

# IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed  
Oct 11 2022 11:42 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

RONALD DAVID HARRIS,  
Appellant(s),

vs.

JENNIFER FIGUEROA,  
Respondent(s),

Case No: D-20-606828-C

Docket No: 85333

# RECORD ON APPEAL VOLUME 3

**ATTORNEY FOR APPELLANT**  
RONALD HARRIS #584414,  
PROPER PERSON  
NECX P.O. BOX 5000  
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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# 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

17053216310016

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 IRC 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

CODE	EXPLANATION OF TRANSACTION	CYCLE	DATE	AMOUNT
150	Tax return filed 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:	DCI Charity #	XX-XXX2473
BUSINESS NAME:	Charity name	YOUR
DESCRIPTION OF BUSINESS/PROFESSION:		
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

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

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
IME 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

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 COMPTER:	\$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

491  $\frac{\$20,000 + \$3250 + \$1042}{\$24,292} = \$24,292$  "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 discuss 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 post marked 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) uses 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.

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 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.

## 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 rights in his children's best interests.

**EXHIBIT 7**

## Harris - EXHIBIT 7

This is a print out from Charitybuzz to show that Ms. Figueroa received this money 10 (Ten) days before she had Mr. Harris arrested.

Approximately 8-26<sup>th</sup> or 27<sup>th</sup> - 2016 Ms. Figueroa created her GoFundMe page. In an effort to gain sympathy and to exploit the case involving her daughter and Mr. Harris, she proceeded to ask for money for plane tickets, moving trucks, hotels, storage units, etc from strangers, friends, family and fans of Mr. Harris' radio show and songwriting / productions. She never once revealed that she clearly had \$20,000 already, stolen from their needy family / children charity "Your Dream is our Dream" and did not need the money. Nor did she ever reveal she had years worth of knowledge of alleged illegal activity between her daughter and Mr. Harris, nor that she had "found" nude photos of her daughters years prior, or "found" an alleged sex video of her daughter and Mr. Harris 4 months earlier, or that she was giving Mr. Harris "chances" - as revealed to DCS & the police 5 days earlier by her daughter, etc. The first thing Ms. Figueroa did with this \$20K was purchase a brand new iPhone (her first one). Not one dime went to the charity. There will not be any record of

any purchases made by Mr. Harris. He had no idea that the money had been received. She (Ms. Figueroa) kept that a secret. No debit cards or anything used to spend this \$20K will come back to Mr. Harris. This is all Ms. Figueroa's doing. She's all about money and power. This should show the court who she really is, and what she's truly about.

Final Auction Report  
 Your Dream is Our Dream (3,797.00)  
 Your Dream is Our Dream August 2016 (11393)  
 Open Date: 8/12/2016 Close Date: 8/12/2016



CHARITYBUZZ

Lot #	Title	Name	Address	Phone	Email	Final Bid
1139300	Meet Sir Paul McCartney with 2 Premium Tickets & Sound Check Access on August 15 in Michigan	Andrew Wincol	702 230 Street 424 701 1302			25,000.00

Gross Auction Total 25,000.00  
 Charitybuzz Fee (20%) -5,000.00  
 Net Auction Total 20,000.00  
 Total Amount of Lots 1



**EXHIBIT 8**

Harris

## EXHIBIT 8

This is a letter from Ms. Figueroa to Mr. Harris from June 2018. The highlighted sections clearly shows not only her negative behavior towards Mr. Harris, it also shows that his children clearly wanted to speak to their daddy. Mr. Harris left the County jail in late February 2018 to go to prison. He had to go to what's called classification for a few months and did not arrive at his prison months later. He did not have an access code or the ability to call his children until about the time he received Ms. Figueroa's letter. Up until he left for prison Mr. Harris spoke to his children on a regular basis. As you can see from Ms. Figueroa's letter and the letters from his two boys they wanted to speak to their daddy, all 4 kids. You can see what that 5 month absence did to the kids (wanted to talk to dad). Imagine what 3 years without talking to their dad has done.

Hello,

So, I havent had a phone call from you in a while, which is fine, trust me I'm not complaining, but the kids have asked if you were going to call. I know you're a wiz @ remembering #1s but here it is again in case you forgot-- 702-412-2617.

I'm sending these cards for you from the kids for Father's Day.

We have now moved - my new address is 3874 Calle De Este Las Vegas NV 89121

I dont know whats going on with your BMI. I've logged in and there is still nothing for over a year. I know your mom is your Power of Attorney, so she will need to contact BMI, unless she adds me to your BMI to speak on your behalf. Point to be honest, I really dont want to have to deal with it.

Anyway, I dont have much to say. I just wanted to send you these cards, and give you my new address.

Jenn

**EXHIBIT 9**

## Harris Exhibit 9

As you can see in these letters to their father, Julian who was 8 at the time said, "I miss you so much. I want to talk to you or call you. I wish you were here right now." And 6 year old River said, "I hope you get out of jail soon" and, "I love you, daddy."

This was written after 5 months of non-contact with their dad, not Mr. Harris' fault. Imagine what 3 years has done to them.

TO : dad

From : Julian  
coming home



dad I miss you  
so much I want  
to talk to you  
on card you.

I ~~don't~~

wish you

right were here

Happy ~~father's~~  
fathers day.  
Julian

DADY, I hope you  
get out of Jail soon  
I love you. When you send  
us your next letter I hope  
you will buy us Cookies and  
Milk. But only me and you.  
I drew you a picture. on  
the front. I love you DADY.  
-oru River.

**EXHIBIT 10**





With Isabelle, Reagan & Julian



With Isabelle and River



With River Harbaugh Harris with my friend and his middle namesake Jim Harbaugh.



With River



With Reagan and Julian



With Reagan and Julian



With Isabelle who shares the  
same birthday as her father, the  
defendant.



With Isabelle



With River promoting the charity single the defendant wrote and produced for the Kawasaki Disease Foundation. River survived this rare disease. "All 4 u"



Album cover for the "All 4 u" charity single to raise money and awareness for the Kawasaki Disease Foundation. River and his daddy.



with Isabelle and Julian



With Julian



With River at the hospital during  
his fight with Kawasaki's Disease



With River



Many of the defendant's family and friends have commented on how sad or withdrawn his four children are when posing for family photos without their father, especially Isabelle (blue dress) who shares a birthday with her father. This family photo is in stark contrast to the other photos taken with their father within these exhibits.

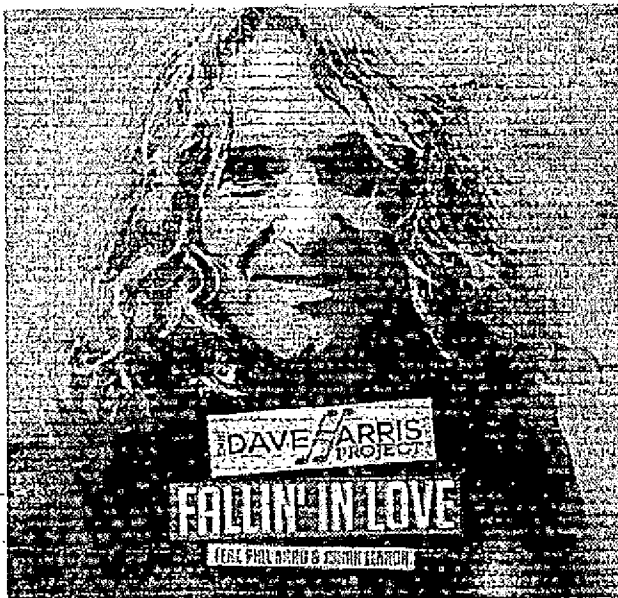


# EXHIBIT 11

3

## Phil Naro Collaborates with Julian Lennon and Brian May for Kawasaki Disease Awareness and Research

Posted on April 15, 2015 by Joel Naphin



Back in December 2014, songwriter, producer and radio host Dave Harris was on YouTube when he came across one of Naro's videos doing a cover of *Your Love* by The Outfield – a band Harris managed in the late 90's.

"Dave contacted me to see if I would have any interest in being part of his charity album for a rare disease his son was a survivor of called Kawasaki Disease," said Naro. "I am always up to supporting good causes in any way I can."

Naro, Harris and keyboardist Ben Crudup wrote *On Your Way Down* which was released on February 17, 2015 from the album *Songs From the Heart: Vol. 1* – an album for Kawasaki Disease Awareness & Research. Kawasaki Disease, also known as Kawasaki Syndrome, is a serious illness characterized by inflammation of blood vessels throughout the body that primarily affects young children and infants. Kawasaki Disease is the leading cause of acquired heart disease in children. Although about 80 percent of patients are under five years of age, older children and teenagers can also get this as well but this is uncommon. Kawasaki Disease is more common in boys than girls, and the majority of cases are diagnosed in the winter and early spring. It is not contagious.

"After this release, I was asked to sing *Fallin' In Love* with Julian Lennon, Brian May (Queen guitarist), Ben Crudup and Dave Harris," said Naro. "It was an honor to be able to work with (these musicians)." But working with them didn't mean being in the same

room. Naro explained, "Julian, Brian, Dave, Ben and I recorded our parts in our home studios and sent them off to Dave Harris to be mixed."

The result, *Fallin' In Love*, was released on March 30, 2015 by label Murdock Entertainment and can be purchased on iTunes and Amazon.

Plans for Volume 2 is currently in the works. Naro, in the meantime, is keeping busy. This summer Naro is touring with **Kim Mitchell** in **The Kim Mitchell Band** and is recording with Lawrence Gowan (of **Styx**) for a new **Gowan** solo album to be released in 2016. This year Naro will also tour as lead vocalist with Gene Cornish from the popular 1960's soul band, **The Rascals** and also **Bulldog** and **FotoMaker**.

"We will have a schedule announcement soon as to when and where **Gene Cornish and the Dangerous Lovers** – featuring **Phil Naro** will be performing," said Naro. The band will also include drummer Steve Holley (**Paul McCartney and Wings**, **Ian Hunter**), bassist Gary Van Scyoc (**John Lennon**, **Elephants Memory**), guitarist Mark Brandenburg (Guitar Club For Men), keyboardist/vocalist Billy Alessi (Barnabe Bye, solo artist) and guitarist/vocalist Bobby Alessi (Barnabe Bye, solo artist).

Help support the **Kawasaki Disease Awareness & Research**. It's a great cause with great musicians!

"I would like to personally thank Dave Harris for finding and asking me to be part of this project," Naro concluded.

---

To Connect Online and For Updates:

Julian Lennon [Grammy Nominated and Platinum recording artist and photographer]

Brian May [Smile, Queen and The Brian May Band]

Ben Crudup [Keyboardist]

Dave Harris [The Dave Harris Project] –  
<https://www.facebook.com/RetroRewind/about> and <http://www.retrorewind.com/>

The Dave Harris Project for Kawasaki Disease

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## Dave Harris Project

### *Songs from the Heart, Vol. 1 (For Kawasaki Disease Awareness & Research)*

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#### Track Listing

	Title/Composer	Performer	Time
1	All I Need R. David Harris	Dave Harris Project	3:51
2	Stay Aaron English / R. David Harris	Dave Harris Project	4:09
3	Fallin' In Love R. David Harris / Julian Lennon / Jonny Miller	Dave Harris Project	4:04
4	Channeling Julia R. David Harris	Dave Harris Project	4:16
5	Meet Me In Memphis Jay Gore / Scott Grimes / R. David Harris	Dave Harris Project	4:00
6	I Had You R. David Harris / John Paul	Dave Harris Project	5:06
7	On Your Way Down Ben Crudup / R. David Harris / Phil Naro	Dave Harris Project	3:26
8	Dyin' R. David Harris	Dave Harris Project	3:54
9	Go! Dickie Chapin / R. David Harris / Michael J. Willett	Dave Harris Project	3:42
10	Don't Let Me Be Misunderstood R. David Harris	Dave Harris Project	3:54
11	Young & Wise Scott Grimes / R. David Harris	Dave Harris Project	5:09

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**Songs From The Heart** Volume one  
For Kawasaki Disease Awareness & Research

**DAVE HARRIS PROJECT**

**Songs from the Heart, Vol. 1 (For Kawasaki Disease Awareness & Research)**

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7	On Your Way Down Ben Crutcher / R. David Harris / Phil Nero	Dave Harris Project	3:26
8	Dyin' R. David Harris	Dave Harris Project	3:54
9	Got Dickie Chapin / R. David Harris / Michael J. Willett	Dave Harris Project	3:42
10			4:04

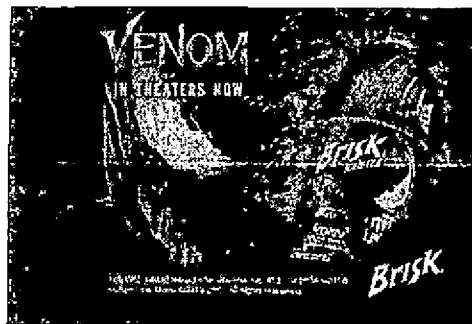
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Release Date **February 16, 2015**

Genre **Pop/Rock**

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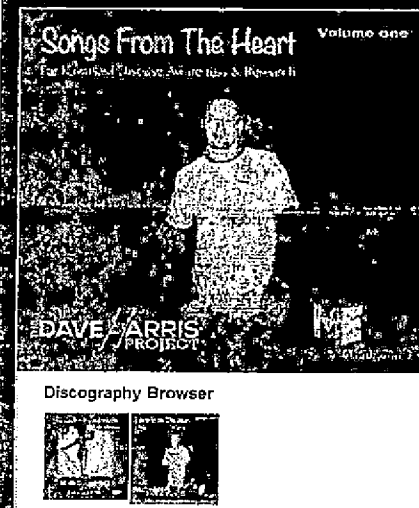
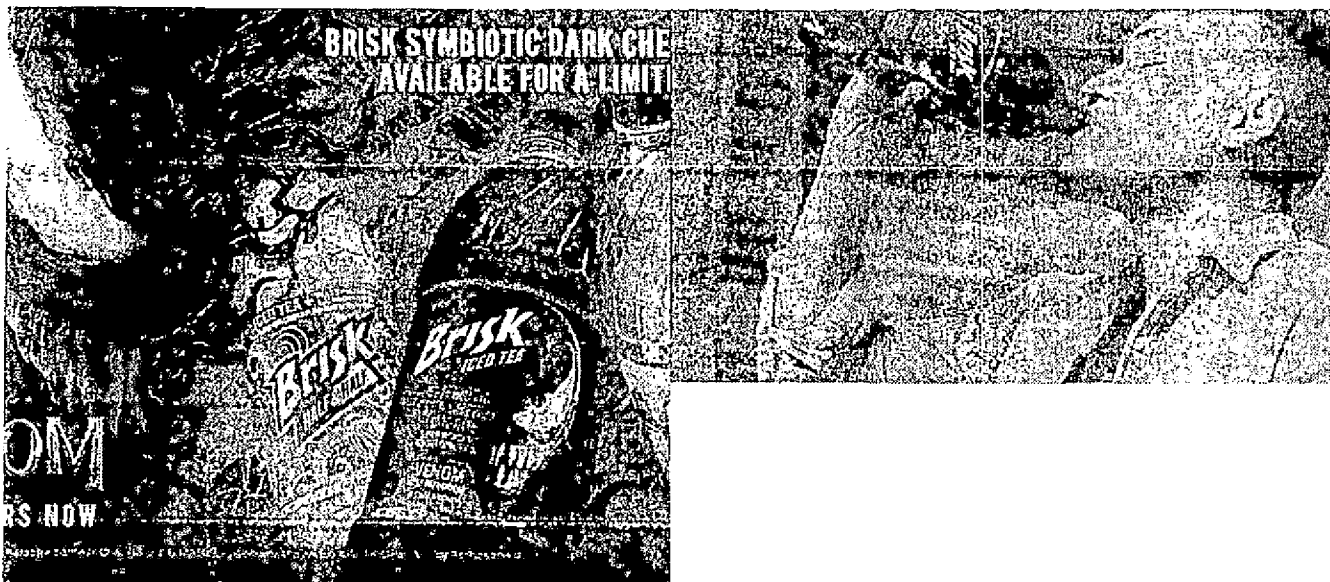


	Title/Composer	Performer	Time
	Thalia R. David Harris	Dave Harris Project	
11	Young & Wise Scott Grimes / R. David Harris	Dave Harris Project	5:09

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Dave Harris Project  
Songs from the Heart, Vol. 1 (For Kawasaki Disease Awareness & Research)

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### Credits

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Artist	Credit
Brad Bass	Mixing, Producer
Dickie Chapin	Composer, Producer
Chris Crabb	Featured Artist, Guest Artist, Vocals
Ben Crudup	Composer, Keyboards, Producer, String Arrangements
Dave Harris Project	Primary Artist
Aaron English	Composer, Featured Artist
Cosmic Geppo	Featured Artist, Guitar
Vince Gill	Featured Artist, Guitar
Jay Gore	Composer
Scott Grimes	Composer
Don Gunn	Drum Programming, Drums, Engineer, Mixing, Percussion
R. David Harris	Bass, Composer, Drums, Guitar, Keyboards, Mixing, Producer, String Arrangements, Vocals (Background)
Dan Hawkins	Bass
An Honest Year	Bass, Drums, Featured Artist, Guitar, Keyboards, Producer, Vocals
The Jofit Paul Band	Featured Artist

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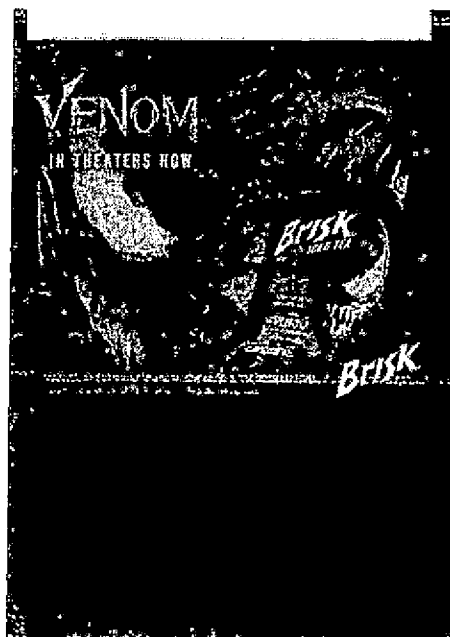
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Release Date February 16, 2015

Genre Pop/Rock

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Artist	Credit
Will Jones	Drums
Kevin Laurence	Featured Artist, Keyboards, Vocals
Julian Lennon	Composer, Featured Artist, Guest Artist, Vocals
Brian May	Guitar
John McCaig	Mastering
Jonny Miller	Bass, Composer
Mishayonna	Featured Artist, Vocals, Vocals (Background)
Phil Narc	Composer, Featured Artist, Producer, Vocals, Vocals (Background)
Steven Oates	Bass
John Paul	Composer, Producer, Vocals
Benny Quinn	Mastering
The Ramones	Bass, Drums, Featured Artist, Guitar, Producer, Vocals
Keith Scott	Featured Artist, Guitar
Andrew Smith	String Arrangements, Strings
Robert Venable	Engineer
Pete Whitfield	String Arrangements, Strings
Michael J. Willett	Composer, Featured Artist, Vocals, Vocals (Background)
Chris Wilson	Featured Artist, Vocals, Vocals (Background)

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Surrender (Beatman Remix) (feat. Mic  
Surrender (Beatman Remix) (feat. Micha



In Love Alone (feat. Michael J. Willett)  
Grandiose Delusions (Deluxe Edition) [fe



You're Easy to Love (Sara's Song) [fe  
Grandiose Delusions (Deluxe Edition) [fe



Got (feat. Michael J. Willett)  
Grandiose Delusions (Deluxe Edition) [fe



Live a Little (feat. Michael J. Willett &  
Grandiose Delusions (Deluxe Edition) [fe



Surrender (feat. Michael J. Willett & Jo  
Grandiose Delusions (Deluxe Edition) [fe



All Mine (feat. Michael J. Willett)  
Grandiose Delusions (Deluxe Edition) [fe



Cathy (feat. Michael J. Willett)  
Grandiose Delusions (Deluxe Edition) [fe



The Ride (feat. Michael J. Willett)  
Grandiose Delusions (Deluxe Edition) [fe

## Albums



Let You Go (feat. Juli  
2015



Surrender (Beatman  
2015



Grandiose Delusio  
2015



Songs from the Heart  
2015



Fallin' in Love (feat. P  
2015



All 4 U (feat. Micky P  
2015

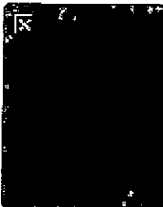
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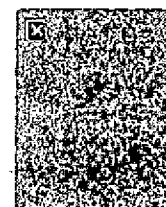
Glee Sings the Beall  
Gina Cant



Louder (Deluxe Versi  
Lau Michael



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Better Together - EP  
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\*\*\*\*\*NOTE \*\*\*\*\*

THE DEFENDANT BELIEVES THE LINK BELOW IS CORRECT, .BUT HE WANTS THE COURT TO KNOW THAT MR. KINSLOW, WHO HELPS THE DEFENDANT FROM TIME TO TIME, SENT THE EXACT AND CORRECT LINK TO THE EXHIBIT BELOW TO MR. MARK FERNANDEZ, THE JUDICIAL ASSISTANT TO JUDGE HARTER, VIA EMAIL ON MONDAY MAY 16, 2022 PER MR. HARRIS' REQUEST. PLEASE MAKE SURE THAT MR. FERNANDEZ PROVIDES THIS INFORMATION TO THE COURT. THE LINK (EXHIBIT) IS RELEVANT BECAUSE IT SHOWS MR. HARRIS' LOVE, BOND AND CONCERN FOR HIS SON, RIVER HARBAUGH HARRIS' HEALTH.

## EXHIBIT 12

IN APRIL 2016 THE DEFENDANT WAS FEATURED, ALONG WITH HIS SON, RIVER, ON THE NATIONALLY SYNDICATED TELEVISION ENTERTAINMENT PROGRAM, "EXTRA." THIS 60 SECOND SPOTLIGHT IS RELEVANT TO THE CUSTODY CASE NOT ONLY TO SHOW THE DEFENDANT'S CHARITABLE WORK, IN STARK CONTRAST THE PLAINTIFF'S EMBEZZLEMENT OF CHARITABLE FUNDS, BUT TO SHOW MOST IMPORTANTLY THE BOND AND DEDICATION BETWEEN THE DEFENDANT AND HIS YOUNGEST CHILD, RIVER, ONE OF THE FOUR CHILDREN HE SHARES WITH THE PLAINTIFF. RIVER SURVIVED A RARE DISEASE (KAWASAKI'S DISEASE) AND THE DEFENDANT WROTE AND PRODUCED A SONG TO RAISE AWARENESS AND FUNDS FOR THE KAWASAKI DISEASE FOUNDATION, WITH THE HELP FROM FRIENDS. THE EXACT LINK TO THE VIDEO IS: [YOUTU.BE/9yBtDH7HpNc](https://youtu.be/9yBtDH7HpNc) OR BY SEARCHING YOUTUBE ITSELF FOR: "EXTRA FEATURES THE DAVE HARRIS PROJECT ABOUT #ALL4UKDF CAMPAIGN RIVER'S STORY." IT IS WORTH INFORMING THE COURT THAT AS A RESULT OF HIS HEALTH SCARE RIVER'S HEART IS SUPPOSED THE BE CHECKED EVERY 3 YEARS FOR THE REST OF HIS LIFE. THE DEFENDANT IS NOT SURE IF THE PLAINTIFF IS EVEN SEEING TO RIVER'S HEALTHCARE. YET ANOTHER REASON THE DEFENDANT SHOULD HAVE A SAY IN HIS CHILDREN'S HEALTHCARE.

*Heather S. Hume*

CLERK OF THE COURT

**Eighth Judicial District Court**

**Clark County, Nevada**

JENNIFFER FIGUEROA,

Plaintiff,

vs.

RONALD DAVID HARRIS,

Defendant.

Case: D-20-606828-C

Dept: N

Date of Hearing: 07/28/2022

Time of Hearing: 11:00 a.m.

**DECISION AND ORDER**

**I. INTRODUCTION**

In the Order Reversing and Remanding (ORR)<sup>1</sup> dated 11/05/2021, the Court of Appeals (COA) held:

[The] presumption [for joint legal custody in NRS 125C.002] is overcome when the court finds that the parents are unable to communicate, cooperate, and compromise in the best interest of the of the children. (ORR at 6) (*citing to Rivero* and another COA case in Footnote 4)... [T]he 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 the children*. And there is otherwise no reference to the children's best interest or reasons for awarding Figueroa sole legal custody. (*Id.* at 7) (*emphasis added*)). . . 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. (*Id.* at 8 (*emphasis added*)).

As the COA used party designations as "Harris" and "Figueroa," this Court will also for purposes of this decision. As the ORR detailed the prior procedural history of this case, a reiteration is unnecessary at this time.

<sup>1</sup> On page 4 of the ORR, it states: "Harris did not attend the case management conference, and there was no explanation on the record or in the decree as to why, and the district court never explained the impact of his non-appearance." This Court humbly admits that in this case, it unfortunately deviated from its normal protocol whereby it regularly cites to the legal basis for a default for a party's non-appearance at a mandatory case management conference. As the old local rules were in effect at the time, this Court would typically have cited to EDCR 5.517(b) (appearance at case management conferences is required) and EDCR 7.60(a)(3) (failure of a party to appear at a required hearing may result in "the striking of the answer and entry of judgment by default"). It is noted that Harris has made his appearances via telephonic means regarding this appellate issue. Again, this is simply noted, it had no bearing on the decision of the limited issue at hand.

## II. LEGAL BASIS

### 125C.002. Joint legal custody

1. When a court is making a determination regarding the legal custody of a child, there is a presumption, affecting the burden of proof, that joint legal custody would be in the best interest of a minor child if:

(a) The parents have agreed to an award of joint legal custody or so agree in open court at a hearing for the purpose of determining the legal custody of the minor child; or  
(b) A parent has demonstrated, or has attempted to demonstrate but has had his or her efforts frustrated by the other parent, an intent to establish a meaningful relationship with the minor child.

2. The court may award joint legal custody without awarding joint physical custody.

**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.** Sole legal custody vests this right with one parent, while joint legal custody vests this right with both parents. **Joint legal custody requires that the parents be able to cooperate, communicate, and compromise to act in the best interest of the child. In a joint legal custody situation, the parents must consult with each other to make major decisions regarding the child's upbringing,** while the parent with whom the child is residing at that time usually makes minor day-to-day decisions.

*Rivero v. Rivero*, 125 Nev. 410, 420-21, 216 P.3d 213 (2009) (*emphasis added*).

## III. ANALYSIS

An evidentiary hearing was held on the above date and time.<sup>2</sup> Both parties filed Briefs. Neither party moved to admit any exhibits. Given the evidence from the parties, Figueroa has not allowed Harris contact with the 4 minor children at issue since 2019. As there was no custody order in place at that time, this Court will assume *arguendo* that the presumption in NRS 125C.002(1)(b) applies. Therefore, it was Figueroa's burden of proof to overcome the presumption. As noted above, the presumption is overcome if it is shown that there is an *ability, or lack thereof, to cooperate, communicate, or compromise in the best interest of the children.* As for the only relevant *best interest* factors on this narrow issue, they are NRS 125.0035(4)(d) "The level of conflict between the parents", (e) "The ability of the parents to cooperate to meet the needs of the child", and (j) "Any history of parental abuse or neglect of the child or a sibling of the child" (as Harris was convicted of abusing the children's step-sister). Harris claimed that he could be cooperative with Figueroa for the children's sake. Figueroa testified that they could

---

<sup>2</sup> Due process requires that a party receive notice of a proceeding and an opportunity to be heard. See generally *Brown v. Brown*, 96 Nev. 713, 715-16, 615 P.2d 962 (1980); "[T]he form of that hearing remains within the district court's discretion." *Arcella v. Arcella*, 133 Nev. 868, 872, 407 P.3d 341 (2017) (*citing to Sims v. Sims*, 109 Nev. 1146, 1148, 865 P.2d 328 (1993) for the proposition that: "The trial court enjoys broad discretionary powers in determining questions of child custody.").

1 not be cooperative. Figueroa's reasons were that Harris upsets the household as he still attempts  
2 to reach out to the victim of the crime for which he is incarcerated, which is Figueroa's daughter.  
3 Figueroa further claimed that Harris continues to "threaten" her. Harris testified that he believed  
4 Figueroa was also "culpable," that he told her of his plans to "bring her to justice," and that  
5 Figueroa is only being uncooperative because of the evidence that he is gathering against her.<sup>3</sup>

6 The animus between these parties is palpable as can be read in their Briefs filed for this  
7 evidentiary hearing.<sup>4</sup> Considering the *best interest* factors above, this Court FINDS that (1) the  
8 level of conflict is *high*; (2) the parties have an *inability to cooperate* regarding their children's  
9 needs; and (3) Harris has been convicted of child abuse of a step-sibling. This Court further  
10 FINDS that Harris is in fact the root cause of these factors for 2 reasons. First, in addressing the  
11 COA's specifically noted issue of whether Harris' behavior with his stepdaughter renders him  
12 "unable to participate in important legal decisions for his four children," this Court FINDS that a  
13 reasonable parent would not emotionally be able to *cooperate, communicate, or compromise*  
14 with another parent that is convicted of serious sexual abuse against their underage daughter and  
15 who also continues to try to reach out to the victim. Second, to add insult to injury, this Court  
16 FINDS that a reasonable parent would not be able to *cooperate, communicate, or compromise*  
17 with a parent who further admits that they are actively attempting to have them prosecuted for  
18 allegedly also being "culpable."

#### 19 **IV. CONCLUSION**

20 Given the findings above, this Court CONCLUDES that Figueroa has overcome the  
21 presumption for joint legal custody as she has sufficiently proven that there is an *ability, or lack*  
22 *thereof, to cooperate, communicate, or compromise in the best interest of the children*. Because

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24 <sup>3</sup> See e.g., Defendant's Brief, p. 4, lines 1-2 (Harris claims he is being punished "for bringing  
25 [Figueroa] to justice and revealing her own shortcomings as a parent and her immoral and unethical  
behavior.").

26 <sup>4</sup> "Joint legal custody is inappropriate where, as here, the record 'convincingly demonstrates that  
27 the parties have an acrimonious relationship and are unable to communicate ... in an amicable manner.'" *(Matter of St. Pierre v. Burrows*, 14 A.D.3d 889, 891, 788 N.Y.S.2d 494 [2005]; see *Matter of Van*  
28 *Zandt v. Sauers*, 12 A.D.3d 821, 822, 784 N.Y.S.2d 240 [2004]; *Matter of Smith v. Miller*, 4 A.D.3d  
697, 698, 772 N.Y.S.2d 742 [2004]; *Matter of Millett v. Millett*, 270 A.D.2d 520, 522, 703 N.Y.S.2d 596  
[2000] ).

1 Harris is the root of this problem noted above and due to the fact it would impractical for Harris  
2 to be the sole legal custodian given his incarceration status, this Court further CONCLUDES that  
3 it is in the best interest of the minor children that Figueroa be granted sole legal custody of the  
4 minor children.

5 Pursuant to the Minute Order from 12/06/2021 issued from the Presiding Judge, now that  
6 this limited issue on remand has been determined, the Clerk of the Court is hereby ORDERED to  
7 immediately re-assign this case back to Department Z.

8  
9  
10 HONORABLE MATHEW P. HARTER

11 Dated this 2nd day of August, 2022

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15 MEF

16 7B9 479 24FD 2583  
17 Mathew Harter  
18 District Court Judge  
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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 Decision and Order was served via the court's electronic eFile system  
13 to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 8/2/2022

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 8/3/2022

19 Ronald Harris

NECX PO BOX 5000

#584414

Mountain City, TN, 37683  
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21  
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28



DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

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

Case No.: D-20-606828-C  
Department N

**NOTICE OF ENTRY OF DECISION AND ORDER**

**TO: ALL PARTIES AND/OR THEIR ATTORNEYS**

Please take notice that the Court prepared a Decision and Order

I hereby certify that I submitted this Decision so that it will be electronically served, faxed, emailed, or mailed to:

Jenniffer Figueroa

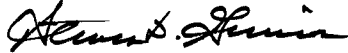
Ronald David Harris  
c/o: Warden Jerry Gentry of the Tennessee Department of Corrections

DATED: 2nd day of August, 2022

By: /s/ Mark Fernandez

Mark Fernandez  
Judicial Executive Assistant  
Department N



  
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

RESPONSE

DISTRICT COURT CLARK COUNTY NEVADA

JENNIFFER FIGUEROA, PLAINTIFF

CASE NO. D-20-606828-C

vs.

DEPARTMENT N

RONALD DAVID HARRIS, DEFENDANT

RESPONSE TO NOTICE OF EVIDENTIARY HEARING

The defendant in this matter wants the court to know that on two occasions he had sent the Notice of a Writ of Mandamus and a motion for a Writ of Mandamus to have Judge Harter disqualified from this case to the Family Court's Pecos Road address. He was under the impression that the court clerk's office would submit the paperwork to the Court of Appeals or the Nevada Supreme Court for consideration. Both times a copy for Chief Judge Bell and Judge Harter were submitted with proof of service and also a copy for Ms. Figueroa. To this date he has not received one document acknowledging his sent paperwork. An email received at the prison from Mr. Fernandez informed the defendant's counselor, not an attorney but prison counselor, that Mr. Harris was sending the Writ of Mandamus to the wrong address and department. Mr. Harris will now send the paperwork to the clerk of the Court of Appeals and to the Supreme Court of Nevada. He sent this originally on May 25, 2022. He is at a loss as to how this paperwork has 'disappeared' from a government office. It was sent again about two weeks ago. The defendant also does not appreciate the tone of the order which appears to all but call the defendant a liar and that he must not have submitted the paperwork. The defendant's recollection was that the court seemed to be very accomodating and not apprehensive about the continuance. The only apprehension the defendant recalls is the court's dismay of the witnesses Ms. Figueroa planned to call. The court has said in its notice of the new hearing date that regardless of whether or not the defendant files a Writ that the matter will move forward. The defendant wants to remind the court in Debiparshad vs. Eighth Judicial Dist. 137 NEV, 499 P.3d 597 (2021) \* 602 the NV Supreme Court concluded that any order entered by the Judge becomes void should the Judge be later disqualified. The defendant swears that he has sent the Writ petition twice, apparently to the wrong address but will be sending it directly to the Court of Appeals and the Supreme Court of Nevada for consideration. The defendant also requests a hearing on any motion the plaintiff might make on sealing of the court record as well that she provide notice to the general public by posting information, including time, date, and location of the hearing, at a place within the confines of the court that is accessible to the general public, as described in RULE 3 from PART VII, section 3. The defendant wants to be able to argue against any request to seal the record.

SUBMITTED BY Ronald D. Harris  
RONALD DAVID HARRIS, PRO SE

JUNE 27, 2022

RONALD HARRIS #584414

NECX

PO BOX 5000

MOUNTAIN CITY, TN. 37683

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08/04/2022

*Heather J. Smith*  
CLERK OF THE COURT

CERT  
Name: Ronald Harris # 584414  
Address: NECX PO Box 5000  
Mtn. City, TN. 37683  
Telephone: \_\_\_\_\_  
Email Address: \_\_\_\_\_  
In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Figueroa  
Plaintiff,

vs.

Harris  
Defendant.

CASE NO.: D-20-606828-C

DEPT: N

**CERTIFICATE OF MAILING**

I, (name of person who mailed the document) Ronald 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) 27, 2022, service of the:

(☒ check all that apply)

☐ Subpoena - Domestic

☐ Deposition Subpoena

☒ Other: Response to Court re: Evidentiary Hearing.

was made pursuant to NRCP 5(b) by depositing a copy in the U.S. Mail in the State of Nevada,  
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 June 27, 2022

*[Signature]*  
(Signature)

1 **SUB**

2 Your Name: RONALD D. HARRIS #584414

3 Address: NECK P.O. BOX 5000

4 City, State, Zip: MOUNTAIN CITY, TN 37683

5 Telephone:                     

6 Email Address:                     

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

9 JENNIFFER FIGUEROA

10 Plaintiff,

11 vs.

12 RONALD HARRIS

13 Defendant.

CASE NO.: 20-606828-C

DEPT: N

**SUBPOENA – DOMESTIC**  
(for personal appearance)

14 **TO:**

15 Name of Person/Company: JUANITA FIGUEROA

16 Address: 4585 LANCER WAY

17 LAS VEGAS, NV. 89121

18 Telephone No.:                     

19 **YOU ARE REQUIRED TO APPEAR AS A WITNESS** and give testimony at the following  
20 date, time, and place pursuant to NRS 50.165 and NRCP 45:

21 Date: (month) JULY (day) 28, 2022

22 Time: 10 ☒ a.m. ☐ p.m.

23 Department: N of the District Court, Clark County, Nevada, located at:

24 ☒ The Family Court & Services Center, 601 N. Pecos Road, Las Vegas, Nevada.

25 ☐ The Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada.

1           **WITNESS FEES:** For attending court in obedience to a subpoena, you are entitled to  
2 witness fees and mileage traveled, as provided by NRS 50.225. This Subpoena must be  
3 accompanied by the fees for one day's attendance and mileage, unless issued on behalf of the  
4 State or a State agency.

5           **CONTEMPT:** Failure by any person without adequate excuse to obey a subpoena  
6 served upon that person may be deemed a contempt of the court that issued the subpoena.  
7 NRCp 45(e.) If you fail to attend, you may also liable to pay all losses and damages caused by  
8 your failure to appear and in addition forfeit \$100.00, and may be committed to jail. NRS  
9 50.195, NRS 50.205.

10           Please see Exhibit "A" attached for information regarding the rights of the person  
11 subject to this Subpoena.

12  
13 STEVEN D. GRIERSON, CLERK OF COURT

14  
15 By: *Mark H. H.* 8/4/22  
16 Deputy Clerk Date

17  
18 Submitted By: (your signature) ▶ *Rod David Harris*  
19 (print your name)

20 RONALD DAVID HARRIS

21 ☐ Plaintiff / ☒ Defendant



EXHIBIT "A" - NEVADA RULES OF CIVIL PROCEDURE RULE 45

(c) **Protection of Persons Subject to Subpoena.**

(1) **Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court that issued the subpoena must enforce this duty and may impose an appropriate sanction — which may include lost earnings and reasonable attorney fees — on a party or attorney who fails to comply.

(2) **Command to Produce Materials or Permit Inspection.**

(A) **Appearance Not Required.**

(i) A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(ii) If documents, electronically stored information, or tangible things are produced to the party that issued the subpoena without an appearance at the place of production, that party must, unless otherwise stipulated by the parties or ordered by the court, promptly copy or electronically reproduce the documents or information, photograph any tangible items not subject to copying, and serve these items on every other party. The party that issued the subpoena may also serve a statement of the reasonable cost of copying, reproducing, or photographing, which a party receiving the copies, reproductions, or photographs must promptly pay. If a party disputes the cost, then the court, on motion, must determine the reasonable cost of copying the documents or information, or photographing the tangible items.

(B) **Objections.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, or a person claiming a proprietary interest in the subpoenaed documents, information, tangible things, or premises to be inspected, may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The person making the objection must serve it before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made:

(i) the party serving the subpoena is not entitled to inspect, copy, test, or sample the materials or tangible things or to inspect the premises except by order of the court that issued the subpoena;

(ii) on notice to the parties, the objecting person, and the person commanded to produce or permit inspection, the party serving the subpoena may move the court that issued the subpoena for an order compelling production or inspection; and

(iii) if the court enters an order compelling production or inspection, the order must protect the person commanded to produce or permit inspection from significant expense resulting from compliance.

(3) **Quashing or Modifying a Subpoena.**

(A) **When Required.** On timely motion, the court that issued a subpoena must quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance;

(ii) requires a person to travel to a place more than 100 miles from the place where that person resides, is employed, or regularly transacts business in person, unless the person is commanded to attend trial within Nevada;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to an undue burden.

(B) **When Permitted.** On timely motion, the court that issued a subpoena may quash or modify the subpoena if it requires disclosing:

(i) a trade secret or other confidential research, development, or commercial information; or

(ii) an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) **Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order an appearance or production under specified conditions if the party serving the subpoena:

1 (i) shows a substantial need for the testimony or material that cannot be otherwise met without  
undue hardship; and

2 (ii) ensures that the subpoenaed person will be reasonably compensated.

3 **(d) Duties in Responding to a Subpoena.**

4 **(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing  
documents or electronically stored information:

5 **(A) Documents.** A person responding to a subpoena to produce documents must produce them as they  
are kept in the ordinary course of business or must organize and label them to correspond to the categories in the  
demand.

6 **(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not  
specify a form for producing electronically stored information, the person responding must produce it in a form or  
forms in which it is ordinarily maintained or in a reasonably usable form or forms.

7 **(C) Electronically Stored Information Produced in Only One Form.** The person responding need  
not produce the same electronically stored information in more than one form.

8 **(D) Inaccessible Electronically Stored Information.** The person responding need not provide  
discovery of electronically stored information from sources that the person identifies as not reasonably accessible  
because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding  
must show that the information is not reasonably accessible because of undue burden or cost. If that showing is  
made, the court may nonetheless order discovery from such sources if the requesting party shows good cause,  
considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

9 **(2) Claiming Privilege or Protection.**

10 **(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is  
privileged or subject to protection as trial-preparation material must:

11 (i) expressly make the claim; and

12 (ii) describe the nature of the withheld documents, communications, or tangible things in a  
manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

13 **(B) Information Produced.** If information produced in response to a subpoena is subject to a claim  
of privilege or of protection as trial-preparation material, the person making the claim may notify any party that  
received the information of the claim and the basis for it. After being notified, a party must promptly return,  
sequester, or destroy the specified information and any copies it has; must not use or disclose the information until  
the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being  
notified; and may promptly present the information under seal to the court for a determination of the claim. The  
person who produced the information must preserve the information until the claim is resolved.



08/04/2022

*Heather Hemin*

CLERK OF THE COURT

EXHS

Name: Ronald Harris #584414Address: NECX PO Box 5000Mountain City, TN 37683

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

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

In Proper Person

DISTRICT COURT  
CLARK COUNTY, NEVADAJ. Figueroa

Plaintiff,

vs.

R. Harris

Defendant.

CASE NO.: D-20-606828-CDEPT: NDATE OF HEARING: 7-28-22TIME OF HEARING: 10 am - 12 pmEXHIBIT APPENDIX(your name) Ronald Harris, the (check one ☒) Plaintiff☒ Defendant, submits the following exhibits in support of my (title of motion / opposition you filed that these exhibits support) My defense. I understand that these are not considered substantive evidence in my case until formally admitted into evidence.Table of Contents:

1. DCFS Report Showing Ms. Figueroa's failure to act.
2. DCFS Report - Harris Children confirm NO abuse
3. DCFS Report - Ms. Figueroa no worries for Harris Kids
4. Police Report / Statement from Ms. Figueroa
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_
9. \_\_\_\_\_
10. \_\_\_\_\_

## EXHIBIT 15

This exhibit shows that one year BEFORE Ms. Figueroa had Mr. Harris arrested. She was point blank told by her daughter, the alleged victim that Mr. Harris was "touching" her. Mr. Harris denies this "touching" occurred. But if true, Ms. Figueroa did nothing at all about this issue at all. Yet even more proof that Ms. Figueroa did nothing over the course of many years. Nothing.



Tennessee Department of Children's Services  
Case Recording Summary

Case Id: 325040618

Case Name: Fix, Sara

Case Status: Close

Organization: Mid Cumberland Region

[REDACTED]

About a year ago, her mom got laid off from work and thy were doing stuff in the bed and her mom couldn't get in. Sara reported that she ran into the bathroom. On the next day, her mom asked her if something was going on and she told her that Dave touched her, but didn't tell her that something happened.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



## Tennessee Department of Children's Services

### Case Recording Summary

Case Id: 325040618

Case Name: Fix, Sara

Case Status: Close

Organization: Mid Cumberland Region

#### Case Recording Details

Recording ID: 27868768

Status: Completed

Contact Date: 08/23/2016

Contact Method: Face To Face

Contact Time: 09:30 AM

Contact Duration:

Entered By: Gray, Tameika N

Recorded For:

Location: DCS Office

Created Date: 08/25/2016

Completed date: 08/25/2016

Completed By: Gray, Tameika N

Purpose(s): Safety - Child/Community

Contact Type(s): ACV Interview/Observation

Contact Sub Type:

#### Children Concerning

Fix, Sara

#### Participant(s)

Gray, Tameika N

#### Narrative Details

Narrative Type: Original Entry Date/Time: 08/25/2016 10:26 AM Entered By: Gray, Tameika N  
Forensic Interview was conducted at the Rutherford County Child Advocacy Center.

This Forensic Interview was observed by CPSI Kisa Johnson and La Vergne Detective Fracker.

During the Interview, Sarah disclosed the following:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NONE

Abuse occurred with any of them.

Harris children confirm No

EXHIBIT 16



**Tennessee Department of Children's Services**  
**Case Recording Summary**

Case Id: 325040618

Case Name: Fix, Sara

Case Status: Close

Organization: Mid Cumberland Region

**Case Recording Details**

Recording ID: 28090760

Status: Completed

Contact Date: 09/08/2016

Contact Method: Face To Face

Contact Time: 04:30 AM

Contact Duration:

Entered By: Gray, Tameika N

Recorded For:

Location: Family Home

Created Date: 10/04/2016

Completed date: 10/04/2016

Completed By: Gray, Tameika N

Purpose(s): Safety - Child/Community

Contact Type(s): ACV Interview/Observation, Parent/Caretaker Interview, Sibling Interview/Observation

Contact Sub Type:

**Children Concerning**

Fix, Sara

**Participant(s)**

Gray, Tameika N; Harris, Jennifer

**Narrative Details**

Narrative Type: Original Entry Date/Time: 10/04/2016 04:50 PM Entered By: Gray, Tameika N

CPSI conducted a home visit with the Harris/Fix family on this date to see the home and meet the other children in the home. CPSI was greeted at the door by the maternal grandmother Ms. Figueroa who came to Tennessee from Las Vegas to help Ms. Harris with the children since Mr. Harris was arrested and remains in jail. Ms. Figueroa invited CPSI to come in the home and CPSI followed her inside. CPSI observed the home and there was no clutter or visible hazards to the children. CPSI met the three younger children Isabella Harris(9), Reagan and Julian Harris (twins age 6), and River Harris age 4. Isabella was the most talkative as she showed CPSI several dances that her older sister Reagan had taught her. The younger child River was playing and hiding in the kitchen then jumping out trying to scare CPSI. Reagan sat on the couch next to CPSI and explained that her mother was taking a class for her job on this date but she would be home soon then she said "my dad is away right now and he wont be here today". Julian sat on the couch next to his grandmother and played on his tablet. Julian was the most quiet of the four children but he would play with his siblings when they would talk or when River would try to climb on him. CPSI explained her role as a case manager and that her job was to ensure all the children in the home felt safe and if there was anything happening to them or their bodies that made them feel unsafe or uncomfortable that they could tell CPSI on this date. All of the children denied any abuse/neglect concerns ACV was upstairs and came down after CPSI spoke with her siblings. Sarah gave CPSI a tour of the four bedroom home and all the basic needs of the children were being met. Sarah sat with CPSI at the kitchen table and reported she had been doing well and she had no contact with her step father. CPSI explained she was informed after the forensic interview that there were some photos taken of her when the family lived in Wilson Co and Sarah said that was true and CPSI explained a DCS referral would be called in to Wilson County to address those issues and Sarah said she understood.

Bio mom Ms. Harris came home and reported the family would be moving to Las Vegas in October when the children are out of school for Fall Break. She stated she has tried to keep the whereabouts of Mr. Harris away from the children due to the situation and she told them their father is away for work. She feels the children can move forward in Las Vegas with their grandparents and away from the local news and papers when Mr. Harris goes to trial. Ms. Harris reported they will be moving in with her parents until she can get her own home for her and the children. Ms. Harris denied having any contact with Mr. Harris in the past three weeks. She said he was calling daily but she wrote him a long letter telling him how he does not want to hear from him and what he did was wrong and she said he has not called since. Ms. Harris also reported she would be getting Sarah in therapy once they are settled in Nevada. CPSI

## EXHIBIT 17

Ms. Figueroa tells DCFS  
that she has no concerns  
about any of the Harris  
Children being abused.



## Tennessee Department of Children's Services

### Case Recording Summary

Case Id: 325040618

Case Name: Fix, Sara

Case Status: Close

Organization: Mid Cumberland Region

#### Case Recording Details:

Recording ID: 27852935

Status: Completed

Contact Date: 08/22/2016

Contact Method: Face To Face

Contact Time: 12:00 PM

Contact Duration:

Entered By: Gray, Tameika N

Recorded For:

Location: DCS Office

Created Date: 08/22/2016

Completed date: 08/22/2016

Completed By: Gray, Tameika N

Purpose(s): Safety - Child/Community

Contact Type(s): Initial ACV Face To Face, Parent/Caretaker Interview

Contact Sub Type:

#### Children Concerning

Fix, Sara

#### Participant(s)

Gray, Tameika N; Harris, Jennifer

#### Narrative Details

Narrative Type: Original Entry Date/Time: 08/22/2016 08:34 PM Entered By: Gray, Tameika N

CPSI met response time with ACV Sarah Fix and her mother Jennifer Harris at the DCS office on this date. CPSI spoke privately with bio mom Ms Harris in the conference room while ACV Sarah and her older sister Rebecca (18) sat in the visitation room. CPSI explained her role and the purpose of the visit which was to initiate the investigation for allegations of sexual abuse involving her husband and her daughter. CPSI asked Ms Harris about her household members and she reported she is married but separated from her husband AP Ronald "Dave" Harris. The two still live in the same home and Mr Harris has a bedroom downstairs and Ms Harris sleeps upstairs. Also in the home is her two daughters from a previous relationship Rebecca age 18 (5/19/1998) and Sarah age 15 (1/18/2001) and she and Mr Harris has four other children with Mr Harris, Isabelle (2/25/2007), twins Reagan and Julian (9/19/2009), and River (10/13/2011).

CPSI asked Ms Harris to explain what she knew about the allegations that her husband has been having a sexual relationship with her daughter Sarah. Ms Harris reported she was doing laundry yesterday and she found a hard drive and when she looked at it she saw a video of her husband being inappropriate with her daughter. She said she told her eighteen year daughter about it but she didn't say anything to Dave because she didn't want to cause any commotion with the younger kids in the house so she waited until she got all the kids out to school today then she went straight to the LaVergne Police Dept. CPSI asked Ms. Harris if she had any additional concerns for any of the other children in her home and she said no. Ms. reported she had not spoken with her husband yet and all she knew was that the police were working on getting a search warrant to go through Mr Harris' things and then they would be arresting him.

CPSI explained the DCS process and that DCS would be working with law enforcement on the case and that ACV Sarah had been scheduled for a forensic interview on the next day at 8:30am and Ms. Harris agreed, CPSI also referral the family for an Our Kids exam and Ms. Harris agreed to take Sarah in for that as well. Ms. Harris said she had no concerns at this time and CPSI gave her a business card and explained if she had any questions or concerns she could call CPSI.

CPI then spoke with ACV Sarah privately in the conference room. Sarah was dressed in a grey sweater, a tshirt, and jeans. Her hair was down and touched her shoulder and she was wearing make up on this date. CPSI asked Sarah if she knew why she was at the office and she said "a little". CPSI explained DCS was contacted due to concerns that she



EXHIBIT 18

If you were to believe Ms. Figueroa's statement to police on the day she turned Mr. Harris in, you can see that she admits "finding" naked photos, messages, she fails to mention the alleged molesting from Aug 2015, the sex video of the alleged victim she "found" in April 2016. But she says she's always been suspicious. She never did a thing about it. Nothing. She acts like she was afraid of Mr. Harris or her girls too. Yet Ms. Figueroa is making threats to him, telling him to do certain things, confronting him, telling him not to communicate with the two girls. Doesn't seem scared to me. She never once called the police for any domestic sex acts, "touching", and "stood up" to Mr. Harris about sex acts, "touching", and "stood up" to Mr. Harris many times. Sure doesn't seem like they are/ were scared either.

COPY

6 of 9

**STATEMENT**

LaVergne Police Department

CASE NUMBER

16-024006

**IDENTIFICATION**

Name JENNIFER HARRIS		Address 307 Clearlake Court		Phone No. 615 926 9263	
Race White	Sex F	Age 40	Date of Birth 6-7-76	Soc. Security No.	Driver's License No. 121 386 500
Employer Kodak		Address		Phone No.	
Relationship to Incident Mom				Can be Contacted At 615-926-9263	
Statement Taken By Dfc. E. Crowder		Location		Date	Time

**STATEMENT**

I always had some suspicion about Ronald + Sara. He was always over protective to an extreme with her, and was always demeaning about her real father who lives in California. Always telling her that her real dad loved her sister Rebecca (my other daughter) and her real dad had the same birthday. When they went to spend the summer in California 2 years ago I found FB messages between them that showed him being aggressive and mean to her (Sara) to control her.

He was always very controlling, of the whole family. Around that time 2 years ago I had found some pictures of both my daughters naked. He was not in them, and when I confronted him, he says that the girls asked him to take pictures. At that time they were 16 + 13. He then took the camera + we fought as I threatened to leave. He says that it was the girls + when he brought the girls in the room to tell me that, he yelled at them and said to them, tell your mom nothing happened and you guys are fine. That you asked me to take these for them.

Of course they were scared and intimidated and just agreed + smiled like everything was ok. They were totally scared, but so was I.

Signature

Page \_\_\_\_ Of \_\_\_\_

## Narrative

After that happened, I was always very watchful of them & questioned the girls & talked to them when Ronald would allow it. I felt like such a bad mom. But the girls were afraid of him, and I was afraid of him.

Over the last 2 years our marriage deteriorated and I filed for divorce in July 2016. We had been separated for almost a year but still living in the same house because neither of us could afford to move.

Anytime he would leave the house I would go through all his things, his hard drives to see if I could find something. But never did. All his PC's & Laptops had passwords. I didn't know so I couldn't get into those.

Over the last few months (probably 6mo.) I noticed that they Sara & Ronald were extremely chummy. They went out together "to the store" or to pick up her friends. Then during the graduation of my 18 year old Rebecca, ~~the~~ Sara & Rebecca's dad was in attendance. ~~He~~ Ronald knew he would be there but was really livid about being around him, and Sara being by her dad. Ronald made Sara feel bad about going to California w/ her dad & I told him to have zero contact with either of the girls while they were with their real dad.

115. Court	<input type="checkbox"/> NA	<input type="checkbox"/> G.S.	<input type="checkbox"/> O.V.	<input type="checkbox"/> Juvenile	<input type="checkbox"/> City	Date:	Time:
116. Signature of Complainant / Victim				119. Advisory Notice Issued			
				<input type="checkbox"/> N/A <input type="checkbox"/> Reused to Sign <input type="checkbox"/> N/A <input type="checkbox"/> Domestic Violence Notice Clear by Exception (select one below)			
117. Reporting Officer (Print Name: First, MI, Last)				<input type="checkbox"/> Open <input type="checkbox"/> Death of Offender <input type="checkbox"/> Unfounded <input type="checkbox"/> Prosecution Declined <input type="checkbox"/> Cleared by Plain Officer <input type="checkbox"/> Extradition Declined <input type="checkbox"/> Cleared by Arrest <input type="checkbox"/> Refused to Cooperate <input type="checkbox"/> Fined (Low Solvability) <input type="checkbox"/> Juvenile, No Custody			
118. Reporting Supervisor (Signature)				Pin No.			
				Pin No.			

COPY

8 of 9

Page 3 of 3

L.P.D. Incident No.

Narrative

He listened for the most part, but I did find out that they communicated over i-message after I told him NOT to communicate w/ them.

When they came back from California he tried to get in their (Sara + Rebecca) good graces by bribing them with concerts + meet + greets with celebs. He has a lot of music + tv connections.

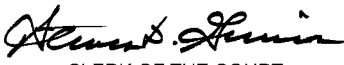
I was uncomfortable with him in the house, and asked him to move numerous times.

Finally I threatened to move to Las Vegas where my parents live. He begged not to move to Vegas because of the kids (we have 4 kids together, Julian + Reagan - 6, Isabelle - 9, River - 4), and I said you need to move then. He said to give him until the end of August.

Yesterday Ronald took Sara + 4 of her friends to Opry Mills. I was home with my 3 younger kids putting laundry away.

I reached into one of Ronalds drawers and felt something. I pulled out a pair of shorts - swimming trunks + in the pocket was a small external hard drive. I grabbed it ran upstairs + hooked it up. It showed videos + pictures of Ronald + my daughter Sara, her nude him nude, + sexual activities including intercourse + oral sex. I copied the files to my hard drive + put his back where I found it.

105. Court <input type="checkbox"/> N/A <input type="checkbox"/> G.S. <input type="checkbox"/> D.V.	<input type="checkbox"/> Juvenile <input type="checkbox"/> City	Date: _____	Time: _____
106. Signature of Complainant / Victim	<input type="checkbox"/> N/A <input type="checkbox"/> Refused to Sign	189. Advisory Notice Issued <input type="checkbox"/> N/A <input type="checkbox"/> Domestic Violence Notice	
107. Reporting Officer (Print Name: First, MI, Last)	Pin No. _____	190. Case Status <input type="checkbox"/> Open <input type="checkbox"/> Unfounded <input type="checkbox"/> Cleared by Rptg Officer <input type="checkbox"/> Cleared by Arrest <input type="checkbox"/> Fixed (Low Solvability)	Clear by Exception (select one below) <input type="checkbox"/> Death of Offender <input type="checkbox"/> Prosecution Declined <input type="checkbox"/> Extradition Declined <input type="checkbox"/> Refused to Cooperate <input type="checkbox"/> Juvenile, No Custody
188. Reviewing Supervisor (Signature)	Pin No. _____		

  
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 WRIT

IN THE SUPREME COURT OF  
THE STATE OF NEVADA

Ronald Harris,  
Petitioner

Case No.  
D-20-606828-C

v.

Honorable Chief Judge, Linda Bell,  
Honorable Judge, Mathew Harter,  
Respondents AND  
Jenniffer Figueroa, Real party in interest

NOTICE OF WRIT OF MANDAMUS PETITION

Notice is hereby given that Ronald Harris, the petitioner named above, hereby petitions the Supreme court or Court of Appeals for the State of Nevada for a writ of Mandamus to disqualify Judge Mathew Harter from hearing the above case.

Ronald David Harris  
Pro Se

Address  
Ronald Harris #584414  
N.E.C.X.  
P.O. Box 5000  
Mountain City, TN 37686-5000

R. D. Harris

Dated 25<sup>th</sup> day of May, 2022

3<sup>rd</sup> attempt

R. D. Harris

6-27-22

Emergency Motion  
NRAP 27 (e)  
requested

RECEIVED

JUL 05 2022

CLERK OF THE COURT

*Matthew P. Harter*  
CLERK OF THE COURT

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**

This matter was originally set for an evidentiary hearing on 05/31/2022. At that time, Defendant asked for a continuance indicating he had filed a Writ based on Judge Bell's denial for disqualification filed 05/13/2022. Apprehensively, this Court granted Defendant's request. The matter was set for a status check hearing today and only Plaintiff appeared. To date, no Writ is being shown as filed. This Court will not comment on the time requirements at this juncture regarding the Writ. In *Debiparshad, M.D. v. Dist. Ct. (Landess)*, 137 Nev. \_\_\_, 499 P.3d 597 (2021), the Court concluded that "once a party files a motion to disqualify a judge pursuant to the Nevada Code of Judicial Conduct, that judge can take no further action in the case until the motion to disqualify is resolved." Again, that part is done as Chief Judge Bell has made her decision. "When a Writ petition is filed, the court retains jurisdiction over the order challenged therein during the pendency of the Writ petition." *Pengilly v. Rancho Santa Fe Homeowners Ass'n*, 116 Nev. 646, 650, 5 P.3d 569 (2000). Accordingly, regardless of whether Defendant files a writ between now and the hearing date below, the matter will be going forward. All of the provisions of the prior Amended Notice of Evidentiary Hearing filed 05/13/2022 are still in effect. The primary purpose of this Notice is to inform the parties of the new date and time for the evidentiary hearing, which will be held by audio/visual means July 28, 2022 from 10:00 a.m to 12:00 p.m. PST.

HONORABLE MATHEW P. HARTER

Dated this 23rd day of June, 2022

MEF

98B D51 D007 CADC  
Mathew Harter  
District Court Judge

SUPREME COURT FOR THE STATE OF NEVADA

PETITION FOR WRIT OF MANDAMUS

RONALD DAVID HARRIS,

PETITIONER

v.

HONORABLE LINDA MARIE BELL, CHIEF JUDGE, HONORABLE  
MATHEW HARTE, DISTRICT JUDGE (DEPT. N)

RESPONDENTS,

AND JENNIFFER FIGUEROA, REAL PARTY in INTEREST

CASE NO. D-20-606828-C

EMERGENCY MOTION UNDER NRAP 27 (e) ACTION BY MAY 31, 2022 or AS SOON AS POSSIBLE

THIS MATTER FALLS IN AT LEAST ONE OF THE CATAGORIES OF CASES RETAINED BY THE SUPREME COURT OF NEVADA PURSUANT TO NRAP 17 (a). THE PETITIONER BELIEVES THIS IS A CASE FOR THE COURT OF APPEALS PURSUANT TO NRAP 17 (b) or RULE 17 (a), (10), (b), (10), (12)

THE RELIEF SOUGHT IS TO DISQUALIFY JUDGE MATHEW HARTE FROM THIS CASE.  
ISSUES PRESENTED IS BIASED TOWARDS THE PETITIONER (DEFENDANT IN THIS CASE)

THESE ARE THE FACTS AND THE REASON WHY THE WRIT OF MANDAMUS SHOULD BE ISSUED.

THE PETITIONER FEELS THAT JUDGE HARTE IS BIASED AND INCAPABLE OF MAKING AN UNBIASED DECISION IN THIS LEGAL CUSTODY MATTER AND THAT THE COURT HAS ALREADY SHOWN BIAS AND INABILITY TO BE FAIR TO THE PETITIONER IN THIS MATTER. NOT ONLY DID THE COURT APPEAR TO BE BIASED TOWARDS THE PETITIONER AT THE JULY 16, 2020 CONFERENCE, BUT MR. HARRIS APPEALED THE COURT'S DECISION TO THE NEVADA COURT OF APPEALS AND WAS SUCCESSFUL. HE FEARS THAT WILL ONLY ADD TO THE BIAS HE FEELS THAT JUDGE HARTE HARBORS AGAINST HIM. READING THE TRANSCRIPT FROM THE JULY 2020 CONFERENCE (A PREVIOUSLY SUBMITTED EXHIBIT) IT IS EASY TO SEE THAT JUDGE HARTE HAD A PREDTERMINED OUTCOME FOR THIS CASE. THE NEVADA COURT OF APPEALS CAME TO THE SAME CONCLUSION IT APPEARS WHEN THEY COMMENTED ON THAT ISSUE IN THEIR REVERSAL ORDER. "IN FACT, THE FIRST ACTION THE DISTRICT COURT TOOK AFTER ITS INTRODUCTORY COMMENTS WAS TO GRANT FIGUEROA SOLE LEGAL AND SOLE PHYSICAL CUSTODY. FIGUEROA HAD MADE NO ARGUMENTS REGARDING ANY SUBJECT AT THAT POINT." HARRIS v. FIGUEROA 2021 WL 5176842 \*3 THE PETITIONER FEELS THAT THE COURT DID NOT WANT TO HEAR THE CASE ON THE MERITS AT ALL. LATER, WHEN THE COURT REFERRED TO THE PETITIONER'S ANSWER OR BRIEF TO FIGUEROA'S MOTION FOR CUSTODY THE COURT SAID THAT IT READ MR. HARRIS' BRIEF "VERY QUICKLY." IN THE CLOSING SECONDS OF THE SIX MINUTE HEARING THE



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R. D. Harris

Ronald David Harris

PRINTED NAME

May 25, 2022

3rd attempt

R. D. Harris

6-27-22

**THIS SEALED  
DOCUMENT,  
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567 - 569  
WILL FOLLOW VIA  
U.S. MAIL**

*Heather L. Hemin*  
CLERK OF THE COURT

CSERV  
Name: Ronald Harris #584414  
Address: NECX PO Box 5000  
Mtn. City, TN. 37683  
Telephone:                       
Email Address:                       
In Proper Person

DISTRICT COURT  
CLARK COUNTY, NEVADA

<u>Figueroa</u> Plaintiff,  vs. <u>Harris</u> Defendant.	CASE NO.: <u>D-20-606828-C</u> DEPT: <u>N</u>  <b>CERTIFICATE OF SERVICE</b>
--	---

I, (name of person who served the document) Ronald Harris,  
declare under penalty of perjury under the law of the State of Nevada that the following is true  
and correct. That I served the: (check all that apply)

- ☒ Motion      ☐ Answer      ☐ Financial Disclosure Form  
☐ Opposition      ☐ Reply      ☐ Notice of Entry of Judgment / Order / Decree  
☒ Other: Writ of Mandamus Petition

In the following manner: (check one)

☒ Mail: By depositing a copy in the U.S. Mail in the State of Nevada, postage prepaid, on  
the (day) 27 of (month) June, 2022 addressed to:

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

Jenn Figueroa  
3874 Calle De Este

☐ Electronic: Through the Court's electronic service system on (date) \_\_\_\_\_  
at (time) \_\_\_\_\_ a.m. ☐ p.m.

DATED this 27 day of June, 2022

Submitted By: (Signature) ▶

*Ronald Harris*  
*Ronald Harris*

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
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Your Name: Ronald Harris #584414  
Address: NECX P.O. Box 5000  
Mountain City, TN 37683-5000  
Telephone: N/A  
Email Address: N/A

**FILED**

AUG 23 2022

*James A. Brown*  
CLERK OF COURT

**District Court  
Clark County, Nevada**

Jennifer Figueroa  
Plaintiff

}

Case No: D-20-606828-C

V

}

Dept: N

Ronald Harris  
Defendant

}

**NOTICE OF APPEAL FROM LEGAL CUSTODY ORDER**

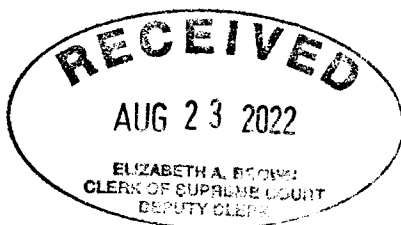
Notice is hereby Given that Ronald Harris, Defendant above named, hereby appeals to the Supreme court of Nevada (from the final Judgment) (from the Order describing it) entered in this action on the 2<sup>nd</sup> day of August, 2022.

The defendant will be filing the pro se Child Custody Fast Track Statement and the Docketing Statement, Civil Appeals in a timely manner.

**CERTIFICATE OF MAILING**

I, Ronald Harris declare under the penalty of perjury and the law of the State of Nevada that on August 11, 2022, I served this notice of the appeal by depositing a copy in the U.S. Mail, postage pre-paid, to:

Jennifer Figueroa  
3874 Calle De Este  
Las Vegas, Nevada 89121



RECEIVED  
APPEALS  
SEP - 8 2022

CLERK OF THE COURT  
573

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

Ronald Harris

D-20-606828-C  
NOAS  
Notice of Appeal  
6006243



Harris # 584414  
NEC  
Po Box 5000  
Mtn. City, TN.  
37683

Supreme Court of Nevada  
Office of the Clerk  
201 S. Carson Street  
Suite 201  
Carson City, Nevada

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IS NOT RESPONSIBLE FOR THE MAILING

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P.O. Box 5000

Mt. Vernon, TN 37683



SUPREME COURT FOR THE STATE OF NEVADA

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R. D. H.

RONALD David Harris

May 25, 2022

**FILED**

SEP - 1 2022

*Elizabeth A. Brown*  
CLERK OF COURT

Your Name: Ronald Harris #584414  
Address: NECX P.O. Box 5000  
Mountain City, TN 37683-5000  
Telephone: N/A  
Email Address: N/A

*8th Judicial*  
District Court  
Clark County, Nevada

Jennifer Figueroa  
Plaintiff

}

Case No: D-20-606828-C

V

}

Dept: N

Ronald Harris  
Defendant

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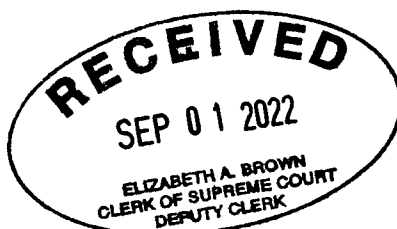
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Jennifer Figueroa  
3874 Calle De Este  
Las Vegas, Nevada 89121

*Ronald Harris*  
Ronald Harris



RECEIVED  
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SEP - 8 2022  
CLERK OF THE COURT  
579

D - 20 - 606828 - C  
NOAS  
Notice of Appeal  
6006244



Hand # 584414

NECX

PO BOX 5000

Mtn. City, TN.  
37683

NECX MAIL ROOM

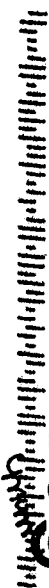
AUG 26 2022

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Supreme Court of Nevada  
Office of the Clerk  
201 South Carson St. Suite 201  
Carson City, Nevada

89701

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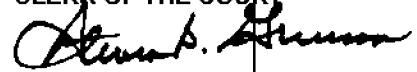
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MOUNTAIN CITY, TN 37683  
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THE DEPARTMENT OF CORRECTION/NECX  
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09.



1 ASTA

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

10 JENNIFER FIGUEROA,

11 Plaintiff(s)

12 vs.

13 RONALD DAVID HARRIS,

14 Defendant(s),  
15

Case No: D-20-606828-C

Dept No: Z

16  
17 **CASE APPEAL STATEMENT**  
18

19 1. Appellant(s): Ronald David Harris

20 2. Judge: Mathew Harter

21 3. Appellant(s): Ronald David Harris

22 Counsel:

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

25 4. Respondent (s): Jennifer Figueroa

26 Counsel:

27 Jennifer Figueroa  
28 3874 Calle De Este  
Las Vegas, NV 89121

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

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

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

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

7 8. Appellant Granted Leave to Proceed in Forma Pauperis: Yes, August 8, 2022

8 Appellant Filed Application to Proceed in Forma Pauperis: Yes,  
9 Date Application(s) filed: August 4, 2022

10 9. Date Commenced in District Court: April 22, 2022

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

12 Type of Judgment or Order Being Appealed: Misc. Order

13 11. Previous Appeal: Yes

14 Supreme Court Docket Number(s): 81746, 84980

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

16 Appeal involves Child Custody and/or Visitation: Custody and Visitation

17 13. Possibility of Settlement: Unknown

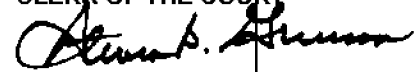
18 Dated This 8 day of September 2022.

19 Steven D. Grierson, Clerk of the Court

20  
21 /s/ Amanda Hampton  
22 Amanda Hampton, Deputy Clerk  
23 200 Lewis Ave  
24 PO Box 551601  
25 Las Vegas, Nevada 89155-1601  
26 (702) 671-0512

27 cc: Ronald David Harris  
28





ASTA

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

JENNIFER FIGUEROA,

Plaintiff(s)

vs.

RONALD DAVID HARRIS,

Defendant(s),

Case No: D-20-606828-C

Dept No: Z

**CASE APPEAL STATEMENT**

1. Appellant(s): Ronald David Harris

2. Judge: Mathew Harter

3. Appellant(s): Ronald David Harris

Counsel:

Ronald David Harris #584414  
NECX P.O. Box 5000  
Mountain City, TN 37683-5000

4. Respondent (s): Jennifer Figueroa

Counsel:

Jennifer Figueroa  
3874 Calle De Este  
Las Vegas, NV 89121

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

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

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

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

7 8. Appellant Granted Leave to Proceed in Forma Pauperis: Yes, August 8, 2022

8 Appellant Filed Application to Proceed in Forma Pauperis: Yes,  
9 Date Application(s) filed: August 4, 2022

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19 Steven D. Grierson, Clerk of the Court

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22 Amanda Hampton, Deputy Clerk  
23 200 Lewis Ave  
24 PO Box 551601  
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27 cc: Ronald David Harris  
28

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Child Custody Complaint****COURT MINUTES**

July 16, 2020

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

**July 16, 2020      3:30 PM      All Pending Motions**

**HEARD BY:** Harter, Mathew**COURTROOM:** Courtroom 24**COURT CLERK:** Hilary Moffett**PARTIES:**

Isabelle Harris, Subject Minor, not present	
Jenniffer Figueroa, Plaintiff, present	Pro Se
Julian Harris, Subject Minor, not present	
Reagan Harris, Subject Minor, not present	
River Harris, Subject Minor, not present	
Ronald Harris, Defendant, not present	Pro Se

<b>JOURNAL ENTRIES</b>
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**- CASE MANAGEMENT CONFERENCE...RETURN HEARING**

This hearing was held telephonically in accordance with Administrative Order 20-17, out of an abundance of caution, in order to prevent the spread of COVID-19 infection in the community.

Court noted that it could only grant the divorce in related case D-17-547582-D as it did not have jurisdiction over custody at that time.

Upon inquiry, Plaintiff stated that a custody case has never been filed in Tennessee.

Plaintiff confirmed that she received the responses filed by Defendant. Court noted that Defendant will be incarcerated for a long period of time.

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Court noted that Plaintiff requested child support based on the royalties Defendant receives for songwriting. However Court advised that it does not have jurisdiction over child support but that Plaintiff may contact District Attorney Family Support (DAFS) for assistance with interstate child support enforcement.

COURT ORDERED, Plaintiff shall have SOLE LEGAL and SOLE PHYSICAL CUSTODY of the minor children pursuant to Hayes v. Gallagher.

Plaintiff shall prepare the order.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Child Custody Complaint****COURT MINUTES**

December 06, 2021

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

**December 06, 2021    7:00 AM                    Minute Order**

**HEARD BY:**    Burton, Rebecca L.**COURTROOM:**    Chambers**COURT CLERK:**    Mirna Loyola**PARTIES:**

Isabelle Harris, Subject Minor, not present  
Jenniffer Figueroa, Plaintiff, not present                    Pro Se  
Julian Harris, Subject Minor, not present  
Reagan Harris, Subject Minor, not present  
River Harris, Subject Minor, not present  
Ronald Harris, Defendant, not present                    Pro Se

<b>JOURNAL ENTRIES</b>
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- COURT FINDS that this case was previously assigned to Department N. On July 22, 2020, the court entered a Custody Decree. This decision was appealed.

COURT FINDS that on January 4, 2021, while the matter was on appeal, the case was administratively reassigned from Department N to Department Z. The reassignment divests Department N of jurisdiction, and Department Z becomes the original judge of the case.

COURT FINDS that on November 5, 2021, the Court of Appeals entered an Opinion which reversed the referenced order and remanded with instructions for the district court to hold an evidentiary hearing on disputed issues of fact.

EDCR 1.31(b)(13) authorizes the Presiding Judge to assign or reassign all cases pending in the Family

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Division of the District Court.

EDCR 1.60(a) states:

[T]he presiding judge of the family division shall have the authority to assign or reassign cases pending in the family division; . . . . Unless otherwise provided in these rules, all cases must be distributed on a random basis. However, when a case is remanded to a lower court or tribunal for further proceedings, it must be returned to the original judge at the conclusion of these proceedings.

NOW, THEREFORE IT IS ORDERED that Case No. D-20-606828-C shall be temporarily reassigned to Department N for further proceedings as required by the remand and when those further proceedings are completed, the case shall be returned from Department N to Department Z.

IT IS FURTHER ORDERED that the Court's Clerk shall provide a copy of this Minute Order to the parties.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Child Custody Complaint****COURT MINUTES**

December 21, 2021

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

**December 21, 2021    11:00 AM      Further Proceedings**

**HEARD BY:** Harter, Mathew**COURTROOM:** Courtroom 24**COURT CLERK:** Hilary Moffett**PARTIES:**

Isabelle Harris, Subject Minor, not present  
Jenniffer Figueroa, Plaintiff, present      Pro Se  
Julian Harris, Subject Minor, not present  
Reagan Harris, Subject Minor, not present  
River Harris, Subject Minor, not present  
Ronald Harris, Defendant, not present      Pro Se

<b>JOURNAL ENTRIES</b>
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**- FURTHER PROCEEDINGS**

In the interest of public safety due to the Coronavirus pandemic, Plaintiff appeared via video conference through the BlueJeans application. Defendant was not present.

Court NOTED the Court has not been contacted by Defendant or the department of corrections in the state of Tennessee. Further, this matter is on for further proceedings after a remand by the Supreme Court directing the Court to hold an Evidentiary Hearing regarding Plaintiff's request for sole legal custody. Upon Court's inquiry, Plaintiff stated she wants to move forward with her request.

COURT ORDERED Evidentiary HEARING SET on April 26, 2022 at 3:00 PM. The Court will provide Defendant with specific notice of what the hearing is about, affording him an opportunity to file

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pleadings and to provide information to the Court, and affording him the opportunity to appear pursuant to the remand.

CLERK'S NOTE: the Minutes were prepared by Court Clerk, Tristy Cox, who was not present.  
(1/5/2022 TC)

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Child Custody Complaint****COURT MINUTES**

May 31, 2022

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

**May 31, 2022      3:00 PM      Evidentiary Hearing**

**HEARD BY:** Harter, Mathew**COURTROOM:** Courtroom 24**COURT CLERK:** Hilary Moffett**PARTIES:**

Isabelle Harris, Subject Minor, not present  
Jenniffer Figueroa, Plaintiff, present      Pro Se  
Julian Harris, Subject Minor, not present  
Reagan Harris, Subject Minor, not present  
River Harris, Subject Minor, not present  
Ronald Harris, Defendant, present      Pro Se

**JOURNAL ENTRIES****- EVIDENTIARY HEARING**

Matter heard via videoconference.

Court noted that after reading both parties' briefs, it seems that the parties misunderstood the purpose of today's evidentiary hearing. Court advised that the matter was remanded for this Court to make specific findings regarding legal custody. Discussion followed regarding legal custody definition under the Rivero II decision.

Defendant stated that he appealed Judge Bell's Decision and Order, which denied his request to disqualify Judge Harter. Court noted that Judge Bell's Decision was entered on 5/13/22 and, although this Court has not yet received notice of the appeal, the time for Defendant to respond to the

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Decision has not yet passed. Court advised that this matter will be set for a status check, at which point this Court will either stay this matter pending a decision on that appeal, or set an evidentiary hearing if no appeal has been filed. Court advised that the only issue to be addressed by this Court is legal custody and that all other issues will be heard by Department Z.

COURT ORDERED, a status check is SET for 6/9/22 at 11:00 a.m.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Child Custody Complaint****COURT MINUTES**

June 23, 2022

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

**June 23, 2022      11:00 AM      Status Check**

**HEARD BY:** Harter, Mathew**COURTROOM:** Courtroom 24**COURT CLERK:** Sheila Bourne**PARTIES:**

Isabelle Harris, Subject Minor, not present  
Jenniffer Figueroa, Plaintiff, present      Pro Se  
Julian Harris, Subject Minor, not present  
Reagan Harris, Subject Minor, not present  
River Harris, Subject Minor, not present  
Ronald Harris, Defendant, not present      Pro Se

<b>JOURNAL ENTRIES</b>
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- STATUS CHECK: RE STATUS OF DEF'S WRIT

Plaintiff present via BLUEJEANS. Court present via BLUEJEANS.

Matter heard via BLUEJEANS Videoconference.

Upon the matter being called and placed on the record, COURT NOTED, Defendant had previously stated that he was not going to be present for today's Status Check. COURT NOTED the Court Records do not indicate that the Writ Defendant was talking about was ever Filed. COURT NOTED Writ. In *Debiparshad, M.D. v. Dist. Ct. (Landess)*, 137 Nev. \_\_\_, 499 P.3d 597 (2021), the Court concluded that "once a party files a motion to disqualify a judge pursuant to the Nevada Code of Judicial Conduct, that judge can take no further action in the case until the

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motion to disqualify is resolved." Again, that part is done as Chief Judge Bell has made her decision. "When a Writ petition is filed, the court retains jurisdiction over the order challenged therein during the pendency of the Writ petition." Pengilly v. Rancho Santa Fe Homeowners Ass'n, 116 Nev. 646, 650, 5 P.3d 569 (2000).

**COURT ORDERED:**

1. The NOTICE OF EVIDENTIARY HEARING was generated in Odyssey and submitted to the OPEN IN COURT APP for the Court's signature, Filing, and E-Service. The Court's Law Clerk shall get out the Notice to Defendant.
2. The matter is SET on 7.28.22 at 10:00 a.m. EVIDENTIARY HEARING, One (1) hour, each side, Pacific Time, 10:00 a.m. until 12:00 p.m.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Child Custody Complaint****COURT MINUTES**

July 28, 2022

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

**July 28, 2022      11:00 AM      Evidentiary Hearing**

**HEARD BY:** Harter, Mathew**COURTROOM:** Courtroom 24**COURT CLERK:** Sheila Bourne**PARTIES:**

Isabelle Harris, Subject Minor, not present  
Jenniffer Figueroa, Plaintiff, present      Pro Se  
Julian Harris, Subject Minor, not present  
Reagan Harris, Subject Minor, not present  
River Harris, Subject Minor, not present  
Ronald Harris, Defendant, present      Pro Se

<b>JOURNAL ENTRIES</b>
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- EVIDENTIARY HEARING: 10:00 A.M. TO 12:00 P.M. PACIFIC TIME (1 HR EACH SIDE)

BOTH the Parties were present via BLUEJEANS VIDEOCONFERENCE.

Prior to the matter being called and placed on the record, the Court instructed the Courtroom Clerk to E-MAIL BOTH the Parties a copy of the 11/05/2021 Court of Appeals of the State of Nevada case number D606828 No. 81746-COA ORDER REVERSING IN PART AND REMANDING.

Upon the matter being called and placed on the record, COURT NOTED the reason for today's brief hearing is due to the Court of Appeals case number 81746-COA ORDER REVERSING IN PART AND REMANDING, filed on 11/05/2021. COURT NOTED for the record there was an ORDER DENYING Defendant's WRIT, issued yesterday, for Court of Appeals case number 84980. Defendant confirmed

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and discussed he received a copy. COURT NOTED the issue today is a very LIMITED ISSUE; it was REMANDED back to this Court, and for the Parties to take notes for referencing the Court of Appeals case number 81746-COA. COURT NOTED starting on page 7 of the ORDER REVERSING IN PART AND REMANDING, "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." The Court indicated, "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 dispute whether Harris's behavior with his step-daughter renders him unable to participate in important legal decisions for his four children." COURT NOTED reading from page 6, "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." 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. The Court discussed, as indicated last time, Court read the Briefs and kind of discussed the fact that a lot contained in BOTH Briefs seem to be more personal attacks; at the end of the day, this is NOT a Jury Trial; this is a Bench Trial, so if we start and get into areas where things are being said or talked about this Court believes is not relevant to assist this Court in making that determination, the Court will inform both parties. COURT also NOTED to Defendant that the last time lot of the stuff Defendant was requesting, on the last about seeing the children, video chatting, anything other than this LIMITED ISSUE will go back in front of Department Z immediately after this Court renders its DECISION on this LIMITED ISSUE, and Dad stated okay. COURT NOTED the ISSUE is "the ability or lack thereof to cooperate, communicate or compromise in your children's best interest. BOTH the Parties acknowledged what the LIMITED ISSUE is in front of the Court today. COURT NOTED the Parties will NOT get a DECISION today; the matter will be UNDER ADVISEMENT for the Court's Written Decision within the next 21 Days.

Plaintiff Jennifer Figueroa made STATEMENTS regarding the LIMITED ISSUES at today's hearing. See Worksheet.

Defendant Ronald Harris made STATEMENTS regarding the LIMITED ISSUES at today's hearing. See Worksheet.

COURT ORDERED:

1. The matter is UNDER ADVISEMENT for the Court's Written Decision within the next 21 Days.

#### **INTERIM CONDITIONS:**

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**FUTURE HEARINGS:** Jul 28, 2022 11:00AM Evidentiary Hearing  
10:00 a.m. to 12:00 p.m. PACIFIC TIME (1 HR EACH SIDE)  
Courtroom 24 Harter, Mathew

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# Certification of Copy and Transmittal of Record

State of Nevada }  
County of Clark } SS:

Pursuant to the Supreme Court order dated September 27, 2022, I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, do hereby certify that the foregoing is a true, full and correct copy of the complete trial court record for the case referenced below. The record comprises three volumes with pages numbered 1 through 597.

JENNIFER FIGUEROA,

Plaintiff(s),

vs.

RONALD DAVID HARRIS,

Defendant(s),

Case No: D-20-606828-C

Dept. No: Z

now on file and of record in this office.

**IN WITNESS THEREOF**, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 11 day of October 2022.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk