2014  
Place Date

[Signature]  
Plaintiff's Signature

Your Address: 307 Clearlake Court La Vergne Tn 37086

Telephone: 615-926-9263 Fax: \_\_\_\_\_ E-Mail: jennifer.harris1@gmail.com

STATE OF TENNESSEE  
COUNTY OF Rutherford

Sworn to and subscribed before me this 25 day of July, 20 14.

My commission expires: 5/19/19  
[Signature]  
Notary Public



**EXHIBIT 4**

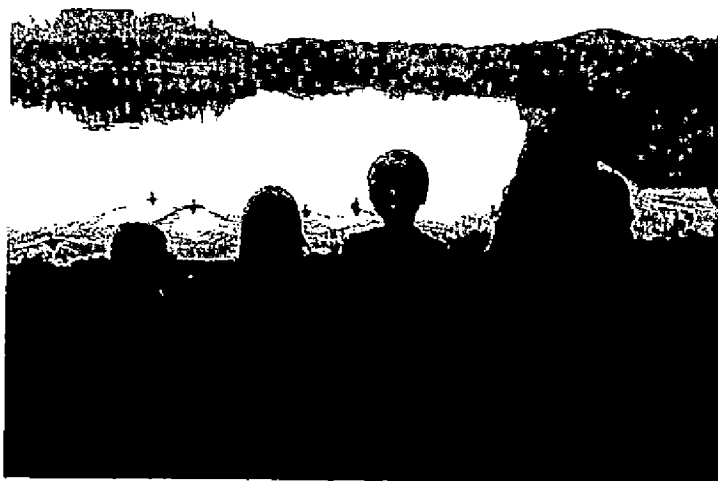
## Harris exhibit 4

These are all pages from Ms. Figveroa's Go Fund Me scam. Not only did she choose to ruin Mr. Harris publicly, she also is exploiting the alleged crimes against her daughter for financial gain and sympathy. What kind of mother goes public like this, possibly scarring her daughter? It's all about money for Ms. Figveroa. Not only was Ms. Figveroa asking for money for plane tickets, moving trucks, gas and expenses - she did so while she already had the stolen \$20,000 that she embezzled from their children's charity non-profit organization. She certainly fails to mention that she already had \$20,000, stolen at that, but that also had years of knowledge of Mr. Harris' alleged crimes against her daughter. She also fails to mention that she's giving Mr. Harris "Chances" or that she "found" a sex video months earlier or photos of her nude daughters years prior. This should say a lot about Ms. Figveroa. Lastly, as you can read she says many damaging things about Mr. Harris, including that she hates him and that he's a piece of shit. She also celebrates him going to prison and saying a life sentence is not long enough. This all was posted on social media and her Go Fund Me page is still up. It's

just an easy Google search away for Mr. Harris' Children. The things Ms. Figueroa said about their father, a lot untrue, will always exist for them to see. She is the person who is doing the damaging talk for Mr. Harris' children to see someday. If not already.

Keep in mind this is her story. Her version. Not all of her claims or accusations are true. She knew I would not have access to the internet or the ability to defend myself or debunk her. She took advantage of people's sympathy, etc. What kind of parent exploits a case like this publicly - for financial gain, etc. ??





## Starting Over - Time For Healing

I don't know where to begin. The news I am about to share with you, my family and friends, is quite upsetting and disturbing.

My family and I have had a tragic event happen to us, and there is no easy way to talk about it other than to just say it straight out honest.

On Monday 8/22/2016, I had to have Dave arrested for statutory rape.

On Sunday night, as I was putting laundry away in Dave's room I had found a hard drive that was hidden in his drawer in a pocket. On this hard drive, I found pictures and videos of different women that were sexually explicit, just stuff that was from the internet...

BUT... then I clicked on a folder that just changed our lives in my family forever.

Dave was arrested for statutory rape...but it gets worse...the girl in the videos and pictures on this particular folder were with my 15 year old daughter (his stepdaughter).

I am sick, heartbroken for her, and my children that I had with him, who now will not have contact with their father.

The day he was arrested, I did it while the kids were all at school. As much hate and disgust that I had for Dave, I knew that I did not want my children to see him be arrested. That meant that I had to pick

**\$1,790** of \$1 goal

Raised by 17 people in 29 months

### Recent Donations ▼



**\$20**

Marky Lennon  
27 months ago

MR

**\$25**

Michele  
Ruitenschild  
27 months ago

Hi. I'm a friend of Amy's. I'm praying for you & your family! Hope..Faith..Trust in GOD! Sending healing prayers your way... Love Michele

AM

**\$150**

Amy McCullough  
27 months ago

Jenn-We pray for you and your beautiful family every day! I know you will fight your way through this. Please know how much we love and

arrested Dave and did the search warrant. We went to McDonald's and had sundaes, they played at the McDonald's land playground for over 2 hours, then we went to the library for 2.5 hours, went to the lake and saw the ducks, then got pizza, and the most heartbreaking part for me was when Reagan said, "Mommy, this was the best day EVER!" not knowing that it was one of the worse days of my life.

Now you're probably saying to yourselves, "No way, WTF, there is no way" but unfortunately, there were at least 2900+ videos and pictures that were sexually explicit with her, with them both etc... and that is not a typo either. 2900+ files. This does NOT include anything else they may find from the numerous other hard drives, laptops, and PCs that he had.

This week has been a nightmare, as I have had to put on a happy face for my younger kids that are 9, 6, 6, and 4. The younger 3 think daddy is doing a music project with a friend.

My 9 year old, now knows because unfortunately she was told by her friend that her mom saw 7 cop cars in front of our house and cops with their guns drawn. So, our 9 year daughter, that shares a birthday with her daddy Dave, knows that her daddy was arrested, (but not why of course) and no longer wants to celebrate her birthday until he is out. It breaks my heart.

I know this is shocking news that I am sure none of you expected to hear about.

Today is Day 5 and I feel like I am in a daze. I cannot stay still too long or in my thought too long as I break down from internalizing everything and cry to the point of getting sick.

He is in some serious trouble, looking at numerous charges and to be in prison for many years.

Now you may ask why I am sharing this with you? Well there are many reasons, but quite honestly, someone like him should NOT have anyone's praise or help no matter what he did for anyone. I feel it is an important thing to know about someone, who made himself out to be a better person than he really was. I also don't want him misleading anyone, or trying to get help, when he more than likely would not be honest about the situation he is in. Or if there was anyone else hurt or taken advantage by him, especially anyone who is under 18, contact me and I will give you the detectives information if you want to report it

support you! Amy, Kevin, Eamonn & Marley



**\$200**  
Ronald Raines  
28 months ago

DC

**\$10**  
Donna Carrion  
28 months ago



**\$10**  
Jenny Dawes-Drone  
28 months ago

MA

**\$100**  
Maggie Ashworth  
28 months ago

AA

**\$100**  
Annie Aguiar  
28 months ago

Prayers to you and your family

GC

**\$5**  
g c  
28 months ago

MF

**\$20**  
Meagan Fletes  
29 months ago

Viewing 10 of 17 Donations

Right now, my mom is here helping with the kids, and her plan is to move us (the kids and I) out to Las Vegas in the next month or so. I am still dealing with the kidney issue with the enlarged artery that I may need surgery for, my appointment with the vascular surgeon is 9/6, so if I need surgery, it only makes sense to do it here in TN. And thankful that my mom is here to help me.

So friends and family, I need your help. Anything that can be shared, good thoughts, prayers is greatly appreciated, as now comes the long journey of starting over, in a different state across the U.S. I am so grateful to have my family and friends that I will be with and closer to. I know that God is watching over my family and I. I know that things will only get better. God always has a plan. I will be in touch soon.

Thank you so much for the calls, texts, messages, emails and support. It means more than you know.

Love Jenn

<https://vinelink.com/#/home>  
<https://vinelink.com/#/home>



#### Most Liked Comments ▼



Celeste Keenan  
9 months ago

Also, people don't realize how their actions affect people?  
Especially when kids are involved.



Celeste Keenan

## Updates (7)

- **FEBRUARY 24, 2018** by Jenniffer Harris, Organizer

Hey Everyone!

**GREAT NEWS!** It is done! Dave has pled guilty in both counties and he has officially been transferred from Rutherford County Jail to TN Dept of Corrections.

He is **NOT** eligible for parole, thank you Lord!

And his date of release is in April of 2046!!! I am so thankful for everyone that has been there for my family and I.

I know that there is still a lot of healing, and questions for the kids, but I finally feel like I can get this behind us for good!!!

2018 is looking up! :)

- **AUGUST 2, 2017** by Jenniffer Harris, Organizer

Well, he decided he did not want to plea...so we go to Trial.

Sara, and I will have to go to TN Oct 2-5 for Trial.

I will update again after that.

Thank you to everyone for their constant support, love and prayers. It really means a lot.

- **JANUARY 26, 2017** by Jenniffer Harris, Organizer

Hi everyone,

I know I have not posted on here in a while, that is because people were getting this info back to Dave in jail, and the detective was worried about affecting his case, so I stopped posting anything.

But I figured I can share this news article that was sent to me, since it wasn't from me, and it is out in the public I guess. I googled his name in TN and I did not find any other news stories. Once everything is said and done I will be sure to update everyone! Thank you so much for your constant support!

<http://www.wgnsradio.com/45-year-old-man-accused-of-especially-aggravated-sexual-exploitation-of-a-minor-13-times-cms-37363>

Show older

- **SEPTEMBER 26, 2016** by Jenniffer Harris, Organizer

Well, the countdown begins...we are 10 days away from leaving TN and heading into Las Vegas.

We have reserved the Moving truck and trailer, and it's going to cost about \$2000 plus gas.

Luckily the kids are on Fall break during the move, so they technically will not be missing school.

There are no updates on Dave, other than the Grand Jury meets in or around November. Neither Sara nor I need to be there for that thankfully.

I wish I had more to update with, but unfortunately this process takes time.

Thank you all so much for your continued help, prayers and shares!

- **SEPTEMBER 12, 2016** by Jenniffer Harris, Organizer

Update: 9/12/2016

Today was Sara's 1st day of therapy. I am so glad that we were able to get her started right away. Even if they can only do a couple of sessions.

I was bummed out today because I received my strongly worded letter return to sender, and on the front, they wrote - NO LETTERS - ONLY POSTCARDS - Ok, no problem, I will gladly send 3 postcards with everything from my letter with the heinous crimes against her he did, for all to see!

I spoke with the Detective today, and he said they are still processing everything and as far as the charges go, he will be charged 1 charge PER picture and video!!! As I said, the drive I found had 2900+ on there, of her, him, and them together. So even if you rounded down, that would still be 2000 charges! Not to mention if they find anything else on his other drives and computers, as well as the charges from Wilson County since they will be charging him as well.

Apparently Dave had a court date today, but he waived it? Not sure what that means, other than the next court date will be with the Grand Jury, and he (the detective) stated that will not be for a few months. Even then, we will not have to be at the grand jury date because the Detective is the witness since he has seen the footage. We just want to be at his sentencing and hopefully be able to read a victims statement.

Last week was an emotional week for my stepdaughter as her friend found a newspaper called Cuffed that had many mug shots, one of which was of her dad Dave. She has a lot of anger, but also loves him because it is her dad. She had dealt with the fact that he wasn't a good dad to her, but was looking forward to starting over, and he had promised her that he wasn't going anywhere, Now that has changed with him in jail, and us moving to Las Vegas. I told her she can come visit as much as she wants.

I realized the other day that not everyone in my feed have seen my posts (thanks FB), so if at all possible, if this comes up on your newsfeed, I would totally appreciate it if you could share on your FB pages, and Twitter or even email it. We are looking to rent our truck/moving/container on 9/30/16 as well as having my car shipped. We also need to buy 7 plane tickets. And rent the storage in

Vegas while we live with my parents. So any shares, prayers, and/or even \$5 for helping my family and I would be GREATLY appreciated because my parents are on a fixed income.

Thank you all for your wonderful support!!!

Love Jenn

• **SEPTEMBER 8, 2016** by Jenniffer Harris, Organizer

UPDATE 9/8: I have not received any more phone calls or letters from Dave, which means he probably received my "strongly worded letter", that pretty much stated not to contact me anymore and some other choice words.

The youngest 3 kids still believe Dave is working somewhere else, and have not really been affected much, other than River asking for the occasional call to talk to daddy which breaks my heart. Isabelle is definitely starting to act out, and it is so hard to see how it is affecting her. Sara has been having her ups and downs, but is doing well and the therapist is on order.

Today we met with the Social Worker and found out that she and the Detective met with the District Attorney to go over both the DCS case and criminal case. Although she didn't know what additional charges he would receive, I feel good knowing that they are already meeting with the D.A.

The good news is that both DCS and the Detective stated they are both fine with us relocating to Vegas with my family so long as they have good contact information so when they do have a court date they can reach us. We may have to come back to TN for trial if he is foolish enough to do one, but as of now we can move! YAY! I don't feel in such limbo anymore.

Now the REAL planning begins, and I am looking to you my friends and family. We will be moving cross-country and are still in need of some help. Whether you can give monetarily or even just share our link would be amazing!

Again, so lucky to have you all being so supportive, and please know that I absolutely do not mind getting messages or texts, calls or emails, so please do not apologize or feel like you are bothering me. I appreciate it all. It just may take me a day or four (lol) to respond. Thank you!!!

Show older

**AUGUST 31, 2016** by Jenniffer Harris, Organizer

I have been truly blessed with how many people have been so supportive and sending wonderful messages, texts and calls. I was very hesitant about sharing this story with everyone because I felt like I failed at protecting my daughter. But after talking to her about this, she wanted people to know. She was very adamant that people know what a piece of shit he is. And that she is a survivor.

**EXHIBIT 5**

## Harris exhibit 5.

Lastly, this exhibit shows and proves that Ms. Figueroa stole (embezzled) the \$20,000 from our non-profit Children's charity. The name is "Your Dream Is our Dream". What she did was claim the stolen \$20,000 as her pay. She only made \$3,250 from working at Target. She knew that \$3250 would NOT effectuate a refund, or generate a substantial refund. So she added this stolen \$20,000 to her \$3250 income from Target. When she did that and used all her deductions and claiming the kids it produced a fraudulent refund of \$6,357. A substantial sum. She did not "work" for our non-profit. If anyone did it was Mr. Harris. He secured the money to start the non-profit (via Ms. Figueroa's threats) and he obtained the auction item from Sir Paul McCartney himself. Not one dime of the stolen \$20,000 went to the non-profit. Ms. Figueroa spent that money on herself. She promptly purchased a brand new iPhone and other electronics for herself. All the while asking for money on Go Fund Me when she already had \$20,000 (stolen). She never once mentions the \$20,000 to anyone on social media.



# IRS Proof that Our Charity Existed In TN.

INTERNAL REVENUE SERVICE  
P. O. BOX 2508  
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: SEP 27 2016

Employer Identification Number:

81-2532473

81-2532473

DIN:

17053215310016

Contact Person:

BENJAMIN L DAVIS

ID# 31465

Contact Telephone Number:

(877) 829-5500

Accounting Period Ending:

December 31

Public Charity Status:

170(b)(1)(A)(vi)

Form 990/990-EZ/990-N Required:

Yes

Effective Date of Exemption:

May 23, 2016

Contribution Deductibility

Yes

Addendum Applies:

No

YOUR DREAM IS OUR DREAM

C/O JENNIFER HARRIS

307 CLEARLAKE COURT

LA VERGNE, TN 37086

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to [www.irs.gov/charities](http://www.irs.gov/charities). Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Letter 947



# Internal Revenue Service

United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 03-14-2019  
Response Date: 03-14-2019  
Tracking Number: 100436443233

## Account Transcript

FORM NUMBER: 1040

TAX PERIOD: Dec. 31, 2016

TAXPAYER IDENTIFICATION NUMBER: XXX-XX-2893  
SPOUSE TAXPAYER IDENTIFICATION NUMBER: XXX-XX-2536

HARR

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00  
ACCRUED INTEREST: 0.00 AS OF: Mar. 13, 2017  
ACCRUED PENALTY: 0.00 AS OF: Mar. 13, 2017

ACCOUNT BALANCE  
PLUS ACCRUALS  
(this is not a  
payoff amount): 0.00

## \*\* INFORMATION FROM THE RETURN OR AS ADJUSTED \*\*

EXEMPTIONS: 08  
FILING STATUS: Married Filing Joint  
ADJUSTED GROSS  
INCOME: 22,879.00  
TAXABLE INCOME: 0.00  
TAX PER RETURN: 2,826.00  
SE TAXABLE INCOME  
TAXPAYER: 18,470.00  
SE TAXABLE INCOME  
SPOUSE: 0.00  
TOTAL SELF  
EMPLOYMENT TAX: 2,826.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Apr. 15, 2017  
PROCESSING DATE Feb. 20, 2017

| TRANSACTIONS |                                       |          |            |             |
|--------------|---------------------------------------|----------|------------|-------------|
| CODE         | EXPLANATION OF TRANSACTION            | CYCLE    | DATE       | AMOUNT      |
| 150          | Tax return filed<br>80221-426-06379-7 | 20170505 | 02-20-2017 | \$2,826.00  |
| 806          | W-2 or 1099 withholding               |          | 04-15-2017 | -\$88.00    |
| 766          | Credit to your account                |          | 04-15-2017 | -\$2,826.00 |
| 768          | Earned income credit                  |          | 04-15-2017 | -\$6,269.00 |
| 846          | Refund issued                         |          | 02-23-2017 | \$6,357.00  |

This Product Contains Sensitive Taxpayer Data

*Fraudulent* ↑

*She Filed this. Not me. I was in jail.*

Tracking Number: 100436443233  
COST OF GOODS SOLD

INVENTORY AT BEGINNING OF YEAR:.....\$0.00  
INVENTORY AT END OF YEAR:.....\$0.00

Schedule E--Supplemental Income and Loss

INCOME OR LOSS FROM RENTAL REAL ESTATE AND ROYALTIES

SCHEDULE E FORM 1099 REQUIRED:.....No box checked  
SCHEDULE E FORM 1099 FILED:.....Neither box checked  
TOTAL RENTS RECEIVED:.....\$0.00  
TOTAL ROYALTIES RECEIVED:.....*My stolen royalties* → \$1,042.00  
TOTAL MORTGAGE INTEREST ALL PROPERTIES:.....\$0.00  
TOTAL DEPRECIATION OR DEPLETION FOR ALL PROPERTIES:.....\$0.00  
TOTAL EXPENSES FOR ALL PROPERTIES:.....\$0.00  
TOTAL RENTAL REAL ESTATE AND ROYALTY INCOME OR LOSS:.....\$0.00  
RENT & ROYALTY INCOME:.....\$1,042.00  
RENT & ROYALTY LOSSES:.....\$0.00  
REPAIRS EXPENSE COLUMN A:.....\$0.00  
REPAIRS EXPENSE COLUMN B:.....\$0.00  
REPAIRS EXPENSE COLUMN C:.....\$0.00

INCOME OR LOSS FROM PARTNERSHIPS AND S CORPS

PRTSHP/CORP PASSIVE INCOME:.....\$0.00  
PRTSHP/CORP NONPASSIVE INCOME:.....\$0.00  
PRTSHP/CORP PASSIVE LOSS:.....\$0.00  
PRTSHP/CORP NONPASSIVE LOSS:.....\$0.00  
PARTNERSHIP INCOME:.....\$0.00  
PARTNERSHIP LOSS:.....\$0.00

INCOME OR LOSS FROM ESTATES AND TRUSTS

ESTATE/TRUST PASSIVE INCOME:.....\$0.00  
ESTATE/TRUST PASSIVE LOSS:.....\$0.00  
ESTATE AND TRUST INCOME:.....\$0.00  
ESTATE AND TRUST LOSS:.....\$0.00  
PASSIVE LOSS NOT REPORTED ON F8582:.....N  
SCH K1 ES PAYMENT INDICATOR:.....N

INCOME OR LOSS FROM REAL ESTATE MORTGAGE INVESTMENT CONDUITS

REAL ESTATE MORTGAGE INCOME/LOSS:.....\$0.00

SUMMARY

NET FARM RENT INCOME/LOSS:.....\$0.00  
GROSS FARMING & FISHING INCOME:.....\$0.00

Schedule SE--Self-Employment Tax

SSN OF SELF-EMPLOYED TAXPAYER:.....XXX-XX-2893  
NET FARM PROFIT/LOSS: SCH F:.....\$0.00  
CONSERVATION RESERVE PROGRAM PAYMENTS:.....\$0.00  
NET NONFARM PROFIT/LOSS:.....*Stolen Money* → \$20,000.00  
TOTAL SE INCOME:.....\$20,000.00  
SE QUARTERS COVERED:......4  
TOTAL SE TAX PER COMPUTER:.....\$2,825.91  
SE INCOME COMPUTER VERIFIED:.....\$0.00  
SE INCOME PER COMPUTER:.....\$18,470.00  
TOTAL NET EARNINGS PER COMPUTER:.....\$18,470.00

LONG FORM ONLY

TENTATIVE CHURCH EARNINGS:.....\$0.00  
TOTAL SOC SEC & RR WAGES:.....\$0.00  
SE SS TAX COMPUTER:.....\$2,290.28  
SE MEDICARE INCOME PER COMPUTER:.....\$18,470.00  
SE MEDICARE TAX PER COMPUTER:.....\$535.63  
SE FARM OPTION METHOD USED:.....0

Tracking Number: 100436443233

|   |            |
|---|------------|
| FORM 2439 REGULATED INVESTMENT COMPANY CREDIT:            | \$0.00     |
| FORM 4136 CREDIT FOR FEDERAL TAX ON FUELS:                | \$0.00     |
| FORM 4136 CREDIT FOR FEDERAL TAX ON FUELS PER COMPUTER:   | \$0.00     |
| HEALTH COVERAGE TX CR: F8885:                             | \$0.00     |
| PREMIUM TAX CREDIT AMOUNT:                                | \$0.00     |
| PREMIUM TAX CREDIT VERIFIED AMOUNT:                       | \$0.00     |
| PRIMARY NAP FIRST TIME HOME BUYER INSTALLMENT AMT:        | \$0.00     |
| SECONDARY NAP FIRST TIME HOME BUYER INSTALLMENT AMT:      | \$0.00     |
| FIRST TIME HOMEBUYER CREDIT REPAYMENT AMOUNT:             | \$0.00     |
| FORM 5405 TOTAL HOMEBUYERS CREDIT REPAYMENT PER COMPUTER: | \$0.00     |
| SMALL EMPLOYER HEALTH INSURANCE PER COMPUTER:             | \$0.00     |
| SMALL EMPLOYER HEALTH INSURANCE PER COMPUTER (2):         | \$0.00     |
| FORM 2439 AND OTHER CREDITS:                              | \$0.00     |
| TOTAL PAYMENTS:   | \$9,183.00 |
| TOTAL PAYMENTS PER COMPUTER:                              | \$9,183.00 |

Refund or Amount Owed

|   |             |
|---|-------------|
| REFUND AMOUNT:                                | \$-6,357.00 |
| APPLIED TO NEXT YEAR'S ESTIMATED TAX:         | \$0.00      |
| ESTIMATED TAX PENALTY:                        | \$0.00      |
| TAX ON INCOME LESS STATE REFUND PER COMPUTER: | \$0.00      |
| BAL DUE/OVER PYMT USING TP FIG PER COMPUTER:  | \$-6,357.00 |
| BAL DUE/OVER PYMT USING COMPUTER FIGURES:     | \$-6,357.00 |
| FORM 8888 TOTAL REFUND PER COMPUTER:          | \$0.00      |

Third Party Designee

|                                 |  |
|---------------------------------|--|
| THIRD PARTY DESIGNEE ID NUMBER: |  |
| AUTHORIZATION INDICATOR:        |  |
| THIRD PARTY DESIGNEE NAME:      |  |

Schedule C--Profit or Loss From Business

|                                     |              |             |
|-------------------------------------|--------------|-------------|
| SOCIAL SECURITY NUMBER:             | Her SSN      | XXX-XX-2893 |
| EMPLOYER ID NUMBER:                 | Oct Charity  | XX-XXX2473  |
| BUSINESS NAME:                      |              | YOUR        |
| DESCRIPTION OF BUSINESS/PROFESSION: | Charity name |             |
| NAICS CODE:                         |              | 813000      |
| ACCT MTHD:                          |              |             |
| FIRST TIME SCHEDULE C FILED:        |              | N           |
| STATUTORY EMPLOYEE IND:             |              | N           |

INCOME

|                                |        |             |
|--------------------------------|--------|-------------|
| GROSS RECEIPTS OR SALES:       | Stolen | \$20,000.00 |
| RETURNS AND ALLOWANCES:        |        | \$0.00      |
| NET GROSS RECEIPTS:            |        | \$0.00      |
| COST OF GOODS SOLD:            |        | \$0.00      |
| SCHEDULE C FORM 1099 REQUIRED: |        | NO          |
| SCHEDULE C FORM 1099 FILED:    |        | NONE        |
| OTHER INCOME:                  |        | \$0.00      |

EXPENSES

|  |        |             |
|--|--------|-------------|
| CAR AND TRUCK EXPENSES:                |        | \$0.00      |
| DEPRECIATION:                          |        | \$0.00      |
| INSURANCE (OTHER THAN HEALTH):         |        | \$0.00      |
| MORTGAGE INTEREST:                     |        | \$0.00      |
| LEGAL AND PROFESSIONAL SERVICES:       |        | \$0.00      |
| REPAIRS AND MAINTENANCE:               |        | \$0.00      |
| TRAVEL:                                |        | \$0.00      |
| MEALS AND ENTERTAINMENT:               |        | \$0.00      |
| WAGES:                                 |        | \$0.00      |
| OTHER EXPENSES:                        |        | \$0.00      |
| TOTAL EXPENSES:                        |        | \$0.00      |
| EXP FOR BUSINESS USE OF HOME:          |        | \$0.00      |
| SCH C NET PROFIT OR LOSS PER COMPUTER: | Stolen | \$20,000.00 |
| AT RISK CD:                            |        |             |
| OFFICE EXPENSE AMOUNT:                 |        | \$0.00      |
| UTILITIES EXPENSE AMOUNT:              |        | \$0.00      |

Tracking Number: 100436443233  
COST OF GOODS SOLD

INVENTORY AT BEGINNING OF YEAR:.....\$0.00  
INVENTORY AT END OF YEAR:.....\$0.00

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PASSIVE LOSS NOT REPORTED ON F8582:.....N  
SCH K1 ES PAYMENT INDICATOR:.....N

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SE MEDICARE TAX PER COMPUTER:.....\$535.63  
SE FARM OPTION METHOD USED:.....0

Tracking Number: 100436443233  
SE OPTIONAL METHOD INCOME:.....\$0.00

Schedule EIC--Earned Income Credit

QUALIFIED EIC DEPENDENTS:.....3

CHILD 1

CHILD'S NAME CNTRL:.....FIX  
SSN:.....XXX-XX-9374  
YEAR OF BIRTH:.....  
STUDENT/DISABLED:.....0  
NUMBER OF MONTHS CHILD LIVED WITH YOU:.....12  
CHILD'S RELATIONSHIP TO YOU:.....son or daughter

CHILD 2

CHILD'S NAME CNTRL:.....FIX  
SSN:.....XXX-XX-9614  
YEAR OF BIRTH:.....  
STUDENT/DISABLED:.....0  
NUMBER OF MONTHS CHILD LIVED WITH YOU:.....12  
CHILD'S RELATIONSHIP TO YOU:.....son or daughter

CHILD 3

CHILD'S NAME CNTRL:.....HARR  
SSN:.....XXX-XX-9759  
YEAR OF BIRTH:.....  
STUDENT/DISABLED:.....0  
NUMBER OF MONTHS CHILD LIVED WITH YOU:.....12  
CHILD'S RELATIONSHIP TO YOU:.....son or daughter

Form 8606--Nondeductible IRAs  
(Occurrence #: 1)

SPOUSE INDICATOR:.....0  
TAXABLE NONDEDUCTIBLE CONTRIBUTIONS:.....\$0.00  
TOTL AMT IRA CNVRTD TO ROTH IRA:.....\$0.00  
IRA BASIS BEFORE CONVERSION:.....\$0.00  
TAXABLE AMOUNT OF CONVERSION:.....\$0.00  
ROTH IRA BASIS BEFORE CONVERSION:.....\$0.00  
TRADITIONAL, SEP AND SIMPLE IRA DISTRIBUTIONS:.....\$0.00

Form 8606--Nondeductible IRAs  
(Occurrence #: 2)

SPOUSE INDICATOR:.....0  
TAXABLE NONDEDUCTIBLE CONTRIBUTIONS:.....\$0.00  
TOTL AMT IRA CNVRTD TO ROTH IRA:.....\$0.00  
IRA BASIS BEFORE CONVERSION:.....\$0.00  
TAXABLE AMOUNT OF CONVERSION:.....\$0.00  
ROTH IRA BASIS BEFORE CONVERSION:.....\$0.00  
TRADITIONAL, SEP AND SIMPLE IRA DISTRIBUTIONS:.....\$0.00

Form 8863 - Education Credits (Hope and Lifetime Learning Credits)

PART III - ALLOWABLE EDUCATION CREDITS

GROSS EDUCATION CR PER COMPUTER:.....\$0.00  
TOTAL EDUCATION CREDIT AMOUNT:.....\$0.00  
TOTAL EDUCATION CREDIT AMOUNT PER COMPUTER:.....\$0.00

This Product Contains Sensitive Taxpayer Data

Tracking Number: 100436443233

|  |        |
|--|--------|
| GROSS EDUCATION CREDIT PER COMPUTER:                 | \$0.00 |
| RETIREMENT SAVINGS CNTRB CREDIT:                     | \$0.00 |
| RETIREMENT SAVINGS CNTRB CREDIT PER COMPUTER:        | \$0.00 |
| PRIM RET SAV CNTRB: F8880 LN6A:                      | \$0.00 |
| SEC RET SAV CNTRB: F8880 LN6B:                       | \$0.00 |
| TOTAL RETIREMENT SAVINGS CONTRIBUTION: F8880 CMPTR:  | \$0.00 |
| RESIDENTIAL ENERGY CREDIT:                           | \$0.00 |
| RESIDENTIAL ENERGY CREDIT PER COMPUTER:              | \$0.00 |
| CHILD TAX CREDIT:                                    | \$0.00 |
| CHILD TAX CREDIT PER COMPUTER:                       | \$0.00 |
| ADOPTION CREDIT: F8839:                              | \$0.00 |
| ADOPTION CREDIT PER COMPUTER:                        | \$0.00 |
| FORM 8396 MORTGAGE CERTIFICATE CREDIT:               | \$0.00 |
| FORM 8396 MORTGAGE CERTIFICATE CREDIT PER COMPUTER:  | \$0.00 |
| F3800, F8801 AND OTHER CREDIT AMOUNT:                | \$0.00 |
| FORM 3800 GENERAL BUSINESS CREDITS:                  | \$0.00 |
| FORM 3800 GENERAL BUSINESS CREDITS PER COMPUTER:     | \$0.00 |
| PRIOR YR MIN TAX CREDIT: F8801:                      | \$0.00 |
| PRIOR YR MIN TAX CREDIT: F8801 PER COMPUTER:         | \$0.00 |
| F8936 ELECTRIC MOTOR VEHICLE CREDIT AMOUNT:          | \$0.00 |
| F8936 ELECTRIC MOTOR VEHICLE CREDIT PER COMPUTER:    | \$0.00 |
| F8910 ALTERNATIVE MOTOR VEHICLE CREDIT AMOUNT:       | \$0.00 |
| F8910 ALTERNATIVE MOTOR VEHICLE CREDIT PER COMPUTER: | \$0.00 |
| OTHER CREDITS:                                       | \$0.00 |
| TOTAL CREDITS:                                       | \$0.00 |
| TOTAL CREDITS PER COMPUTER:                          | \$0.00 |
| INCOME TAX AFTER CREDITS PER COMPUTER:               | \$0.00 |

#### Other Taxes

|   |            |
|---|------------|
| SE TAX:   | \$2,826.00 |
| SE TAX PER COMPUTER:  | \$2,826.00 |
| SOCIAL SECURITY AND MEDICARE TAX ON UNREPORTED TIPS:              | \$0.00     |
| SOCIAL SECURITY AND MEDICARE TAX ON UNREPORTED TIPS PER COMPUTER: | \$0.00     |
| TAX ON QUALIFIED PLANS F5329 (PR):                                | \$0.00     |
| TAX ON QUALIFIED PLANS F5329 PER COMPUTER:                        | \$0.00     |
| IRAF TAX PER COMPUTER:  | \$0.00     |
| TP TAX FIGURES (REDUCED BY IRAF) PER COMPUTER:                    | \$2,826.00 |
| IMF TOTAL TAX (REDUCED BY IRAF) PER COMPUTER:                     | \$2,826.00 |
| OTHER TAXES PER COMPUTER:   | \$0.00     |
| UNPAID FICA ON REPORTED TIPS:                                     | \$0.00     |
| OTHER TAXES:  | \$0.00     |
| RECAPTURE TAX: F8611:   | \$0.00     |
| HOUSEHOLD EMPLOYMENT TAXES:                                       | \$0.00     |
| HOUSEHOLD EMPLOYMENT TAXES PER COMPUTER:                          | \$0.00     |
| HEALTH CARE RESPONSIBILITY PENALTY:                               | \$0.00     |
| HEALTH CARE RESPONSIBILITY PENALTY VERIFIED:                      | \$0.00     |
| RECAPTURE TAXES:  | \$0.00     |
| TOTAL ASSESSMENT PER COMPUTER:                                    | \$2,826.00 |
| TOTAL TAX LIABILITY TP FIGURES:                                   | \$2,826.00 |
| TOTAL TAX LIABILITY TP FIGURES PER COMPUTER:                      | \$2,826.00 |

#### Payments

|   |            |
|---|------------|
| FEDERAL INCOME TAX WITHHELD:                            | \$88.00    |
| HEALTH CARE: INDIVIDUAL RESPONSIBILITY:                 | \$0.00     |
| HEALTH CARE FULL-YEAR COVERAGE INDICATOR:               | 1          |
| ESTIMATED TAX PAYMENTS:                                 | \$0.00     |
| OTHER PAYMENT CREDIT:                                   | \$0.00     |
| REFUNDABLE EDUCATION CREDIT:                            | \$0.00     |
| REFUNDABLE EDUCATION CREDIT PER COMPUTER:               | \$0.00     |
| REFUNDABLE EDUCATION CREDIT VERIFIED:                   | \$0.00     |
| EARNED INCOME CREDIT:                                   | \$6,269.00 |
| EARNED INCOME CREDIT PER COMPUTER:                      | \$6,269.00 |
| EARNED INCOME CREDIT NONTAXABLE COMBAT PAY:             | \$0.00     |
| SCHEDULE 8812 NONTAXABLE COMBAT PAY:                    | \$0.00     |
| EXCESS SOCIAL SECURITY & RRTA TAX WITHHELD:             | \$0.00     |
| SCHEDULE 8812 TOT SS/MEDICARE WITHHELD:                 | \$248.00   |
| SCHEDULE 8812 ADDITIONAL CHILD TAX CREDIT:              | \$2,826.00 |
| SCHEDULE 8812 ADDITIONAL CHILD TAX CREDIT PER COMPUTER: | \$2,826.00 |
| SCHEDULE 8812 ADDITIONAL CHILD TAX CREDIT VERIFIED:     | \$0.00     |
| AMOUNT PAID WITH FORM 4868:                             | \$0.00     |

Tracking Number: 100436443233

|  |             |
|--|-------------|
| TAXABLE SOCIAL SECURITY BENEFITS PER COMPUTER: | \$0.00      |
| OTHER INCOME:                                  | \$0.00      |
| SCHEDULE EIC SE INCOME PER COMPUTER:           | \$18,587.00 |
| SCHEDULE EIC EARNED INCOME PER COMPUTER:       | \$21,837.00 |
| SCH EIC DISQUALIFIED INC COMPUTER:             | \$1,042.00  |
| TOTAL INCOME:                                  | \$24,292.00 |
| TOTAL INCOME PER COMPUTER:                     | \$24,292.00 |

Adjustments to Income

|   |             |
|---|-------------|
| EDUCATOR EXPENSES:                            | \$0.00      |
| EDUCATOR EXPENSES PER COMPUTER:               | \$0.00      |
| RESERVIST AND OTHER BUSINESS EXPENSE:         | \$0.00      |
| HEALTH SAVINGS ACCT DEDUCTION:                | \$0.00      |
| HEALTH SAVINGS ACCT DEDUCTION PER COMPTR:     | \$0.00      |
| MOVING EXPENSES: F3903:                       | \$0.00      |
| SELF EMPLOYMENT TAX DEDUCTION:                | \$1,413.00  |
| SELF EMPLOYMENT TAX DEDUCTION PER COMPUTER:   | \$1,413.00  |
| SELF EMPLOYMENT TAX DEDUCTION VERIFIED:       | \$0.00      |
| KEOGH/SEP CONTRIBUTION DEDUCTION:             | \$0.00      |
| SELF-EMP HEALTH INS DEDUCTION:                | \$0.00      |
| EARLY WITHDRAWAL OF SAVINGS PENALTY:          | \$0.00      |
| ALIMONY PAID SSN:                             | \$0.00      |
| ALIMONY PAID:                                 | \$0.00      |
| IRA DEDUCTION:                                | \$0.00      |
| IRA DEDUCTION PER COMPUTER:                   | \$0.00      |
| STUDENT LOAN INTEREST DEDUCTION:              | \$0.00      |
| STUDENT LOAN INTEREST DEDUCTION PER COMPUTER: | \$0.00      |
| STUDENT LOAN INTEREST DEDUCTION VERIFIED:     | \$0.00      |
| TUITION AND FEES DEDUCTION:                   | \$0.00      |
| TUITION AND FEES DEDUCTION PER COMPUTER:      | \$0.00      |
| DOMESTIC PRODUCTION ACTIVITIES DEDUCTION:     | \$0.00      |
| OTHER ADJUSTMENTS:                            | \$0.00      |
| ARCHER MSA DEDUCTION:                         | \$0.00      |
| ARCHER MSA DEDUCTION PER COMPUTER:            | \$0.00      |
| TOTAL ADJUSTMENTS:                            | \$1,413.00  |
| TOTAL ADJUSTMENTS PER COMPUTER:               | \$1,413.00  |
| ADJUSTED GROSS INCOME:                        | \$22,879.00 |
| ADJUSTED GROSS INCOME PER COMPUTER:           | \$22,879.00 |

Tax and Credits

|  |             |
|--|-------------|
| 65-OR-OVER:  | NO          |
| BLIND:   | NO          |
| SPOUSE 65-OR-OVER:   | NO          |
| SPOUSE BLIND:  | NO          |
| STANDARD DEDUCTION PER COMPUTER:                             | \$12,600.00 |
| ADDITIONAL STANDARD DEDUCTION PER COMPUTER:                  | \$0.00      |
| TAX TABLE INCOME PER COMPUTER:                               | \$10,279.00 |
| EXEMPTION AMOUNT PER COMPUTER:                               | \$32,400.00 |
| TAXABLE INCOME:  | \$0.00      |
| TAXABLE INCOME PER COMPUTER:                                 | \$0.00      |
| TOTAL POSITIVE INCOME PER COMPUTER:                          | \$24,292.00 |
| TENTATIVE TAX:   | \$0.00      |
| TENTATIVE TAX PER COMPUTER:                                  | \$0.00      |
| FORM 8814 ADDITIONAL TAX AMOUNT:                             | \$0.00      |
| TAX ON INCOME LESS SOC SEC INCOME PER COMPUTER:              | \$0.00      |
| FORM 6251 ALTERNATIVE MINIMUM TAX:                           | \$0.00      |
| FORM 6251 ALTERNATIVE MINIMUM TAX PER COMPUTER:              | \$0.00      |
| FOREIGN TAX CREDIT:  | \$0.00      |
| FOREIGN TAX CREDIT PER COMPUTER:                             | \$0.00      |
| FOREIGN INCOME EXCLUSION PER COMPUTER:                       | \$0.00      |
| FOREIGN INCOME EXCLUSION TAX PER COMPUTER:                   | \$0.00      |
| EXCESS ADVANCE PREMIUM TAX CREDIT REPAYMENT AMOUNT:          | \$0.00      |
| EXCESS ADVANCE PREMIUM TAX CREDIT REPAYMENT VERIFIED AMOUNT: | \$0.00      |
| CHILD & DEPENDENT CARE CREDIT:                               | \$0.00      |
| CHILD & DEPENDENT CARE CREDIT PER COMPUTER:                  | \$0.00      |
| CREDIT FOR ELDERLY AND DISABLED:                             | \$0.00      |
| CREDIT FOR ELDERLY AND DISABLED PER COMPUTER:                | \$0.00      |
| EDUCATION CREDIT:  | \$0.00      |
| EDUCATION CREDIT PER COMPUTER:                               | \$0.00      |

The \$24,292.00 figure comes via the stolen \$20,000 + her Wages \$3250 from Target + my music royalties (stolen from me) \$1,042

228  $\frac{\$20,000 + \$3250 + \$1042}{\$24,292}$  = \$24,292 "Income" to generate a tax return of \$6357



**EXHIBIT 6**

## Response to Ms. Figueroa's EXHIBIT 1

At no time did Mr. Harris compare any age gap between Ms. Figueroa, Mr. Greenstein to an age gap between Mr. Harris and his step-daughter. Look at the exhibit. That claim does not exist. Only Ms. Figueroa asserts that. Ms. Figueroa was 16 when she first dated Mr. Greenstein. The law doesn't care about age gaps. The law only cares if it's a minor and an adult. All 50 states agree that under age 18 is a minor and anyone over 18 is an adult. Ms. Figueroa has just confirmed in her exhibit that she in fact was a minor in a relationship with an adult. And willingly participated in it.

At no time did Mr. Harris say anything at all about justifying pedophilia. Where? This was just a court case where several doctors, Justice's, Judges, experts, psychiatrists and others said that certain cases, theories, etc were normal and not mental disorders. Acting on those thoughts or beliefs are of course criminal. This information was sent to Ms. Figueroa because she likes to claim that people like her ex-boyfriend, Mr. Greenstein or perhaps Mr. Harris are sick, etc. The case in the exhibit, and many others cited in that case, disagree. It was simply something Mr. Harris found interesting and sent a copy to Ms. Figueroa.

At no time has Mr. Harris ever admitted to taking anyone's virginity or having sex with Ms. FiX

at age 12. Ms. Figueroa offers no proof of that claim nor is there any evidence to back that up. Hearsay or accusations are not proof.

Ms. Figueroa cannot prove that Mr. Harris highlighted anything in exhibit 1. It's simply not relevant.

Lastly, Mr. Harris would never have any type of a sexual conversation with his children and hasn't. Mr. Harris has never "exposed" or would he push or dis~~sauss~~ a belief on pedophilia. It's simply not appropriate and would serve no purpose.

Ms. Figueroa fails to mention that not only did she willingly engage in sexual ~~behavior~~ behavior with, and including losing her virginity to, Mr. Greenstein (an adult) while she was a minor (starting at age 16) - using Mr. Greenstein for sex, perks, material things - but she filmed a sex video with Mr. Greenstein in a motel room in 1992 when she was 16 and he was in his 20's! It was her very own video camera and she instigated the "production." Ms. Figueroa also kept a copy of this sex video (underage) and proudly showed both of her ex-husbands this enchanting, candle lit (motel room) performance. A copy of this video is still in state's (TN) evidence and law enforcement is aware of its existence. Ms. Figueroa has no problem with pedophilia it seems.

## Response to Ms. Figueroa's EXHIBIT 2

Mr. Harris did not make any threat towards Ms. Figueroa. He simply stated that at some point in the future they will probably run into each other again at some family gathering involving one of their 4 children, who will more than likely be adults then. The chance of seeing each other again is quite high. It's true that Mr. Harris won't be happy to see Ms. Figueroa. She cut contact off between him and his children. He also alludes to the possibility the kids may one day be upset with her for robbing them of contact with their father who loves them. Not once did he say any harm would come to her. This exhibit also shows Mr. Harris' concern that Ms. Figueroa may be saying terrible things about him to the children. This letter is from Feb. 2021 TWO years since he last spoke to his children. It's only human nature for someone to be concerned that an ex-spouse might try and turn the children against the other parent. Especially with no contact or way of gauging the children's demeanor, etc.

Ms. Figueroa would extort and threaten Mr. Harris with her knowledge of alleged criminal conduct between Mr. Harris and his step-daughter. She also kept illegal sex videos/photos of her daughter on her laptop and on hard drives and threaten to turn him in if her

demands or moving to Las Vegas weren't met. That is what Mr. Harris meant by power and leverage that Ms. Figueroa possessed over him.

### Response to Ms. Figueroa's EXHIBIT 3

Any letter to Ms. Fix is usually related to a music publishing company that Mr. Harris set up as a trust for her. Substantial royalties have been accumulating for the past 2½ years and Mr. Harris is providing statements or updates about the company to her. He tells her what needs to be done in order to claim the money. Any letter that Mr. Harris may have sent to Ms. Fix after January 2019 is going to an adult Ms. Fix. Ms. Fix no longer requires her mother's permission or approval of anything. Furthermore no letter to Ms. Fix or anything even regarding Ms. Fix has anything to do with Mr. Harris' children or his ability to have a loving relationship with them. It also has no bearing on him being ~~able~~ able to make important decisions about his children's healthcare, education, religion or upbringing. EXHIBIT 3 is irrelevant to this custody case and Mr. Harris' ability to exercise his joint legal custodial rights.

## Response to Ms. Figueroa's EXHIBIT 4

Ms. Figueroa is trying to mislead the court. Three of these envelopes were all mailed and postmarked June 2, 2020. They were split into 3 envelopes because they were cheaper to send that way. They were meant for one envelope. The contents contained legal documents, contracts and information regarding publishing info. The other letters probably were for Mr. Harris' kids or in relation to the custody case. Sending letters or documents is not a crime. EXHIBIT 4 has nothing to do at all with this custody case or Mr. Harris' ability to exercise his joint custody (legal) use rights. The letter to Ms. Fix that Ms. Figueroa ~~did~~ did not come from any envelope that Ms. Figueroa uses in Exhibit 4. This brief letter was sent while Mr. Harris was in the county jail in 2017. He is simply apologizing for how he may have upset Ms. Fix on some occasions. Mr. Harris was also heavily medicated at the time that letter was drafted. It was around the same time Mr. Harris suffered from deep depression. Again, irrelevant to this custody case or his ability to be a father to his children or make decisions for his children's healthcare, education, well-being or religion.

## Response to Ms. Figueroa's EXHIBIT 5

In regards to the first letter to Isabelle Harris featuring "mommy." - Ms. Figueroa tries to paint a picture that Mr. Harris says that she "better be good" and let Isabelle stay in touch with her father. No where in that letter did Mr. Harris make such a demand. This letter is in response to Ms. Figueroa not allowing Mr. Harris to speak to Isabelle on his and her shared birthday of February 25<sup>th</sup>. On Sunday February 3, 2019 Mr. Harris called to speak to his children at his regular time (weekly). Mr. Harris and Ms. Figueroa spoke briefly and cordially; as they always did. Things took a turn for the worst when Mr. Harris asked Ms. Figueroa about a hard drive in her possession. The hard drive, which was Mr. Harris', contained a hidden file folder that housed a valid contract agreement and sound file of a song Mr. Harris co-wrote with Justin Timberlake in 2000. The agreement (contract), dated 2002, had a clause in it that would benefit Mr. Harris if the song that the men co-wrote (Mr. Harris & Mr. Timberlake) ever went to Number One on the Billboard Hot 100 Chart in any incarnation. In January 2019 an interpolation of the composition Mr. Harris helped to compose was used in a song by Halsey. The song using the interpolation went to Number One. That activated the clause in Mr. Harris' agreement with Mr. Timberlake.

Mr. Harris wanted Ms. Figueroa's help in getting a printed copy of the contract and was hoping to start the legal process being financially compensated for his contribution, money he was gladly willing to share with his children. Ms. Figueroa made a snide remark to Mr. Harris. At the time Mr. Harris had started his post conviction relief petition. Ms. Figueroa was not happy about that. Mr. Harris shared his fear of retaliation on the part of Ms. Figueroa if he were to expose Ms. Figueroa's crimes in his case and separate crimes of embezzlement, fraud (IRS). He believed that Ms. Figueroa would retaliate by cutting off his contact with their 4 children. Ms. Figueroa said that she would never stoop that low and vowed to let him speak to his children and to still send him photos of them to him no matter what. Later in that conversation Ms. Figueroa launched into a series of F-bombs against Mr. Harris after Mr. Harris said he would see to it that Ms. Figueroa was brought to justice for her own crimes if it came down to it. February 3, 2019 was the last time Ms. Figueroa has answered the phone. She has in fact retaliated against Mr. Harris for seeking justice against her and that is the only reason she has cut off his contact. As far as Ms. Figueroa's highlighted sections in the first letter to Isabelle goes - Mr. Harris was simply telling his daughter that her mother said she wasn't going to cut off contact, send pictures, and basically would not use the kids as weapons of revenge. Mr. Harris has the right to tell his daughter not to listen to



any derogatory comments or possible lies being told about him. He has no problem refraining from that in the future.

Lastly, this letter shows Mr. Harris' love for his daughter. He also apologizes for not speaking to her on his and her shared b-day. He could've chosen to bad mouth Ms. Figueroa for not letting him speak to his daughter on her b-day. He obviously made no mention of the real reason he wasn't able to speak to her. Her mother refused to allow it out of retaliation.

As far as the "paying the price" comment - Mr. Harris meant that he's paying a heavy price for loving his children. Even if it means that Ms. Figueroa faces the music for her crimes. She's (Ms. Figueroa) is using his love for his children against him, to punish him for holding her accountable. Nowhere in any letter has Mr. Harris claimed that the "price of love" or "the game love" refers to his step-daughter. Ms. Figueroa is simply trying to insinuate something that is untrue to fit her agenda.

Mr. Harris finds it hard to believe that Ms. Figueroa never discusses him with his children. They haven't spoken to their father in 3 years. Surely they wonder why or ask why daddy doesn't call, etc

It defies logic that they don't ask about their father. The 2<sup>nd</sup> letter to Isabelle Harris was a month before her 13<sup>th</sup> b-day. She goes to Magnate School and is very intelligent. She knew that Mr. Harris was arrested and later found out why because her mother left her Facebook or computer open and a then 9 year old Isabelle read it. So Ms. Figueroa is not being truthful when she claims in this EXHIBIT (5) that the children don't know why he's in prison. The kids are 14 (almost 15) 12 and 10. All 4 know how to use the internet and how to read. Ms. Figueroa has several places, including Go Fund Me, where she has posted disparaging remarks about their father, his alleged crimes and untruths. It's all a Google Search away. With Isabelle nearly 15 years old and aware of why her father is in prison - it's highly probable she has told her 12 year old twin siblings and 10 year old sibling why Mr. Harris is in prison. Mr. Harris has not said anything hateful or threatening about Ms. Figueroa. He is simply shooting his intelligent and mindful teen-age daughter straight. He also gives his opinion on her mother's actions - not allowing him to speak to them and apologizing for what it's doing to her and her innocent siblings.

The letter to Julian is a loving letter to a son. A son who probably thinks his father doesn't love him because he never gets to speak to him and it was abrupt.

Julian was a 10 yr old boy at the time and deserves to know that it's not his father's doing. He's being told the truth as to why he can't speak to his father and that it hurts his father. Mr. Harris even hopes that if the kids were to resent their mother later in life for cutting off contact with their father, over what amounts to retaliation, that they forgive her and hold no ill will against her. Nowhere in that letter to Julian does Mr. Harris say the mistakes he made or the "game of love" he played had anything to do with Ms. Figueroa's daughter. Knowing that Ms. Figueroa was going to read that letter, Mr. Harris was saying that perhaps he and Ms. Figueroa were a mistake and that falling in love with her was a losing battle. Mr. Harris quickly followed that sentiment up with that it doesn't mean his 4 children were mistakes or that he doesn't love them. Once again, Ms. Figueroa wants to make assumptions as to what Mr. Harris meant in order to pedal her own agenda or fiction to the court. Lastly, Mr. Harris meant that when he said there's nothing he can do right now to compel Ms. Figueroa to allow him to speak to his children - it was in reference to Mr. Harris filing a motion to order contact between his children and him.

## Response to Ms. Figueroa's EXHIBIT 6

Mr. Harris is asking kindly to speak to his children on Christmas day. It's been 3 years since he's heard their voice. The order was reversed by the Nevada Court of Appeals, unanimously - which gave Ms. Figueroa full legal custody.

Mr. Harris is within his rights to send a copy of that reversal to law enforcement or the DA's office to show that Ms. Figueroa has no legal right to control or stave off Mr. Harris' rights to speak to his children.

There is no order in place that bans or prevents Mr. Harris from speaking to his children. All he said is that he was thinking about sending a legal and binding reversal order from the Nevada Court of Appeals to law enforcement. That's the depths he seems to have to go through to have a conversation with his kids on Christmas day. That's not not strong arming or controlling. Ms. Figueroa is the one doing the "controlling". When in fact Mr. Harris has a legal right to speak to his kids. The reversal means Mr. Harris' joint legal custody is once again intact until if and when a court revokes his rights. Not one of Ms. Figueroa's 6 EXHIBITS are relevant to Mr. Harris' ability to exercise his joint legal custody right ~~240~~ in his children's best interests.

1 NOTC

2 Your Name: Ronald Harris # 584414

3 Address: NEX- PO BOX 5000

4 City, State, Zip: Mantain City, TN, 37683

5 Phone: —

6 Email: —

7 Self-Represented

Electronically Filed

03/08/2022

*Heather L. Linn*

CLERK OF THE COURT

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

10 Jennifer Figueroa  
11 Plaintiff,

12 vs.

13 Ronald Harris  
14 Defendant.

CASE NO.: D-20-606828-C

DEPT: N

15 **NOTICE OF INTENT TO SERVE SUBPOENA**

16 **PLEASE TAKE NOTICE** that a Subpoena commanding the production of documents,  
17 electronically stored information, or tangible items, or inspection of premises before trial has  
18 been issued. A copy of the Subpoena is attached.

19 The Subpoena will be served on the person to whom it is directed in not less than seven  
20 days from the date of this notice.

21 DATED February 22, 20 22

22 (your signature) ▶ *Ronald Harris*

23 (print your name) Ronald Harris

CERTIFICATE OF MAILING

I, (your name) \_\_\_\_\_ declare under penalty of perjury under the law of the State of Nevada that I served this *Notice of Intent to Serve Subpoena* and *Subpoena* on (date of mailing: month) \_\_\_\_\_ (day) \_\_\_\_\_, 20\_\_\_\_, by depositing a copy in the U.S. Mail in the State of Nevada, postage prepaid, addressed to:

Name of Opposing Party/Attorney: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

DATED \_\_\_\_\_, 20\_\_\_\_

(your signature) ► \_\_\_\_\_