

# IN THE SUPREME COURT OF THE STATE OF NEVADA

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Elizabeth A. Brown  
Clerk of Supreme Court

KIMBERLY WHITE,  
Appellant(s),

vs.

TAMIKA BEATRICE JONES,  
Respondent(s),

Case No: D-19-594413-C

Docket No: 86500

# RECORD ON APPEAL VOLUME 1

ATTORNEY FOR APPELLANT  
KIMBERLY WHITE, PROPER PERSON  
10461 HARTFORD HILLS AVE.  
LAS VEGAS, NV 89166

ATTORNEY FOR RESPONDENT  
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5550 PAINTED MIRAGE RD., STE 320  
LAS VEGAS, NV 89149

D-19-594413-C Tamika Beatrice Jones, Plaintiff. vs. Christopher Charles Judson,  
Defendant.

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**THIS SEALED  
DOCUMENT,  
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1 - 5  
WILL FOLLOW VIA  
U.S. MAIL**

*Heather L. Linn*  
CLERK OF THE COURT

COMC  
Your Name: Tamika Jones  
Address: 4730 East Craig Rd #2088  
City, State, Zip: Las Vegas NV 89115  
Phone: 713 452-2067  
Email: Tamika5809@gmail.com  
Self-Represented Plaintiff

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Tamika Jones

Plaintiff.

CASE NO.: D-19-594413-C

DEPT: Dept. TBD

vs.  
Christopher Judson

Defendant.

**COMPLAINT FOR CUSTODY AND UCCJEA DECLARATION**

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

1. (Name of parent who is a Nevada resident) Tamika Jones has been a resident of the State of Nevada for at least six weeks prior to filing this Complaint.
2. The parties (☒ check one) ☐ have / ☒ have not been married.
3. **Children.** There are (number) 3 minor children at issue:

Child's Name	Date of Birth	State of Residence	How long child lived in the state	Disability
<u>Xy Shone Judson</u>	<u>11/20/11</u>	<u>Nevada</u>	<u>6 years</u>	<u>NA</u>
<u>Xaia Judson</u>	<u>8/13/15</u>	<u>Nevada</u>	<u>3 years</u>	<u>NA</u>
<u>Xionne Judson</u>	<u>5/3/2017</u>	<u>Nevada</u>	<u>3 MGS</u>	<u>NA</u>

**4. UCCJEA Declaration.** (☒ check all that apply)

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

☐ The child(ren) have NOT lived in Nevada for the past six months.

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

Time Period (mo/yr – mo/yr)	Name of Person the Child(ren) Lived With:	City and State	Child's Name (if not all children)
11/18 - present	Tamika Jones	Ferndale, MI Las Vegas, NV	XyShane Judson
08/2015 - 08/2017	Tamika Jones	Ferndale, MI Las Vegas, NV	Xaia Judson
05/2014 - 08/2017	Tamika Jones	Las Vegas, NV	Xienne Judson
_____ - _____			
_____ - _____			

The names and current addresses of each non-parent the children lived with during the last five years are: \_\_\_\_\_

b. **Participation in Other Cases:** (☒ check one)

I ☐ have / ☒ have not participated as a party or witness or in some other capacity in any other case involving the child(ren); (if you have, provide all specifics including the state, the court, children involved, the case number and the date of the child custody order, if any): \_\_\_\_\_

c. **Knowledge of Other Cases:** (☒ check one)

I ☐ do / ☒ do not know of a different case that could affect the current case: (if you do, provide all specifics including the state, the court, parties involved, the case number and the nature of the proceeding): \_\_\_\_\_

d. **Person(s) Who Claim Custody / Visitation:** (☒ check one)

I ☐ do / ☒ do not know of anyone other than the parents who has physical custody of the child(ren) or who claims custody/visitation rights to the child(ren). (if so, list names and addresses of anyone who claims custody/visitation rights) \_\_\_\_\_

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

- ☒ **Birth Certificate.** The man named above is the father listed on the birth certificate(s).
- ☐ **Court Order.** Paternity was already established by a court order through (name of court) \_\_\_\_\_ in case number (case number) \_\_\_\_\_ on (date) \_\_\_\_\_.
- ☐ **DNA Test.** A DNA test shows who is the biological father; a copy is attached.
- ☐ **Parents Lived Together.** The parties lived together at least 6 months before conception and lived together through the period of conception.
- ☐ **Admission.** The man named above openly holds out the child as his own and has accepted the child into his home.

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

- ☐ The parties should share joint legal custody of the child(ren).
- ☒ Plaintiff should have sole legal custody of the child(ren).
- ☐ Defendant should have sole legal custody of the child(ren).

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

- ☐ The parties should share joint physical custody of the child(ren) (each parent must have the child(ren) roughly 40% of the time, or 146 days per year). A proposed parenting timeshare and holiday schedule is attached as Exhibit 1.
- ☐ The (☒ check one) ☐ Plaintiff / ☐ Defendant should have primary physical custody of the child(ren). A proposed parenting timeshare and holiday schedule is attached as Exhibit 1.
- ☐ The (☒ check one) ☐ Plaintiff / ☐ Defendant should have sole physical custody of the child(ren).

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

☒ Domestic Violence

☐ State of Residency

☐ CPS Involvement

☐ Other: \_\_\_\_\_

☐ Military Deployment

9. **Public Assistance.** (☒ *check one*)

☐ None of the parties in this case have ever received state assistance or welfare.

☒ State assistance or welfare has been or is being provided to parties in this case.

10. **Child Support.** Complete the attached Child Support Worksheet that applies to your custody arrangement before you complete this section. (☒ *check one*)

☒ Child support should be paid by (name of parent who should pay child support) Christopher Judson in the amount of (amount) \$ 300 per month. This is based on: (☒ *check one*)

☒ The statutory minimum of \$100/month per child.

☐ The calculation from the attached Child Support Worksheet.

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

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

☐ I'm not sure how much child support should be paid, and ask the court to set support.

11. **Child Support Arrears.** (☒ *check one*)

☐ No back child support or arrears are requested.

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

☒ Back child support should be paid by (name of parent who should pay back child support) Christopher Judson from (date back child support should begin) 11/20/2011 to present.

12. **Wage Withholding.** (☒ *check one*)

☐ A wage withholding order should be entered to secure payment of any support owed.

☐ A wage withholding order should NOT be entered.



**13. Health Insurance.** (☒ check all that apply)

☐ Both parties should provide future health insurance for the minor child(ren) if available.

☒ Future health insurance for the minor child(ren) should be provided by (name of parent) Tamika Jones if available.

**14. Unreimbursed Medical Expenses.** (☒ check one)

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

☒ Any expenses not covered by insurance should be paid by (name of parent) Tamika Jones due to the following extraordinary circumstances:  
(explain) My job has me and the children insured

**15. "30/30 Rule."** (☒ check one)

☐ The Court should order the 30/30 Rule for payment of all unreimbursed medical / dental expenses.<sup>1</sup> (see below for explanation)

☒ The Court should NOT order the 30/30 Rule for payment of unreimbursed medical / dental expenses.

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

☒ The Plaintiff should claim the following children as dependents for tax purposes every year: (insert child(ren)'s names): Y'Shone Xara Xionne

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

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

☐ The tax deduction should be allocated per federal law.

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

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

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

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

This request is made pursuant to NRS 41.298

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

**Plaintiff requests:**

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

DATED (month) August (day) 10, 2014.

Submitted By: (your signature) Tamika Jones  
(print your name) Tamika Jones

### **VERIFICATION**

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

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

DATED (month) August (day) 10, 2019.

Submitted By: (your signature) ▶ Tamika Jones  
(print your name) Tamika Jones

I am not sure how to fill out the visitation form. I just wanted Christopher to be supervised on his weekend visits. But not by his mother or grandparents. I want the supervision approved by the judge. I also want Kimberly White and her parents to have supervised weekend visits. If I'm able to I would like the ENTIRE yr done this way.



## EXHIBIT 1: Parenting Timeshare and Holiday Schedule

☐ No Visitation Requested Because: (explain) \_\_\_\_\_

<p><b>Regular Schedule:</b>  <u>Be very specific. Include the times and days of the week for each parent's timeshare.</u>          (ex.: Mom: Saturday 7pm – Wednesday 3pm,          Dad: Wednesday 3pm – Saturday 7pm)</p>	<p><u>I'm filing for full custody. I rather that Chris have supervised weekend visits with the kids. Also I rather his mother and grandparents come on seperate days then him</u></p>
<p><b>Summer Schedule:</b></p>	<p><input type="checkbox"/> Same as the regular schedule.  <input checked="" type="checkbox"/> Other: <u>Chris every weekend with supervised visits</u></p>
<p><b>Mother's Day and Mother's Birthday:</b></p>	<p><input type="checkbox"/> Mother every year from 9am – 7pm.  <input checked="" type="checkbox"/> Other: <u>Tamika - 6AM - 5AM</u></p>
<p><b>Father's Day and Father's Birthday:</b></p>	<p><input checked="" type="checkbox"/> Father every year from 9am – 7pm.  <input checked="" type="checkbox"/> Other: _____</p>
<p><b>Child's Birthday:</b></p>	<p><input type="checkbox"/> <u>Even years</u> with (parent) _____  <u>Odd years</u> with (parent) _____          *Time shall be from 9am – 7pm.*  <input type="checkbox"/> Other: _____</p>
<p><b>3 Day Weekends:</b></p>	<p><input type="checkbox"/> <u>Even Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____          President's Day, Independence Day, Nevada Admissions Day with the other parent.  <u>Odd Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____          President's Day, Independence Day, Nevada Admissions Day with the other parent.          *Time begins when school lets out the day before the holiday weekend (or 3pm if no school), and ends the day following the holiday weekend when school resumes (or 9am).*          **If Independence Day falls on a Tuesday, Wednesday, or Thursday, the time shall be from July 3 at 9am until July 5 at 9am.**  <input type="checkbox"/> Other: _____</p>

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

## Worksheet A - Primary Physical Custody Child Support Calculation Worksheet

If you are asking for primary physical custody, fill out this worksheet and attach it to the document you are filing. Primary physical custody exists when one parent has the child more than 60% (219 days) of the time calculated over a one year period.

### ① Determine the Gross Monthly Income (GMI) of the non-custodial parent (estimate if unknown).

Gross monthly income is the income received from all sources. If you do not know the parent's gross monthly income, you can calculate the number with the formula on the last page.

### ② Determine Child Support Obligation.

GMI \$ <u>1540</u>	X	<div style="display: inline-block; vertical-align: top; margin-right: 10px;"><div>.18 (for 1 Child)</div><div>.25 (for 2 Children)</div><div>.29 (for 3 Children)</div><div>.31 (for 4 Children)</div><div>Add .02 for each additional child</div></div>	=	<div>Monthly Child Support:</div> <div>\$ <u>435</u> OR \$100 per child \$ <u>145</u></div> <div>(write the higher amount)</div> <div>Higher Amount: \$ _____</div>
-----------------------	---	--	---	---

### ③ Apply the Presumptive Maximum (rarely applicable).

Usually, this is the maximum amount a parent may be required to pay per month per child (and can *reduce* – not increase – the amount that would be owed under step ②). This amount changes every year on July 1<sup>st</sup> and can be found by going to <http://nycourts.gov> and searching the phrase “presumptive maximum.” Make sure you are using the most current chart.

Presumptive Maximum Reduction to: \$ _____ Or <input type="checkbox"/> not applicable
--

### ④ Deviations. You may request an amount of child support that is lower or higher than the amount in ② or ③, but your reason(s) must be based upon one of the following factors. (☒ check all that apply)

- |   |   |
|---|---|
| <div><input checked="" type="checkbox"/> The cost of health insurance</div> <div><input checked="" type="checkbox"/> The cost of childcare</div> <div><input type="checkbox"/> Special educational needs</div> <div><input checked="" type="checkbox"/> Age of the child</div> <div><input type="checkbox"/> Parent's legal responsibility to support others</div> <div><input type="checkbox"/> The value of services contributed by either parent</div> <div><input type="checkbox"/> Public assistance paid to support the child</div> | <div><input checked="" type="checkbox"/> Expenses reasonably related to the mother's pregnancy and confinement</div> <div><input checked="" type="checkbox"/> Cost of transportation for visitation if the custodial parent moved out of the jurisdiction</div> <div><input type="checkbox"/> The amount of time the child spends with each parent</div> <div><input checked="" type="checkbox"/> Any other necessary expenses for the benefit of the child</div> <div><input type="checkbox"/> The relative income of both parents</div> |
|---|---|

◆ Explain: Single mother of three

Total Child Support: \$ <u>450</u>
---------------------------------------



## Worksheet B - Joint Physical Custody Child Support Calculation Worksheet

If you are asking for joint physical custody, fill out this worksheet and attach it to the document you are filing. A joint physical custody arrangement exists when each parent has the child at least 40% (146 days) of the time calculated over a one year period.

Parent 1's Name:

Parent 2's Name:

### ① Determine Each Parent's Gross Monthly Income (GMI) (estimate other parent's income if unknown).

*Gross monthly income is the income received from all sources. If you do not know a parent's gross monthly income, you can calculate the number with the formula on the last page.*

### ② Determine Each Parent's Child Support Obligation.

Parent 1 GMI  
\$

.18 (for 1 Child)

.25 (for 2 Children)

.29 (for 3 Children)

.31 (for 4 Children)

Add .02 for each additional child

X

=

Parent 2 GMI  
\$

Parent 1's Monthly Child Support:

\$  OR \$100 per child \$

(write the higher amount and use in step 3)

Higher Amount: \$

Parent 2's Monthly Child Support:

\$  OR \$100 per child \$

(write the higher amount and use in step 3)

Higher Amount: \$

### ③ Subtract the lower earning parent's amount of child support in ② from the higher earning parent's amount.

Higher  
\$

-

Lower  
\$

=

Child Support Obligation  
\$

paid by

Name of higher income parent:

### ④ Apply the Presumptive Maximum (*rarely applicable*).

Usually, this is the maximum amount a parent may be required to pay per month per child (and can *reduce* – not increase – the amount that would be owed under step ③). This amount changes every year on July 1<sup>st</sup> and can be found by going to <http://nycourts.gov> and searching the phrase “presumptive maximum.” Make sure you are using the most current chart.

Presumptive Maximum

Reduction to:

\$

Or ☐ not applicable

### ⑤ Deviations. You may request an amount of child support that is lower or higher than the amount in ③ or ④, but your reason(s) must be based upon one of the following factors. (☒ check all that apply)

☐ The cost of health insurance

☐ The cost of childcare

☐ Special educational needs

☐ Age of the child

☐ Parent's legal responsibility to support others

☐ The value of services contributed by either parent

☐ Public assistance paid to support the child

☐ Expenses reasonably related to the mother's pregnancy and confinement

☐ Cost of transportation for visitation if the custodial parent moved out of the jurisdiction

☐ The amount of time the child spends with each parent

☐ Any other necessary expenses for the benefit of the child

☐ The relative income of both parents

Explain:

Total Child Support:

\$

**To Determine a Parent's Gross Monthly Income:**

Gross monthly income is a parent's income from all sources before taxes. To find this number, calculate the following:

	Parent 1	Parent 2
*Monthly Wages from Employment (before taxes)	\$ NA	\$
Monthly Tip Income	\$ NA	\$
Monthly Self-Employment Income (after business expenses)	\$ NA	\$
Monthly Unemployment Benefits	\$ NA	\$
Social Security	\$ NA	\$
Social Security Disability	\$ NA	\$
Retirement / Pension	\$ NA	\$
Other: _____	\$ NA	\$
<b>TOTAL INCOME</b>	\$ NA	\$

**\*To Determine a Parent's Employment Income:**

If you do not know a parent's gross monthly income from employment, you can calculate the number if you know the 1) hourly wage, 2) weekly income, or 3) annual income.

Gross Monthly Income Based on Annual Income:

$$\text{Annual Income } \$1500 \div 12 = \$125$$

Gross Monthly Income Based on Weekly Income:

$$\text{Weekly Income } \$375 \times 52 = \text{Annual Income } \$19,500$$

$$\text{Annual Income } \$19,500 \div 12 = \$1,625$$

Gross Monthly Income Based on Hourly Wage:

$$\text{Hourly Wage } \$12 \times \text{\# of Hours Worked per week } 40 = \text{Weekly Income } \$480$$

$$\text{Weekly Income } \$480 \times 52 = \text{Annual Income } \$24,960$$

$$\text{Annual Income } \$24,960 \div 12 = \$2,080$$

1 SUMM

Plaintiff's Name:

Tamika Jones

2 Address:

4730 East Craig Rd #2028  
Las Vegas NV, 89115

3 Telephone:

313-452-5009

Email Address:

TamikaJ8092@gmail.com

5  
6 **DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

7 Tamika Jones  
8 Plaintiff,

CASE NO.: \_

D-19-594413-C

9 vs.

DEPT: \_

Dept. TBD

10 Christopher Judson  
11 Defendant.

**SUMMONS**

12 **NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**  
13 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND IN WRITING WITHIN**  
14 **21 DAYS. READ THE INFORMATION BELOW VERY CAREFULLY.**

15 To the Defendant named above:

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

19 ☐ Divorce.

20 ☐ Annulment.

21 ☐ Legal Separation.

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

23 ☐ Other: \_\_\_\_\_

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

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

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

10                   STEVEN D. GRIERSON  
11                   CLERK OF COURT

12                   By:   
13                   Deputy Clerk

8/12/19

Date

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

17                   Regional Justice Center  
18                   200 Lewis Avenue  
19                   Las Vegas, Nevada 89155



20 Issued on Behalf of Plaintiff:

21 Plaintiff's Name: Tamika Jones  
22 Address: 4730 East Craig Rd #2088  
23 City, State, Zip Las Vegas NV 89149

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

*Heaven S. Shuman*  
CLERK OF THE COURT

MOT  
Name: Tamika Jones  
Address: 4730 East Craig Rd #2088  
Las Vegas NV 89115  
Telephone: 313-452-5004  
Email Address: Tamika58092@gmail.com  
In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

<u>Tamika Jones</u> Plaintiff.	CASE NO.: <u>D-19-594413-C</u> DEPT: <u>Dept. TBD</u>
vs. <u>Christopher</u> Defendant.	DATE OF HEARING: <u>9.19.2019</u> TIME OF HEARING: <u>10:15 am</u> Oral Argument Requested: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**MOTION AND NOTICE OF MOTION FOR ORDERS FOR TEMPORARY CUSTODY,  
VISITATION, AND/OR CHILD SUPPORT**

TO: Name of Opposing Party and Party's Attorney, if any. \_\_\_\_\_

PLEASE TAKE NOTICE that a hearing on this motion will be held on the date and time  
above before the Eighth Judicial District Court - Family Division located at: (☒ check one)

- ☐ The Family Courts and Services Center, 601 N. Pecos Road Las Vegas, Nevada 89101.
- ☐ The Regional Justice Center, 200 Lewis Avenue Las Vegas, Nevada 89101.
- ☐ The Child Support Center of Southern Nevada, 1900 E. Flamingo Rd #100, LV NV 89119.

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

Submitted By: Tamika Jones  
(☒ check one) ☒ Plaintiff ☐ Defendant In Proper Person

### MOTION

(Your name) Tamika Jones, in Proper Person, moves this Court for an Order granting temporary custody, visitation, and/or child support. (☒ *check one*)

- ☒ I tried to resolve this issue with the other party before filing this motion.
- ☐ I did not try to resolve this issue with the other party before filing this motion. Any attempt to resolve the issue would have been useless or impractical because *(explain why you did not try to resolve this issue directly with the other party before filing this motion)*
- 
- 

### Financial Disclosure Form ("FDF") Certification

(☒ *check one*)

- ☐ I filed a Financial Disclosure Form in the last 6 months and have no changes to report.
- ☐ I understand that I must file my FDF within 2 judicial days of filing this motion to support my request for temporary child support. Failure to file a timely, complete, and accurate FDF may result in the court ruling against me and/or imposing sanctions.

### POINTS AND AUTHORITIES LEGAL ARGUMENT

When determining physical custody of a child, the sole consideration of the court is the best interest of the minor child. In determining the best interest of the child, the court shall consider:

a) The wishes of the child if the child is of sufficient age and capacity to form an intelligent preference as to his or her custody; b) Any nomination of a guardian for the child by a parent; c) Which parent is more likely to allow the child to have frequent associations and a continuing relationship with the noncustodial parent; d) The level of conflict between the parents; e) The ability of the parents to cooperate to meet the needs of the child; f) The mental and physical health of the parents; g) The physical, developmental and emotional needs of the child; h) The nature of the relationship of the child with each parent; i) The ability of the child to maintain a relationship with any sibling; j) Any history of parental abuse or neglect of the child or a sibling of the child; k) Whether either parent or any other person seeking custody has engaged in an act of domestic violence against the child, a parent of the child or any other person residing with the

child; and l) Whether either parent or any other person seeking custody has committed any act of abduction against the child or any other child. NRS 125C.0035.

**There is a presumption that joint physical custody and joint legal custody would be in the best interest of the child if: 1) the parents have so agreed; or 2) a parent has demonstrated, or attempted to demonstrate but had his or her efforts frustrated by the other parent, an intent to establish a meaningful relationship with the child.** NRS 125C.0025. A court may award one parent primary physical custody if it determines that joint physical custody is not in the best interest of the child. NRS 125C.003.

The court shall also determine child support under NRS 125B.070 and NRS 125B.080. A noncustodial parent shall pay the following percentage of gross monthly income:

For one child, 18% of gross monthly income;  
For two children, 25% of gross monthly income;  
For three children, 29% of gross monthly income; and  
For each additional child, an additional 2% of gross monthly income.

A parent must pay a minimum of \$100 per child, per month in child support. The maximum amount to be paid per month per child varies according to the parent's income. The court can deviate from the amounts above based on the factors listed in NRS 125B.080.

### FACTS AND ARGUMENT

- Number of Minor Children.** The parties have (*number*) 3 minor children in common.
- Paternity.** (☒ *check one*)  
☒ Paternity is not disputed.  
☐ Paternity needs to be determined. ☐ A DNA test is requested.
- Children's Residency.** The minor children's names, dates of birth, states and lengths of residence are as follows:

Child's Name:	Date of Birth	State of Residence:	How long child has lived in the state:	Disability
Xy'Shone Judson	1/20/2011	Nevada	6 years	NA
Xa'ra Judson	8/13/2015	Nevada	3 years	NA
Xionne Judson	5/03/2019	Nevada	3 mos	NA

4. **Jurisdiction.** (☒ check one)

☒ The children are residents of Nevada and have lived in Nevada for at least the past 6 months. This Court has the necessary UCCJEA jurisdiction to enter custody orders.

☐ The children have not lived in Nevada for the past 6 months, however, Nevada should take jurisdiction over custody because: *(explain why Nevada is the proper state to issue custody orders):* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**A. Request for Temporary Custody and Visitation**

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

☐ Joint legal custody of the minor children should be awarded to both parties.

☒ Sole legal custody of the children should be granted to *(name of parent)*

Tamika Jones because *(explain):*  
My children live with me and I provide for  
them. They are on my leasing agreement.  
Christopher is not fit because he is a  
drug felon. He is physically, emotionally, mentally  
and verbally abusive.

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

Joint physical custody exists when each parent has physical custody of the children at least 40% (146 days) of the time calculated over a one year period.

Primary physical custody exists when one parent has physical custody of the children more than 60% (219 days) of the time calculated over a one year period.

☐ The parties should have joint physical custody of the minor children with a timeshare as proposed in Exhibit 1.



☒ Primary physical custody of the minor children should be granted to (name of parent)  
Tamika Jones with the other parent having visitation as proposed in Exhibit 1.

☐ Sole physical custody of the minor children should be granted to (name of parent)  
\_\_\_\_\_.

7. **Holiday Visitation.**

☐ The proposed holiday visitation schedule is attached as Exhibit 1. The holiday visitation schedule should control when in conflict with the regular visitation schedule.

8. **Best Interest of the Children.** The proposed temporary physical custody and visitation arrangements are in the children's best interest because (explain why your proposed custody and visitation order is in the child(ren)'s best interest):

I Tamika Jones take care of my children by myself. I buy clothes, shoes, diapers & household utilities. I also pay all my rent and bills by myself. No one in the state of Nevada is helping me financially. I am a good mother to my children. I am not unfit or unstable. Chris is just bitter because I am fed up with him. Christopher Judson is mentally, physically, and verbally abusive to me. I did not report the physical abuse because I knew this would happen. It has been a few times Chris has punched me and busted my lip. A wk after I had my third child, Chris told me "Shut the fuck up, before I knock you the fuck out." He calls me dumb fucking idiots and stupid every day. So no I can not be with this man. He's trying to withhold my children because he is bitter.

(Attach additional pages if more space is needed)

### B. Request for Temporary Child Support

9. **Public Assistance.** (☒ check one)

- ☐ I have never received Temporary Assistance for Needy Families (TANF).
- ☐ I am now or have received Temporary Assistance for Needy Families (TANF) in the past.

10. **Child Support.** (☒ check one)

- ☐ Child support is being handled through the District Attorney, Family Support Division, case (insert case number) R\_\_\_\_\_ and should continue as ordered in that case.
- ☐ Based on my proposed physical custody arrangement, (name of parent who should pay child support) \_\_\_\_\_ should pay (amount) \$\_\_\_\_\_ per month in child support.
- ☐ Child support should be set at the statutory minimum of \$100/month per child.
- ☐ I'm not sure how much child support should be paid. The judge should set child support.

☒ Other (explain how much child support should be ordered and how you came up with the amount of child support): I just recently filed for  
child support. I have not heard anything back  
yet.

### C. Other Relief

11. In addition to the relief requested above, I would like the Court to also order the following:

(Explain anything else that you would like the judge to order, or enter "N.A." if you do not want anything else. Be specific.)

I want visitation rights for  
Christopher and his mother. But on separate  
days. If I am granted custody, I do not want  
them to visit my children on the same day.

I respectfully ask the Court to grant me the relief requested above, including an award of attorney's fees if I am able to retain an attorney for this matter, and any other relief the Court finds appropriate.

DATED August 9, 2014.

Submitted By: (your signature) Tamika Jones  
(print your name) Tamika Jones

**DECLARATION IN SUPPORT OF MOTION FOR TEMPORARY CUSTODY,  
VISITATION, AND/OR CHILD SUPPORT**

I declare, under penalty of perjury:

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

2. Additional facts to support my requests include: (write anything else that the judge should know to make a decision about your case, or write "N/A" if there is nothing else to add)

Your honor I am truly fed up with Christopher Judson.  
The fact that I no longer want to be with him,  
he is bitter and his mother is on his side.

3. Any Exhibit(s) in support of this Motion will be filed separately in an Exhibit Appendix.

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

DATED August 9, 2014.

Submitted By: (your signature) Tamika Jones  
(print your name) Tamika Jones

## EXHIBIT 1: Parenting Timeshare and Holiday Schedule

☐ No Visitation Requested Because: (explain) \_\_\_\_\_

<p><b>Regular Schedule:</b>  <i><b>Be very specific. Include the times and days of the week for each parent's timeshare.</b></i>  <i>(ex.: Mom: Saturday 7pm – Wednesday 3pm,  Dad: Wednesday 3pm – Saturday 7pm)</i></p>	<p><i>I want to have full custody of my kids and believe that Christopher should be granted supervised visitation rights on weekends. I believe he should have the Judge have someone accompanying him while he visits. Not his mother.</i></p>
<p><b>Summer Schedule:</b></p>	<p><input type="checkbox"/> Same as the regular schedule.  <input type="checkbox"/> Other: _____</p>
<p><b>Mother's Day and Mother's Birthday:</b></p>	<p><input type="checkbox"/> Mother every year from 9am – 7pm.  <input type="checkbox"/> Other: _____</p>
<p><b>Father's Day and Father's Birthday:</b></p>	<p><input type="checkbox"/> Father every year from 9am – 7pm.  <input type="checkbox"/> Other: _____</p>
<p><b>Child's Birthday:</b></p>	<p><input type="checkbox"/> <u>Even years</u> with (parent) _____  <u>Odd years</u> with (parent) _____  *Time shall be from 9am – 7pm.*  <input type="checkbox"/> Other: _____</p>
<p><b>3 Day Weekends:</b></p>	<p><input type="checkbox"/> <u>Even Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____  President's Day, Independence Day, Nevada Admissions Day with the other parent.  <u>Odd Years:</u> MLK Jr. Day, Memorial Day, Labor Day with (parent) _____  President's Day, Independence Day, Nevada Admissions Day with the other parent.  *Time begins when school lets out the day before the holiday weekend (or 3pm if no school), and ends the day following the holiday weekend when school resumes (or 9am).*  **If Independence Day falls on a Tuesday, Wednesday, or Thursday, the time shall be from July 3 at 9am until July 5 at 9am.**  <input type="checkbox"/> Other: _____</p>

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

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Tamika Jones

Plaintiff/Petitioner

Christopher Judson

Defendant/Respondent

Case No. \_\_\_\_\_

Dept. \_\_\_\_\_

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

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

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

Party filing Motion Opposition: Tamika Jones Date 8/9/19

Signature of Party or Preparer Tamika Jones

**THIS SEALED  
DOCUMENT,  
NUMBERED PAGE(S)  
32 - 39  
WILL FOLLOW VIA  
U.S. MAIL**

*Heather L. Hemin*  
CLERK OF THE COURT

EXMT

Your Name: Tamika Jones  
Address: 8447 Sequoia Grove  
Las Vegas NV 89115  
Telephone: 313-452-5009  
Email Address: Tamika Jones  
Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Tamika Jones  
Plaintiff,  
vs.  
Christopher Judson  
Defendant.

CASE NO.: D-19-594413-C  
DEPT: 5

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

☒ Plaintiff / ☐ Defendant, (your name) Tamika Jones  
in proper person, hereby files an Ex Parte Motion for an Order Shortening Time pursuant to  
EDCR 5.513, and requests that this Court shorten the time in which to hear the (title of the  
upcoming hearing) Motion for Temporary orders.

This application is based upon the pleadings and papers on file and the declaration of  
Movant attached to this motion.

DATED August 14, 2019.

Submitted By: (your signature) Tamika Jones  
(print your name) Tamika Jones



**DECLARATION IN SUPPORT OF EX PARTE MOTION FOR AN ORDER**  
**SHORTENING TIME**

I declare, under penalty of perjury:

1. I am the Movant in this case. I have personal knowledge of the facts contained herein and am competent to testify to these facts.

2. There is a hearing scheduled for (current court date) 09/14/2019 at  
(time of hearing) 10:15 AM.

3. (☒ check one)

☐ The other party was already served with a copy of the underlying motion on which the hearing is based. The motion was served (☒ check one) ☐ by mail / ☐ by personal service on (date of service) \_\_\_\_\_.

☒ The other party HAS NOT been served with a copy of the motion yet. I understand emergency hearings are not normally granted until the other party is served with the motion. The judge should consider my request without waiting for the other party to be served because (explain why you need the judge to consider your request before the other party is served)

I'm being My children are being withheld from me.

4. There is an emergency that cannot wait until the regular court date to be heard. The emergency is: (explain why you need the judge to hear your case quickly)

I would like for the hearing to be sooner so I can see my children and have them in my possession.

5. This Ex Parte Motion for an Order Shortening Time is made in good faith.

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

DATED August 14, 2019.

Submitted By: (your signature) Tamika Jones  
(print your name) Tamika Jones

*Heather S. Hemin*  
CLERK OF THE COURT

AOS  
Your Name: Tamika Jones  
Address: 4730 East Craig Rd #2088  
Las Vegas NV 89115  
Telephone: 313-452-5004  
Email Address: Tamika58092@gmail.com  
Self-Represented

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Tamika Jones  
Plaintiff,  
vs.  
Christopher Judson  
Defendant.

CASE NO.: D-14-594413-C  
DEPT: S

**AFFIDAVIT OF SERVICE**

*(this form is to be completed by the person who serves the documents)*

I, (name of person who served the documents) Tamika Jones, declare  
**(complete EVERY SECTION below):**

1. I am not a party to or interested in this action and I am over 18 years of age.
2. I was asked to serve legal documents by (name of the party who asked you to serve the documents) \_\_\_\_\_. (☒ check one)
  - ☐ I know this person because (describe how you know the person, for example, "we work together," "roommates" etc.) \_\_\_\_\_.
  - ☐ I do not know the person above.
3. **What Documents You Served.** I served a copy of the (☒ check all that apply)
  - ☒ Complaint for \_\_\_\_\_
  - ☒ Summons
  - ☐ Joint Preliminary Injunction
  - ☒ Other: Motion for Temporary Custody

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

☐ Plaintiff

☒ Defendant

5. **When You Served.** I personally served the documents on (date you served the documents) (month) August (day) 14, 20 19 at the hour of (time) 4 : 12 ☐ a.m. ☒ p.m. Certified Mail

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

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

\_\_\_\_\_  
Name of Person Served

\_\_\_\_\_  
Address Where Served

\_\_\_\_\_  
City, State, Zip Code

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

\_\_\_\_\_  
Name of Person Served

\_\_\_\_\_  
Address Where Served

\_\_\_\_\_  
City, State, Zip Code

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

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

DATED (month) August (day) 16, 20 19.

Server's Signature: Tamika Jones

Server's Printed Name: Tamika Jones

Residential / Business Address: 4730 East Craig Rd #2088

City, State, Zip: Las Vegas NV 89115

Server's Phone Number: 313-452-5009



1 ACCC  
KENNETH M. ROBBINS, Esq.  
2 Nevada Bar No.: 13572  
732 South 6<sup>th</sup> Street, Suite #100  
3 Las Vegas, NV 89101  
(702) 400-0000 Telephone  
4 (702) 400-0001 Facsimile  
FamilyFirst@HalfPriceLawyers.com  
5 "Unbundled" Attorney for Defendant

6 DISTRICT COURT  
FAMILY DIVISION  
7 CLARK COUNTY, NEVADA

8 TAMIKA JONES,

9 Plaintiff,

10 vs.

11 CHRISTOPHER JUDSON,

12 Defendant.

) Case No.: D-19-594413-C

) Dept.: S

) **ANSWER AND COUNTERCLAIM**  
) **FOR CUSTODY, VISITATION AND**  
) **CHILD SUPPORT**

13  
14 COMES NOW, Defendant, Christopher Judson by and through his attorney of  
15 record, Kenneth M. Robbins, Esq., and hereby states their Answer to the Amended  
16 Complaint filed by the Plaintiff as follows:

17 As to allegations 1, 2, 3, 9, 13, 14 and 17 upon information and belief, Defendant  
18 admits same.

19 As to allegations 4, 5, 6, 7, 8, 10, 11, 15, 16 and 18 upon information and belief,  
20 Defendant specifically denies same.

21 **COUNTERCLAIM FOR CUSTODY, VISITATION AND CHILD SUPPORT**

22 1) That Defendant is and for at least six weeks prior to the filing of this counterclaim,

23 has been a bona fide resident of the County of Clark, State of Nevada, and has  
24

1 actually, physically and corporeally domiciled herein during all of said period of  
2 time.

3 2) There are three minor children the subject of this action; to wit: Nyshone Judson,  
4 born on November 20, 2011, currently 7 years old; Naia Judson, born on August  
5 13, 2015, currently 4 years old, Nionne Judson, born on May 3, 2019, currently 3  
6 months old, hereinafter collectively "the children".

7 3) That Plaintiff is the natural and legal mother of the children.

8 4) At all times relevant, the Defendant is a resident of the County of Clark, State of  
9 Nevada; Defendant is the legal father of the minor children.

10 5) That Nevada is the habitual residence of the minor children and that the children  
11 are residents of the County of Clark. Per the parameters of the UCCJEA and  
12 related Nevada statutes, Nevada is the home state of the children regarding a  
13 custody dispute.

14 6) That Plaintiff and Defendant were never married.

15 7) That no court has ever determined custody, visitation. There is a child support  
16 case R-19-211539-R.

17 8) That both parties be awarded Joint Legal Custody of the minor children.

18 9) That Defendant shall be awarded Primary Physical Custody of the minor children.

19 10) That visitation with Plaintiff shall be every Friday from 6:00 p.m., through  
20 Monday at 7:00 a.m.

21 11) That Plaintiff is not able to pick up children at any time from school.

22 12) That child support be set pursuant to NRS 125B.070 and NRS 125B.08.

23 13) That a wage assignment be ordered for child support.

24 14) That Plaintiff shall provide health insurance for the minor children.

13) That the parties split all un-reimbursed out-of-pocket medical expenses based upon the 30/30 rule.

16) That both parties alternate the dependent tax exemption for the minor children, with Plaintiff claiming the odd years and Defendant claiming the even years.

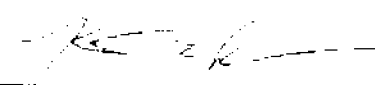
17) That Plaintiff shall pay for Defendant's attorney's fees.

18) For such other and further relief as the Court may deem just and proper.

WHEREFORE, Defendant, Christopher Judson, prays for relief as follows:

1. That Plaintiff take nothing by way of their amended complaint;
2. That the Court grant the relief requested in this counterclaim for custody; and
3. Such other relief as the Court may deem just and proper under the circumstances be ordered.

Respectfully submitted this 22 day of September, 2019.

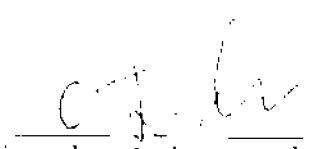
  
\_\_\_\_\_  
Kenneth M. Robbins, Esq.  
Nevada Bar No.: 13572  
Attorney for Defendant

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**VERIFICATION**

Comes now, Christopher Judson, and declares, under penalties of perjury, that I have read the **ANSWER AND COUNTERCLAIM FOR CUSTODY, VISITATION AND CHILD SUPPORT** and know the contents thereof; and that the same is true of my own knowledge, except those matters therein contained stated upon information and belief and as to those matters, I believe them to be true and correct.

Dated this 6 day of September, 2019

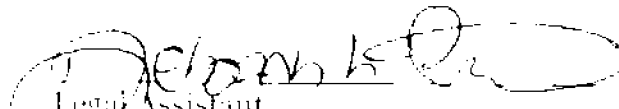
  
\_\_\_\_\_  
Christopher Judson, Defendant

**CERTIFICATE OF SERVICE**

Thereby certify that on the 6<sup>th</sup> day of September, 2019, a copy of the foregoing **ANSWER AND COUNTERCLAIM** was served upon the following persons and entities entitled to notice, by mailing a true copy thereof, via US Mail, first class mail postage prepaid, or by electronic service via the Eighth Judicial District Court E-filing System, to the following at their last known address:

TAMIKA JONES  
4730 East Craig Road, #2088  
Las Vegas, Nevada 89115  
Plaintiff in Proper Person

Dated this 6<sup>th</sup> day of September, 2019.

  
Legal Assistant



)  
)  
)  
) CASE NO. D-19-594413-C  
) DEPT. NO. S  
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1 Complex Litigation procedure by filing and serving a "Request to Opt-  
2 in to Detailed Financial Disclosure Form and Complex Litigation  
3 Procedure" certifying that:

4 (A) Either party's individual gross income, or the combined gross  
5 income of the parties, is more than \$250,000 per year; or  
6

7 (B) Either party is self-employed or the owner, partner, managing  
8 or majority shareholder, or managing or majority member of a business. If none  
9 of the foregoing applies or neither party filed a Request to Opt-in, you must  
10 complete the General Financial Disclosure Form.  
11

12 **2. Concurrently failure to Complete, File and Serve to the other**  
13 **Party the Financial Disclosure Form may result in the imposition of**  
14 **Sanctions pursuant to NRCP 16.2(d).** Such initial disclosures shall include the  
15 following information and documentation:

16  
17 (A) **Bank and Investment Statements.** Copies of all monthly or  
18 periodic bank, checking, savings, brokerage, investment, and  
19 security account statements in which any party has or had an  
20 interest for the period commencing 6 months prior to the  
21 service of the Summons and Complaint through the date of the  
22 disclosure;

23 (B) **Insurance Policies.** Copies of all policy statements and  
24 evidence of costs of premiums for health and life insurance  
policies covering either party or any child of the relationship;

1           **(C) Tax Returns.** Copies of all personal and business tax returns,  
2 balance sheets, profit and loss statements, and all documents that may assist in  
3 identifying or valuing any business or business interest for the last 3 completed  
4 calendar or fiscal years with respect to any business or entity in which any party  
5 has or had an interest within the past 12 months;  
6

7  
8           **(D) Proof of Income.** Proof of income of the party from all  
9 sources, specifically including W-2, 1099, and K-1 forms, for the past 2  
10 completed calendar years, and year-to-date income information (paycheck stubs,  
11 etc.) for the period commencing 6 months prior to the service of the Summons  
12 and Complaint through the date of the disclosure; and  
13

14  
15           **(E) Exhibits.** A copy of every other document or exhibit, including  
16 summaries of other evidence, that a party expects to offer as evidence at trial in  
17 any manner.  
18

19           3. No later than 90 days after the Financial Disclosure Form is due, you  
20 must disclose the identity of any witnesses (any person who may be used at trial  
21 to present evidence pursuant to NRS 50.275, 50.285, and 50.305). If the  
22 evidence is intended solely to contradict or rebut evidence on the same subject  
23 matter, the disclosure must be within 21 days after the disclosure made by the  
24 other party.

1           4. No later than 45 days after service of the Answer, you and, if you have  
2 an attorney, your attorney, must meet for an Early Case Conference. This  
3 conference is intended for the purpose of ensuring compliance with the initial  
4 disclosure rules (see paragraph 2; NRCP 16.205(d)). The Plaintiff shall  
5 designate the time and place of each meeting, which must be held in the county  
6 where the action was filed, unless the parties agree upon a different location.  
7 You and the other party may submit a Stipulation and Order to continue the time  
8 for the case conference for an additional period of not more than 60 days, which  
9 the court may, in its discretion and for good cause shown, enter. Absent  
10 compelling and extraordinary circumstances, neither the court nor the parties  
11 may extend the time to a day more than 90 days after service of the Answer. The  
12 time for holding a case conference with respect to a defendant who has filed a  
13 motion pursuant to Rule 12(b)(2)-(4) is tolled until entry of an order denying the  
14 motion.  
15  
16

17           5. Early Case Conference Report. Within 15 days after the early case  
18 conference, but not later than 5 days prior to the scheduled case management  
19 conference, you must file a joint early case conference report, or if you and the  
20 other side are unable to agree upon the contents of a joint report, you must serve  
21 and file an early case conference report, which, either as a joint or individual  
22 report, must contain:  
23  
24

(A) A statement of jurisdiction;

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

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

5  
6 (D) A written list of all documents provided at or as a result of the  
7 case conference, together with any objection that the document is not authentic  
8 or genuine. The failure to state any objection to the authenticity or genuineness  
9 of a document constitutes a waiver of such objection at a subsequent hearing or  
10 trial. For good cause, the court may permit the withdrawal of a waiver and the  
11 assertion of an objection;

12  
13 (E) A written list of all documents not provided under Rule  
14 16.205(d), together with the explanation as to why each document was not  
15 provided;

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

19  
20 (G) The list of witnesses exchanged in accordance with Rule  
21 16.205(d)(5) and (d)(6);

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

1 (I) A litigation budget; and

2 (J) Proposed trial dates.

3 6. You are under the continuing obligation to supplement any disclosures  
4 required herein or by court rule. You must make additional or amended  
5 disclosures whenever new or different information is discovered or revealed.  
6 Such additional or amended disclosures, including corrections to your financial  
7 disclosure form, shall be made within 14 days after acquiring the additional  
8 information or after otherwise learning that your disclosure is incomplete or  
9 incorrect. However, if a hearing, deposition, case management conference, or  
10 other calendared event is scheduled less than 14 days from the discovery date,  
11 then the update must be filed and served within 24 hours of the discovery of new  
12 information.  
13  
14

15 7. If you fail to timely complete, file, or serve the appropriate financial  
16 disclosure form required by this rule, or the required information and disclosures  
17 under this rule, the court shall impose an appropriate sanction upon you, your  
18 attorney, or both, unless specific affirmative findings of fact are made that you  
19 have proven: (1) either good cause for the failure by a preponderance of the  
20 evidence or that the violating party would experience an undue hardship if the  
21 penalty is applied; and (2) that other means fully compensate the non-violating  
22 party for any losses, delays, and expenses suffered as a result of the violation.  
23  
24

Sanctions may include:

1 (A) An order finding the violating party in civil contempt of court,  
2 an order requiring the violating party to timely file and serve the disclosures, to  
3 pay the opposing party's reasonable expenses including attorney fees and costs  
4 incurred as a result of the failure, and any other sanction the court deems just  
5 and proper; and/or  
6

7 (B) An order refusing to allow the violating party to support or  
8 oppose designated claims or defenses, or prohibiting that party from introducing  
9 designated matters in evidence, and/or any other sanction the court deems just  
10 and proper.  
11

12 8. Failure to accurately report income will result in sanctions if the non-  
13 violating party can establish by a preponderance of the evidence that there is not  
14 good cause for the failure. Sanctions may include:

15 (A) An order finding the violating party in civil contempt of court,  
16 an award of reasonable attorney fees and costs to the non-violating party, and  
17 any other sanction the court deems just and proper.  
18

19 Pursuant to EDCR 5.401, each party may file and serve a brief at least 5  
20 calendar days prior to the scheduled NRCP 16.205 Case Management  
21 Conference. The brief should include, if relevant, the following:

- 22 (1) A statement of jurisdiction.  
23 (2) If custody is at issue in the case, a proposed custodial  
24 timeshare and a proposed holiday, special day, and vacation schedule.

1 (3) For each issue in the case, a statement of what information,  
2 documents, witnesses, and experts are needed.

3 (4) Identification of each specific issue preventing immediate  
4 global resolution of the case, along with a description of what action is  
5 necessary to resolve each issue identified.  
6

7 (5) A litigation budget.

8 (6) Proposed trial dates.  
9  
10  
11  
12

13 Dated this 9 day of Sept., 2019.  
14

15   
16

17 **VINCENT OCHOA,**  
18 **DISTRICT COURT JUDGE**  
19 **DEPARTMENT S**  
20  
21  
22  
23  
24



1                   **CERTIFICATE OF SERVICE**

2           I hereby certify that on the above file stamped date, I E-Served  
3 pursuant to NEFCR 9, and/or:

4           I placed a copy of the foregoing Notice of Case Management  
5 Conference in the appropriate attorney folder located in the Clerk of  
6 the Court's Office as follows:

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

9  
10       Tamika B. Jones  
11       4730 E. Craig Road Apt. 2088 Bld 15  
12       Las Vegas, NV 89115

13       Kennth M. Robbins, Esq.  
14       732 S. 6<sup>th</sup> Street STE 100  
15       Las Vegas, NV 89101

16                                   **DENIECE LOPEZ**

17                                   \_\_\_\_\_  
18                                   Deniece Lopez  
19                                   Judicial Executive Assistant  
20                                   Department S  
21  
22  
23  
24



1 OPP  
Kenneth Robbins, Esq.  
2 Nevada Bar No. 13572  
732 South 6<sup>th</sup> Street, Suite #100  
3 Las Vegas, NV 89101  
(702) 400-0000 Telephone  
4 FamilyFirst@HalfPriceLawyers.com  
"Unbundled" Attorney for Defendant  
5

6 DISTRICT COURT  
FAMILY DIVISION  
7 CLARK COUNTY, NEVADA  
8

9 TAMIKA JONES,

10 Plaintiff,

11 vs.

12 CHRISTOPHER JUDSON,

13 Defendant.  
14

) Case No.: D-19-594413-C

)

) Dept.: C

)

) Hearing: 9/19/2019

) Time: 10:15 a.m.

)

) **ORAL ARGUMENTS REQUESTED:**

) **YES**

15 **OPPOSITION AND COUNTERMOTION**

16 COMES NOW, Defendant, Christopher Judson, by and through his attorney of  
17 record, Kenneth Robbins, Esq., and does file this Opposition in pursuit of the  
18 following relief:

- 19 1) An Order that the Plaintiff is sanctioned.  
20 2) An Order granting the parties share Joint Legal Custody of the minor children.  
21 3) An Order granting the Defendant Primary Physical Custody of the minor  
22 children.  
23 4) An Order that the Plaintiff not be allowed to pick-up/remove the children from  
24 school.

1 5) An Order that the Plaintiff pay child support pursuant to NRS 125B.080 and  
2 NRS 125B.070.

3 6) An Order requiring Plaintiff to continue to pay 100% of the minor children's  
4 health insurance costs and the parties equally divide all medical bills not covered  
5 by insurance pursuant to the "30/30" Rule.

6 7) An Order that the Defendant claim the children for tax purposes each year.

7 8) An Order that the Plaintiff pay the Defendant's attorney fees.

8 9) For such other relief, the Court deems just and proper.

9 This Opposition and Countermotion is made and based upon the papers and  
10 pleadings herein, the points and authorities submitted herewith, and any argument  
11 which may come to be adduced at the time of hearing.

12 Dated this 11 day of September, 2019

13  
14 Kenneth Robbins, Esq.  
15 Nevada Bar No.: 13572  
"Unbundled" Attorney for Defendant

16 **MEMORANDUM OF POINTS AND AUTHORITIES**

- 17
- 18 1. Christopher Judson and Tamica Jones were never married, however they have  
19 three (3) minor children from a previous relationship: Xy'Shone Christopher  
20 Judson, born November 20, 2011, currently 7 years old; Xaia Mahogany Judson,  
21 born August 13, 2015, currently 4 years old; and Xionne Remy Judson, born May  
22 3, 2019, currently 4 months old.
  - 23 2. The Plaintiff filed a Complaint for Custody on August 12, 2019. Plaintiff requested  
24 sole legal custody but failed to request physical custody of the minor children.

1 On the same day the Plaintiff filed a Motion for Temporary Custody, Visitation,  
2 and/or Child Support. She failed to properly request physical custody in her  
3 motion, she requested "full custody" along with checking the box for primary  
4 physical custody.

5 3. Defendant promptly filed an Answer and Counterclaim for custody of the minor  
6 children. He requested primary physical custody and joint legal custody.  
7 Additionally, he requested child support and the right to claim the minor  
8 children on his taxes each years, amongst other requests.

9 4. A custody order is necessary as the parties are unable to properly co-parent on  
10 their own. This situation has been brought on by the Plaintiff's inadequate care  
11 of the minor children. Plaintiff refuses to work regularly, which has left her  
12 unable and unwilling to provide for the children financially. Additionally, the  
13 Plaintiff refuses to communicate with the Defendant, even over important  
14 matters in the lives of the children. Most concerning the Plaintiff has abducted  
15 the children when she moved them to Michigan in 2015. Recently she has made  
16 indications that she could abduct the children from school again, this has left the  
17 Defendant afraid to take them to school. **See Exhibit 1.** Without a strict custody  
18 order the Plaintiff can easily take the children from school and remove them  
19 from the state without the Defendant's consent or knowledge again.

## 20 **LEGAL ARGUMENT**

### 21 **I. SACNCTIONS**

22 **EDCR Rule 5.506.** Financial disclosure required for motions involving money.

23 Unless otherwise ordered by the court, or otherwise required by another rule or statute:  
24

1 (a) **A General Financial Disclosure Form (GFDF) must be filed in**  
2 **support of any motion or countermotion that includes a request to**  
3 establish or modify child support, spousal support, fees and allowances,  
4 exclusive possession of a residence, **or any matter involving money to be**  
5 **paid by a party.**

6  
7 (b) A GFDF must be filed in support of any opposition to a motion or  
8 countermotion described in section (a).

9  
10 (c) All financial disclosures must be filed on the form(s) specified by the Nevada  
11 Rules of Civil Procedure.

12 (d) **A financial disclosure must be filed within 2 judicial days of the**  
13 **filing of the motion, countermotion, or opposition it supports, and**  
14 **may only be filed in open court with leave of the judge upon a**  
15 **showing of excusable delay.**

16  
17 (e) Every GFDF filing shall include copies of the filing party's 3 most recent  
18 paycheck stubs (or equivalent).

19  
20 (f) An assertion within a motion, opposition, or countermotion that there has  
21 been no change in a financial disclosure filed within the preceding 6 months  
22 satisfies this rule.

23 (g) The court may construe any motion, opposition, or countermotion not supported  
24 by a timely, complete, and accurate financial disclosure as admitting that the positions

1 asserted are not meritorious and cause for entry of orders adverse to those positions,  
2 and as a basis for imposing sanctions.

3 (h) In paternity matters, or postjudgment family division matters, only the case  
4 information, household, and income and expense sections of the GFDF need be  
5 completed. For good cause shown, the court may require a party to complete the  
6 remaining portions of the GFDF.

7  
8 (i) For good cause shown, the court may require a party to file a Detailed  
9 Financial Disclosure Form (DFDF).

10 A party that submits in a motion regarding money to be paid between the parties  
11 must submit a General Financial Disclosure Form within 2 judicial days of submitting  
12 their motion. If they do not, the Court has the right to sanction the moving party and  
13 hold that their motion is not meritorious. Thus, the court can deny all their requests.

14 Here, the Plaintiff filed a MOTION FOR ORDERS FOR TEMPORARY  
15 CUSTODY, VISITATION, AND/OR CHILD SUPPORT on August 12, 2019. In her  
16 motion, she is requesting that the Defendant pay child support. Thus, her motion, in  
17 part, is requesting a transfer of money between the parties. Plaintiff has failed to  
18 submit a General Financial Disclosure Form within 2 judicial days. In fact, she has  
19 failed to submit a General Financial Disclosure Form at all. Thus, the Defendant  
20 humbly requests that the Court deny all the contents in the Plaintiff's motion.  
21 Additionally, the Plaintiff should be sanction the amount of money that the Defendant  
22 had to pay for counsel to tend to this matter, \$1,850.00.

23 **II. CUSTODY**  
24

1 NRS 125C.002 addresses the considerations of the Court with regards to legal  
2 custody of a child. It provides, in pertinent part, that "When a court is making a  
3 determination regarding the legal custody of a child, there is a presumption, affecting  
4 the burden of proof, that joint legal custody would be in the best interest of a minor  
5 child if: a) The parents have agreed to an award of joint legal custody or so agree in  
6 open court at a hearing for the purpose of determining the legal custody of the minor  
7 child; or (b) a parent has demonstrated, or has attempted to demonstrate (except that  
8 the efforts are frustrated by the other parent) an intent to establish a meaningful  
9 relationship with the minor child. In regards to the minor children in this case both  
10 parties have established a meaningful relationship, thus the Court should order them  
11 to share joint legal custody.

12 The Court should be aware that in the past the Plaintiff has unilaterally made the  
13 choice to exhibit behavior in which she has sole legal custody of the children. This has  
14 included removing the child from school, enrolling the children in schools without the  
15 Defendant's permission and not including Christopher in other legal decisions related  
16 to the wellbeing of the children. Plaintiff behavior was completely unwarranted as  
17 Christopher was an active and participating parent. Plaintiff's behavior regarding the  
18 legal decisions of the children has become so absurd that their school administration is  
19 requesting a detailed definition of legal custody which explains that the Plaintiff is not  
20 allowed to unilaterally remove the children from school, daycare, extracurricular  
21 activities, etc.

22 Under the new statutes promulgated by the Nevada Legislature, prior to making  
23 an award of Physical Custody, the Court must first do an analysis as to whether it  
24 would be in a Child's best interests to grant Joint Physical Custody. However, pursuant

1 to NRS 125C.003, there is a legal presumption that Joint Physical Custody is not in a  
2 Child's best interest if a parent has engaged in activities that are deemed detrimental  
3 to the safety and welfare of a child. Those factors include:

4 **a. Inability to Adequately Care for Child for at Least 146 Days of the**  
5 **Year.**

6 It is clear that the Defendant can adequately care for the children for at least  
7 146 days per year. This is evident by the fact that Christopher is on pace to do this in  
8 2019. Until two months ago Christopher had steady employment, unfortunately he  
9 was laid off after the plant he was working at closed. He is still able to support the  
10 children financially through savings and the social service benefits that he is receiving.  
11 Additionally, he has the fortune to rely on his family to help him and the children  
12 financially. This includes his mother, Kimberly White, and his grandparents.  
13 Thankfully Christopher is able to provide for the children financially, because it is the  
14 Plaintiff that refuses to provide support for the children.

15 Plaintiff cannot provide for the children for at least 146 days per year because  
16 she has never shown the ability to provide for them financially with any consistency.  
17 Xy'Shone was born in November of 2011, at the time the parties lived in Farmington  
18 Hills, Michigan. Christopher and his family paid for all expenses for the Plaintiff and  
19 their child. In the Spring of 2013 the parties relocated with their child to the Las Vegas  
20 area. Once again, the Plaintiff did not contribute to the family financially. All expenses  
21 were paid for by Christopher and his family, this includes relocation expenses. While  
22 in the Las Vegas area the Plaintiff continued to reside with Christopher's mother  
23 and/or grandparents rent free. Even with having the luxury of living rent free she still  
24 failed to provide for the children financially, this was left to Christopher who was



1 consistently employed. In the Fall of 2014 the Plaintiff finally obtained employment  
2 with the help of Kimberly White. This did not last long, she was eventually terminated  
3 in the winter of 2015 for attendance issues. While employed she still failed to provide  
4 for the family financially.

5 The only time that the Plaintiff has provided for the family financially was in  
6 the winter of 2015/2016. Plaintiff unlawfully abducted the minor children (see section  
7 below) and moved them back to Michigan. Christopher and his family stopped  
8 supporting the Plaintiff and the children because they did not know where she had  
9 taken the children and would not allow him to see the children. While in Michigan it is  
10 unknown how the Plaintiff actually supported the children financially.

11 In the summer of 2016 the Plaintiff brought the children back to the Las Vegas  
12 area. Between the summer of 2016 and August of 2018 the Plaintiff obtained two  
13 different jobs with the help of Kimberly White. Plaintiff was fired from both jobs  
14 within 3 months for ethics violations and an inability to follow policy. During this time  
15 period the Plaintiff finally began to contribute to the wellbeing of the children, but  
16 very minimally. Plaintiff received SNAP and WIC benefits, those were used for the  
17 family sometimes. Additionally, she borrowed money from her family members to  
18 help with the children. From the money she actually earned she contributed only  
19 approximately \$300.00 toward the family.

20 Currently, the Plaintiff is once again having monetary issues, which may be the  
21 only reason that she is requesting primary physical custody. She is currently living in a  
22 3 bedroom condo, but has stated that she cannot afford the rent and must find  
23 cheaper housing. **See Exhibit 2.** As her motion states, she does not have anyone in  
24 Nevada to help her financially. Thus, she has resorted to asking the Defendant's

1 mother, Kimberly White, to move into her home. Plaintiff is still receiving WIC  
2 benefits for the children, but is using them for herself when the children are in the  
3 care of Christopher. **See Exhibit 3.** In fact, the Plaintiff's financial struggles are so  
4 bad that she cannot put enough food in her home for herself and the children. **See**  
5 **Exhibit 4.** Without the ability to provide suitable housing or even food for the  
6 children the Plaintiff should not be requesting primary physical custody of the minor  
7 children.

8 **b. Abandonment.**

9 This is not an issue.

10 **c. Domestic Violence:**

11 Plaintiff claims that she was the victim of domestic violence during the  
12 relationship, this is 100% false. Defendant has never been convicted or even charged  
13 with any crime related to domestic violence. Plaintiff has failed to provide any  
14 supporting evidence of her claims. Plaintiff claims that she was the victim of mental,  
15 physical and verbal abuse. However, she claims that she failed to call the police on  
16 Christopher because, "[she] knew this would happen." This reasoning makes no logical  
17 sense, what did she know would happen? The only thing that Christopher is doing is  
18 defending his name against false allegations of domestic violence that the Plaintiff  
herself has alleged.

19 In reality Christopher was the only victim of domestic violence during the  
20 relationship. In April of 2013 the Plaintiff violently attacked him. However,  
21 Christopher did not report the crime.

22 **NRS §125C.003(4) provides: In determining the best interest of the child,**  
**the court shall consider, among other things:**

23 **(a) The wishes of the child if the child is of sufficient age and**  
24 **capacity to form an intelligent preference as to his custody.**

1 The oldest child is only 7 years old, thus they are not old enough to state their  
2 custodial preference intelligently.  
3

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

5 This is not an issue.

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

9 It is clear that the Plaintiff cannot be entrusted with primary physical custody of  
10 the children because she plans to withhold them from Christopher. The Plaintiff has a  
11 history of preventing Christopher from seeing the minor children. For example, in late  
12 2015 the Plaintiff picked-up Xy'Shone from school, an act that she never did before.  
13 Shockingly she then proceeded to move the children to Michigan without notifying  
14 Christopher. Plaintiff refused to even inform Christopher where the children were for  
15 3 weeks. She eventually revealed that she moved the children to Michigan. During this  
16 time the Plaintiff did not allow Christopher to see the children and only allowed him to  
17 have minimal contact with the children.

18 The Plaintiff refuses to actually discuss parenting issues with Christopher,  
19 instead she abuses 911 by calling the cops when she is upset with him, even when  
20 nothing illegal has occurred. In August of 2019 the Plaintiff kicked Christopher out of  
21 their residence. He had the children in his care on August 10, 2019. The parties agreed  
22 that Kimberly White would return the children to the Plaintiff later that day. Instead of  
23 discussing the situation with Christopher, she elected to call the police and falsely  
24 claimed that they were taken without her permission and that she was unable to see

1 the children. Since then the Plaintiff has refused to communicate with Christopher  
2 about their children.

3 **(d) The level of conflict between the parents.**

4 Christopher does not have a personal problem with the Plaintiff, he is solely  
5 focused on raising their minor children. Plaintiff's motion that she cannot put her  
6 personal feelings of Christopher aside and focus on what is best for the minor children.  
7 In her motion she says, "I am fed up with him" and "Your honor I am truly fed up with  
8 Christopher Judson." Plaintiff has filed a motion that focuses on the failed relationship  
9 of the parties, and not what is most important, the wellbeing of the minor children.

10 Since the Plaintiff cannot focus on the best interest of the minor children the Defendant  
11 should be awarded primary physical custody.

12 **(e) The ability of the parents to cooperate to meet the needs of the**  
13 **child.**

14 The parties have not been able to communicate to meet the needs of the  
15 children because the Plaintiff refuses to do so. Instead of contacting Christopher  
16 about the needs or wants of the children the Plaintiff will call the police or make a  
17 decision unilaterally. Christopher has been forced to have his mother reach out to the  
18 Plaintiff about the needs of the children, since she ignores him or argues with him.  
19 The Plaintiff generally ignores his mother as well even if the topic is the educational or  
20 medical needs of the children. For example, the Plaintiff moved the children to  
21 Michigan in 2015 without obtaining Christopher's permission or even telling him. She  
22 was going to take the two oldest children out of Innovation Academy in August of  
23 2019 without consulting with Christopher. Plaintiff enrolled Xy'Shone in a preschool  
24 that was more of a daycare than an educational institution. Christopher realized that

1 the school as a waste of money because the educational needs of the child were not  
2 being met. Plaintiff refused to help pick a school for the child, instead she left that for  
3 Christopher and his family.

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

5 Christopher does not deny that he has a criminal history. In 2016 he was  
6 convicted of Trafficking in Controlled Substance (NRS 453.3385.1) in case C-16-  
7 316825-1. The Court should not have concerns about his drug history though.  
8 Christopher has completed all requirements related to his case and drug counseling.  
9 **See Exhibit 5.** Christopher does not have any other mental or physical issues that  
10 will prevent him from having primary physical custody of the minor children.

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

12 Christopher has been able to meet the physical, developmental and emotional  
13 needs of the children since they have been in his care. Christopher has the two oldest  
14 children enrolled in a fantastic elementary school which pushes them academically.  
15 Even though he lost his job he makes sure that their tuition is paid on time. **See**  
16 **Exhibit 6.** He takes the children to the library almost daily to help them learn. With  
17 the help of his family the children have had reading time with hundreds of books. Each  
18 Sunday the children spend time with Christopher's grandfather for religious teachings.  
19 Xaia has been enrolled in dance classes, another activity arranged by Christopher. His  
20 devoted attention to the children has resulted in the children having a close bond with  
21 him and they have excelled in school. Christopher's ability to meet the physical,  
22 emotional and developmental needs of the children is just another reason that the  
23 Court should award him primary physical custody.

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

2           The minor children do not have a close relationship with the Plaintiff, because  
3 she has not attempted to make a loving connection with the minor children. When the  
4 children are in the care of the Plaintiff she does not pay attention to their needs, she  
5 simply lets them fend for themselves the majority of the time. The children recognize  
6 that Christopher is the parent that actually helps them with problems and provides  
7 them with love and care. As a result they have an unbreakable bond. This is evident by  
8 the fact that the Plaintiff abducted the children in 2015 for 6 months, when the  
9 children returned to the care of Christopher they continued their loving relationship.

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

12           Christopher hopes that all three children have the same custody arrangement so  
13 their sibling bond is not broken.

14           **(j) Any history of parental abuse or neglect of the child or a**  
15 **sibling of the child.**

16           Christopher has always provided fantastic care for the minor children, the  
17 Plaintiff cannot say that she has done the same. When Xy'Shone was a babe the  
18 Plaintiff held him over a second story balcony railing and screaming "Look, I'm  
19 Michael Jackson!" Luckily the minor child was not physically harmed, but the fact that  
20 the Plaintiff would put the child in such a dangerous situation should prevent her from  
21 having primary or joint physical custody of the minor children.

22           **(k) Whether either parent or any other person seeking custody**  
23 **has engaged in an act of domestic violence against the child, a parent**  
24 **of the child or any other person residing with the child.**

See Domestic Violence section above.

**(I) Whether either parent or any other person seeking custody has committed any act of abduction against the child or any other child.**

As stated above, in 2015 the Plaintiff abducted the minor children and moved them to Michigan. She did not obtain Christopher's permission nor did she even tell him that she was moving the children. The Plaintiff simply took the children from school and moved them half way across the country. For the first three weeks after the abduction Christopher did not even know where the Plaintiff took the children. This act alone should prevent the Plaintiff from having primary or joint legal custody of the minor children.

**III. CHILD SUPPORT**

**N.R.S. 125B.070 provides as follows:**

1. As used in this section and NRS 125B.080, unless the context otherwise requires:

(a) "Gross monthly income" means the total amount of income received each month from any source of a person who is not self-employed or the gross income from any source of a self-employed person, after deduction of all legitimate business expenses, but without deduction for personal income taxes, contributions for retirement benefits, contributions to a pension or for any other personal expenses.

(b) "Obligation for support" means the sum certain dollar amount determined per the following schedule:

**(3) For three children, 29 percent;**

of a parent's gross monthly income, but not more than the presumptive maximum amount per month per child set forth for the parent in subsection 2 for an obligation for support determined pursuant to subparagraphs (1) to (4), inclusive, unless the court sets forth findings of fact as to the basis for a different amount pursuant to subsection 6 of NRS 125B.080

If the Defendant is awarded primary physical custody, child support should be set in accordance with NRS 125B.080 and NRS 125B.070. The Plaintiff is employed at

1 Health Care Partners. Despite filing a motion she has thus far failed to file a valid  
2 Financial Disclosure Form. The Court should order her to file a valid Financial  
3 Disclosure Form immediately, so her child support calculation can be calculated.

4 Additionally, the parties should equally pay for the cost of the children's health  
5 insurance and they should equally pay for any unpaid medical expenses of the minor  
6 children, pursuant to NRS125B.080(7).

#### 7 **IV. ATTORNEY'S FEES**

8 NRS 18.010 provides as follows:

9 2. In addition to the cases where an allowance is authorized by specific  
10 statute, the court may make an allowance of attorney's fees to a prevailing party:

11 (a) When he has not recovered more than \$20,000.00; or

12 (b) Without regard to the recovery sought, when the court finds that the  
13 claim, counterclaim, cross-claim or third party complaint or defense of the opposing  
14 party was brought without reasonable ground or to harass the prevailing party.

15 NRS 125.150(3). Except as otherwise provided in NRS 125.141, whether or not  
16 application for suit money has been made under the provisions of NRS 125.040, the  
17 court may award a reasonable attorney's fee to either party to an action for divorce if  
18 those fees are in issue under the pleadings.

19 Christopher is entitled to attorney's fees. Christopher would not have had to  
20 retain counsel if the Plaintiff did not file a motion filled with baseless claims and  
21 omissions of facts. Additionally, the Plaintiff has filed a motion in which she is  
22 requesting child support, but has failed to file a valid Financial Disclosure Form. The  
23 Plaintiff's refusal to follow court procedure and rules should allow the Defendant to  
24 recoup the money he has paid to retain counsel.



1 With specific reference to Family Law matters, the Supreme Court has recently  
2 adopted "well known basic elements," which in addition to hourly time schedules kept  
3 by the attorney, are to be considered in determining the reasonable value of an  
4 attorney's services, qualities, commonly known as the *Brunzell* factors.

5 In applying the *Brunzell* factors to the present case, we respectfully submit that the  
6 qualities of Christopher's attorney have been shaped by his education and experience.  
7 More specifically, Christopher's attorney holds a J.D. He is a licensed attorney in good  
8 standing with the State of Nevada. As to the character and quality of the work  
9 performed, we believe that all the filings submitted on behalf of our client by this  
10 office are adequate, both factually and legally. Considering the foregoing, Christopher  
11 respectfully request an award for his attorney's fees and costs in the amount of  
12 \$1,850.00.

#### 13 **IV. CONCLUSION**

- 14 1) An Order that the Plaintiff is sanctioned.
- 15 2) An Order granting the parties share Joint Legal Custody of the minor children.
- 16 3) An Order granting the Defendant Primary Physical Custody of the minor  
17 children.
- 18 4) An Order that the Plaintiff not be allowed to pick-up/remove the children from  
19 school.
- 20 5) An Order that the Plaintiff pay child support pursuant to NRS 125B.080 and  
21 NRS 125B.070.
- 22 6) An Order requiring Plaintiff to continue to pay 100% of the minor children's  
23 health insurance costs and the parties equally divide all medical bills not covered  
24 by insurance pursuant to the "30/30" Rule.

- 1 7) An Order that the Defendant claim the children for tax purposes each year.  
2 8) An Order that the Plaintiff pay the Defendant's attorney fees.  
3 9) For such other relief, the Court deems just and proper.  
4

5 Dated this 1 day of September, 2019.

6  
7 Kenneth Robbins  
8 Kenneth Robbins, Esq.  
9 Nevada Bar No.: 13572  
10 "Unbundled" Attorney for Defendant  
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**DECLARATION FROM DEFENDANT IN SUPPORT OF THE OPPOSITION  
AND COUNTERMOTION**

I, Christopher Judson, being first duly sworn on oath states and declares as follows:

a. That I am the Defendant in the above-entitled action. That I read the foregoing Opposition and Countermotion, including the points and authorities and any exhibits attached hereto and the same are true and correct to the best of my knowledge and belief.

b. For these reasons, I am requesting that the Court grant me the relief sought in my Motion

Executed this 16<sup>th</sup> day of September 2019.

/s/ Christopher Judson

Christopher Judson, Defendant

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Tamika Jones  
Plaintiff/Petitioner

Case No. D-19-594413-C

v. Christopher Judson  
Defendant/Respondent

Dept. C

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.

-OR-

☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:

The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.

The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.

The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on \_\_\_\_\_.

Other Excluded Motion (must specify) \_\_\_\_\_

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

☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:

The Motion/Opposition is being filed in a case that was not initiated by joint petition.

The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.

-OR-

☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.

OR

☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

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

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

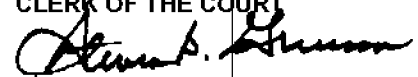
☒ **\$0**   ☐ **\$25**   ☐ **\$57**   ☐ **\$82**   ☐ **\$129**   ☐ **\$154**

Party filing Motion/Opposition: Defendant

Date 9/17/19

Signature of Party or Preparer





1: Kenneth Robbins, Esq.  
Nevada Bar No. 13572  
2: 732 South 6<sup>th</sup> Street, Suite #100  
Las Vegas, NV 89101  
3: (702) 400-0000 Telephone  
FamilyFirst@HalfPriceLawyers.com  
4: "Unbundled" Attorney for Defendant

5  
6 DISTRICT COURT  
FAMILY DIVISION  
7 CLARK COUNTY, NEVADA

8 TAMIKA JONES,

9 Plaintiff,

10 vs.

11  
12 CHRISTOPHER JUDSON,

13 Defendant.

) Case No.: D-19-594413-C

)

) Dept.: C

)

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14  
15 **EXHIBITS IN SUPPORT OF DEFENDANT'S OPPOSITION &**  
**COUNTERMOTION**

16 COMES NOW, Defendant, Christopher Judson, by and through his attorney of  
17 record, Kenneth M. Robbins, Esq., and hereby submits this Exhibits in Support of  
18 Defendant's Opposition & Countermotion as follows:

19 Exhibit 1 – Communication by the Plaintiff in which she is interfering with the  
20 children's schooling.

21 Exhibit 2 – Communications with the Plaintiff in which she is showing that she  
22 is struggling financially.

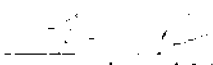
23 Exhibit 3 – Plaintiff's use of social services.  
24

1 Exhibit 4 – Plaintiff's financial struggles.

2 Exhibit 5 – Defendant's completion of drug counseling.

3 Exhibit 6 – Defendant's financial support of the children.

4 Dated this 17<sup>th</sup> day of September, 2019

5  
6   
Kenneth Robbins, Esq.  
Nevada Bar No.: 13572  
"Unbundled" Attorney for Defendant  
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# **EXHIBIT 1**

Inquiring when I want be  
around in plan to take kids  
from school

10:01

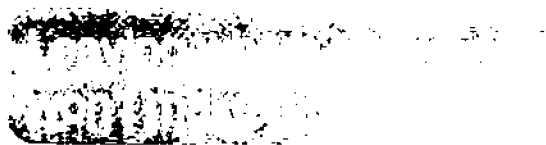
11 3 1



Tamika

I keep asking when ur  
leaving. No response. My  
hair sal8n is doing kids hair  
free tomorrow. But gotta be  
there at 1. Xykie can get his  
hair cut too.

You can get the uniforms  
today or tomorrow.



I meant the free hair styles  
are tomorrow... i thought u  
were going to Laughlin??



Ok.

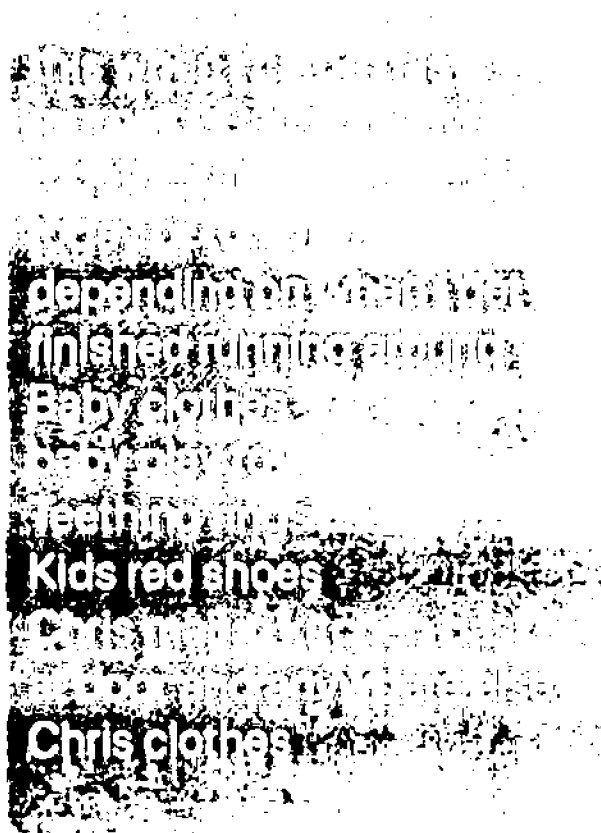




10:04



Tamika



Ok. U guys have his swing  
over there already.

get

Let me know when ur  
coming.

Can u please get my wic  
card.??

# **EXHIBIT 2**

Financial Need - Rent

9:56

...



Tamika

Wed 10/1/19

...

Ok. Thanks.

10/1/2019 10:00 AM

Im trying to find a place. I  
cant afford this.. cant even  
pay rent tomorrow.

10/1/2019 10:00 AM

No.

10/1/2019 10:00 AM

Crazy. Im just overwhelmed.  
Things has to change i cant  
take this anymore.

10/1/2019 10:00 AM

10:09



Tamika

Gotta have a loooong talk  
with u... im ready to move  
out this place..

Not sure if its ok. But  
wanted to know if i can  
come over there.

I try to talk to my kids.  
Doesnt work. I ask for pics.  
Dont work. Tried to go over  
to see them cuz i thought u  
came back. That dont even  
work. Not sure what to do.  
Where is Chris with 3  
kids.??? He didnt answer  
the door and the dogs were  
running around in the  
house.

Asking to move in with me  
Asking me about kids but  
was communicating with  
Chris

What is going on? I'm still in

10:11

Asking to move in. Says  
no other options



Tamika

I owe leasing 600.. dont  
have it.. thats why i wanted  
to talk to u about me  
coming over there for a  
while..

**Sorry. So much going on.**

Yea i know. I cant stay there  
the remainder of this mo.. i  
asked my neighbor and a  
coworker. I cant go to their  
place.

**Yeah we'll have to talk. How  
that would work with Chris  
there? You said you were so  
mad you would stab him.  
Maybe you should move  
and let him stay there.**

Cant afford to move.

But ok.

He was just at the house

10:12



Cont afford rent.  
Saying didnt stab him as  
said she wanted to



Tamika

But ok.

He was just at the house  
recently. I didnt stab him.

I just want to focus on  
working and being with my  
kids.

Yes the kids need stability.  
We'll figure it out. When is  
your lease up?

Lease been up since june.

What!!! You havent said  
anything all this time when  
you need to move

Got a patient

I told u a few few times...  
just been mo to mo... i need  
to go ASAP..... I cant afford  
to give them the rest of rent.

# **EXHIBIT 3**

Requesting WIC card  
when kids at my house

10:07

..

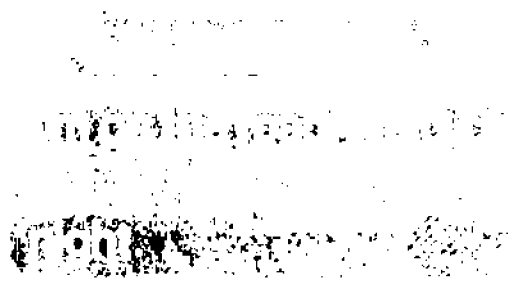


Tamika

10:15 AM

Wanted to talk to my babies  
b4 they go to bed.

Can you please get my wic  
card.??? Your son is using  
my benefits and i need my  
stuff for my house...



I keep tryin to call. No use.

10:20 AM

U know he's not. Im  
depending on YOU. That i  
talk to them and get nice

10:21 AM



10:07

10:07



Tamika

U know he's not. Im  
depending on YOU. That i  
talk to them and get pics.

SPY! I know he's not  
going to be a spy.

SPY! I know he's not  
going to be a spy.

Dont worry about it.

The's only one I see  
spending time with  
the's only one I see  
spending time with  
the's only one I see  
spending time with  
the's only one I see  
spending time with

I didnt know u guys were  
gone...

Requesting WIC card  
when kids at my house

10:07

11 7

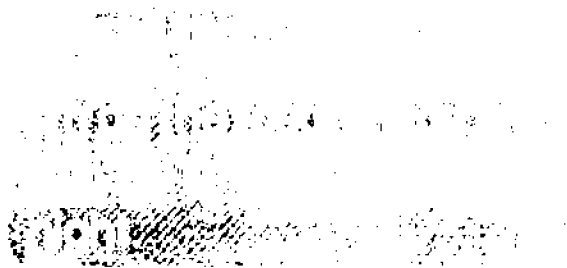


Tamika

10:07 AM

Wanted to talk to my babies  
b4 they go to bed.

Can you please get my wic  
card.??? Your son is using  
my benefits and i need my  
stuff for my house...



I keep tryin to call. No use.

10:07 AM

U know he's not. Im  
depending on YOU. That i  
talk to them and get nice

10:07 AM

10:07



Tamika

U know he's not. Im  
depending on YOU. That i  
talk to them and get pics.

He's not the one who  
should be worried.

I'll tell you the truth. I  
money's not the only thing  
that matters.

Dont worry about it.

That's only all I need to  
spending money. I don't  
kids. I don't need  
of the money. I don't  
need it. I don't need it.  
I don't need it. I don't  
need it. I don't need it.  
I don't need it. I don't  
need it. I don't need it.

I didnt know u guys were  
gone...

\_\_\_\_\_

\_\_\_\_\_

# **EXHIBIT 4**

10:13



My response about her  
claims no food, nowhere to  
go



Tamika

Ok. I wanted to pick the kids  
up after i got off tomorrow  
but Chris wont let me.

Yeah it'll be hard to find  
a place with a kitchen  
and a bathroom. I mean  
one that's not too expensive.  
I mean, I don't want to  
pass is up. Don't waste  
money on Uber when you're  
having trouble getting food  
in the house. It's a  
good situation to bring kids  
to. You have to be the  
first. If you're not the  
first, you have to  
say no. I mean, I don't  
even want to go back  
back Saturday. I mean,  
you up to see them? Then  
you guys need to go  
them call to go to  
getting them to school, etc.  
so they have a stable  
schedule.

# **EXHIBIT 5**

# **CENTER FOR BEHAVIORAL HEALTH**

3470 W. Cheyenne Ave. Suite 400  
North Las Vegas, NV 89032  
Telephone: 702-636-0085  
Fax: 702-636-0087  
[www.CenterforBehavioralHealth.com](http://www.CenterforBehavioralHealth.com)

February 9, 2018

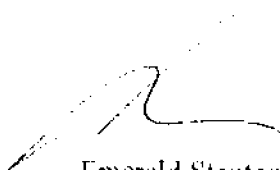
Re: Judson, Christopher  
DOB: 09/08/1988  
SSN: 373-11-0627

Dear Officer Quackenboss:

This letter is to inform you that Mr. Christopher Judson has completed all of his recommendations per his screening with Center for Behavioral Health. Mr. Judson was recommended to complete 6 hours of Substance Abuse Counseling. Mr. Judson completed all of his requirements on February 9, 2018. Please see the attached copy of Mr. Judson's certificate of completion for your records.

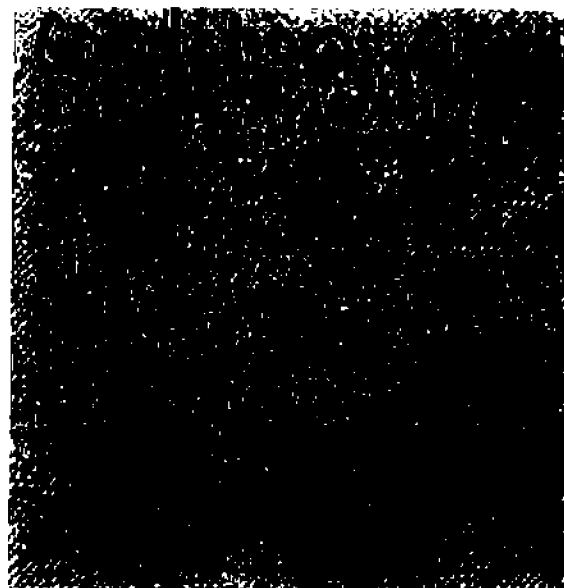
Should the defendant display any concerning behaviors, and/or test positive for any illicit drugs, please have him return for further evaluation. Thank you for your referral. It is a pleasure to work with you in service to our community. Should you have any further questions or concerns, please feel free to contact us at (702) 636-0085, Monday through Friday from 8:00 am to 1:00 pm or by email at [emerald.stanton@centerforbehavioralhealth.com](mailto:emerald.stanton@centerforbehavioralhealth.com).

Respectfully,

  
BA-CADC-I  
Emerald Stanton BA-CADC-I  
Director of Outpatient Services

Attached:

Certificate of Completion for 6 hours of Substance Abuse Counseling



# CENTER FOR BEHAVIORAL HEALTH

THIS IS TO CERTIFY THAT  
CHRISTOPHER JUDSON

HAS SUCCESSFULLY COMPLETED

*SUBSTANCE ABUSE COUNSELING - 6 HOURS*

FEBRUARY 9, 2018

SIGNATURE

FACILITATOR

BA-CADCE

STATE OF NEVADA BOARD OF EXAMINERS FOR ALCOHOL DRUG,  
AND GAMBLING COUNSELORS - 0444C



Center for  
Behavioral Health



# **EXHIBIT 6**

# Transaction Details

Amount	\$100.00
Description	CHILDREN'S LEARNING ADVENTURE
Date	01/12/2018
Account	****
Notes	Before/after school program

Children's Learning Adventure  
Before/after School Program.

Before/after school  
payments from my  
bank account

More  
Receipts  
Available

Transaction Details

Transaction ID	TXN-2023-10-27-001
Date	2023-10-27
Amount	\$1,200.00
Category	Utilities
Description	Electricity bill for October 2023
Merchant	City of Springfield
Payment Method	Credit Card
Status	Completed
Receipt Number	REC-2023-10-27-001

Transaktion (Debits)

[illegible]

Account: Checking \*\*\*\*2319 Check Number: 2011 | Date Posted: 08-17-2018 | Amount: \$300.00

KIMBERLY WHITE  
8427 SECURITA CROVE AVE  
LAS VEGAS, NV 89117

DATE 7/23/18

2011

PAID TO THE ORDER OF Innovation Academy \$300.00

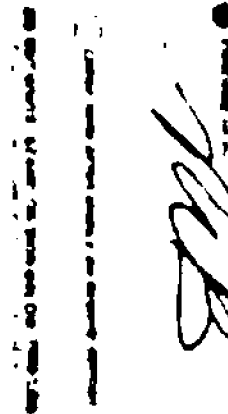
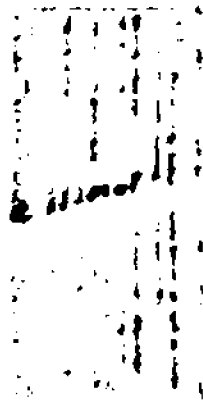
Three hundred dollars 00/100

AMERICA FIRST CREDIT UNION  
P.O. BOX 8148  
OCEAN, UTAH 84058  
WWW.AMERICANFCU.COM

FOR X. JUDSON

Supplies 2018-2019

⑆324377516⑆7460276823190⑆ 2011



Print

Receipts from  
private school

more receipts  
available if needed

Account: Checking \*\*\*\*2319 Check Number: 2062 Date Posted: 09/05/2019 Amount: \$300.00  
2/20/2019/2019

KIMBERLY WHITE  
8417 SEQUOIA GROVE AVE  
LAS VEGAS, NV 89119

2062

DATE \_\_\_\_\_

PAY TO THE ORDER OF Innovation Academy \$ 300.00

Three Hundred Dollars 00/100 DOLLARS 0 00

AMERICA FIRST CREDIT UNION  
P.O. BOX 9199  
OGDEN, UTAH 84246  
WWW.AMFCU.UTAH.COM

FOR Supply Fee

12/20/2019/2019

⑆324377516⑆746027682319⑆ 2062

THE FOLLOWING INFORMATION IS FOR THE BANK'S USE ONLY  
DO NOT WRITE IN THESE SPACES

DO NOT WRITE STAMP OR SIGN BELOW THIS LINE

DEPOSIT ONLY

mobile

MLB

Print

KIMBERLY WHITE  
 8417 SEQUOIA GROVE AVE  
 LAS VEGAS, NV 89149

91-77512293 2001

DATE 4/1

PAY TO THE ORDER OF Innovation Academy \$ 800.00

Eight hundred dollars 800 DOLLARS

AMERICA FIRST CREDIT UNION  
 P.O. BOX 8169  
 OGDEN, UTAH 84408  
 WWW.AMERICAFIRST.COM

3243775160746027682319 2001

1. The Board of Directors of the Bank of America and the Board of Directors of the Bank of the South Atlantic, both of which are members of the Board of Directors of the Bank of the United States, have agreed to merge their respective banks into a new bank, the Bank of the United States, which shall be organized under the laws of the United States.

**DO NOT WRITE IN THESE SPACES**

FBI/DOJ  
7-16

103

Account: Checking \*\*\*\*2119 Check Number: 2024 Date Posted: 01/07/2019 Amount: \$800.00  
Zachary Z...

01/02/19 2024

KIMBERLY WHITE  
8447 SEQUOIA GROVE AVE  
LAS VEGAS, NV 89149

DATE 1/02/19

PAY TO THE ORDER OF *Innovation Credit*

\$ 800.00

*Eight hundred dollars 00/100*

AMERICA FIRST CREDIT UNION  
P.O. BOX 9199  
OGDEN, UT 84409  
WWW.AMFCREDITUNION.COM

FOR *Yashua*

1532437751617460276823190 2024

1-D

For deposit only. This check is not valid for cashing.

Do not write, stamp or sign below this line.

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE  
IN ORDER TO MAINTAIN FULL FUNCTIONALITY

☐ CHECK ABOVE AFTER DEPOSIT OR RETURN TO DEPOSITOR

1-MORE TO BE FILED

*WLB*

Print



Account: Checking \*\*\*\*2319 Check Number: 2064 Date Posted: 09/05/2019 Amount: \$1,500.00  
Account: 2064

2064

KIMBERLY WHITE  
847 SEQUOIA GROVE AVE  
LAS VEGAS, NV 89149

DATE: 9/03/19

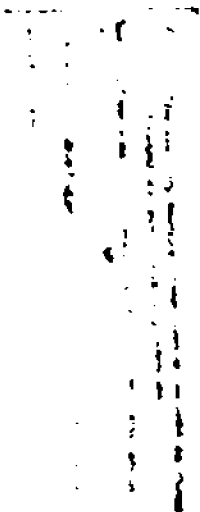
1500.00

1500.00

AMERICA FIRST CREDIT UNION  
P.O. BOX 9180  
OCCIDENT, UTAH 84408  
WWW.AMFCREDIT.COM

FOR: *Ly Stone*

13243775161746027682319 2064



DO NOT WRITE STAMP OR SIGN BELOW THIS LINE

1 CHECK WHEN AFTER 10:00 AM 10:00 AM DEPOSIT

mobile

MLB

ENCLOSURE

Print

I started bank accounts  
for kids after birthdays

Money is automatically  
deposited biweekly. A  
Funds for college, graduations



Capital One

## Settings

★ Primary Payment Account

## Capital One Accounts

360 Savings ... 6952  
Nickname : Xaia

Kids Savings Account ... 3594  
Nickname : Xy'Shone

QuicksilverOne ... 9468  
Nickname : Credit Card

## External Accounts

No Data Available You don't have any external accounts yet. Add external accounts for payments

# Enrollment Record

Date of Enrollment: \_\_\_\_\_

Date of Withdrawal: \_\_\_\_\_

## Child Information

Child's Name	_____	Sex	_____
Age	_____	DOB	_____
Address	_____		
City	_____	State	_____
Zip	_____	County	_____
Parent/Guardian Name	_____		
Relationship	_____		

## Parent/Guardian Information

### Mother

Name	_____	Address	_____
City	_____	State	_____
Zip	_____	County	_____
Phone	_____	Work	_____
Home	_____	Cell	_____

### Father

Name	_____	Address	_____
City	_____	State	_____
Zip	_____	County	_____
Phone	_____	Work	_____
Home	_____	Cell	_____

### Legal Guardian

Name	_____	Address	_____
City	_____	State	_____
Zip	_____	County	_____
Phone	_____	Work	_____
Home	_____	Cell	_____

## Notice of Right to Information

Parent/Guardian Notification of NRS 125 Child Care Facility required to maintain certain information regarding information to parents and guardians in the following manner:

Parents/Guardians have the right to request and receive information from the facility that is relevant to the child's care, including but not limited to:

1. Child's name

2. Child's age

## Permission to Release Information

I understand that the time my child \_\_\_\_\_ is in the facility, the director may be asked to provide information regarding my child.

☒ I hereby give permission to release information to the facility, which may be used for the purpose of providing care, supervision, welfare or other services to my child.

☐ I do not give permission to release information to the facility, which may be used for the purpose of providing care, supervision, welfare or other services to my child. I understand that I may be asked to provide information to the facility regarding my child's care, supervision, welfare or other services.

Signature of Parent/Guardian \_\_\_\_\_

Date \_\_\_\_\_

- CONTINUED ON REVERSE SIDE -

### Emergency Information

Individuals authorized to assume responsibility in the event of an emergency or illness if parents or guardians cannot be reached immediately.

#### Emergency Contact #1

Name	Relationship
Mr. [illegible]	[illegible]

#### Emergency Contact #2

Name	Relationship
Mr. [illegible]	[illegible]

### Authorized Pick Up Information

Individuals authorized to pick up my child:

#### Authorized Individual #1

Name	Relationship
Mr. [illegible]	[illegible]

#### Authorized Individual #2

Name	Relationship
Mr. [illegible]	[illegible]

The following individuals are not authorized to pick up my child:

### Signature

Signature of Parent/Guardian: \_\_\_\_\_  
Date: \_\_\_\_\_

[illegible]



Healthcare Alliance  
5614 Connecticut Ave. NW #312  
Washington, D.C. 20015-2604



PRESORTED STANDARD  
U.S. POSTAGE  
PAID  
PERMIT NO. 520

•••••  
Tamika Jones  
28340 N. Skye Dr.  
Farmington Hills, MI 48334-5335

**IMPORTANT  
DO NOT BEND**

*Winter 2011*

*Proof Addressed Tamika  
Jones with me.*



9100 West Post Road  
Las Vegas, Nevada 89148

Jones, Tamika  
8447 Sequoia Grove Ave  
Las Vegas, NV 89149-0253



1 CSERV  
Kenneth M. Robbins, Esq.  
2 Nevada Bar No.: 13572  
732 South 6<sup>th</sup> Street, Suite #100  
3 Las Vegas, NV 89101  
(702) 400-0000 Telephone  
4 [FamilyFirst@HalfPriceLawyers.com](mailto:FamilyFirst@HalfPriceLawyers.com)  
"Unbundled" Attorney for Defendant

5  
6 DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA  
7

8 TAMIKA JONES, )

9 Plaintiff, )

10 vs. )

11 CHRISTOPHER JUDSON, )

12 Defendant. )

) Case No.: D-19-594413-C

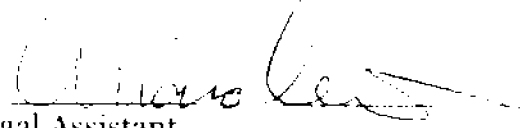
) Dept.: S

**CERTIFICATE OF SERVICE**

13 I hereby certify that on the 17 day of September, 2019, the foregoing  
14 **OPPOSITION AND COUNTERMOTION AND EXHIBITS IN SUPPORT OF**  
15 **DEFENDANT'S OPPOSITION & COUNTERMOTION** was served upon the  
16 following persons and entities entitled to notice, by mailing a true and completed copy  
17 thereof, via first class mail at their last known addresses  
18

19 TAMIKA JONES  
4730 East Craig Road, #2088  
20 Las Vegas, Nevada 89115  
*Plaintiff in Proper Person*  
21

22 Dated this 17 day of September, 2019.

23   
24 Legal Assistant



9-19, 20 19

Steven D. Grierson, Clerk of the Court

By: [Signature]  
WETTE CLAYTON Deputy

OFFM

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADAJones, Tamika Beatrice

Plaintiff,

Case No. D-19-594413-C

vs.

Department SJudson, Christopher Charles

Defendant.

ORDER FOR FAMILY MEDIATION  
CENTER SERVICES

Pursuant to Nevada Revised Statutes 3.475 and 125.480 IT IS HEREBY ORDERED by the Court that, regarding the child(ren) at issue, the Family Mediation Center (FMC) shall provide:

☒ Mediation. \_\_\_\_\_☐ Include Safety Protocol☐ Child Interview. Name(s): \_\_\_\_\_☐ Standard FMC Child Interview Questions

Additional questions/topics:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_☐ Non-therapeutic Parent/Child Observation. No. of observation sessions: 1 ☐ 2 ☐ \_\_\_\_\_

Parent and Child Name(s): \_\_\_\_\_

IT IS FURTHER ORDERED that, if an interpreter is needed, it is the party's responsibility to pay the interpreter at the time services are rendered. The language needed is: ☐ Spanish ☐ Other: \_\_\_\_\_

☐ Good cause appearing, court interpreter fees waived by the Court.

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

IT IS FURTHER ORDERED that the parties must report to FMC at 601 N. Pecos Road, Las Vegas, NV 89101.

IT IS FURTHER ORDERED that, if the UNLV Mediation Clinic is in session, a referral is ☐ authorized ☐ not authorized.

DATED this 19 day of Sept, 20 19.

YOUR RETURN COURT DATE IS:

Date: 11-27-19 Time: 11:00 AMVincent Ochoa  
District Judge

Bar No. of Plaintiff's Attorney: \_\_\_\_\_

Bar No. of Defendant's Attorney: K. Robbins

VINCENT OCHOA

*Steven D. Grierson*

NCOA

Name: Tamika Jones  
Address: 4730 East Craig Rd  
City/St/Zip: #2028 Las Vegas NV 89115  
Telephone: 313-452-5009  
Email Address: Tamika58092@gmail.com

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Tamika Jones

Plaintiff,

Case No. D-19-594413-C

vs.

Christopher Judson

Defendant.

Dept No. 8

**NOTICE OF CHANGE OF ADDRESS**

**PLEASE TAKE NOTICE** that (☒ check one) ☒ Plaintiff / ☐ Defendant, has new email information and that the Court records should be changed to reflect:

Name: Tamika Jones

Email Address: Tamika58092@gmail.com

DATED this 19 day of September, 2019.

Submitted by: (Signature) ▶

Tamika Jones

Printed Name: Tamika Jones





**ORDR**

Kenneth M. Robbins, Esq.  
Nevada Bar #13572  
732 South 6<sup>th</sup> Street, Suite 100  
Las Vegas, NV 89101  
(702) 400-0000 Telephone  
[FamilyFirst@HalfPriceLawyers.com](mailto:FamilyFirst@HalfPriceLawyers.com)  
Attorney for Defendant,  
in an *Unbundled Capacity*

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

TAMIKA BEATRICE JONES,

Plaintiff,

vs.

CHRISTOPHER  
CHARLES JUDSON,

Defendant.

CASE NO.: D-19-594413-C  
DEPT. NO.: S

HEARING DATE: 9/19/2019  
HEARING TIME: 10:150 A.M.

**ORDER**

This matter having come before the Honorable Vincent Ochoa on the  
*Plaintiff's Motion and Notice of Motion for Orders for Temporary Custody,*  
*Visitation, and/or Child Support; and Defendant's Opposition and*  
*Countermotion; and a Case Management Conference on the 19<sup>th</sup> day of*  
September 2019. Plaintiff, TAMIKA BEATRICE JONES, appearing in  
*Proper Person*, and the Defendant, CHRISTOPHER CHARLES JUDSON,  
appearing in person and by and through his attorney, Kenneth M. Robbins,  
Esq., in an "unbundled" capacity.

RECEIVED

10/24/2019

**116 DEPT. S**

1       Whereas Mr. Robbins stated that the parties have a temporary  
2 agreement and placed the agreement on the record.

3       **NOW THEREFORE,**

4       **IT IS HEREBY ORDERED** as follows:

5       1.     The parties will share joint legal and joint physical custody of the  
6 minor children;

7       2.     Plaintiff's timeshare will be beginning on Fridays at 6:00 p.m.  
8 (Defendant will drop off) and conclude on Monday mornings. Defendant  
9 will pick-up the children and take them to school on Monday mornings;

10      3.     The parties are referred to Family Mediation Center (FMC) to  
11 formulate a Parenting Plan; FMC Referral Order signed and filed in Open  
12 Court;

13      4.     Upon mutual agreement of the parties, neither side will pay  
14 child support to the other pursuant to *Wright vs. Osburn*;

15      5.     The Plaintiff shall provide to counsel a breakdown of the health  
16 insurance cost for the children only. If there is a cost for the children only,  
17 the parties shall split that cost. Anything out of pocket expenses for health,  
18 dental or vision care shall be split equally pursuant to the 30/30 rule.

19       The 30/30 rule means that any party incurring out-of-pocket medical  
20 expenses on behalf of the minor children shall provide a copy of any  
21 paperwork regarding those expenses to the other parent within thirty (30)

1 days of the visit, along with a request that the other parent pay one-half  
2 (50%) of the out-of-pocket payment(s). After receipt of a request for  
3 contribution for one-half of an out-of-pocket expense by a parent on behalf  
4 of the minor children, the other parent will reimburse the requesting parent  
5 in the amount requested within thirty (30) days of receipt of the request.  
6 Upon receipt of any reimbursement from any insurance carrier by either  
7 parent, and if the other parent previously paid a portion of the payment  
8 resulting in that reimbursement, the parent receiving the reimbursement  
9 shall equally divide the reimbursement with the other parent within thirty  
10 (30) days of receipt of the same.

11       Whereas discussion ensued and counsel stated that the parties cannot  
12 agree on the children schooling. Further discussion ensued regarding if  
13 Plaintiff is to stay away from the school. The Plaintiff addressed Christmas  
14 holiday visitation.

15       **IT IS FURTHER ORDERED** as follows:

16       6.     The children shall remain in the same school until there is an  
17 agreement or further order from the Court. The Plaintiff shall not remove  
18 the children from school for any reason unless there is an agreement;

19       7.     The Plaintiff shall be at the children's school for public events  
20 only. The school shall not be used as a time to visit the children;

21       8.     The children shall not go out of state pending further orders

1 from the Court. If either party wants to take a vacation out of state, the  
2 agreement shall be in writing. Also, there should be in writing a full  
3 itinerary;

4 9. For the Thanksgiving Holiday, the Defendant shall have the  
5 children until 3:00 p.m.; The Plaintiff shall have the children beginning at  
6 3:00 p.m. on Thanksgiving Day, and shall keep the children for the rest of  
7 the weekend;

8 10. For Xyshore's birthday November 20, 2019 (this year), the  
9 Plaintiff shall have the child from 6:00 p.m. until 8:30 p.m.;

10 11. A *Return Hearing from FMC re: Parenting Agreement* is  
11 scheduled for **December 4, 2019, at 11:00 a.m.**

12 **STATUTORY NOTICES AND DISCLOSURES**

13 That the party responsible for paying child support is hereby put  
14 on notice that he subject to the provisions of NRS 31A through  
15 NRS 31A.240, which deal with the recovery of payments for the  
16 support of children by the welfare division of the Department of  
17 Human Resources or the District Attorney. That an employer  
can be ordered to withhold his wages or commissions for  
delinquent payments of child support, and that the County Clerk  
may collect and disburse those withholdings.

18 That the parties are hereby notified that each person who is  
19 subject to an Order for the support of a child may request a  
review of that Order every three years, pursuant to NRS125B.145

20 \*\*\*

21 \*\*\*

1 NOTICE IS HEREBY GIVEN that, pursuant to NRS125C.006

2 1. If primary physical custody has been established  
3 pursuant to an order, a judgment or Decree of a court and the  
4 custodial parent intends to relocate his or her residence to a  
5 place outside of this State or to a place within this State that is  
6 at such a distance that would substantially impair the ability of  
7 the other parent to maintain a meaningful relationship with the  
8 child, and the custodial parent desires to take the child with him  
9 or her, the custodial parent shall, before relocating:

10 (a) Attempt to obtain the written consent of the  
11 noncustodial parent to relocate with the child; and

12 (b) If the noncustodial parent refuses to give that  
13 consent, petition the court for permission to relocate with the  
14 child.

15 2. The court may award reasonable attorney's fees and costs  
16 to the custodial parent if the court finds that the noncustodial  
17 parent refused to consent to the custodial parent's relocation  
18 with the child:

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

21 (b) for the purpose of harassing the custodial parent.

3. A parent who relocates with a child pursuant to this  
section without the written consent of the noncustodial parent  
or the permission of the court is subject to the provisions of  
NRS200.359.

**PENALTY FOR VIOLATION OF ORDER: THE**  
**ABDUCTION, CONCEALMENT OR DETENTION OF A**  
**CHILD IN VIOLATION OF THIS ORDER IS**  
**PUNISHABLE AS A CATEGORY D FELONY AS**  
**PROVIDED BY NRS 193.130.**

NRS 200.359 provides that every person having a limited right  
of custody to a child or any parent having no right of custody to  
the child who willfully detains, conceals or removes the child  
from a parent, guardian or other person having lawful custody  
or a right of visitation of the child in violation of an order of this  
court, or removes the child from the jurisdiction of the court  
without the consent of either the court or all persons who have



1 the right to custody or visitation is subject to being punished for  
2 a category D felony as provided by NRS 193.130.

3 That pursuant to NRS 125.510 (7) and (8), the terms of the  
4 Hague Convention of October 25, 1980, adopted by the 14th  
5 Session of the Hague Conference on Private International Law  
6 are applicable to the parties:

7 "Section 8. If a parent of the children lives in a foreign country  
8 or has significant commitments in a foreign country:

- 9 (a) The parties may agree, and the Court shall include in the  
10 Order for custody of the children, that the United States  
11 is the country of habitual residence of the children for the  
12 purpose of applying the terms of the Hague Convention as  
13 set forth in Subsection 7.
- 14 (b) Upon motion of the parties, the Court may order the  
15 parent to post a bond if the Court determines that the  
16 parent poses an imminent risk of wrongfully removing or  
17 concealing the children outside the country of habitual  
18 residence. The bond must be in an amount determined by  
19 the Court and may be used only to pay for the cost of  
20 locating the children and returning them to their habitual  
21 residence. The fact that a person has significant  
commitments in a foreign country does not create a  
presumption that the parent poses an imminent risk of  
wrongfully removing or concealing the children."

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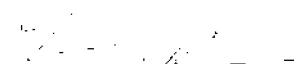
1 **IT IS FURTHER ORDERED, ADJUDGED AND**  
2 **DECREED**, that the parties shall submit the information  
3 required by NRS125B.055, NRS125.130, and, NRS125.230 on a  
4 separate form to the Court and the Welfare Division of the  
5 Department of Human Resources within ten days from the date  
6 this Decree is filed. Such information shall be maintained by the  
Clerk in a confidential manner and not part of the public record.  
The Petitioners shall update the information filed with the Court  
and the Welfare Division of the Department of Human  
Resources within ten days should any of that information  
become inaccurate.

7 **IT IS SO ORDERED.**

8 DATED this Oct 18 2019.

9   
10 **DISTRICT COURT JUDGE**

11 Respectfully submitted by:

12   
13 Kenneth M. Robbins, Esq.  
14 Nevada Bar #13572  
15 732 South 6<sup>th</sup> Street, Suite 100  
16 Las Vegas, NV 89101  
(702) 400-0000 Telephone  
FamilyFirst@HalfPriceLawyers.com  
Attorney for Defendant,  
in an *Unbundled Capacity*



1 NEOJ  
2 Kenneth M. Robbins, Esq.  
3 Nevada Bar #13572  
4 732 South 6<sup>th</sup> Street, Suite #100  
5 Las Vegas, NV 89101  
6 (702) 400-0000 Telephone  
7 (702) 425-1156 Facsimile  
8 FamilyFirst@HalfPriceLawyers.com  
9 "Unbundled" Attorney for Defendant

6  
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**DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA**

9 TAMIKA JONES,

10 Plaintiff,

11 vs.

12 CHRISTOPHER JUDSON,

13 Defendant.

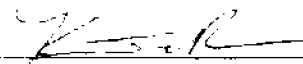
)  
) Case No.: D-19-594413-C  
)  
) Dept. No.: C  
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**NOTICE OF ENTRY OF ORDER**

15 PLEASE TAKE NOTICE that the **Order** was entered in the above-entitled action  
16 on the 24<sup>th</sup> day of October, 2019; a copy of which is attached hereto and made apart  
17 hereof.

19 Dated this 28 day of October, 2019.

20  
21   
22 Kenneth M. Robbins, Esq.  
23 Nevada Bar #13572  
24 "Unbundled" Attorney for Defendant

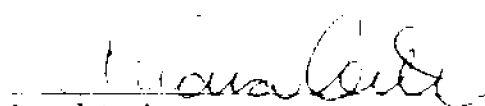
**CERTIFICATE OF SERVICE**

I hereby certify that on the 30 day of October, 2019, the foregoing **NOTICE OF ENTRY OF ORDER** was served upon the following persons and entities entitled to notice, by mailing a true and completed copy thereof, via US Mail, first class mail, postage prepaid, or by electronic service via the Eighth Judicial District Court E-Filing System to the following at their last known addresses:

TAMIKA JONES  
4730 East Craig Road, #2088  
Las Vegas, Nevada 89115  
*Plaintiff in Proper Person*

Christopher Charles Judson  
8447 Sequoia Grove Ave  
Las Vegas NV 89149  
*Defendant*

Dated this 30 day of October, 2019.

  
Legal Assistant



**ORDER**

Kenneth M. Robbins, Esq.  
Nevada Bar #13572  
732 South 6<sup>th</sup> Street, Suite 100  
Las Vegas, NV 89101  
(702) 400-0000 Telephone  
[FamilyFirst@HalfPriceLawyers.com](mailto:FamilyFirst@HalfPriceLawyers.com)  
Attorney for Defendant,  
in an *Unbundled Capacity*

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

TAMIKA BEATRICE JONES,

Plaintiff,

vs.

CHRISTOPHER  
CHARLES JUDSON,

Defendant.

CASE NO.: D-19-594413-C

DEPT. NO.: S

HEARING DATE: 9/19/2019

HEARING TIME: 10:150 A.M.

**ORDER**

This matter having come before the Honorable Vincent Ochoa on the  
*Plaintiff's Motion and Notice of Motion for Orders for Temporary Custody,*  
*Visitation, and/or Child Support; and Defendant's Opposition and*  
*Countermotion; and a Case Management Conference on the 19<sup>th</sup> day of*  
September 2019. Plaintiff, TAMIKA BEATRICE JONES, appearing in  
*Proper Person,* and the Defendant, CHRISTOPHER CHARLES JUDSON,  
appearing in person and by and through his attorney, Kenneth M. Robbins,  
Esq., in an "unbundled" capacity.

RECEIVED

1       Whereas Mr. Robbins stated that the parties have a temporary  
2 agreement and placed the agreement on the record.

3       **NOW THEREFORE,**

4       **IT IS HEREBY ORDERED** as follows:

5       1.     The parties will share joint legal and joint physical custody of the  
6 minor children;

7       2.     Plaintiff's timeshare will be beginning on Fridays at 6:00 p.m.  
8 (Defendant will drop off) and conclude on Monday mornings. Defendant  
9 will pick-up the children and take them to school on Monday mornings;

10      3.     The parties are referred to Family Mediation Center (FMC) to  
11 formulate a Parenting Plan; FMC Referral Order signed and filed in Open  
12 Court;

13      4.     Upon mutual agreement of the parties, neither side will pay  
14 child support to the other pursuant to *Wright vs. Osburn*;

15      5.     The Plaintiff shall provide to counsel a breakdown of the health  
16 insurance cost for the children only. If there is a cost for the children only,  
17 the parties shall split that cost. Anything out of pocket expenses for health,  
18 dental or vision care shall be split equally pursuant to the 30/30 rule.

19       The 30/30 rule means that any party incurring out-of-pocket medical  
20 expenses on behalf of the minor children shall provide a copy of any  
21 paperwork regarding those expenses to the other parent within thirty (30)

1 days of the visit, along with a request that the other parent pay one-half  
2 (50%) of the out-of-pocket payment(s). After receipt of a request for  
3 contribution for one-half of an out-of-pocket expense by a parent on behalf  
4 of the minor children, the other parent will reimburse the requesting parent  
5 in the amount requested within thirty (30) days of receipt of the request.  
6 Upon receipt of any reimbursement from any insurance carrier by either  
7 parent, and if the other parent previously paid a portion of the payment  
8 resulting in that reimbursement, the parent receiving the reimbursement  
9 shall equally divide the reimbursement with the other parent within thirty  
10 (30) days of receipt of the same.

11 Whereas discussion ensued and counsel stated that the parties cannot  
12 agree on the children schooling. Further discussion ensued regarding if  
13 Plaintiff is to stay away from the school. The Plaintiff addressed Christmas  
14 holiday visitation.

15 **IT IS FURTHER ORDERED** as follows:

16 6. The children shall remain in the same school until there is an  
17 agreement or further order from the Court. The Plaintiff shall not remove  
18 the children from school for any reason unless there is an agreement;

19 7. The Plaintiff shall be at the children's school for public events  
20 only. The school shall not be used as a time to visit the children;

21 8. The children shall not go out of state pending further orders

1 from the Court. If either party wants to take a vacation out of state, the  
2 agreement shall be in writing. Also, there should be in writing a full  
3 itinerary;

4 9. For the Thanksgiving Holiday, the Defendant shall have the  
5 children until 3:00 p.m.; The Plaintiff shall have the children beginning at  
6 3:00 p.m. on Thanksgiving Day, and shall keep the children for the rest of  
7 the weekend;

8 10. For Xyshore's birthday November 20, 2019 (this year), the  
9 Plaintiff shall have the child from 6:00 p.m. until 8:30 p.m.;

10 11. A *Return Hearing from FMC re: Parenting Agreement* is  
11 scheduled for **December 4, 2019, at 11:00 a.m.**

## 12 **STATUTORY NOTICES AND DISCLOSURES**

13 That the party responsible for paying child support is hereby put  
14 on notice that he subject to the provisions of NRS 31A through  
15 NRS 31A.240, which deal with the recovery of payments for the  
16 support of children by the welfare division of the Department of  
17 Human Resources or the District Attorney. That an employer  
can be ordered to withhold his wages or commissions for  
delinquent payments of child support, and that the County Clerk  
may collect and disburse those withholdings.

18 That the parties are hereby notified that each person who is  
19 subject to an Order for the support of a child may request a  
review of that Order every three years, pursuant to NRS125B.145

20 \*\*\*

21 \*\*\*



1 NOTICE IS HEREBY GIVEN that, pursuant to NRS125C.006

2 1. If primary physical custody has been established  
3 pursuant to an order, a judgment or Decree of a court and the  
4 custodial parent intends to relocate his or her residence to a  
5 place outside of this State or to a place within this State that is  
6 at such a distance that would substantially impair the ability of  
7 the other parent to maintain a meaningful relationship with the  
8 child, and the custodial parent desires to take the child with him  
9 or her, the custodial parent shall, before relocating:

6 (a) Attempt to obtain the written consent of the  
7 noncustodial parent to relocate with the child; and

7 (b) If the noncustodial parent refuses to give that  
8 consent, petition the court for permission to relocate with the  
9 child.

9 2. The court may award reasonable attorney's fees and costs  
10 to the custodial parent if the court finds that the noncustodial  
11 parent refused to consent to the custodial parent's relocation  
12 with the child:

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

12 (b) for the purpose of harassing the custodial parent.

12 3. A parent who relocates with a child pursuant to this  
13 section without the written consent of the noncustodial parent  
14 or the permission of the court is subject to the provisions of  
15 NRS200.359.

14 **PENALTY FOR VIOLATION OF ORDER: THE**  
15 **ABDUCTION, CONCEALMENT OR DETENTION OF A**  
16 **CHILD IN VIOLATION OF THIS ORDER IS**  
17 **PUNISHABLE AS A CATEGORY D FELONY AS**  
18 **PROVIDED BY NRS 193.130.**

17 NRS 200.359 provides that every person having a limited right  
18 of custody to a child or any parent having no right of custody to  
19 the child who willfully detains, conceals or removes the child  
20 from a parent, guardian or other person having lawful custody  
21 or a right of visitation of the child in violation of an order of this  
court, or removes the child from the jurisdiction of the court  
without the consent of either the court or all persons who have

1 the right to custody or visitation is subject to being punished for  
2 a category D felony as provided by NRS 193.130.

3 That pursuant to NRS 125.510 (7) and (8), the terms of the  
4 Hague Convention of October 25, 1980, adopted by the 14th  
5 Session of the Hague Conference on Private International Law  
6 are applicable to the parties:

7 "Section 8. If a parent of the children lives in a foreign country  
8 or has significant commitments in a foreign country:

9 (a) The parties may agree, and the Court shall include in the  
10 Order for custody of the children, that the United States  
11 is the country of habitual residence of the children for the  
12 purpose of applying the terms of the Hague Convention as  
13 set forth in Subsection 7.

14 (b) Upon motion of the parties, the Court may order the  
15 parent to post a bond if the Court determines that the  
16 parent poses an imminent risk of wrongfully removing or  
17 concealing the children outside the country of habitual  
18 residence. The bond must be in an amount determined by  
19 the Court and may be used only to pay for the cost of  
20 locating the children and returning them to their habitual  
21 residence. The fact that a person has significant  
commitments in a foreign country does not create a  
presumption that the parent poses an imminent risk of  
wrongfully removing or concealing the children."

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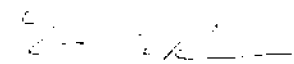
1 **IT IS FURTHER ORDERED, ADJUDGED AND**  
2 **DECREED**, that the parties shall submit the information  
3 required by NRS125B.055, NRS125.130, and, NRS125.230 on a  
4 separate form to the Court and the Welfare Division of the  
5 Department of Human Resources within ten days from the date  
6 this Decree is filed. Such information shall be maintained by the  
7 Clerk in a confidential manner and not part of the public record.  
8 The Petitioners shall update the information filed with the Court  
9 and the Welfare Division of the Department of Human  
10 Resources within ten days should any of that information  
11 become inaccurate.

12 **IT IS SO ORDERED.**

13 DATED this Oct 18 2019.

14   
15 **DISTRICT COURT JUDGE** *W.*

16 Respectfully submitted by:

17   
18 \_\_\_\_\_  
19 Kenneth M. Robbins, Esq.  
20 Nevada Bar #13572  
21 732 South 6<sup>th</sup> Street, Suite 100  
Las Vegas, NV 89101  
(702) 400-0000 Telephone  
FamilyFirst@HalfPriceLawyers.com  
Attorney for Defendant,  
in an *Unbundled Capacity*



1 NORH

2  
3  
4 DISTRICT COURT  
5 CLARK COUNTY, NEVADA

6 \*\*\*\*

7 TAMIKA BEATRICE JONES,  
8 PLAINTIFF.  
9 VS.  
10 CHRISTOPHER CHARLES  
11 JUDSON, DEFENDANT.

CASE NO.: D-19-594413-C  
DEPARTMENT S  
Courtroom 7

12  
13 **NOTICE OF RESCHEDULING OF HEARING**

14 Please be advised that the date and time of a hearing set before the Honorable  
15 Vincent Ochoa, has been changed. The Return Hearing, presently  
16 scheduled for the 4th day of December, 2019, at 11:00 AM, has been  
17 rescheduled to the 5th day of December, 2019, at 1:45 PM at the Family  
18 Courts & Services Center, Courtroom 7.

19  
20 Honorable Vincent Ochoa

21 By: /S/ Deniece Lopez  
22 Judicial Executive Assistant  
23 Department S  
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**CERTIFICATE OF MAILING**

I hereby certify that the foregoing Notice of Rescheduling Hearing was:

☒ E-served pursuant to NEFCR 9, or placed in the folder of counsel maintained in the Office of the Clerk of Court.

Tamika Beatrice Jones; Kenneth M Robbins

☒ E-Served pursuant to NEFCR 9, or mailed, via first-class mail, postage fully prepaid to:

Christopher Charles Judson  
8447 Sequoia Grove AVE  
Las Vegas, NV 89149

Kenneth M Robbins  
732 S Sixth ST STE 100  
Las Vegas, NV 89101

Tamika Beatrice Jones  
4730 E Craig RD APT 2088Bldg15  
Las Vegas, NV 89115

/S/ Deniece Lopez  
Judicial Executive Assistant  
Department S

*Heather L. Lamin*  
CLERK OF THE COURT

**MOT**  
**TAMIKA JONES**  
**4730 East Craig Rd., Bldg. 15, #2088**  
**Las Vegas, NV 89115**  
**(313)452-5009**  
TJones2@hcpnv.com  
Defendant *In Proper Person*

DISTRICT COURT, FAMILY DIVISION  
CLARK COUNTY, NEVADA

**TAMIKA JONES,**  
  
Plaintiff,  
  
vs.  
  
**CHRISTOPHER JUDSON,**  
  
Defendant.

CASE NO: D-19-594413-C  
DEPT. NO: S

DATE: 2/20/2020  
TIME: 10:15 am

Oral Argument Requested ✓ YES

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

**EMERGENCY MOTION FOR PERMISSION TO RELOCATE IMMEDIATELY,  
FOR TEMPORARY SOLE PHYSICAL CUSTODY, AND RELATED RELIEF**

COMES NOW Plaintiff, **TAMIKA JONES**, *In Proper Person*, and hereby files her  
*Motion to Relocate* and for related relief, requesting:

- 1) That Plaintiff be allowed to relocate immediately, pending further proceedings;
- 2) In the alternative, that Plaintiff receive *Sole Physical Custody*, statutory child support, and that Defendant's supervised visitation be set;
- 3) That Defendant undergo drug treatment and reimburse Plaintiff for the drug test;

1 4) That Defendant undergo an Anger Management Assessment and any treatment  
2 needed:

3 5) That the Court enter specified findings related to the children's best interests;

4 6) That Plaintiff receive her reasonable Attorney's Fees and Costs; and

5 7) For any other related relief to Plaintiff that this Court deems just and proper.

6  
7 This *Motion* is made and based upon the papers and pleadings on file herein, the  
8 Memorandum of Points and Authorities contained herein, the *Declaration* of the Plaintiff  
9 to be filed concurrently herewith, any exhibits submitted, and any argument the Court will  
10 entertain at time of hearing.  
11

12 Dated this 17<sup>th</sup> day of December, 2019.

13 **TAMIKA JONES**  
14 /s/ Tamika Jones  
15 4730 East Craig Rd., Bldg. 15, #2088  
16 Las Vegas, NV 89115  
17 (313)452-5009  
18 TJones2@hcpnv.com  
19 Defendant *In Proper Person*

20 **NOTICE OF MOTION**

21 **TO: KENNETH ROBBINS, ESQ.,** Attorney for Defendant; and

22 **TO: CHRISTOPHER JUDSON,** Defendant.

23 **YOU WILL PLEASE TAKE NOTICE** that the undersigned will bring on the  
24 foregoing "**MOTION**" for hearing before the Court at the Courtroom of the above  
25 entitled Court on the on the 20<sup>th</sup> day of February, 2020, at the hour of 10:15  
26 a.m., in **Department S** of said Court, located at 601 N. Pecos Rd., Las  
27 Vegas, NV.

28 Dated this 17<sup>th</sup> day of December, 2019.

29 **TAMIKA JONES**  
30 /s/ Tamika Jones  
31 4730 East Craig Rd., Bldg. 15, #2088  
32 Las Vegas, NV 89115  
33 (313)452-5009  
34 TJones2@hcpnv.com  
35 Defendant *In Proper Person*

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1 Dad was charged with multiple felonies for Drug Trafficking, but ultimately  
2 accepted a plea deal admitting to 13.9 grams of methamphetamine. Dad apparently  
3 believes that he is capable of being in a “loving relationship” with the children when he is  
4 dealing drugs. Alarming, Dad alleged in his *Opposition and Countermotion* at 13, that  
5 Mom “abducted the children in 2015 for 6 months, when the children returned to the care  
6 of Christopher they continued their loving relationship.” He has a very skewed reality.  
7

8  
9 ***Dad is Actively Engaged in his Addiction and has Tested Positive for Cocaine***

10 Dad purportedly completed treatment for his long standing history of drug addiction  
11 in February, 2018. The treatment failed. Dad has tested positive for Cocaine. Dad lied to  
12 this Honorable Court in his *Opposition and Countermotion*. He alleged specifically that  
13 “[t]he Court should not have concerns about his drug history.”  
14

15 ***Dad Has Been Physically Abusing the 8 Year Old, Xy'shone***

16  
17 Dad's behavior has become more and more erratic and volatile. Dad recently made  
18 threats to the Mom, and he has been domestically violent toward her in the past. On or  
19 about December 4, 2019, Dad slapped the parties' son, Xy'shone, hard in the face. Dad  
20 denied this in Court on December 5, 2019. However, since Dad has been gone from  
21 Mom's residence, Xy'shone's has been opening up about further instances of abuse which  
22 have occurred during the last few months, and apparently was influenced not to tell Mom.  
23  
24

25 On the evening of December 14, 2019, Mom and the children were watching a  
26 movie. She moved her hand to adjust Xy'shone's pillow, and he flinched, putting his hands  
27 on his face exclaiming, “Please don't hit me!”  
28

1 When Mom asked him why he would say that, Xy'shone explained that he feels  
2 someone will hit him when they get close to his face. Xy'shone reports that that Dad picked  
3 him up around his shoulders and threw him across the room when they were at the paternal  
4 mother's house on or about October 18 or 19, 2019. Mom is concerned, because Xy'shone  
5 was too afraid to say anything, and nobody had told her about the event in October.  
6 Xy'shone reports that he told Ganny (Dad's mom) about this incident and being slapped in  
7 the face on December 3.) Dad's mother told Xy'shone she would take care of it and have a  
8 talk with Dad, but Dad's mother never informed Mom of the abuse.  
9

11 ***Mom is Concerned about Dad's Mental Health and Suicidal thoughts***

13 On December 3, 2019, Dad expressed in text messages as follows:

14 "I'm so stressed I don't know if I can go on living anymore."

15 "Nobody likes me . . . nobody is trying to help me with my issues. . ."

16 "I care about nothing u have destroyed my life over and over. . ."

17 "I'm fucking miserable I hate myself and my life . . ."

18 "I'm as sober as shit don't press me."

19 ***Dad's Behavior is Escalating and he is in Denial about His Addiction***

20 After this custodial action had ensued, and after more false assurances of sobriety,  
21 Dad was living with Mom. (He maintains he was living more with his mother.) However,  
22 as in the past, Dad became more and more rude, did not follow through on his promises.  
23 He was up at all hours of the night, would leave without explanation for extended periods  
24 of time, and became physically abusive again. Mom is finished with Dad's stories and his  
25 abusive. This is why she sought this Court's assistance to get him out of her apartment.  
26  
27  
28

1                   ***Dad's Addiction Makes His Behavior Dangerous to Others.***

2           Dad's drug addiction seems to fuel his domestic abuse. His dangerous behavior  
3 occurs when he is coming down off of Cocaine and he becomes irritable and suicidal. He  
4 gets erratic and volatile when he is withdrawing. Dad denies hitting the parties' eight year  
5 old son on December 4, 2019, but Mom saw the abusive incident. This recent information  
6 makes a lot of sense to Mom. Whenever Dad is coming down off of his high and having  
7 withdrawals, he takes his anger out on the next person around.  
8  
9

10                   ***Dad lied about not being charged with a Crime Related to Domestic Violence***

11           Dad lied to this Honorable Court in his *Opposition and Countermotion*. He alleged  
12 specifically that he "has never been convicted of or even charged with any crime related to  
13 domestic violence." Dad was charged with DOMESTIC BATTERY, (1ST) in City of  
14 North Las Vegas Case No. CR002515-13. Dad was able to plea bargain down the charge  
15 to Disturbing the Peace, but he was arrested and charged for domestic battery and has lied.  
16  
17

18                   ***There is an Active Warrant out for Dad's Arrest***

19           There is a warrant out for Dad's arrest for Failure to Appear on charges for Driving  
20 without a License from earlier in 2019.  
21

22                   ***Mom is Taking Further Efforts to Protect the Children***

23           On December 13, 2019, Mom learned that the Dad tested positive for cocaine. She  
24 contacted Child Protective Services, and explained the situation to the operator, "Heather."  
25 Heather is reporting this to her supervisor. Mom called CPS because Mom does not feel  
26 comfortable with the children being around Dad unsupervised, as he is active in addiction.  
27  
28

1 Sunday, December 15, 2019, the custodial exchange day, Mom called the police,  
2 after being informed of Dad's ongoing physical abuse of Xy'shone. Mom made a police  
3 report and Mom believes the police also have called CPS. This *Motion* is being finalized  
4 Sunday evening in anticipation of filing on Monday, December 16, 2019, along with a  
5 request for the matter to be heard on shortened time. Mom desperately wants to protect the  
6 children, and she has not yet been able to pay her Counsel for this *Motion*.  
7

8 Dad using Cocaine corroborates Mom's allegations, and it clearly explains Dad's  
9 violent behavior and erratic mood swings. Mom's position is that Dad needs drug treatment  
10 and an anger management assessment and treatment, and he should have supervised  
11 contact with the minor children for the immediate foreseeable future. Dad's mother works  
12 essentially the same hours as Mom and cannot be there to supervise. Dad's grandparents  
13 are elderly and not in a good position to provide very much supervision and they are  
14 grossly unaware of Dad's drug usage. Additionally, Dad's grandparents often have medical  
15 appointments. Thus, Dad is not in a position to help co-parent the children at this time.  
16  
17

18  
19 ***Mom is requesting to relocate back to Michigan immediately***  
20

21 Now that Dad's ongoing illicit drug abuse has been confirmed, Mom believes she  
22 has shown that he clearly is not a suitable candidate for any type of custodial timeshare.  
23 Accordingly, Mom is requesting to relocate with the minor children to Ferndale, Michigan  
24 where she will have familial support. Moreover, Mom has learned that she is second in  
25 line for HUD housing in where she applied in Michigan, and she has a solid place to stay  
26 with her mother until such time that the housing becomes available.  
27  
28

1 Mom believes the move is in the children's best interests, even if the Court's ruling  
2 is temporary pending further proceedings. The children flourished when they were in  
3 Michigan, have friends there, but more importantly, will have a lot of family support.

4  
5 ***Dad's Refuses to Sign an Order allowing Mom to get the Children from School***

6 We provided the draft Order from the hearing to Dad's counsel, and while he is  
7 reviewing it, a simple Stipulation and Order that allows Mom to pick up the children from  
8 school. Dad's counsel will not sign off on that provision for reasons that remain unclear.  
9

10 **II.**  
11 **GOVERNING LAW AND LEGAL ANALYSIS**

12 This Court has authority to make interim orders concerning custody of the minor  
13 children in this matter, pursuant to NRS 125C.0045, which provides as follows:  
14

15 NRS 125C.0045 Court orders; modification or termination of orders; form for orders; court may order  
parent to post bond if parent resides in or has significant commitments in foreign country.

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

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

19  
20 **A. RELOCATION SHOULD BE GRANTED.**

21 Mom's best interests analysis is set forth below. Dad is not in a position to have  
22 unsupervised visitation at this point and he needs to focus on completing drug treatment  
23 and getting help for his mental state. Mom is asking to relocate to go back to Michigan and  
24 live with her mother. Mom is second in line for HUD housing, which she expects to open  
25 soon, but in the interim, her mother's house is a safe place where Mom and the children  
26 can get familial support and this will better the children's lives.  
27  
28

**NRS 125C.007 Petition for permission to relocate; factors to be weighed by court.**

1. In every instance of a petition for permission to relocate with a child that is filed pursuant to NRS 125C.006 or 125C.0065, the relocating parent must demonstrate to the court that:

(a) There exists a sensible, good-faith reason for the move, and the move is not intended to deprive the non-relocating parent of his or her parenting time;

(b) The best interests of the child are served by allowing the relocating parent to relocate with the child; and

(c) The child and the relocating parent will benefit from an actual advantage as a result of the relocation.

2. If a relocating parent demonstrates to the court the provisions set forth in subsection 1, the court must then weigh the following factors and the impact of each on the child, the relocating parent and the non-relocating parent, including, without limitation, the extent to which the compelling interests of the child, the relocating parent and the non-relocating parent are accommodated:

(a) The extent to which the relocation is likely to improve the quality of life for the child and the relocating parent;

(b) Whether the motives of the relocating parent are honorable and not designed to frustrate or defeat any visitation rights accorded to the non-relocating parent;

(c) Whether the relocating parent will comply with any substitute visitation orders issued by the court if permission to relocate is granted;

(d) Whether the motives of the non-relocating parent are honorable in resisting the petition for permission to relocate or to what extent any opposition to the petition for permission to relocate is intended to secure a financial advantage in the form of ongoing support obligations or otherwise;

(e) Whether there will be a realistic opportunity for the non-relocating parent to maintain a visitation schedule that will adequately foster and preserve the parental relationship between the child and the non-relocating parent if permission to relocate is granted; and

(f) Any other factor necessary to assist the court in determining whether to grant permission to relocate.

3. A parent who desires to relocate with a child pursuant to NRS 125C.006 or 125C.0065 has the burden of proving that relocating with the child is in the best interest of the child.

*Potter v. Potter*, 119 P.3d 1246 (Nev. 2005) states as follows:

When a parent with joint physical custody of a child wishes to relocate outside of Nevada with the child, the parent must move for primary physical custody for the purposes of relocating. The district court must consider the motion for primary custody under the best interest of the child standard established for joint custody situations in NRS 125.510 and *Truax v. Truax*. "Any order for joint custody may be modified or terminated by the court. If it is shown that the best interest of the child requires the modification or termination."

The district court must determine whether the moving parent will be relocating outside of Nevada with the children if he or she obtains primary custody. The district court may also consider, among other factors, the locales of the parents, and whether

1 one parent had *de facto* primary custody of the children prior to the motion. The moving  
2 party has the burden of establishing that it is in the children's best interest to reside  
3 outside of Nevada with the moving parent as the primary physical custodian.  
4

5 In the case at bar, Mom can meet her burden in addressing the requirement for  
6 Primary Physical Custody for purposes of the move. Mom's proposed move will benefit  
7 the minor children immensely as detailed below. Mom and the children will have much  
8 better social and economic factors, and more. There is a lot more familial support in  
9 Michigan for the Mom and the children, and Dad is no longer a reasonable candidate to  
10 provide such support by virtue of his ongoing active addiction and he abusive actions.  
11  
12

13 **1. Mom can demonstrate that she has a sensible good faith reason to move,**  
14 **that the move is in the minor children's best interest, and how the children and**  
15 **Mom will benefit from an actual advantage pursuant to NRS 125C.007(1).**

16 **a. There exists a sensible, good-faith reason for the move, and the move is**  
17 **not intended to deprive the non-relocating parent of his parenting time;**

18 Mom has provided enough information to determine there exists a sensible, good-  
19 faith reason for her to move. Dad is once again engaged in illegal drug use and he cannot  
20 now realistically exercise anything other than supervised visitation. Logically, he will  
21 need at least six months for a drug treatment program, likely longer, as his addiction is  
22 long standing and he recently already unsuccessfully completed treatment in 2018. In all  
23 actuality, Dad will need at least one full year or more of the patch program and in depth  
24 counseling, if not residential treatment, if he can obtain the means to do so.  
25  
26

27 *///*  
28

1 Mom's mother lives in Ferndale, Michigan, and in 2015 and 2016, she provided  
2 financial, physical, emotional and familial support for Mom and the children. Mom's  
3 mother is in a position to do the same now. Mom's familial support would allow Mom a  
4 home at no cost, and the ability for Mom to pursue schooling. Mom and the minor  
5 children will be able to start saving for their own home and build a future.  
6

7 Additionally, Dad has not paid a dime of support, while he somehow finds money to  
8 purchase very expensive illicit drugs. Sadly, Dad is not capable of providing for the  
9 children at this time. Familial support is necessary, however, and Mom's mother and  
10 family in Michigan are ready, willing, and able to provide such financial, emotional, and  
11 familial support. Ferndale housing costs are 35.2% less expensive than Las Vegas.  
12 Ferndale spends more money on their students and has higher teacher to student ratios,  
13 more educated teachers, and a much higher percentage of students achieving four year  
14 degrees, master's degrees, professional degrees, and doctorate degrees.  
15  
16  
17

18 **b. The best interests of the children will be served by allowing the relocating**  
19 **parent to relocate with the child;**

20 As stated above, Mom can meet her burden to establish that the minor children's best  
21 interests will be served by relocating to Ferndale, Michigan. Mom does not have funds to  
22 hire an expert at this time, but she has make a good faith offer of information received  
23 from Sperling's Best Places (**EXHIBIT 2**):  
24

25 ///

26 ///



Ferndale has a much smaller population, with larger median and household incomes, a lower unemployment rate, and a smaller average commute time.

OVERVIEW	Ferndale, MI	Las Vegas, NV	United States
<u>Population</u>	20,159	621,662	321,004,407
<u>Median Income</u>	\$61,060	\$53,159	\$57,652
<u>Median Age</u>	34.6	37.4	37.8
<u>Avg. Home Price</u>	\$177,100	\$273,200	\$231,200
<u>Unemployment Rate</u>	4.5%	4.9%	3.9%
<u>Avg. Commute Time</u>	23.26	25.43	26.38

Ferndale expends more money per student on education and pays a higher expenditure for instructors. It has a better student to teacher ratio with more availability of teachers to students. Ferndale also has more high school graduates, and two year, four year, masters, graduates, and doctorate degrees.

EDUCATION	Ferndale, MI	Las Vegas, NV	United States
<u>Expend. per Student</u>	\$12,560	\$8,868	\$12,383
<u>Educ. Expend. per Student</u>	\$10,034	\$7,943	\$10,574
<u>Instr. Expend. per Student</u>	\$5,242	\$4,581	\$6,428
<u>Pupil/Teacher Ratio</u>	17.3	20.9	16.8
<u>Students per Librarian</u>	3247.3	1111	538.1
<u>Some High School Educ.</u>	3.8%	9.1%	7.2%
<u>High School Educ.</u>	95.0%	84.0%	87.3%
<u>Some College Educ.</u>	26.4%	24.9%	20.8%
<u>2 yr College Grad.</u>	6.9%	7.8%	8.3%
<u>4 yr College Grad.</u>	43.7%	23.2%	30.9%
<u>Masters Grad.</u>	11.5%	5.5%	8.4%
<u>Professional Degree</u>	3.0%	1.8%	2.0%
<u>Doctorate Degree</u>	1.1%	0.7%	1.4%

Ferndale has less violent crimes, almost one fourth that of Las Vegas.

CRIME	Ferndale, MI	Las Vegas, NV	United States
<u>Violent Crime</u>	11.9	40.9	22.7
<u>Property Crime</u>	37.9	43.4	35.4

///

**Ferndale has much lower cost of living.**

<b>COST OF LIVING</b>	<b>Ferndale, MI</b>	<b>Las Vegas, NV</b>	<b>United States</b>
<u>Overall</u>	96.9	111.6	100
<u>Food &amp; Groceries</u>	95.3	102.3	100
<u>Health</u>	81.4	92.3	100
<u>Housing</u>	76.6	118.2	100
<u>Median Home Cost</u>	177,100	273,200	\$231,200
<u>Utilities</u>	93.2	102.6	100
<u>Transportation</u>	125.6	128.5	100
<u>Miscellaneous</u>	109.5	103.6	100

**The Ferndale economy is much better than Las Vegas. It has less unemployment, more income per capita, and higher household and family median incomes.**

<b>ECONOMY</b>	<b>Ferndale, MI</b>	<b>Las Vegas, NV</b>	<b>United States</b>
<u>Unemployment Rate</u>	4.5%	4.9%	3.7%
<u>Recent Job Growth</u>	0.3%	3.5%	1.6%
<u>Future Job Growth</u>	36.5%	39.0%	33.5%
<u>Sales Taxes</u>	6.0%	8.3%	6.2%
<u>Income Taxes</u>	4.3%	0	4.6%
<u>Income per Cap.</u>	\$37,332	\$27,650	\$31,177
<u>Household Income</u>	\$61,060	\$53,159	\$57,652
<u>Family Median Income</u>	\$75,252	\$62,786	\$70,850

**Ferndale has better weather, with four true seasons a year, lower summer temperatures, and more opportunities for year round sports.**

Mom and the minor children will experience much better educational opportunities, live in an area with one fourth the violent crime rate, with higher income rates and higher median and household incomes, less unemployment, lower cost of living in every single category, and much higher students obtaining four year college graduates, master's graduates, and professional and doctorate degrees.

///

1           **c. The children and the relocating parent will benefit from an actual**  
2           **advantage as a result of the relocation.**

3           The minor children will benefit from the support system they know, love, and thrive  
4 in. They are bonded to their maternal grandmother and relatives in Michigan. Moreover,  
5 Dad is ill equipped mentally to care for the children at this point; the sad reality is that he  
6 cannot adequately care for himself at this time. Dad will need an effective drug treatment  
7 program and counseling. His recovery likely will take a year or more.

8  
9           Thus, Mom has demonstrated a sensible, good-faith reason to move, that the  
10 relocation is in the children's best interests, and she has proffered enough evidence  
11 of how the children will benefit from an actual advantage as a result of the relocation to  
12 Ferndale. Once Mom has met her burden, the Court would take into consideration the  
13 following factors pursuant to NRS 125C.007(2) as analyzed below:  
14  
15

16           **(a) The extent to which the relocation is likely to improve the quality of**  
17           **life for the children and the relocating parent;**

18           As set forth above, Ferndale will offer better educational opportunities for Mom and  
19 the minor children, higher income, important familial support, less dense population, less  
20 crime, better weather, and an overall better quality of life.  
21

22           **(b) Whether the motives of the relocating parent are honorable and not**  
23           **designed to frustrate or defeat any visitation rights accorded to the non-**  
24           **relocating parent;**

25           Mom's motives are honorable. She has tried, repeatedly to work with Dad and has  
26 listened to his many promises to change. He clearly is not capable of changing at this time.  
27 Mom needs familial support and Dad is not in the position to provide the same.  
28

1 Mom and the children thrived in Ferndale in 2015-2016 when they had her mother's  
2 support. Mom's motives are to regain that support for the children. Such support is  
3 necessary; Dad's actions have created the need. Mom's motives therefore are honorable.  
4

5 **(c) Whether the relocating parent will comply with any substitute**  
6 **visitation orders issued by the court if permission to relocate is granted;**

7 Mom will comply with any Orders related to visitation.  
8

9 **(d) Whether the motives of the non-relocating parent are honorable in**  
10 **resisting the petition for permission to relocate or to what extent any**  
11 **opposition to the petition for permission to relocate is intended to secure a**  
12 **financial advantage in the form of ongoing support obligations or**  
13 **otherwise;**

14 Dad's motives to resist this move would be dishonorable. His actions clearly  
15 evidence that he has failed to make his relationship with the children a priority. Instead,  
16 Dad engaged in highly illegal actions as well as actions that make him unsuitable to  
17 exercise normal and regular parental caretaking.  
18

19 **(e) Whether there will be a realistic opportunity for the non-relocating parent**  
20 **to maintain a visitation schedule that will adequately foster and preserve the**  
21 **parental relationship between the child and the non-relocating parent if**  
22 **permission to relocate is granted;**

23 Dad can maintain a visitation schedule that will adequately foster and preserve his  
24 relationship with the children via Skype initially, and when appropriate, with supervised  
25 visitation until he can successfully complete a drug treatment program and prove a  
26 sustained period of successful sobriety. If he commences treatment now, he hopefully will  
27 be able demonstrate an appropriate period of sobriety prior to school recessing for  
28 summer, 2020.

**(f) Any other factor necessary to assist the court in determining whether to grant permission to relocate.**

Addressing NRS 125C.007(3), Mom's best interests analysis is set forth below, and she incorporates it by reference as though fully set forth in this subsection.

**B. ALTERNATIVELY, IT IS IN THE CHILD'S BEST INTERESTS FOR DAD TO HAVE SOLE PHYSICAL CUSTODY**

**1. The Best Interest Factors set forth in NRS 125C.0035(4) Favor Mom**

The Nevada Supreme Court has held consistently “[i]n custody matters, the polestar for judicial decision is the best interest of the child.” *Schwartz v. Schwartz*, 107 Nev. 378, 382, 812 P.2d 1268, 1272 (1991). NRS 125C.0035(4) provides guiding factors directly related to the child’s best interests, and will be discussed in full below.

## NRS 125C.0035(4) ANALYSIS

**(a) The wishes of the children if the children are of sufficient age and capacity to form an intelligent preference as to his or her custody.**

The minor children are not old enough to express a preference, but if necessary, the eight year old should be interviewed as to his father hitting him in the face, as Dad has denied this. Dad lied to this Honorable Court on the record. Dad most certainly did hit Xy'Shone full on the face when he lost his temper. Dad also threw him by the shoulders.

**(b) Any nomination by a parent or a guardian for the children.**

Dad has nominated Mom with his actions. Dad is once again deep into his illegal drug addiction and using Cocaine. He currently is not fit for any custodial responsibilities. Dad chooses to engage in crime, and as such, he has voted with his feet.

1 **(c) Which parent is more likely to allow the children to have frequent associations**  
2 **and a continuing relationship with the noncustodial parent.**

3 Mom was living in Michigan in 2015 and 2016 with Dad's knowledge and consent.  
4 Mom went home to care for her father who had a stroke. Mom planned to return in March,  
5 2016, but returned about seven weeks after that, in May, as her father still needed her help.  
6 Dad knew where Mom and the minor children were the entire time, and Mom did return to  
7 Las Vegas. Dad has created a fictional argument that Mom absconded with the children  
8 when she most certainly did not. During that time, Dad was supposed to be working on  
9 resolving his drug issues and had promised that he did, yet Dad was arrested/charged with  
10 Drug Trafficking in 2016. Thus, Dad was engaged in the illegal activities, not Mom.  
11

12 Dad allegedly got clean again in 2018, but that has failed. He's made many  
13 promises that have not come true. Despite his promises, Mom has tried to work with the  
14 Dad. She will continue to do so, but she cannot take him back anymore. Dad slapping  
15 Xy'Shone in the face was the last straw. Mom will comply with any *Orders* for visitation  
16 or alternate visitation that this Court makes.  
17

18 **(d) The level of conflict between the parents.**

19 The level of conflict is high. Dad is using Cocaine again and he recently slapped  
20 Xy'Shone, and he also has thrown the child across the room by his shoulders. Mom asked  
21 the Court to intervene and she voluntarily paid for a drug test, for which she needs to be  
22 reimbursed. Dad has lied to the Court about Mom absconding with the children and has  
23 told the Court not to be concerned about his past criminal history. This increases conflict.  
24  
25  
26  
27  
28

1       **(e) The ability of the parents to cooperate to meet the needs of the children.**

2           Dad is in denial about how his actions affect others. He lied to this Court and has  
3 tested positive for Cocaine. Dad's level of cooperation is bad, and he is not trustworthy.

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

5           Dad has demonstrated mental health issues in his inability to control his anger and  
6 his repeated destructive actions, acting out upon his impulses. He is mentally unstable. As  
7 recently as December 3, 2019 Dad texted suicidal thoughts. As recently as December 4,  
8 2019, Dad let his irritability and temper get the best of him when he apparently was coming  
9 down from Cocaine. He slapped the parties' eight year old son. Dad needs to be evaluated  
10 and good cause exists. Dad has demonstrated the necessity for this; his actions place his  
11 mental health squarely into controversy, and it is in the children's best interests for such an  
12 examination to occur. Dad should pay for it.

13       **Rule 35. Physical and Mental Examinations**

14       **(a) Order for Examination.**

15           **(1) In General.** The court where the action is pending may order a party whose mental or  
16 physical condition — including blood group — is in controversy to submit to a physical or mental  
17 examination by a suitably licensed or certified examiner. The court has the same authority to order a party  
18 to produce for examination a person who is in the party's custody or under the party's legal control.

19           **(2) Motion and Notice; Contents of the Order.**

20           **(A)** The order may be made only on motion for good cause and on notice to all parties and the  
21 person to be examined.

22           **(B)** The order must specify the time, place, manner, conditions, and scope of the examination,  
23 as well as the person or persons who will perform it. The examination must take place in an appropriate  
24 professional setting in the judicial district in which the action is pending, unless otherwise agreed by the  
25 parties or ordered by the court.

26       **(g) The physical, developmental and emotional needs of the children.**

27           Dad tested positive for Cocaine while he has maintained that he is not using drugs.  
28 He is in denial of his addiction, and he is not capable of tending to the children's physical,

developmental and emotional needs at this time. Mom has been meeting those needs by caring for the children every day and promoting their relationship with Dad and his family. This factor strongly favors the Mom.

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

Mom has a close knit bond with the children and cares for them daily. Dad has chosen an alternate path at this time, by his actions of engaging in illegal drug use and of abusive behavior toward their son. Dad is an addict and he needs a lengthy period of treatment. The nature of his relationship with the children is at the level of an addict who is irritable and has now engaged in abusive acts of slapping the parties' eight year old son.

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

Mom will ensure that the children maintain their bond with Dad.

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

Dad is engaged in illegal drug use and recently committed acts of physical abuse on the parties' eight year old son by slapping him in the face on December 4, 2019 and by throwing him by his shoulders across the room in October, 2019.

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

Dad has a past history of domestic abuse toward the Mom and was arrested on April 23, 2013 and charged with Domestic Battery. He recently slapped the parties' eight year old son by slapping him in the face on December 4, 2019 and threw the child by the shoulders in October, 2019.



1 (I) Whether either parent or any other person seeking physical custody has  
2 committed any act of abduction against the child or any other child.

3 Dad accused Mom of absconding with the children in 2015, yet he filed no custodial  
4 action, and he knew where Mom and the children were. More importantly, Dad consented  
5 to Mom leaving. There was no abduction, no custodial suit filed, and no police reports.  
6

7 Thus, while there is a preference for *Joint Physical Custody* pursuant to NRS  
8 125C.0025(a) and NRS 125C.0035(3)(a), Dad is not a fit or proper person to receive *Joint*  
9 *Physical Custody* at this time. Dad needs to get his drug addiction and impulses under  
10 control, and to be treated for the underlying issues causing his drugs abuse and anger, prior  
11 to the parties even considering unsupervised visitation, let alone any sort of joint  
12 arrangement. Mom therefore should receive *Sole Physical Custody*.  
13  
14

15 2. Dad's Child Support Obligation Should be Ordered.

16 Financial orders should be put into place utilizing the statutory guidelines set forth in  
17 NRS 125B.070.  
18

19 **C. MOM REQUESTS THAT THE COURT MAKE SPECIFIC FINDINGS**

20 Mom requests the following findings as part of the Court's interim orders:

21 1. That Mom and the minor children lived in Michigan in 2015-2026 with Mom's  
22 Mother;  
23

24 2. That Dad alleged in his *Opposition and Countermotion* that he has "never been  
25 charged with any crime related to domestic violence," but Dad was charged with  
26 DOMESTIC BATTERY in Clark County, Nevada, in Case No. CR002515-13;  
27  
28

1       3. That Dad conceded in his *Opposition and Countermotion* that he was convicted of  
2       Trafficking in Controlled Substance in case C-16-316825-1 and Dad specifically alleged  
3       that “[t]he Court should not have concerns about his drug history.”  
4

5       4. That Dad completed a drug program as recently as February, 2018;

6       5. That on December 5, 2019, Dad tested positive in his urine for Cocaine, and that the  
7       presence of Cocaine in his urine likely signifies a recent usage;  
8

9       6. That Dad will need to participate in a drug treatment program lasting six months or  
10      longer and it is in the minor children’s best interests for Dad to demonstrate a lengthy  
11      period of sobriety prior to receiving unsupervised visitation;  
12

13      7. That by virtue of the positive drug test results, and Dad’s denial of usage, that Dad  
14      cannot currently demonstrate that he is capable of exercising physical custody 146 days of  
15      the year;  
16

17      8. That Dad’s actions have, by default, nominated Mom to have primary physical  
18      custody;  
19

20      9. That Dad’s continued use of illegal drugs has placed his mental health into question;

21      10. That Dad’s actions of lying about his drug abuse has increased the level of conflict  
22      between the parties and demonstrated a lack of ability to cooperate on Dad’s part;  
23

24      11. That Mom has demonstrated a reasonable, good faith reason for relocating; and

25      12. That it will be in the children’s best interests to relocate to Ferndale, Michigan  
26      pending further proceedings in this matter.  
27

28      ///  
29

1 **D. MOM SHOULD RECEIVE FEES, COSTS, AND SANCTIONS**

2 Given these facts, any *Opposition and Countermotion* by Dad necessarily would be  
3 brought without reasonable ground. Accordingly, NRS 18.010 supports Mom's requests.  
4 See, NRS 18.010(2)(b) (prevailing party) and EDCR 7.60(b)(1),(3) (frivolous and  
5 vexatious litigation).<sup>1</sup> Dad has requested sanctions against the Mom, while lying to the  
6 Court about his sobriety, lying to this Court about slapping the parties' son, lying about  
7 never having been charged with domestic violence. Moreover, Dad is using illegal drugs,  
8 thus increasing the costs of litigation and multiplying the proceedings. Dad knowingly  
9 requested for this Court to make rulings that would be against the best interests of the  
10 children, and he has sought to inflame the Court against Mom with untrue allegations and  
11 critical omissions of fact.  
12  
13  
14

15 ///  
16  
17

18 <sup>1</sup> **EDCR 7.60(b)** provides as follows:

19 (b) The court may, after notice and an opportunity to be heard, impose upon an attorney or a party any  
20 and all sanctions which may, under the facts of the case, be reasonable, including the imposition of fines,  
21 costs or attorney's fees when an attorney or a party without just cause:

22 (1) Presents to the court a motion or an opposition to a motion which is obviously frivolous,  
23 unnecessary or unwarranted.

24 (2) Fails to prepare for a presentation.

25 (3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.

26 **NRS 18.010 Award of attorney's fees.**

27 1. The compensation of an attorney and counselor for his services is governed by agreement, express  
or implied, which is not restrained by law. In addition to the cases where an allowance is authorized by  
specific statute, the court may make an allowance of attorney's fees to a prevailing party:

28 (a) When he has not recovered more than \$20,000; or

29 (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim  
or third-party complaint or defense of the opposing party was brought or maintained without reasonable  
ground or to harass the prevailing party. The court shall liberally construe the provisions of this paragraph  
in favor of awarding attorney's fees in all appropriate situations. . . .

1 The Rules provide that under such circumstances, sanctions may be imposed. Mom's  
2 obligation pursuant to EDCR 5.501 to attempt resolution of these issues with Dad should  
3 be dismissed; she already requested for the parties to attend mediation and Dad declined.  
4 Dad failed both times to attend the prior scheduled mediations, stating that he "forgot," and  
5 when offered by the Court on December 5, 2019, he declined the referral.  
6

7 **Rule 5.501. Requirement to attempt resolution.**

8 (a) Except as otherwise provided herein or by other rule, statute, or court order, before any family  
9 division matter motion is filed, the movant must attempt to resolve the issues in dispute with the other  
10 party.

11 (b) A party filing a motion in which no attempt was made to resolve the issues in dispute with the  
12 other party shall include a statement within the motion of what provision, futility, or impracticability  
prevented an attempt at resolution in advance of filing.

(c) Failure to comply with this rule may result in imposition of sanctions if the court concludes that  
the issues would have been resolved if an attempt at resolution had been made before filing.

13 Our *Brunzell* analysis is incorporated by reference, and attached as **Appendix A**.

14 **III.**  
15 **CONCLUSION**

16 Plaintiff respectfully requests that the Court grant the *Motion* in full.

17 Dated this 17<sup>th</sup> day of December, 2019.

18 **TAMIKA JONES**  
19 /s/ Tamika Jones  
20 **4730 East Craig Rd., Bldg. 15, #2088**  
21 **Las Vegas, NV 89115**  
**(313)452-5009**  
**TJones2@hcpnv.com**  
**Defendant In Proper Person**

22 ATTORNEY DISCLOSURE NOTICE: The above document was drafted by JILLIAN M.  
23 TINDALL, ESQ. who was engaged by the Plaintiff in the capacity of a scrivener only in  
24 an *Unbundled Capacity*. Her sole tasks having been completed, the Plaintiff may be  
25 contacted directly at the above address and telephone number.

26 /s/ Jillian M. Tindall

27 Jillian M. Tindall, Esq.

28 Nevada Bar No. 7194

29 3838 Raymert Drive, Ste. 20

30 Las Vegas, NV 89120

(702) 688-5716

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**DECLARATION OF PLAINTIFF**

TAMIKA JONES, under penalty of perjury, declares and states as follows:

1. That I am over 18 years old and am competent to testify as to the matters contained herein. I am the Plaintiff in the above-entitled action and have read the above *Motion* and know the contents thereof; the same is true of my own knowledge, except for those matters therein stated on information and belief, and as to those matters, I believe them to be true;

2. I incorporate all of the factual assertions made in my *Motion* as though fully set forth herein. I learned on December 13, 2019 that Defendant tested positive in his urine for Cocaine. This comports with his behavior, which has become abusive and erratic. The Defendant has been physically abusive to our son; he's threatened me; and he has expressed suicidal thoughts. I don't want him around the children unsupervised;

3. That Defendant's lies to this Court are concerning. They are actions of someone who doesn't believe they have a problem and who is not ready to change. I am in need of familial support, as Defendant is not providing for the children and he is engaged in illegal activities of illicit drug use. It would not surprise me if he was dealing drugs to support his Cocaine habit. I therefore am requesting to immediately relocate to Ferndale, Michigan and I will comply with any Court Orders, including any orders to return later.

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

Executed on this 16 day of December, 2019.

  
TAMIKA JONES

## APPENDIX A - BRUNZELL ANALYSIS

*Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

1. ***The Qualities of the Advocate.*** Ms. Tindall's practice has been limited to domestic relations matters for over twenty (20) years. She has Nevada Supreme Court Appellate experience, and has written and lectured on domestic relations issues.

2. ***The Character of the Work to Be Done.*** This is a custody matter wherein Plaintiff has not acted in good faith. He's filed a *Motion* after having a criminal case for drugs, and after certifying to the Court that the Court should have no concern over his drug history. We have had to work around time and money issues, gather, review, discuss, and prepare these pleadings. The work involved is very important. The Court needs the facts applied to the law in order to render its decision. The skill involved reaches a medium high level. The parties' background is important and necessary for the Court to consider in rendering its decision according to statutory factors.

3. ***Work Actually Performed by the Lawyer:*** skill, time and attention given. The undersigned has performed a wealth of work on this case just to get this *Motion* completed. The time and attention given to the work speak from the pleading filed, and the completeness of our pleadings, legal analysis, and exhibits.

4. ***The Result.*** Defendant is hopeful that the relief she requested will be granted.

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

TAMIKA JONES

Plaintiff/Petitioner

v.

CHRISTOPHER JUDSON

Defendant/Respondent

Case No. D-19-594413-C

Dept. S

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

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

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

Party filing Motion/Opposition: TAMIKA JONES via counsel, Ms. Tindall Date December 17, 2019

Signature of Party or Preparer /s/ Jillian M. Tindall, Esq.



EXHS  
TAMIKA JONES  
4730 East Craig Rd., Bldg. 15, #2088  
Las Vegas, NV 89115  
(313)452-5009  
TJones2@hcpnv.com  
Defendant *In Proper Person*

DISTRICT COURT, FAMILY DIVISION  
CLARK COUNTY, NEVADA

TAMIKA JONES,

Plaintiff,

vs.

CHRISTOPHER JUDSON,

Defendant.

CASE NO: D-19-594413-C

DEPT. NO: S

**EXHIBITS TO EMERGENCY MOTION**

COMES NOW Plaintiff, **TAMIKA JONES**, *In Proper Person*, and files her *Motion Exhibits* as follows:

**LIST OF EXHIBITS**

1. Criminal Complaint for Drug Trafficking and Declaration of Undercover Agent;
2. Guilty Plea Agreement for Drug Trafficking, Criminal Case No. 16F10287X;
3. Criminal Docket for DOMESTIC BATTERY/DISTURING THE PEACE Case No. CR002515-13;
4. North Las Vegas Docket for Case No. TR-015696-19 showing active Warrant;
5. Declaration of Plaintiff's Mother stating Plaintiff and children are welcome to return;
6. Victim's Information sheet provided by the Police;
7. Sperling's statistics.

Dated this 15<sup>th</sup> day of December, 2019.

TAMIKA JONES  
/s/ Tamika Jones  
4730 East Craig Rd., Bldg. 15, #2088  
Las Vegas, NV 89115  
(313)452-5009  
TJones2@hcpnv.com  
Defendant *In Proper Person*



# **EXHIBIT 1**

JUSTICE COURT, LAS VEGAS TOWNSHIP  
CLARK COUNTY, NEVADA

2016 JUN 24 P 1:08

16F10287X  
CRM  
Criminal Complaint  
6666402



THE STATE OF NEVADA,

Plaintiff,

JUSTICE COURT  
LAS VEGAS, NEVADA

CASE NO: 16F10287X

-vs-

DEPT NO: 4

CHRISTOPHER CHARLES JUDSON  
#2867911,

Defendant.

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of SALE OF CONTROLLED SUBSTANCE (Category B Felony - NRS 453.321 - NOC 51090) and TRAFFICKING IN CONTROLLED SUBSTANCE (Category B Felony - NRS 453.3385.2 - NOC 51158), in the manner following, to-wit: That the said Defendant, on or between March 1, 2016 and June 21, 2016, at and within the County of Clark, State of Nevada,

COUNT 1 - SALE OF CONTROLLED SUBSTANCE

did on or about March 1, 2016 willfully, unlawfully, and feloniously sell to G. RIOS, a controlled substance, to-wit: Cocaine.

COUNT 2 - SALE OF CONTROLLED SUBSTANCE

did on or about March 1, 2016 willfully, unlawfully, and feloniously sell to G. RIOS, a controlled substance, to-wit: Methylenedioxymethamphetamine.

COUNT 3 - SALE OF CONTROLLED SUBSTANCE

did on or about March 10, 2016 willfully, unlawfully, and feloniously sell to G. RIOS, a controlled substance, to-wit: Methylenedioxymethamphetamine.

COUNT 4 - SALE OF CONTROLLED SUBSTANCE

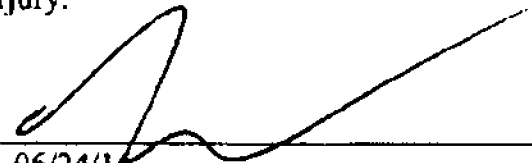
did on or about April 21, 2016 willfully, unlawfully, and feloniously sell to G. RIOS, a controlled substance, to-wit: Methylenedioxymethamphetamine.

COUNT 5 - TRAFFICKING IN CONTROLLED SUBSTANCE

did on or about June 21, 2016 willfully, unlawfully, feloniously, and knowingly or intentionally possess, either actually or constructively, 14 grams or more, but less than 28

1 grams, to-wit: approximately 22.9 grams of Methylenedioxymethamphetamine, or any  
2 mixture of substance consisting of approximately 22.9 grams containing the controlled  
3 substance Methylenedioxymethamphetamine.

4 All of which is contrary to the form, force and effect of Statutes in such cases made and  
5 provided and against the peace and dignity of the State of Nevada. Said Complainant makes  
6 this declaration subject to the penalty of perjury.

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8   
9 06/24/16

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26 16F10287X/cb  
27 LVMPD EV# 1606214027;  
1604213280; 1603103495;  
28 1603013523  
(TK4)

## DECLARATION OF ARREST

Event #: 160621-4027

I.D. #: 2867911

True Name: JUDSON, CHRISTOPHER

Date of Arrest: 06/21/16

Time of Arrest: 2200

## OTHER CHARGES RECOMMENDED FOR CONSIDERATION:

Other Charges

THE UNDERSIGNED MAKES THE FOLLOWING DECLARATIONS SUBJECT TO THE PENALTY FOR PERJURY AND SAYS: That I am a peace officer with the Las Vegas Metropolitan Police Department, Clark County, Nevada, being so employed for a period of 19.5 years.

That I learned the following facts and circumstances which lead me to believe that the above named subject committed (or was committing) the offense(s) of 4X SALES C/S MOLY/MDMA, SALES COCAINE at the location of 5710 E Tropicana Ave. Canyon Willow Tropicana, and that the offense(s) occurred at approximately 2200 hours on the 21st day of June, 2016, in the:

☒ County of Clark☐ City of Las Vegas

## DETAILS FOR PROBABLE CAUSE:

On Today's date of 06/21/16, I Detective J. Jones working out of the Central Narcotics Section was continuing an ongoing narcotics investigation into suspect identified as Christopher Judson, ID# 2867911, which began in March 2016. During the course of the investigation, I Detective J. Jones had undercover Detective G. Rios P#8917, working in undercover capacity contact suspect (CASH) later identified as Christopher Judson on 03/01/16, via cell phone number (313) 434-8867 that was connected to a Craigslist's add add for (Party Favors). U/C Detective G. Rios contacted Christopher Judson and arranged and completed a purchase of 2.1 gross grams of purported mdma/molly, and 3.2 gross grams of ODV+ Cocaine from Judson 03/01/16 under event 160301-3523. As the case continued the U/C contacted Christopher Judson on 03/10/16 and arranged a larger purchase of Molly/Mdma from Judson. Judson agreed to meet the U/C Detective G. Rios at the CVS parking lot located at Tropicana Ave./Boulder Highway. At 2056 hours the U/C pulled into the parking lot of the CVS and notified Judson he was arrived at the meet location. A few minutes later Detective T Bachman observed Judson walking towards the U/C's vehicle from the area of a white Chevy Impala bearing Nevada plate 947-LUL. Judson entered into the U/C's vehicle and sold U/C 6.6 gross grams of purported mdma/molly. Judson completed the sale of purported molly with the J/C and walked back over to the white Chevy Impala. Judson entered into the white Chevy Impala's rear passenger's seat, and drove around the CVS parking lot. Judson exited the rear seat of the vehicle and walked across Boulder Hwy to get some food. Judson was then surveilled directly back to his apartment complex located at 5710 E. Tropicana Ave. (Canyon Willow Tropicana) Judson walked directly over to building #47, and walked up the stairs to the second story and entered into apartment #2187, with the use of a key. During the same time

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor).

Declarant must sign all page(s)  
with an original signature.

J. JONES

Print Declarant's Name

Declarant's Signature

P#

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
CONTINUATION REPORT

160621-4027

Event #: 160000-

ID#: 2867911

Detectives Meegan and C. Cannon followed the white Chevy Impala bearing Nevada plate 947-LUL, over to 4465 Powell Ave. and parked in the driveway of the location, and the two occupants exited the car and entered into the residence. The 6.6 gross grams of purported Molly/Mdma purchased by the U/C from Judson was impounded under LVMPD Event# 160310-3495. On 04/21/16 U/C Detective G. Rios called Judson and arranged another purchase of Molly/Mdma from him. Judson told U/C Detective G. Rios to meet him at his apartment complex located at 5710 E Tropicana Ave. (Canyon Willow Tropicana). At approximately 2015 hours the U/C pulled into the parking lot of the Canyon Willow Tropicana Apartments and parked in front near the office area of the complex. At 2020 hours Judson exits his apartment #2187 in building #47 with a second male adult and began walking towards the front gate. At 2033 hours Judson walked out to the front of the complex and meet up with U/C Detective G. Rios. During that time Judson completed the hand to hand transaction with the U/C via the passenger's window of the U/C's vehicle. The U/C purchased the purported MDMA from Judson for \$250 dollars of LVMPD buy money, and later weighed the purchased purported MDMA purchased from Judson. U/C Detective G. Rios determined the purported MDMA to weigh 5.8 gross grams, and impounded the purported MDMA into evidence under event #160421-3280

On 06/21/16 the U/C contacted Judson once again and arranged a purchase of 100 capsules MDMA from Judson for \$1100 dollars, and they agreed to meet at Judson's apartment complex (Canyon Willow Tropicana) located at 5710 E Tropicana Ave. At approximately 2145 hours, the U/C pulled into the parking lot of the Canyon Willow Tropicana Apartments and parked in front near the office area of the complex. At 2150 hours Judson exits his apartment #2187 in building #47, and began walking towards the front gate. At 2157 hours Judson walked out to the front of the complex and meet up with U/C Detective G. Rios. During that time Judson entered into the U/C's vehicle and completed the hand to hand transaction with the U/C. The U/C proceed to pay Judson the agreed upon amount of \$1100 dollars of LVMPD buy money for the purported 100 capsules of MDMA, when Detectives K. Hooten and I Detective J. Jones (Case Agent) took Judson into custody without incident. The U/C later weighed the purported capsules of MDMA and determined them to be 22.9 gross grams, and impounded the purported MDMA into evidence under event #160621-4027. Additional information can be obtained from the U/C buy/surveillance reports and events listed above. In addition to a subsequent officers report of items recovered from suspect Judson's apartment building #47, apartment #2187 Judson was transported and booked into CCDC accordingly for TCS MDMA under event 160621-4027, Sales C/S cocaine and MDMA under event #160301-3523, Sales C/S MDMA under event #160310-3495, and Sales C/S MDMA under event #160421-3280

Wherefore, Declarant prays that a finding be made by a magistrate that probable cause exists to hold said person for preliminary hearing (if charges are a felony or gross misdemeanor) or for trial (if charges are misdemeanor)

Declarant must sign all page(s)  
with an original signature.

J. JONES

Print Declarant's Name

Declarant's Signature

P#

# **EXHIBIT 2**

36  
**ORIGINAL**

1 **GPA**  
2 **STEVEN B. WOLFSON**  
3 **Clark County District Attorney**  
4 **Nevada Bar #001565**  
5 **SHANON CLOWERS**  
6 **Chief Deputy District Attorney**  
7 **Nevada Bar #010008**  
8 **200 Lewis Avenue**  
9 **Las Vegas, NV 89155-2212**  
10 **(702) 671-2500**  
11 **Attorney for Plaintiff**

**FILED IN OPEN COURT**  
**STEVEN D. GRIERSON**  
**CLERK OF THE COURT**

**JUL 29 2016**

BY Kristen Brown  
**KRISTEN BROWN, DEPUTY**

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

9 **THE STATE OF NEVADA,**

10 **Plaintiff,**

11 **-vs-**

12 **CHRISTOPHER CHARLES JUDSON,**  
13 **#2867911**

14 **Defendant.**

**CASE NO: C-16-316825-1**

**DEPT NO: XXIII**

15 **GUILTY PLEA AGREEMENT**

16 I hereby agree to plead guilty to: **TRAFFICKING IN CONTROLLED**  
17 **SUBSTANCE (Category B Felony - NRS 453.3385.1 - NOC 51156)**, as more fully alleged  
18 in the charging document attached hereto as Exhibit "1".

19 My decision to plead guilty is based upon the plea agreement in this case which is as  
20 follows:

21 Both Parties stipulate to twelve (12) to sixty (60) months in the Nevada Department of  
22 Corrections. The Defendant agrees to forfeit any and all property seized in connection with  
23 this case. The State has no opposition to bail being reduced to \$20,000.00 with source hearing  
24 and house arrest.

25 I agree to the forfeiture as set forth in the Stipulation for Compromise of Seized  
26 Property which is attached hereto and incorporated herein by reference as Exhibit "2".

27 I understand and agree that, if I fail to interview with the Department of Parole and  
28 Probation, fail to appear at any subsequent hearings in this case, or an independent magistrate,

C-16-316825-1  
GPA  
Guilty Plea Agreement  
0000014



W:\2016\2016F\10287\16F10287-GPA-001.DOCX

1 by affidavit review, confirms probable cause against me for new criminal charges including  
2 reckless driving or DUI, but excluding minor traffic violations, the State will have the  
3 unqualified right to argue for any legal sentence and term of confinement allowable for the  
4 crime(s) to which I am pleading guilty, including the use of any prior convictions I may have  
5 to increase my sentence as an habitual criminal to five (5) to twenty (20) years, life without  
6 the possibility of parole, life with the possibility of parole after ten (10) years, or a definite  
7 twenty-five (25) year term with the possibility of parole after ten (10) years.

8 Otherwise I am entitled to receive the benefits of these negotiations as stated in this  
9 plea agreement.

#### 10 CONSEQUENCES OF THE PLEA

11 I understand that by pleading guilty I admit the facts which support all the elements of  
12 the offense(s) to which I now plead as set forth in Exhibit "1".

13 I understand that as a consequence of my plea of guilty the Court must sentence me to  
14 imprisonment in the Nevada Department of Corrections for a minimum term of not less than  
15 one (1) year and a maximum term of not more than six (6) years. The minimum term of  
16 imprisonment may not exceed forty percent (40%) of the maximum term of imprisonment. I  
17 understand that I may also be fined up to \$50,000.00. I understand that the law requires me to  
18 pay an Administrative Assessment Fee. I also understand that a conviction of any violation of  
19 NRS Chapter 453, the Uniform Controlled Substance Act, requires that I pay a controlled  
20 substance analysis fee.

21 I understand that, if appropriate, I will be ordered to make restitution to the victim of  
22 the offense(s) to which I am pleading guilty and to the victim of any related offense which is  
23 being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to  
24 reimburse the State of Nevada for any expenses related to my extradition, if any.

25 I understand that I am not eligible for probation for the offense to which I am pleading  
26 guilty.

27 I understand that I must submit to blood and/or saliva tests under the Direction of the  
28 Division of Parole and Probation to determine genetic markers and/or secretor status.



1 I understand that if I am pleading guilty to charges of Burglary, Invasion of the Home,  
2 Possession of a Controlled Substance with Intent to Sell, Sale of a Controlled Substance, or  
3 Gaming Crimes, for which I have prior felony conviction(s), I will not be eligible for probation  
4 and may receive a higher sentencing range.

5 I understand that if more than one sentence of imprisonment is imposed and I am  
6 eligible to serve the sentences concurrently, the sentencing judge has the discretion to order  
7 the sentences served concurrently or consecutively.

8 I understand that information regarding charges not filed, dismissed charges, or charges  
9 to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

10 I have not been promised or guaranteed any particular sentence by anyone. I know that  
11 my sentence is to be determined by the Court within the limits prescribed by statute.

12 I understand that if my attorney or the State of Nevada or both recommend any specific  
13 punishment to the Court, the Court is not obligated to accept the recommendation.

14 I understand that if the offense(s) to which I am pleading guilty was committed while I  
15 was incarcerated on another charge or while I was on probation or parole that I am not eligible  
16 for credit for time served toward the instant offense(s).

17 I understand that if I am not a United States citizen, any criminal conviction will likely  
18 result in serious negative immigration consequences including but not limited to:

- 19 1. The removal from the United States through deportation;
- 20 2. An inability to reenter the United States;
- 21 3. The inability to gain United States citizenship or legal residency;
- 22 4. An inability to renew and/or retain any legal residency status; and/or
- 23 5. An indeterminate term of confinement, with the United States Federal  
24 Government based on my conviction and immigration status.

25 Regardless of what I have been told by any attorney, no one can promise me that this  
26 conviction will not result in negative immigration consequences and/or impact my ability to  
27 become a United States citizen and/or a legal resident.

28 I understand that the Division of Parole and Probation will prepare a report for the

1 sentencing judge prior to sentencing. This report will include matters relevant to the issue of  
2 sentencing, including my criminal history. This report may contain hearsay information  
3 regarding my background and criminal history. My attorney and I will each have the  
4 opportunity to comment on the information contained in the report at the time of sentencing.  
5 Unless the District Attorney has specifically agreed otherwise, the District Attorney may also  
6 comment on this report.

### 7 WAIVER OF RIGHTS

8 By entering my plea of guilty, I understand that I am waiving and forever giving up the  
9 following rights and privileges:

- 10 1. The constitutional privilege against self-incrimination, including the right  
11 to refuse to testify at trial, in which event the prosecution would not be  
allowed to comment to the jury about my refusal to testify.
- 12 2. The constitutional right to a speedy and public trial by an impartial jury,  
13 free of excessive pretrial publicity prejudicial to the defense, at which  
14 trial I would be entitled to the assistance of an attorney, either appointed  
or retained. At trial the State would bear the burden of proving beyond  
a reasonable doubt each element of the offense(s) charged.
- 15 3. The constitutional right to confront and cross-examine any witnesses who  
16 would testify against me.
- 17 4. The constitutional right to subpoena witnesses to testify on my behalf.
- 18 5. The constitutional right to testify in my own defense.
- 19 6. The right to appeal the conviction with the assistance of an attorney,  
20 either appointed or retained, unless specifically reserved in writing and  
21 agreed upon as provided in NRS 174.035(3). I understand this means I  
22 am unconditionally waiving my right to a direct appeal of this conviction,  
including any challenge based upon reasonable constitutional,  
23 jurisdictional or other grounds that challenge the legality of the  
proceedings as stated in NRS 177.015(4). However, I remain free to  
challenge my conviction through other post-conviction remedies  
including a habeas corpus petition pursuant to NRS Chapter 34.

### 24 VOLUNTARINESS OF PLEA

25 I have discussed the elements of all of the original charge(s) against me with my  
26 attorney and I understand the nature of the charge(s) against me.

27 I understand that the State would have to prove each element of the charge(s) against  
28 me at trial.

1 I have discussed with my attorney any possible defenses, defense strategies and  
2 circumstances which might be in my favor.

3 All of the foregoing elements, consequences, rights, and waiver of rights have been  
4 thoroughly explained to me by my attorney.

5 I believe that pleading guilty and accepting this plea bargain is in my best interest, and  
6 that a trial would be contrary to my best interest.

7 I am signing this agreement voluntarily, after consultation with my attorney, and I am  
8 not acting under duress or coercion or by virtue of any promises of leniency, except for those  
9 set forth in this agreement.

10 I am not now under the influence of any intoxicating liquor, a controlled substance or  
11 other drug which would in any manner impair my ability to comprehend or understand this  
12 agreement or the proceedings surrounding my entry of this plea.

13 My attorney has answered all my questions regarding this guilty plea agreement and its  
14 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

15 DATED this 29 day of July, 2016.

16  
17   
18 CHRISTOPHER CHARLES JUDSON  
19 Defendant

20 AGREED TO BY:

21   
22  
23 SHANON CLOWERS  
24 Chief Deputy District Attorney  
25 Nevada Bar #010008  
26  
27  
28

1 CERTIFICATE OF COUNSEL:

2 I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court  
3 hereby certify that:

- 4 1. I have fully explained to the Defendant the allegations contained in the  
5 charge(s) to which guilty pleas are being entered.  
6 2. I have advised the Defendant of the penalties for each charge and the restitution  
7 that the Defendant may be ordered to pay.  
8 3. I have inquired of Defendant facts concerning Defendant's immigration status  
9 and explained to Defendant that if Defendant is not a United States citizen any  
10 criminal conviction will most likely result in serious negative immigration  
11 consequences including but not limited to:  
12 a. The removal from the United States through deportation;  
13 b. An inability to reenter the United States;  
14 c. The inability to gain United States citizenship or legal residency;  
15 d. An inability to renew and/or retain any legal residency status; and/or  
16 e. An indeterminate term of confinement, by with United States Federal  
17 Government based on the conviction and immigration status.

18 Moreover, I have explained that regardless of what Defendant may have been  
19 told by any attorney, no one can promise Defendant that this conviction will not  
20 result in negative immigration consequences and/or impact Defendant's ability  
21 to become a United States citizen and/or legal resident.

- 22 4. All pleas of guilty offered by the Defendant pursuant to this agreement are  
23 consistent with the facts known to me and are made with my advice to the  
24 Defendant.  
25 5. To the best of my knowledge and belief, the Defendant:  
26 a. Is competent and understands the charges and the consequences of  
27 pleading guilty as provided in this agreement,  
28 b. Executed this agreement and will enter all guilty pleas pursuant hereto  
voluntarily, and  
c. Was not under the influence of intoxicating liquor, a controlled  
substance or other drug at the time I consulted with the Defendant as  
certified in paragraphs 1 and 2 above.

Dated: This 29 day of July, 2016.

  
ATTORNEY FOR DEFENDANT

ed/HIDTA

  
CLERK OF THE COURT

1 **INFM**  
2 **STEVEN B. WOLFSON**  
3 **Clark County District Attorney**  
4 **Nevada Bar #001565**  
5 **SHANON CLOWERS**  
6 **Chief Deputy District Attorney**  
7 **Nevada Bar #010008**  
8 **200 Lewis Avenue**  
9 **Las Vegas, Nevada 89155-2212**  
10 **(702) 671-2500**  
11 **Attorney for Plaintiff**

12 **I.A. 7/29/2016**  
13 **10:00 AM**  
14 **R. HEMLICK**

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

15 **THE STATE OF NEVADA,**  
16  
17 **Plaintiff,**

**CASE NO: C-16-316825-1**

18 **-vs-**

**DEPT NO: XXIII**

19 **CHRISTOPHER CHARLES JUDSON,**  
20 **#2867911**

21 **Defendant.**

**INFORMATION**

22 **STATE OF NEVADA } ss.**  
23 **COUNTY OF CLARK }**

24 **STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State**  
25 **of Nevada, in the name and by the authority of the State of Nevada, informs the Court:**

26 **That CHRISTOPHER CHARLES JUDSON, the Defendant(s) above named, having**  
27 **committed the crime of TRAFFICKING IN CONTROLLED SUBSTANCE (Category B**  
28 **Felony - NRS 453.3385.1 - NOC 51156), on or about the 21st day of June, 2016, within the**  
29 **County of Clark, State of Nevada, contrary to the form, force and effect of statutes in such**  
30 **cases made and provided, and against the peace and dignity of the State of Nevada, did**  
31 **willfully, unlawfully, feloniously, and knowingly or intentionally possess, either actually or**

32 **///**

33 **///**

34 **///**

35 **///**

1 constructively, 4 grams or more, but less than 14 grams, to-wit: approximately 13.9 grams of  
2 Methylenedioxymethamphetamine, or any mixture of substance consisting of approximately  
3 13.9 grams containing the controlled substance Methylenedioxymethamphetamine.

4 STEVEN B. WOLFSON  
5 Clark County District Attorney  
6 Nevada Bar #001565

7 BY /s/ SHANON CLOWERS  
8 SHANON CLOWERS  
9 Chief Deputy District Attorney  
10 Nevada Bar #010008  
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26 16F10287X /ed – HIDTA  
27 LVMPD EV#1606214027;  
1604213280; 1603103495;  
28 1603013523  
(TK4)

# **EXHIBIT 3**

# CR002515-13 CITY OF NORTH LAS VEGAS VS. JUDSON, CHRISTOPHER

- Case Type:  
• CRIMINAL NLV
- Case Status:  
• CLOSED
- Case Judge:  
• RAMSEY, CATHERINE
- Next Event:

All Information   Party   Charge   Ticket/Citation #   Event   Docket   Financial   Receipt   Additional Fields

## Party Information

JUDSON, CHRISTOPHER  
- DEFENDANT

- DOB  
• 09/08/1968
- Address  
• 5536 AYERS CLIFF  
• NORTH LAS VEGAS, NV 89081
- Phone  
• (702)403-5623

Alias

Party Attorney

[More Party Information](#)

[Pending Cases](#)

## Party Charge Information

- JUDSON, CHRISTOPHER
- - DEFENDANT

M01001M00NV - MISDEMEANOR   DISTURBING PEACE (BREACH OF PEACE)

- Original Charge
- A12016M00NV DOM BATTERY, (1ST) (MISDEMEANOR)
- Indicted Charge
- Amended Charge
- M01001M00NV DISTURBING PEACE (BREACH OF PEACE) (MISDEMEANOR)
- DV Related?
- Modifiers
- Stage Date
- Ticket #
- B00095671
- ATN #
- Tracking #
- Place of Offense
- CITY OF NORTH LAS VEGAS
- Offense Location
- Date of Offense
- 04/23/2013
- Complainant

## Party Charge Disposition

Disposition Date

Disposition

07/18/2016

CHANGE PLEA TO NOLO AT PRETRIAL

[Sentencing Information](#)

## Ticket/Citation #

Citation # : B00095671 - CITY OF NORTH LAS VEGAS

- Offense Date
- 04/23/2013
- Agency
- NORTH LAS VEGAS POLICE DEPARTMENT
- Complainant
- Speed Cited
- 0
- Speed Limit
- 0
- Location



- 5536 AYERS CLIFF
- Insured/Proof
- 
- Accident
- N
- Work Zone
- N
- Haz Mat
- N
- Points
- 
- Priors
- 
- License Taken
- N
- BAC
- 

- Plate
- 
- State
- NV
- Year
- 
- Type
- 
- Style
- 
- Color
- 

#### Events

<u>Date/Time</u>	<u>Location</u>	<u>Type</u>	<u>Result</u>	<u>Event Judge</u>
05/28/2013 08:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	ARRAIGNMENT	EVENT COMPLETED	RAMSEY, CATHERINE
07/11/2013 11:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL	BENCH WRNT ISSUED NO PLEA CNOR FULL BAIL	SCHULKE, KURT
01/09/2014 08:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	NOTICE TO SURETY HEARING	EVENT COMPLETED	NORTH LAS VEGAS MUNICIPAL COURT
08/12/2015 09:30 AM	NORTH LAS VEGAS MUNICIPAL COURT	ARRAIGNMENT (IN CUSTODY)	EVENT COMPLETED	SCHULKE, KURT
08/17/2015 08:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	MOTIONS (ATTORNEY)	EVENT COMPLETED	RAMSEY, CATHERINE
09/16/2015 11:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL	EVENT COMPLETED	RAMSEY, CATHERINE
10/22/2015 11:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL	EVENT COMPLETED	RAMSEY, CATHERINE
12/03/2015 11:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL	EVENT COMPLETED	RAMSEY, CATHERINE
01/05/2016 08:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	MOTIONS (ATTORNEY)	EVENT COMPLETED	RAMSEY, CATHERINE
01/05/2016 11:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL	BENCH WARRANT ISSUED - NO PLEA	RAMSEY, CATHERINE
06/15/2016 09:30 AM	NORTH LAS VEGAS MUNICIPAL COURT	ARRAIGNMENT (IN CUSTODY)	EVENT COMPLETED	RAMSEY, CATHERINE
06/16/2016 08:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	MOTIONS (ATTORNEY)	EVENT COMPLETED	RAMSEY, CATHERINE
07/18/2016 11:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL	EVENT COMPLETED	SCHULKE, KURT
07/18/2016 01:30 PM	NORTH LAS VEGAS MUNICIPAL COURT	PRETRIAL (TRAFFIC)	EVENT COMPLETED	SCHULKE, KURT

#### Docket Information

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
04/23/2013	DEFENDANT ARRESTED/IN- CUSTODY	DEFENDANT ARRESTED/IN-CUSTODY			
04/24/2013	HEARING SCHEDULED	ARRAIGNMENT AND SENTENCING HEARING SCHEDULED Event: ARRAIGNMENT Date: 05/28/2013 Time: 8:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Result: EVENT COMPLETED			
04/24/2013	BOND FEE	BOND FEE Receipt: 1794467 Date: 04/24/2013	\$40.00	\$0.00	
04/24/2013	DEFENDANT RELEASED FROM DETENTION	DEFENDANT RELEASED FROM DETENTION			
05/01/2013	SURETY BOND FILED	SURETY BOND FILED  Arrest Bond Added to Case with: Action Code: DOM BATTERY, (1ST) Arrest Date: 04/23/2013 Arrest # Type: LAW ENFORCEMENT AGENCY NUMBER Number: 130423006868 Bond Status: ACTIVE BOND Status Date: 04/24/2013 Blanket Bond: No Okay to Apply: No Bond Type: SURETY BOND Bond Amount: 3137 Bond/Pwr No.: AS6K398044 Bonding Co.: ALWAYS AVAILABLE BAIL BONDS Insurance Co.: ALLEGHENY CASUALTY COMPANY			
05/28/2013	PLED NOT GUILTY	PLED NOT GUILTY Charge #1: DOM BATTERY, (1ST)			
05/28/2013	EVENT COMPLETED	EVENT COMPLETED The following event: ARRAIGNMENT scheduled for 05/28/2013 at 8:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
05/28/2013	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check in: Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: CURTIS, DAVITA - COURT CLERK 3: Present MORGAN, SANDRA - DEPUTY CITY ATTORNEY: Present PALOMO, GUILLERMO - INTERPRETER: Present WALLER, DAWNA - COURT CLERK 3: Present Prosecutors: BARR, JEFFREY F: Present Parties:			
05/28/2013	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL Date: 07/11/2013 Time: 11:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
07/11/2013	BENCH WARRANT ISSUED NO PLEA - CNOR FULL BAIL	BENCH WARRANT ISSUED NO PLEA - CNOR FULL BAIL The following event: PRETRIAL scheduled for 07/11/2013 at 11:00 am has been resulted as follows:  Result: BENCH WARRANT ISSUED NO PLEA - CNOR FULL BAIL Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
07/11/2013	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: CURTIS, DAVITA - COURT CLERK 3: Present MORGAN, SANDRA - DEPUTY CITY ATTORNEY: Present PALOMO, GUILLERMO - INTERPRETER: Present WALLER, DAWNA - COURT CLERK 3: Present Prosecutors: BARR, JEFFREY F: Present Parties:			
07/11/2013	NOTICE TO SURETY HEARING SCHEDULED	NOTICE TO SURETY HEARING SCHEDULED Event: NOTICE TO SURETY HEARING Date: 01/09/2014 Time: 8:00 am Judge: NORTH LAS VEGAS MUNICIPAL COURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Result: EVENT COMPLETED			
07/11/2013	NOTICE TO SURETY PRINTED	NOTICE TO SURETY PRINTED  NOTICE TO SURETY Sent on: 07/11/2013 14:08:23.29			
07/15/2013	ALERT ISSUED	ALERT ISSUED ACTIVE WARRANT issued on: 07/15/2013 For: JUDSON, CHRISTOPHER Bond Amt: 0 Bond Type:			
07/15/2013	WARRANT PRINTED.	WARRANT PRINTED (** \$3337 CNOR **) BW NO PLEA Sent on: 07/15/2013 08:00:31.48			
10/23/2013	WARRANT ASSIGNED TO: F. DIGIOVANNI	WARRANT ASSIGNED TO: F. DIGIOVANNI			
01/09/2014	BAIL BOND FORFEITURE ORDERED	FORFEIT BAIL BOND; BAIL BOND FORFEITURE HEARING HELD BAIL BOND FORFEITURE SCHEDULED			
01/09/2014	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT: JUDGE C. RAMSEY C/A S. WEBSTER SCC D. CURTIS			
01/09/2014	EVENT COMPLETED	EVENT COMPLETED The following event: NOTICE TO SURETY HEARING scheduled for 01/09/2014 at 8:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: NORTH LAS VEGAS MUNICIPAL COURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
01/16/2014	JUDGMENT:	JUDGEMENT: GRANTED			
01/16/2014	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT: JUDGE: CATHERINE RAMSEY CITY ATTORNEY: KIMBERLY PHILLIPS COURTROOM CLERK: MARIA AUSTAD			
01/30/2014	BAIL BOND FORFEITURE PAYMENT	BAIL BOND FORFEITURE PAYMENT Receipt: 1868840 Date: 01/30/2014	\$3,137.00	\$0.00	
01/30/2014	JUDGMENT SATISFIED	JUDGMENT SATISFIED			
01/30/2014	BOND EXONERATED	BOND EXONERATED			
01/30/2014	CASH BAIL FORFEITED	CASH BAIL FORFEITED - BAIL BOND FORFEITURE Receipt: 1868844 Date: 01/30/2014	\$3,137.00	\$0.00	

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
08/10/2015	MOTION TO QUASH NO PLEA	MOTION TO QUASH NO PLEA Attorney: HELMICK, KIRK R (012769)			
08/10/2015	CASE REACTIVATED	CASE REACTIVATED			
08/10/2015	HEARING SCHEDULED	ARRAIGNMENT AND SENTENCING HEARING SCHEDULED Event: MOTIONS Date: 08/17/2015 Time: 8:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Result: EVENT COMPLETED			
08/11/2015	DEFENDANT ARRESTED//IN- CUSTODY	DEFENDANT ARRESTED//IN-CUSTODY			
08/11/2015	CASE REACTIVATED	CASE REACTIVATED			
08/11/2015	WARRANT SERVED	WARRANT SERVED ACTIVE WARRANT served on: 08/11/2015 For: JUDSON, CHRISTOPHER			
08/11/2015	HEARING SCHEDULED	ARRAIGNMENT AND SENTENCING HEARING SCHEDULED Event: ARRAIGNMENT (IN CUSTODY) Date: 08/12/2015 Time: 9:30 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
08/12/2015	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT HELMICK, KIRK R			
08/12/2015	DEFENSE MOTION	DEFENSE MOTION TO RELEASE O/R: GRANTED			
08/12/2015	NOT GUILTY PLEA STANDS	NOT GUILTY PLEA STANDS			
08/12/2015	RELEASED ON OWN RECOGNIZANCE	RELEASED ON OWN RECOGNIZANCE			
08/12/2015	EVENT COMPLETED	EVENT COMPLETED The following event: ARRAIGNMENT (IN CUSTODY) scheduled for 08/12/2015 at 9:30 am has been resulted as follows:  Result: EVENT COMPLETED Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
08/12/2015	EVENT COMPLETED	EVENT COMPLETED The following event: MOTIONS scheduled for 08/17/2015 at 8:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
08/12/2015	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: AUSTAD, MARIA - COURT CLERK 3: Present CURTIS, DAVITA - COURT CLERK 3: Present PALOMO, GUILLERMO - INTERPRETER: Present SMEDLEY ESQ, JAMES J. - DEPUTY CITY ATTORNEY: Present WADE, RICHARD - ATTORNEY: Present Prosecutors: BARR, JEFFREY F: Present Parties:  Parties: JUDSON, CHRISTOPHER - DEFENDANT BARR, JEFFREY F - COMPLAINANT			

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
08/12/2015	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL Date: 09/16/2015 Time: 11:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
09/16/2015	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT RYAN HELMICK			
09/16/2015	CONTINUE COURT DATE	CONTINUE COURT DATE			
09/16/2015	EVENT COMPLETED	EVENT COMPLETED The following event: PRETRIAL scheduled for 09/16/2015 at 11:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
09/16/2015	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: AUSTAD, MARIA - COURT CLERK 3: Present PALOMO, GUILLERMO - INTERPRETER: Present SMEDLEY ESQ, JAMES J - DEPUTY CITY ATTORNEY: Present SYPHUS, SHELLY - COURT CLERK 2: Present Prosecutors: BARR, JEFFREY F: Present Parties:			
09/16/2015	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL Date: 10/22/2015 Time: 11:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
10/22/2015	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT RYAN HELMICK			
10/22/2015	CONTINUE COURT DATE	CONTINUE COURT DATE FOR PRETRIAL			
10/22/2015	EVENT COMPLETED	EVENT COMPLETED The following event: PRETRIAL scheduled for 10/22/2015 at 11:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
10/22/2015	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check in: Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: PELAS, VERONICA - INTERPRETER: Present TAYLOR, BRANDY - COURT CLERK 3: Present WALLER, DAWNA - COURT CLERK 3: Present WEBSTER ESQ, STEPHEN C - SENIOR DEPUTY CITY ATTORNEY: Present Prosecutors: BARR, JEFFREY F: Present Parties:			

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
10/22/2015	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL Date: 12/03/2015 Time: 11:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
12/03/2015	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT HELMICK, RYAN			
12/03/2015	CONTINUE COURT DATE	CONTINUE COURT DATE			
12/03/2015	DEFENSE MOTION	DEFENSE MOTION CONT PT			
12/03/2015	EVENT COMPLETED	EVENT COMPLETED The following event: PRETRIAL scheduled for 12/03/2015 at 11:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
12/03/2015	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL Date: 01/05/2016 Time: 11:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
12/03/2015	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: AUSTAD, MARIA - COURT CLERK 3: Present CURTIS, DAVITA - COURT CLERK 3: Present PALOMO, GUILLERMO - INTERPRETER: Present WEBSTER ESQ, STEPHEN C - SENIOR DEPUTY CITY ATTORNEY: Present Prosecutors: BARR, JEFFREY F: Present Parties:			
12/29/2015	MOTION	MOTION TO WITHDRAW Attorney: HELMICK, KIRK R (012789)			
12/29/2015	HEARING SCHEDULED	ARRAIGNMENT AND SENTENCING HEARING SCHEDULED Event: MOTIONS Date: 01/05/2016 Time: 8:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Result: EVENT COMPLETED			
01/05/2016	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT - KRIS HELMICK			
01/05/2016	MOTION GRANTED	MOTION GRANTED TO WITHDRAW AS ATTORNEY OF RECORD			
01/05/2016	EVENT COMPLETED	EVENT COMPLETED The following event: MOTIONS scheduled for 01/05/2016 at 8:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
01/05/2016	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	<p>PRESIDING JUDGE AND STAFF ATTENDING IN-COURT</p> <p>Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1</p> <p>Check In:            Judge: RAMSEY, CATHERINE            Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1            Staff:            AUSTAD, MARIA - COURT CLERK 3: Present            PELAS, VERONICA - INTERPRETER: Present            PHILLIPS, KIMBERLY - DEPUTY CITY ATTORNEY: Present            TAYLOR, BRANDY - COURT CLERK 3: Present            Prosecutors:            BARR, JEFFREY F: Present            Parties:</p> <p>Parties:            JUDSON, CHRISTOPHER - DEFENDANT            BARR, JEFFREY F - COMPLAINANT</p>			
01/05/2016	BENCH WARRANT ISSUED WITHOUT PLEA	<p>BENCH WARRANT ISSUED WITHOUT PLEA (DEPT 1)</p> <p>The following event: PRETRIAL scheduled for 01/05/2016 at 11:00 am has been resulted as follows:</p> <p>Result: BENCH WARRANT ISSUED - NO PLEA (DEPT 1)            Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS            MUNICIPAL COURT DEPT. 1</p>			
01/05/2016	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	<p>PRESIDING JUDGE AND STAFF ATTENDING IN-COURT</p> <p>Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1</p> <p>Check In:            Judge: RAMSEY, CATHERINE            Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1            Staff:            AUSTAD, MARIA - COURT CLERK 3: Present            PELAS, VERONICA - INTERPRETER: Present            PHILLIPS, KIMBERLY - DEPUTY CITY ATTORNEY: Present            TAYLOR, BRANDY - COURT CLERK 3: Present            Prosecutors:            BARR, JEFFREY F: Present            Parties:</p>			
01/05/2016	NO COURT COSTS ASSESSED	NO COURT COSTS ASSESSED			
01/05/2016	ALERT ISSUED	<p>ALERT ISSUED</p> <p>ACTIVE WARRANT issued on: 01/05/2016            For: JUDSON, CHRISTOPHER            Bond Amt: 0            Bond Type:</p>			
01/05/2016	WARRANT PRINTED.	<p>WARRANT PRINTED</p> <p>BW NO PLEA (DEPT 1)            Sent on: 01/05/2016 15:02:25.94</p>			
06/09/2016	MOTION	MOTION TO PLACE ON CALENDAR TO QUASH BENCH WARRANT Attorney: HELMICK, KIRK R (012769)			
06/09/2016	HEARING SCHEDULED	<p>ARRAIGNMENT AND SENTENCING HEARING SCHEDULED</p> <p>Event: MOTIONS            Date: 06/16/2016 Time: 8:00 am            Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS            MUNICIPAL COURT DEPT. 1</p> <p>Result: EVENT COMPLETED</p>			
06/09/2016	MOTION TO QUASH NO PLEA	MOTION TO QUASH NO PLEA			
06/09/2016	CASE REACTIVATED	CASE REACTIVATED			
06/13/2016	DEFENDANT ARRESTED//IN- CUSTODY	DEFENDANT ARRESTED//IN-CUSTODY			

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
06/13/2016	CASE REACTIVATED	CASE REACTIVATED			
06/13/2016	WARRANT SERVED	WARRANT SERVED P2065 ACTIVE WARRANT served on: 06/13/2016 For: JUDSON, CHRISTOPHER			
06/14/2016	MOTION	CITY'S MOTION: OPPOSITION TO MOTION TO PLACE ON CALENDAR QUASH BENCH WARRANT Attorney: GOSWAMI ESQ, DEEP (0010884)			
06/14/2016	EVENT COMPLETED	EVENT COMPLETED The following event: MOTIONS scheduled for 06/16/2016 at 8:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
06/14/2016	HEARING SCHEDULED	ARRAIGNMENT AND SENTENCING HEARING SCHEDULED Event: ARRAIGNMENT (IN CUSTODY) Date: 06/15/2016 Time: 9:30 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Result: EVENT COMPLETED			
06/15/2016	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT - D. GILLIAM FOR R. HELMICK			
06/15/2016	NO COURT COSTS ASSESSED	NO COURT COSTS ASSESSED			
06/15/2016	CONTINUE COURT DATE	CONTINUE COURT DATE FOR PT - D/M			
06/15/2016	EVENT COMPLETED	EVENT COMPLETED The following event: ARRAIGNMENT (IN CUSTODY) scheduled for 06/15/2016 at 9:30 am has been resulted as follows:  Result: EVENT COMPLETED Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
06/15/2016	NOT GUILTY PLEA STANDS	NOT GUILTY PLEA STANDS			
06/15/2016	RELEASED ON OWN RECOGNIZANCE	RELEASED ON OWN RECOGNIZANCE			
06/15/2016	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: ORTIZ, RAUL A - DEPUTY CITY ATTORNEY: Present PALOMO, GUILLERMO - INTERPRETER: Present PARK ESQ, LESLIE - ATTORNEY: Present TAYLOR, BRANDY - COURT CLERK 3: Present WALLER, DAWNA - COURT CLERK 3: Present Prosecutors: BARR, JEFFREY F: Present Parties:  Parties: JUDSON, CHRISTOPHER - DEFENDANT BARR, JEFFREY F - COMPLAINANT			
06/15/2016	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL Date: 07/18/2016 Time: 11:00 am Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
07/18/2016	COURT ORDERED:	COURT ORDERED: CONTINUE TO 1:30 CALENDAR			



<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
07/18/2016	EVENT COMPLETED	EVENT COMPLETED The following event: PRETRIAL scheduled for 07/18/2016 at 11:00 am has been resulted as follows:  Result: EVENT COMPLETED Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
07/18/2016	PRETRIAL HEARING SCHEDULED:	PRETRIAL HEARING SCHEDULED: Event: PRETRIAL (TRAFFIC) Date: 07/18/2016 Time: 1:30 pm Judge: RAMSEY, CATHERINE Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
07/18/2016	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: AUSTAD, MARIA - COURT CLERK 3: Present ORTIZ, RAUL A - DEPUTY CITY ATTORNEY: Present PALOMO, GUILLERMO - INTERPRETER: Present WALLER, DAWNA - COURT CLERK 3: Present Prosecutors: BARR, JEFFREY F: Present Parties:			
07/18/2016	CHANGE PLEA TO NOLO PRIOR TO TRIAL	CHANGE PLEA TO NOLO PRIOR TO TRIAL Charge #1: DISTURBING PEACE (BREACH OF PEACE)			
07/18/2016	FOUND GUILTY	FOUND GUILTY Charge #1: DISTURBING PEACE (BREACH OF PEACE)			
07/18/2016	\$3 GENETIC MARKER TESTING FEE	\$3 GENETIC MARKER TESTING FEE Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 09/16/2016	\$3.00	\$0.00	
07/18/2016	\$5 ADMINISTRATIVE ASSESSMENT - GEN FUND	\$5 ADMINISTRATIVE ASSESSMENT - GEN FUND Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 08/18/2016	\$5.00	\$0.00	
07/18/2016	\$7 SPECIALTY COURT FEE ASSESSED	\$7 SPECIALTY COURT FEE Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 09/16/2016	\$7.00	\$0.00	
07/18/2016	\$10 COURT FACILITIES FEE ASSESSED	\$10 COURT FACILITIES FEE ASSESSED Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 09/16/2016	\$10.00	\$0.00	
07/18/2016	AR PLAN FEE	AR PLAN FEE Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 02/12/2017	\$40.00	\$0.00	
07/18/2016	\$115 ADMINISTRATIVE ASSESSMENT	\$115 ADMINISTRATIVE ASSESSMENT Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 08/18/2016 Receipt: Date: 09/16/2016	\$115.00	\$0.00	
07/18/2016	\$500 FINE/BAIL ASSESSED	\$500 FINE ASSESSED Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 09/18/2016 Receipt: Date: 10/15/2016 Receipt: Date: 11/16/2016 Receipt: Date: 12/13/2016 Receipt: Date: 01/19/2017 Receipt: Date: 02/12/2017	\$500.00	\$0.00	
07/18/2016	DEFENDANT'S ATTORNEY PRESENT	DEFENDANT'S ATTORNEY PRESENT RYAN HELMICK			
07/18/2016	CASE IN ACCOUNTS RECEIVABLE STATUS	CASE IN ACCOUNTS RECEIVABLE STATUS AR-100 30 DAYS			

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
07/18/2016	EVENT COMPLETED	EVENT COMPLETED The following event: PRETRIAL (TRAFFIC) scheduled for 07/18/2016 at 1:30 pm has been resulted as follows:  Result: EVENT COMPLETED Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1			
07/18/2016	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT	PRESIDING JUDGE AND STAFF ATTENDING IN-COURT Court Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1  Check In: Judge: SCHULKE, KURT Location: NORTH LAS VEGAS MUNICIPAL COURT DEPT. 1 Staff: AUSTAD, MARIA - COURT CLERK 3: Present ORTIZ, RAUL A - DEPUTY CITY ATTORNEY: Present PALOMO, GUILLERMO - INTERPRETER: Present WALLER, DAWNA - COURT CLERK 3: Present Prosecutors: BARR, JEFFREY F: Present Parties:			
08/18/2016	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 09/16/2016	\$3.30	\$0.00	
09/16/2016	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 09/16/2016	\$3.30	\$0.00	
10/15/2016	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 10/15/2016	\$3.30	\$0.00	
11/16/2016	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 11/16/2016	\$3.30	\$0.00	
12/13/2016	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 12/13/2016	\$3.30	\$0.00	
01/19/2017	COLLECTION NOTICE SENT	COLLECTION NOTICE SENT JUDSON, CHRISTOPHER was sent notice for \$ 83.50 Printed on 01/19/2017 09:20:34.03.			
01/19/2017	ACCOUNT IN COLLECTION	ACCOUNT IN COLLECTION			
01/19/2017	COLLECTION FEE 10% ON BALANCE UP TO \$1999.99 (MAX FEE \$100)	COLLECTION FEE 10% ON BALANCE UP TO \$1999.99 (MAX FEE \$100) Charge #1: DISTURBING PEACE (BREACH OF PEACE) Receipt: Date: 01/19/2017	\$18.00	\$0.00	
01/19/2017	CASE IN COLLECTIONS - ASSIGNED TO JED	CASE IN COLLECTIONS - ASSIGNED TO JED			
01/19/2017	JED - LETICIA	JED - LETICIA			
01/19/2017	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 01/19/2017	\$3.30	\$0.00	
02/12/2017	CREDIT CARD PROCESSING FEE	CREDIT CARD PROCESSING FEE Receipt: Date: 02/12/2017	\$3.24	\$0.00	
02/12/2017	BAIL APPLIED	BAIL APPLIED			
02/12/2017	BAIL IN LIEU OF FINE	BAIL IN LIEU OF FINE Charge #1: DISTURBING PEACE (BREACH OF PEACE)			
02/12/2017	CASE CLOSED	CASE CLOSED			

#### Financial Summary

<u>Cost Type</u>	<u>Amount Owed</u>	<u>Amount Paid</u>	<u>Amount Adjusted</u>	<u>Amount Outstanding</u>
Total	Total	Total	Total	Total
	\$3,898.04	\$3,898.04	\$0.00	\$0.00

<u>Cost Type</u>	<u>Amount Owed</u>	<u>Amount Paid</u>	<u>Amount Adjusted</u>	<u>Amount Outstanding</u>
AA FEE	\$120.00	\$120.00	\$0.00	\$0.00
BAIL FORFEITED	\$3,137.00	\$3,137.00	\$0.00	\$0.00
FEE	\$101.04	\$101.04	\$0.00	\$0.00
AR FEE	\$40.00	\$40.00	\$0.00	\$0.00
FINE	\$500.00	\$500.00	\$0.00	\$0.00
Total	Total	Total	Total	Total
	\$3,898.04	\$3,898.04	\$0.00	\$0.00

• **Money on Hold with the Court**

<u>Account</u>	<u>Amount Owed</u>	<u>Amount Paid</u>	<u>Amount Adjusted</u>	<u>Amount Outstanding</u>
HOLDING	\$3,137.00	\$3,137.00	\$0.00	\$0.00
Total	Total	Total	Total	Total
	\$3,137.00	\$3,137.00	\$0.00	\$0.00

• **Money on Deposit with the Court**

<u>Account</u>	<u>Deposit Amount</u>	<u>Applied Amount</u>	<u>Checks Paid</u>	<u>Balance</u>
BAILS	\$3,137.00	\$3,137.00	\$0.00	\$0.00
Total	Total	Total	Total	Total
	\$3,137.00	\$3,137.00	\$0.00	\$0.00

**Receipts**

<u>Receipt Number</u>	<u>Receipt Date</u>	<u>Received From</u>	<u>Payment Amount</u>
1794467	04/24/2013	ALWAYS AVAILABLE BAIL BONDS	\$40.00
1868840	01/30/2014	AIA HOLDINGS INC.	\$3,137.00
1868844	01/30/2014	JUDSON, CHRISTOPHER	\$3,137.00
2085558	08/18/2016	kimberly white	\$103.30
2091510	09/16/2016	kimberly white	\$103.30
2097423	10/15/2016	Kimberly White	\$103.30
2104071	11/16/2016	Kimberly White	\$103.30
2109725	12/13/2016	Kimberly White	\$103.30
2117043	01/19/2017	kimberly white	\$103.30
2121934	02/12/2017	Kimberly White	\$101.24
Total	Total	Total	Total
			\$7,035.04

**Additional Fields**

- POLICE DEPARTMENT INCIDENT NUMBER 130423006868
- AGENT JLA
- BASE IDENTIFICATION NUMBER 1003479975
- SCOPE 2867911

# **EXHIBIT 4**

# TR015696-19 CITY OF NORTH LAS VEGAS VS. JUDSON, CHRISTOPHER

- Case Type:
- TRAFFIC NLV
- Case Status:
- WARRANT
- Case Judge:
- SALMON, DAVID
- Next Event:

All Information Party Charge Ticket/Citation # Event Docket Additional Fields

## Party Information

JUDSON, CHRISTOPHER  
- DEFENDANT

- DOB
- 09/08/1988
- Address
- 8447 SEQUOIA GROVE AVE  
LAS VEGAS, NV 89149
- Phone
- (702)778-7977

Alias

Party Attorney

[More Party Information](#)

## Party Charge Information

- JUDSON, CHRISTOPHER
- - DEFENDANT

T02021M00NV - MISDEMEANOR DRIVE W/O DRV-LIC

- Original Charge
- T02021M00NV DRIVE W/O DRV-LIC (MISDEMEANOR)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- Ticket #
- B00367761
- ATN #
- Tracking #
- Place of Offense
- CITY OF NORTH LAS VEGAS
- Offense Location
- Date of Offense
- 09/04/2019
- Complainant

[Sentencing Information](#)

- JUDSON, CHRISTOPHER
- - DEFENDANT

T01045M00NV - MISDEMEANOR NON-SURRENDER SUS/REV/CANX REG CARD/LIC PLATE

- Original Charge
- T01045M00NV NON-SURRENDER SUS/REV/CANX REG CARD/LIC PLATE (MISDEMEANOR)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- Ticket #
- B00367761
- ATN #
- Tracking #
- Place of Offense
- CITY OF NORTH LAS VEGAS
- Offense Location
- Date of Offense
- 09/04/2019
- Complainant

[Sentencing Information](#)

- JUDSON, CHRISTOPHER
- - DEFENDANT

T25001M00NL - MISDEMEANOR FAILURE TO APPEAR (OBEY CITATION)

- Original Charge
- T25001M00NL FAILURE TO APPEAR (OBEY CITATION) (MISDEMEANOR)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- Ticket #
- B00367761
- ATN #
- Tracking #
- Place of Offense
- CITY OF NORTH LAS VEGAS
- Offense Location
- Date of Offense
- 09/04/2019
- Complainant
- MENDEZ, TEODORO P#1684(001684)

Sentencing Information

#### Ticket/Citation #

Citation # : B00367761 - CITY OF NORTH LAS VEGAS

- Offense Date
- 09/04/2019
- Agency
- NORTH LAS VEGAS POLICE DEPARTMENT
- Complainant
- Speed Cited
- Speed Limit
- 0
- Location
- ANN AT CAMINO AL NORTE
- Insured/Proof
- Accident
- N
- Work Zone
- N
- Haz Mat
- N
- Points
- Priors
- License Taken
- N
- BAC
- Plate
- 878J05
- State
- NV
- Year
- 2009
- Type
- FORD
- Style
- Color
- RED OR AUBURN \ RED OR AUBURN

#### Events

Date/Time	Location	Type	Result	Event Judge
09/30/2019 12:00 AM	NORTH LAS VEGAS MUNICIPAL COURT	CITATION APPEARANCE DATE	FAILURE TO APPEAR WARRANT ISSUED	NORTH LAS VEGAS MUNICIPAL COURT

#### Docket Information

<u>Date</u>	<u>Description</u>	<u>Docket Text</u>	<u>Amount Owed</u>	<u>Amount Due</u>	<u>File Ref Nbr.</u>
09/07/2019	APPEARANCE DATE SET BY OFFICER	APPEARANCE DATE SET BY OFFICER Event: CITATION APPEARANCE DATE Date: 09/30/2019 Time: 12:00 am Judge: NORTH LAS VEGAS MUNICIPAL COURT Location: NORTH LAS VEGAS MUNICIPAL COURT  Result: FAILURE TO APPEAR WARRANT ISSUED			
09/07/2019	FAILURE TO APPEAR VIOLATION ADDED	FAILURE TO APPEAR VIOLATION ADDED Charge #3: FAILURE TO APPEAR (OBEY CITATION)			
10/31/2019	FAILURE TO APPEAR WARRANT ORDERED	FAILURE TO APPEAR WARRANT ORDERED The following event: CITATION APPEARANCE DATE scheduled for 09/30/2019 at 12:00 am has been resulted as follows:  Result: FAILURE TO APPEAR WARRANT ISSUED Judge: NORTH LAS VEGAS MUNICIPAL COURT Location: NORTH LAS VEGAS MUNICIPAL COURT			
10/31/2019	DMV FTA PRINTED	DMV FTA PRINTED  DMV FTA NOTICE Sent on: 10/31/2019 10:37:15.59			
10/31/2019	ALERT ISSUED	ALERT ISSUED ACTIVE WARRANT issued on: 10/31/2019 For: JUDSON, CHRISTOPHER Bond Amt: 1071 Bond Type:			
10/31/2019	FAILURE TO APPEAR WARRANT PRINTED	FAILURE TO APPEAR WARRANT PRINTED  FAILURE TO APPEAR WARRANT Sent on: 10/31/2019 10:43:17.22			
10/31/2019	IN WARRANT STATUS	IN WARRANT STATUS			

#### **Additional Fields**

• TR HISTORY NUMBER TR015696-19

# **EXHIBIT 5**



**DECLARATION OF PLAINTIFF'S MOTHER**

Annette Sterling, under penalty of perjury, declares and states as follows:

1. That I am over 18 years old and am competent to testify as to the matters contained herein, and I attest that those allegations are true and correct, except for those matters based upon belief and information; as to those matters, I believe them to be true.

2. That I am the mother of the Plaintiff in the above-entitled action. Plaintiff and the two older minor children lived with me in 2015-2016, and they are more than welcome to return at any time;

3. That Plaintiff still has her own room here, and she and the children were very comfortable and well-adjusted when they previously resided in my home;

4. That Plaintiff has extended family in the Ferndale area and she would receive a great deal of familial support upon her return to Michigan;

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

Executed on this 16 day of December, 2019.

Name

Annette Sterling  
Address 21014 Peimannville  
Ferndale, MI 48220  
313-989-7916

# **EXHIBIT 6**

# **LAS VEGAS METROPOLITAN POLICE DEPARTMENT VICTIM'S INFORMATION GUIDE**

Offense: **CHILD ABUSE** Date: **04/02/2017**

The report is important for you to keep as it is the only reference to your particular case and event number. A copy of your report can be obtained at your local area command or the Records and Fingerprint Bureau for a nominal fee. Please visit LVMPD.com to see if your report qualifies for this service. Please allow FIVE WORKING DAYS after the report has been filed. Hours of operation and locations to local Area Commands can be found at LVMPD.com.

The department relies on a number of factors available in any report to assign a follow-up investigator. Experience has shown that information must normally be determined at the time of the initial investigation before a case has the potential for being solved. Without suspects, witnesses, evidence, or other investigative leads, a case cannot be solved except under special circumstances. If a suspect caught committing another crime is found with evidence linking him to this one, or he may confess to other crimes, this one. If you have any questions or additional information, please contact the detective handling your case at the appropriate telephone number listed below or complete an Additional Crime Information report. (Refer to the Event Number listed above.)

## **OBLIGATIONS OF CITIZENS FILING MISDEMEANOR CRIME REPORTS WITH LVMPD**

1. If an arrest was not made, or if a citation was not issued, and you wish to pursue this matter, you must contact the detective assigned to handle your case at the appropriate number listed below, AT LEAST TEN (10) BUSINESS DAYS AFTER THE REPORT HAS BEEN FILED. Monday through Friday, 8:00 a.m. - 4:00 p.m. You may be required to testify against the defendant (suspect) if the case is prosecuted in the courts. All felonies will be investigated.
2. You must give the Event Number at the top of this page if you call about your case.
3. If the suspect in your case is arrested or cited for a misdemeanor, DO NOT CONTACT THE DETECTIVE ASSIGNED TO YOUR CASE. You may get information about the status of your case by contacting either the County or City Victim Advocates (listed below). The police department does not have any court information.
4. If this is a misdemeanor crime report and is for INSURANCE PURPOSES ONLY or YOU DO NOT WISH TO PROSECUTE, and no one has been arrested, please DO NOT contact the detective.
5. If no arrest has been made and you need victim assistance, you may contact a Victim Advocate from the Police Department at (702) 828-2955.

## **CONTACT TELEPHONE NUMBERS**

Financial Crimes (Fraud/Forgery/ID Theft).....	(702) 828-3483	Bolden Area Command.....	(702) 828-3347
Abuse-Neglect.....	(702) 828-3384	Convention Center Area Command.....	(702) 828-3204
Homicide.....	(702) 828-3321	Downtown Area Command.....	(702) 828-4314
Missing Persons.....	(702) 828-2907	Enterprise Area Command.....	(702) 828-4839
Commercial Robbery.....	(702) 828-3591	Northeast Area Command.....	(702) 828-7353
Sexual Assault.....	(702) 828-3421	Northwest Area Command.....	(702) 828-6577
Records and Fingerprint Bureau.....	(702) 828-3271	Southeast Area Command.....	(702) 828-8242
		South Central Area Command.....	(702) 828-8839
		Spring Valley Area Command.....	(702) 828-2639

**LVMPD VICTIM ADVOCATE:** Provides crisis intervention, an assessment of the immediate needs of the victims and their families, initiates crime victim assistance paperwork, provides referrals to other agencies, and functions as a liaison with LVMPD personnel and other law enforcement agencies. For assistance, please call the LVMPD Victim Advocate at (702) 828-2955 Monday through Friday 7:00 a.m. - 4:00 p.m.

**LAS VEGAS CITY ATTORNEY VICTIM/WITNESS ASSISTANCE:** Provides specialized advocacy for victims of domestic violence or battery occurring within the City of Las Vegas. If you are a victim of domestic violence or battery and an arrest has been made or a citation has been issued, please contact the Las Vegas City Attorney's Victim Witness Advocate at (702) 229-2525.

**CLARK COUNTY DISTRICT ATTORNEY VICTIM/WITNESS ASSISTANCE CENTER:** Provides Justice Court and District Court case information and addresses any concerns you may have regarding your appearance as a witness. When you receive a subpoena to appear in a Justice Court or District Court case, please contact the Victim Witness Assistance Center at (702) 671-2525. If you move or have another address where you wish to receive a subpoena, please contact the advocates at the court.

**ASSISTANCE TO VICTIMS OF VIOLENT CRIME:** Victims of violent crime who are physically injured or victims of sexual assault may qualify for medical and counseling assistance from the State of Nevada under NRS 217. For information, contact the LVMPD Victim/Witness Advocate or the Nevada State Victims of Violent Crime Program at (702) 486-2740. Note: Applications for this service must be received within one year of the commission of the crime.

**ASSISTANCE TO VICTIMS OF SEXUAL ASSAULT:** Victims of sexual assault may be eligible for medical treatment and counseling. For information, call the Clark County District Attorney Victim Witness Assistance Center (702) 671-2525 or Rape Crisis Center at (702) 828-2955. Note: Applications for this service must be received within 60 days of the commission of the crime.

**THREATS AND DISSUASION TO TESTIFY:** Victims and witnesses threatened and/or asked not to testify or prosecute should contact the appropriate law enforcement agency. You may also notify the prosecutor if you have already been assigned an attorney.

# **EXHIBIT 7**

## CATEGORIES

Overview  
 Cost of Living  
 Real Estate  
 Job Market  
 Crime  
 Climate  
 Weather  
 Population  
 Economy  
 Lifestyle  
 Air Quality  
**People**  
 Politics &  
 Voting  
 Religion  
 Communication  
 Shopping  
 Schools

2019 Compare Cities People:  
Ferndale, MI vs Las Vegas, NV
[Change Cities](#)

## Highlights

- Las Vegas is 0% more densely populated than Ferndale.
- People are 32.7% more likely to be married in Las Vegas.
- The Median Age is 2.8 years older in Las Vegas.

## Ferndale Housing Options

Condominiums  
 Multi-Family Homes  
 Single-Family Homes  
 Row House

## Las Vegas Housing Options

Homes for Sale  
 Multi-Family Homes  
 Condo Townhome open house

[realtor.com](#)

## People

	Ferndale, MI	Las Vegas, NV	United States
<u>Population</u>	20,159	621,662	321,004,407
<u>Female Population</u>	50.3%	50.0%	50.8%
<u>Male Population</u>	49.7%	50.0%	49.2%
<u>Median Age</u>	34.6	37.4	37.8
<u>Population - 2010</u>	20,286	579,786	308,745,538
<u>Population - 2000</u>	22,105	478,434	285,036,114
<u>Population - 1990</u>	25,084	258,295	251,960,433
<u>Pop. 2000 to Now</u>	-8.8%	29.9%	12.6%
<u>Pop. 1990 to Now</u>	-19.6%	140.7%	27.4%
<u>Population Density</u>	5,199.6	4,385.0	90.9
<u>Land Area</u>	3.9	141.8	3,531,905.4
<u>Water Area</u>	0.0	0.1	264,836.8

## Est. Total Population By Age

	Ferndale, MI	Las Vegas, NV	United States
<u>Age 0 to 4</u>	4.9%	6.4%	6.2%
<u>Age 5 to 9</u>	2.7%	6.8%	6.4%
<u>Age 10 to 14</u>	3.7%	6.9%	6.5%
<u>Age 15 to 17</u>	1.9%	4.0%	3.9%

COMPARE COST OF  
LIVING

Compare Ferndale, Michigan  
 Cost of Living vs Las Vegas,  
 Nevada Cost of Living: Taxes,  
 Childcare, Groceries, Health...

Want it.  
 Need it.

[SHOP NOW](#)
ZIPS IN FERNDALE,  
MICHIGAN
[View All](#)
ZIPS IN LAS VEGAS,  
NEVADA

89004, 89110, 89120, 89111,  
 89121, 89141, 89102, 89145,  
 89107, 89128, 19 total

Estée Lauder

Advanced  
 Eye Sup  
 Complex S  
 Rec

\*\*  
 \$

<u>Age 18 to 20</u>	2.8%	3.5%	4.1%
<u>Age 21 to 24</u>	6.8%	5.0%	5.6%
<u>Age 25 to 34</u>	28.0%	14.3%	13.7%
<u>Age 35 to 44</u>	14.3%	13.7%	12.7%
<u>Age 45 to 54</u>	13.2%	13.6%	13.4%
<u>Age 55 to 59</u>	7.1%	6.4%	6.7%
<u>Age 60 to 64</u>	6.2%	5.3%	6.0%
<u>Age 65 to 74</u>	5.3%	8.6%	8.6%
<u>Age 75 to 84</u>	2.5%	4.2%	4.4%
<u>Age 85 and over</u>	0.7%	1.3%	1.9%

#### Race

	<b>Ferndale, MI</b>	<b>Las Vegas, NV</b>	<b>United States</b>
<u>White</u>	84.2%	44.4%	61.5%
<u>Black</u>	6.7%	11.7%	12.3%
<u>Asian</u>	0.8%	6.5%	5.3%
<u>Native American</u>	0.5%	0.4%	0.7%
<u>Hawaiian, Pacific Islander</u>	0.0%	0.7%	0.2%
<u>Other</u>	0.3%	0.3%	0.2%
<u>Two or More Races</u>	4.6%	3.4%	2.3%
<u>Hispanic</u>	2.8%	32.7%	17.6%

#### Marriage & Family

	<b>Ferndale, MI</b>	<b>Las Vegas, NV</b>	<b>United States</b>
<u>Married Population</u>	34.4%	45.6%	50.2%
<u>Currently Married</u>	32.9%	43.0%	48.2%
<u>Married but Separated</u>	1.4%	2.6%	2.0%
<u>Single Population</u>	65.6%	54.4%	49.8%
<u>Never Married</u>	50.3%	34.8%	33.1%
<u>Divorced</u>	12.9%	14.1%	10.9%
<u>Widowed</u>	2.5%	5.4%	5.8%
<u>Household Size</u>	2.03	2.77	2.63
<u>Households</u>	9,909	221,584	118,825,921
<u>Family Households</u>	3,763	140,378	78,298,703

Estée Lauder

SHOP NOW

#### LEARN MORE ABOUT FERNDALE, MICHIGAN

Overview  
Cost of Living  
Job Market  
Crime  
Climate  
Economy  
Religion  
Voting

#### LEARN MORE ABOUT LAS VEGAS, NEVADA

Overview  
Cost of Living  
Job Market  
Crime  
Climate  
Economy  
Religion  
Voting

#### PREMIUM SUBSCRIPTION

Includes Cost of Living  
compares for child care,  
utilities, transportation, health,  
taxes, housing for home  
owners vs renters, weather,  
insurance premiums and so  
much more.

<u>Married couple, w/children</u>	25.6%	29.6%	31.1%
<u>Married couple, no children</u>	50.9%	37.4%	42.3%
<u>Non Family Households</u>	6,146	81,206	40,527,218
<u>Single householder, w/children</u>	10.0%	20.5%	16.3%
<u>Single householder, no children</u>	13.5%	12.5%	10.3%



## CATEGORIES

[Overview](#)  
[Cost of Living](#)  
[Real Estate](#)  
[Job Market](#)  
[Crime](#)  
[Climate](#)  
[Weather](#)  
[Education](#)  
[Economy](#)  
[Health](#)  
[Housing](#)  
[Transportation](#)  
[Utilities](#)  
[Demographics](#)  
[Environment](#)  
[Community](#)  
[Services](#)  
[Reviews](#)

## 2019 Compare Cities Education: Ferndale, MI vs Las Vegas, NV

[Change Cities](#)

### Highlights

- Las Vegas spends 29.4% less per student than Ferndale.
- The Student Teacher Ratio is 20.8% higher in Las Vegas than in Ferndale. (lower means fewer students in each classroom).
- Las Vegas had 11.6% fewer residents who had graduated High School compared to Ferndale

### Education

	Ferndale, MI	Las Vegas, NV	United States
<u>Expend. per Student</u>	\$12,560	\$8,868	\$12,383
<u>Educ. Expend. per Student</u>	\$10,034	\$7,943	\$10,574
<u>Instr. Expend. per Student</u>	\$5,242	\$4,581	\$6,428
<u>Pupil/Teacher Ratio</u>	17.3	20.9	16.8
<u>Students per Librarian</u>	3247.3	1111	538.1
<u>Students per Counselor</u>	446.5	538	403.2
<u>Grade School Educ.</u>	1.1%	6.9%	5.4%
<u>Some High School Educ.</u>	3.8%	9.1%	7.2%
<u>High School Educ.</u>	95.0%	84.0%	87.3%
<u>Some College Educ.</u>	26.4%	24.9%	20.8%
<u>2 yr College Grad.</u>	6.9%	7.8%	8.3%
<u>4 yr College Grad.</u>	43.7%	23.2%	30.9%
<u>Masters Grad.</u>	11.5%	5.5%	8.4%
<u>Professional Degree</u>	3.0%	1.8%	2.0%
<u>Doctorate Degree</u>	1.1%	0.7%	1.4%

### COMPARE COST OF LIVING

Compare **Ferndale, Michigan Cost of Living** vs **Las Vegas, Nevada Cost of Living**: Taxes, Childcare, Groceries, Health...



### ZIPS IN FERNDALE, MICHIGAN

48001, MI

### ZIPS IN LAS VEGAS, NEVADA

89108, 89110, 89119, MI 89121, 89122, 89123, 89124, 89125, 89126, 89127, 89128, 89129, 89130, 89131, 89132, 89133, 89134, 89135, 89136, 89137, 89138, 89139, 89140, 89141, 89142, 89143, 89144, 89145, 89146, 89147, 89148, 89149, 89150, 89151, 89152, 89153, 89154, 89155, 89156, 89157, 89158, 89159, 89160, 89161, 89162, 89163, 89164, 89165, 89166, 89167, 89168, 89169, 89170, 89171, 89172, 89173, 89174, 89175, 89176, 89177, 89178, 89179, 89180, 89181, 89182, 89183, 89184, 89185, 89186, 89187, 89188, 89189, 89190, 89191, 89192, 89193, 89194, 89195, 89196, 89197, 89198, 89199, 89200, 89201, 89202, 89203, 89204, 89205, 89206, 89207, 89208, 89209, 89210, 89211, 89212, 89213, 89214, 89215, 89216, 89217, 89218, 89219, 89220, 89221, 89222, 89223, 89224, 89225, 89226, 89227, 89228, 89229, 89230, 89231, 89232, 89233, 89234, 89235, 89236, 89237, 89238, 89239, 89240, 89241, 89242, 89243, 89244, 89245, 89246, 89247, 89248, 89249, 89250, 89251, 89252, 89253, 89254, 89255, 89256, 89257, 89258, 89259, 89260, 89261, 89262, 89263, 89264, 89265, 89266, 89267, 89268, 89269, 89270, 89271, 89272, 89273, 89274, 89275, 89276, 89277, 89278, 89279, 89280, 89281, 89282, 89283, 89284, 89285, 89286, 89287, 89288, 89289, 89290, 89291, 89292, 89293, 89294, 89295, 89296, 89297, 89298, 89299, 89300, 89301, 89302, 89303, 89304, 89305, 89306, 89307, 89308, 89309, 89310, 89311, 89312, 89313, 89314, 89315, 89316, 89317, 89318, 89319, 89320, 89321, 89322, 89323, 89324, 89325, 89326, 89327, 89328, 89329, 89330, 89331, 89332, 89333, 89334, 89335, 89336, 89337, 89338, 89339, 89340, 89341, 89342, 89343, 89344, 89345, 89346, 89347, 89348, 89349, 89350, 89351, 89352, 89353, 89354, 89355, 89356, 89357, 89358, 89359, 89360, 89361, 89362, 89363, 89364, 89365, 89366, 89367, 89368, 89369, 89370, 89371, 89372, 89373, 89374, 89375, 89376, 89377, 89378, 89379, 89380, 89381, 89382, 89383, 89384, 89385, 89386, 89387, 89388, 89389, 89390, 89391, 89392, 89393, 89394, 89395, 89396, 89397, 89398, 89399, 89400, 89401, 89402, 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89546, 89547, 89548, 89549, 89550, 89551, 89552, 89553, 89554, 89555, 89556, 89557, 89558, 89559, 89560, 89561, 89562, 89563, 89564, 89565, 89566, 89567, 89568, 89569, 89570, 89571, 89572, 89573, 89574, 89575, 89576, 89577, 89578, 89579, 89580, 89581, 89582, 89583, 89584, 89585, 89586, 89587, 89588, 89589, 89590, 89591, 89592, 89593, 89594, 89595, 89596, 89597, 89598, 89599, 89600, 89601, 89602, 89603, 89604, 89605, 89606, 89607, 89608, 89609, 89610, 89611, 89612, 89613, 89614, 89615, 89616, 89617, 89618, 89619, 89620, 89621, 89622, 89623, 89624, 89625, 89626, 89627, 89628, 89629, 89630, 89631, 89632, 89633, 89634, 89635, 89636, 89637, 89638, 89639, 89640, 89641, 89642, 89643, 89644, 89645, 89646, 89647, 89648, 89649, 89650, 89651, 89652, 89653, 89654, 89655, 89656, 89657, 89658, 89659, 89660, 89661, 89662, 89663, 89664, 89665, 89666, 89667, 89668, 89669, 89670, 89671, 89672, 89673, 89674, 89675, 89676, 89677, 89678, 89679, 89680, 89681, 89682, 89683, 89684, 89685, 89686, 89687, 89688, 89689, 89690, 89691, 89692, 89693, 89694, 89695, 89696, 89697, 89698, 89699, 89700, 89701, 89702, 89703, 89704, 89705, 89706, 89707, 89708, 89709, 89710, 89711, 89712, 89713, 89714, 89715, 89716, 89717, 89718, 89719, 89720, 89721, 89722, 89723, 89724, 89725, 89726, 89727, 89728, 89729, 89730, 89731, 89732, 89733, 89734, 89735, 89736, 89737, 89738, 89739, 89740, 89741, 89742, 89743, 89744, 89745, 89746, 89747, 89748, 89749, 89750, 89751, 89752, 89753, 89754, 89755, 89756, 89757, 89758, 89759, 89760, 89761, 89762, 89763, 89764, 89765, 89766, 89767, 89768, 89769, 89770, 89771, 89772, 89773, 89774, 89775, 89776, 89777, 89778, 89779, 89780, 89781, 89782, 89783, 89784, 89785, 89786, 89787, 89788, 89789, 89790, 89791, 89792, 89793, 89794, 89795, 89796, 89797, 89798, 89799, 89800, 89801, 89802, 89803, 89804, 89805, 89806, 89807, 89808, 89809, 89810, 89811, 89812, 89813, 89814, 89815, 89816, 89817, 89818, 89819, 89820, 89821, 89822, 89823, 89824, 89825, 89826, 89827, 89828, 89829, 89830, 89831, 89832, 89833, 89834, 89835, 89836, 89837, 89838, 89839, 89840, 89841, 89842, 89843, 89844, 89845, 89846, 89847, 89848, 89849, 89850, 89851, 89852, 89853, 89854, 89855, 89856, 89857, 89858, 89859, 89860, 89861, 89862, 89863, 89864, 89865, 89866, 89867, 89868, 89869, 89870, 89871, 89872, 89873, 89874, 89875, 89876, 89877, 89878, 89879, 89880, 89881, 89882, 89883, 89884, 89885, 89886, 89887, 89888, 89889, 89890, 89891, 89892, 89893, 89894, 89895, 89896, 89897, 89898, 89899, 89900, 89901, 89902, 89903, 89904, 89905, 89906, 89907, 89908, 89909, 89910, 89911, 89912, 89913, 89914, 89915, 89916, 89917, 89918, 89919, 89920, 89921, 89922, 89923, 89924, 89925, 89926, 89927, 89928, 89929, 89930, 89931, 89932, 89933, 89934, 89935, 89936, 89937, 89938, 89939, 89940, 89941, 89942, 89943, 89944, 89945, 89946, 89947, 89948, 89949, 89950, 89951, 89952, 89953, 89954, 89955, 89956, 89957, 89958, 89959, 89960, 89961, 89962, 89963, 89964, 89965, 89966, 89967, 89968, 89969, 89970, 89971, 89972, 89973, 89974, 89975, 89976, 89977, 89978, 89979, 89980, 89981, 89982, 89983, 89984, 89985, 89986, 89987, 89988, 89989, 89990, 89991, 89992, 89993, 89994, 89995, 89996, 89997, 89998, 89999, 90000



## CATEGORIES

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[Cost of Living](#)  
[Real Estate](#)  
[Job Market](#)  
[Crime](#)  
[Climate](#)  
[Weather](#)  
[Education](#)  
[Commute](#)  
[Health](#)  
[Recreation](#)  
[Arts & Culture](#)  
[Politics & Government](#)  
[Shopping](#)  
[Entertainment](#)  
[Sports & Recreation](#)  
[Reviews](#)

## 2019 Compare Cities Crime: Ferndale, MI vs Las Vegas, NV

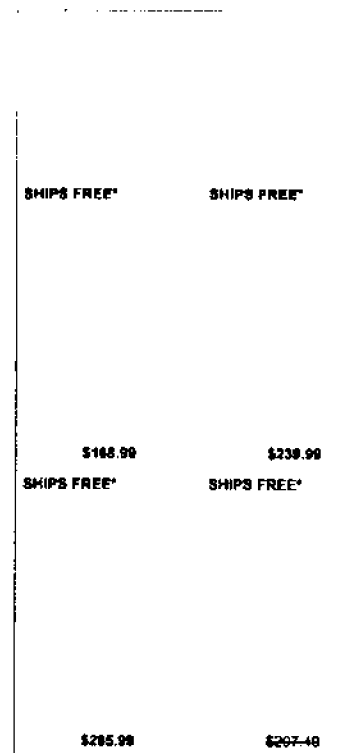
Compare Cities

### Crime

	Ferndale, MI	Las Vegas, NV	United States
<b>Violent Crime</b>	11.9	40.9	22.7
<b>Property Crime</b>	37.9	43.4	35.4

## COMPARE COST OF LIVING

Compare Ferndale, Michigan Cost of Living vs Las Vegas, Nevada Cost of Living: Taxes, Childcare, Groceries, Health...



## ZIPS IN FERNDALE, MICHIGAN

48222

## ZIPS IN LAS VEGAS, NEVADA

89106, 89107, 89109, 89110,  
 89131, 89140, 89102, 89143,  
 89103, 89108, 19 total

## CATEGORIES

Overview  
**Cost of Living**  
 Real Estate  
 Job Market  
 Crime  
 Climate  
 Weather  
 Education  
 Healthcare  
 Retail  
 Religion  
 Politics  
 Culture &  
 Voting  
 Insurance  
 Commuting  
 Gaming  
 Recreation

## 2019 Compare Cities Cost of Living: Ferndale, MI vs Las Vegas, NV

Change Cities

### Highlights

Las Vegas is **15.2% more expensive** than Ferndale.

Las Vegas housing costs are **54.3% more expensive** than Ferndale housing costs.

Health related expenses are **13.4% more** in Las Vegas.

#### Ferndale Housing Options

Single-Family Sub  
 Multi-Family Homes  
 Condo, Townhome or Row Home

#### Las Vegas Housing Options

Single-Family Sub  
 Multi-Family Homes  
 Condo, Townhome or Row Home

realtor.com

### Cost of Living

	Ferndale, MI	Las Vegas, NV	United States
<b>Overall</b>	<b>96.9</b>	<b>111.6</b>	<b>100</b>
<b>Food &amp; Groceries</b>	<b>95.3</b>	<b>102.3</b>	<b>100</b>
<b>Health</b>	<b>81.4</b>	<b>92.3</b>	<b>100</b>
<b>Housing</b>	<b>76.6</b>	<b>118.2</b>	<b>100</b>
<b>Median Home Cost</b>	<b>\$177,100</b>	<b>\$273,200</b>	<b>\$231,200</b>
<b>Utilities</b>	<b>93.2</b>	<b>102.6</b>	<b>100</b>
<b>Transportation</b>	<b>125.6</b>	<b>128.5</b>	<b>100</b>
<b>Miscellaneous</b>	<b>109.5</b>	<b>103.6</b>	<b>100</b>

100 = National Average (Below 100 means cheaper than the US average. Above 100 means more expensive.)

#### DID YOU KNOW?

In order to keep your same standard of living your salary can vary greatly - whether you buy or rent, require child care, or want to include taxes. This is why we are now offering a Premium Salary & Cost of Living calculator.

#### Our Premium Calculator Includes:

- Compare Cities cost of living across 9 different categories
- Personal salary calculations can optionally include Home ownership or rental, Child care, and Taxes (with details on state and local sales, income, property and automobile taxes)
- Includes the cost of Child Care for toddlers or infants, at a day care center or home care
- Grocery prices, detailed for 29 staple items in six categories
- Difference in cost of Utilities, including electric, gas and fuel oil
- Health Care Premiums and hospital expenses for major surgeries
- Taxes, Fees and Expenses you should know about, such as local car insurance rates, automobile taxes and registration, commuting costs.
- and 100s of other items you should consider before you relocate

### COMPARE COST OF LIVING

Compare **Ferndale, Michigan Cost of Living vs Las Vegas, Nevada Cost of Living**: Taxes, Childcare, Groceries, Health...

### ZIPS IN FERNDALE, MICHIGAN

48220

### ZIPS IN LAS VEGAS, NEVADA

89108, 89110, 89120, 89121, 89127, 89101, 89102, 89149, 89107, 89128, 19 total



## CATEGORIES

Overview  
 Cost of Living  
 Real Estate  
 Job Market  
 Crime  
 Climate  
 Weather  
 Education  
**Economy**  
 Health  
 Religion  
 People  
 Politics &  
 Voting  
 Housing  
 Communities  
 Rankings  
 Reviews

## 2019 Compare Cities Economy: Ferndale, MI vs Las Vegas, NV

[Change Cities](#)

### Highlights

- Household income in Las Vegas, is 13% less than it is in Ferndale and is 8% below the National Average.
- Ferndale unemployment rate is 4.50%.
- Las Vegas unemployment rate is 4.90%.

#### Ferndale Housing Options

Homes For Sale  
 Multi-Family Homes  
 Condo/Town Homes or Row Home

#### Las Vegas Housing Options

Homes For Sale  
 Multi-Family Homes  
 Condo/Town Home or Row Home

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### Economy

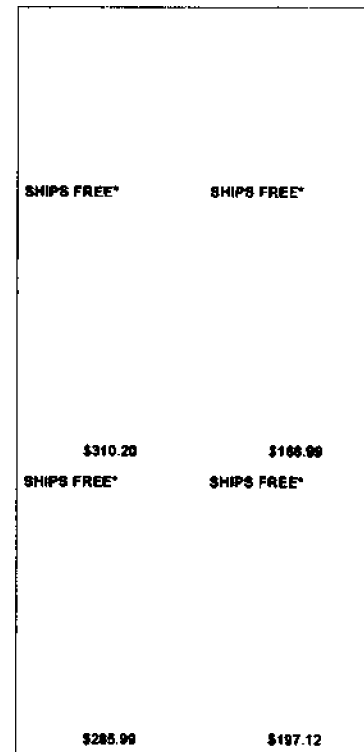
	Ferndale, MI	Las Vegas, NV	United States
<u>Unemployment Rate</u>	4.5%	4.9%	3.7%
<u>Recent Job Growth</u>	0.3%	3.5%	1.6%
<u>Future Job Growth</u>	36.5%	39.0%	33.5%
<u>Sales Taxes</u>	6.0%	8.3%	6.2%
<u>Income Taxes</u>	4.3%	0.0%	4.6%
<u>Income per Cap.</u>	\$37,332	\$27,650	\$31,177
<u>Household Income</u>	\$61,060	\$53,159	\$57,652
<u>Family Median Income</u>	\$75,252	\$62,786	\$70,850

#### Est. Households By Income

	Ferndale, MI	Las Vegas, NV	United States
<u>Income Less Than 15K</u>	11.0%	11.8%	11.5%
<u>Income between 15K and 20K</u>	2.7%	4.8%	4.8%
<u>Income between 20K and 30K</u>	8.2%	10.5%	9.7%
<u>Income between 30K and 40K</u>	10.2%	10.8%	9.3%
<u>Income between 40K and 50K</u>	8.4%	9.4%	8.5%
<u>Income between 50K and 60K</u>	8.3%	8.1%	7.7%
<u>Income between 60K and 75K</u>	11.2%	10.3%	9.9%

### COMPARE COST OF LIVING

Compare Ferndale, Michigan  
 Cost of Living vs Las Vegas,  
 Nevada Cost of Living: Taxes,  
 Childcare, Groceries, Health...



### ZIPS IN FERNDALE, MICHIGAN

[48220](#)

### ZIPS IN LAS VEGAS, NEVADA

89106, 89108, 89120, 89117,  
 89131, 89101, 89104, 89158,  
 89102, 89103, 19 total

<u>Income between 75K and 100K</u>	17.9%	12.6%	12.3%
<u>Income between 100K and 150K</u>	16.7%	12.8%	14.1%
<u>Income between 150K and 200K</u>	2.9%	4.6%	5.8%
<u>Income greater than 200K</u>	2.6%	4.2%	6.3%

#### Population By Occupation

	Ferndale, MI	Las Vegas, NV	United States
<u>Management, business, finance</u>	20.4%	11.5%	15.1%
<u>Engineering, computers, science</u>	7.4%	3.2%	5.6%
<u>Community, social services</u>	1.2%	1.0%	1.7%
<u>Legal</u>	2.1%	1.1%	1.1%
<u>Education, library</u>	6.3%	4.3%	6.0%
<u>Arts, design, media, sports, entertainment</u>	5.7%	2.2%	2.0%
<u>Healthcare practitioners and technology</u>	5.3%	4.7%	5.9%
<u>Healthcare support</u>	1.4%	1.9%	2.4%
<u>Firefighters, law enforcement</u>	1.0%	3.3%	2.2%
<u>Food preparation, serving</u>	6.5%	10.1%	5.8%
<u>Building maintenance</u>	2.0%	7.2%	3.9%
<u>Personal care</u>	4.6%	5.7%	3.7%
<u>Sales, office, administrative support</u>	22.2%	26.5%	23.5%
<u>Farming, fishing, forestry</u>	0.1%	0.1%	0.7%
<u>Construction, extraction, maintenance/repair</u>	3.7%	8.2%	8.2%
<u>Production, transportation, material moving</u>	10.1%	9.0%	12.2%

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SHIP'S CREW SHIP'S CREW

SHIP'S CREW SHIP'S CREW

#### LEARN MORE ABOUT FERNDALE, MICHIGAN

Overview  
Cost of Living  
Job Market  
Crime  
Climate  
Education  
Religion  
Voting

#### LEARN MORE ABOUT LAS VEGAS, NEVADA

Overview  
Cost of Living  
Job Market  
Crime  
Climate  
Education  
Religion  
Voting

#### PREMIUM SUBSCRIPTION

Includes Cost of Living  
compares for child care,  
utilities, transportation, health,  
taxes, housing for home  
owners vs renters, weather,  
insurance premiums and so  
much more.



## CATEGORIES

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[Economy](#)  
[Health](#)  
[Religion](#)  
[People](#)  
[Politics &](#)  
[Visiting](#)  
[Housing](#)  
[Communities](#)  
[Parties](#)  
[Reviews](#)

## 2019 Compare Cities Job Market: Ferndale, MI vs Las Vegas, NV

[Change Cities](#)

### Highlights

- Job Growth in Las Vegas has been positive.
- Las Vegas has 0.4% more unemployment than Ferndale.
- Las Vegas job growth has increased by 12.1% in the past 10 years.

### Job Market

	Ferndale, MI	Las Vegas, NV	United States
<b><u>Current Unemployment</u></b>	4.5%	4.9%	3.7%
<b><u>Future Job Growth</u></b>	36.5%	39.0%	33.5%
<b><u>Recent Job Growth</u></b>	0.3%	3.5%	1.6%
<b><u>3 Yr. Job Growth</u></b>	5.9%	8.3%	4.7%
<b><u>5 Yr. Job Growth</u></b>	8.8%	14.5%	8.3%
<b><u>10 Yr. Job Growth</u></b>	2.4%	12.1%	7.3%

### COMPARE COST OF LIVING

Compare **Ferndale, Michigan Cost of Living vs Las Vegas, Nevada Cost of Living**: Taxes, Childcare, Groceries, Health...



### ZIPs IN FERNDALE, MICHIGAN

48220

### ZIPs IN LAS VEGAS, NEVADA

89108, 89110, 89120, 89117,  
 89131, 89101, 89104, 89149,  
 89132, 89178, 89169

## CATEGORIES

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[Culture](#)  
[Real Estate](#)  
[Politics](#)  
[Politics & Cost of Living](#)  
[Housing](#)  
[Infrastructure](#)  
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## 2019 Compare Cities Housing: Ferndale, MI vs Las Vegas, NV

Compare Cities

### Highlights

- The median age of a home in Las Vegas is 66.2% older than the median age of a home in Ferndale.
- Homes are 29.1% more expensive likely to be rented in Las Vegas than in Ferndale.

#### Ferndale Housing Options

[Homes For Rent](#)  
[Multi-Family Homes](#)  
[Single-Family Home](#) [Condo/Apt](#)

#### Las Vegas Housing Options

[Homes For Sale](#)  
[Multi-Family Homes](#)  
[Condo / Townhome or Row Home](#)

realtor.com

### Housing

	Ferndale, MI	Las Vegas, NV	United States
<b>Median Home Age</b>	71	24	40
<b>Median Home Cost</b>	\$177,295	\$223,268	\$231,200
<b>Home Appr. Last 12 months</b>	9.3%	13.6%	6.7%
<b>Home Appr. Last 5 yrs.</b>	57.2%	68.3%	35.6%
<b>Home Appr. Last 10 yrs.</b>	47.9%	50.5%	27.4%
<b>Property Tax Rate</b>	\$20.6	\$7.3	\$11.8
<b>Homes Owned</b>	59.0%	45.4%	56.0%
<b>Housing Vacant</b>	8.3%	12.4%	12.2%
<b>Homes Rented</b>	32.7%	42.3%	31.8%

#### Avg Rent For Home Or Apartment

	Ferndale, MI	Las Vegas, NV	United States
<b>Average Rent</b>	\$1,583	\$1,455	\$1,470
<b>Studio Apartment</b>	\$610	\$745	\$821
<b>1 Bedroom Home or Apartment</b>	\$740	\$905	\$930
<b>2 Bedroom Home or Apartment</b>	\$950	\$1,120	\$1,148
<b>3 Bedroom Home or Apartment</b>	\$1,240	\$1,622	\$1,537

### COMPARE COST OF LIVING

Compare **Ferndale, Michigan Cost of Living vs Las Vegas, Nevada Cost of Living**: Taxes, Childcare, Groceries, Health...

#### ZIPS IN FERNDALE, MICHIGAN

48101

#### ZIPS IN LAS VEGAS, NEVADA

89108, 89109, 89128, 89110,  
 89130, 89103, 89104, 89113,  
 89102, 89119, 89101

<u>4 Bedroom Home or Apartment</u>	\$1,350	\$1,963	\$1,791
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#### Vacant Housing

	Ferndale, MI	Las Vegas, NV	United States
<u>Vacant For Rent</u>	1.8%	3.1%	2.1%
<u>Vacant Rented</u>	0.7%	0.8%	0.5%
<u>Vacant For Sale</u>	0.3%	0.9%	1.0%
<u>Vacant Sold</u>	0.9%	0.4%	0.5%
<u>Vacant Vacation</u>	0.8%	2.8%	4.0%
<u>Vacant Other</u>	3.8%	4.4%	4.2%

#### Owner-Occupied Housing Value

	Ferndale, MI	Las Vegas, NV	United States
<u>Less Than \$20,000</u>	1.8%	2.1%	3.5%
<u>\$20,000 to \$39,999</u>	4.2%	0.8%	3.1%
<u>\$40,000 to \$59,999</u>	5.9%	2.0%	3.9%
<u>\$60,000 to \$79,999</u>	8.2%	3.6%	5.4%
<u>\$80,000 to \$99,999</u>	11.0%	4.5%	6.3%
<u>\$100,000 to \$149,999</u>	29.5%	14.7%	14.7%
<u>\$150,000 to \$199,999</u>	21.3%	19.2%	14.6%
<u>\$200,000 to \$299,999</u>	13.1%	27.4%	18.7%
<u>\$300,000 to \$399,999</u>	3.6%	13.6%	11.0%
<u>\$400,000 to \$499,999</u>	1.1%	5.5%	6.2%
<u>\$500,000 to \$749,999</u>	0.0%	3.9%	7.0%
<u>\$750,000 to \$999,999</u>	0.3%	1.3%	2.7%
<u>\$1,000,000 to \$1,499,999</u>	0.0%	0.8%	1.5%
<u>\$1,500,000 to \$1,999,999</u>	0.0%	0.2%	0.5%
<u>\$2,000,000 and over</u>	0.0%	0.4%	0.7%

#### Housing Units By Year Built

	Ferndale, MI	Las Vegas, NV	United States
<u>2015 and Newer</u>	0.0%	0.8%	0.9%
<u>2010 to 2014</u>	0.0%	2.3%	2.3%
<u>2000 to 2009</u>	3.4%	24.2%	14.5%
<u>1990 to 1999</u>	1.7%	31.9%	14.0%

SHIPS FREE\*

\$168.99

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\$168.99

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[Overview](#)  
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#### PREMIUM SUBSCRIPTION

Includes Cost of Living compares for child care, utilities, transportation, health, taxes, housing for home owners vs renters, weather, insurance premiums and so much more.

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<u>1980 to 1989</u>	3.6%	17.4%	13.6%
<u>1970 to 1979</u>	4.3%	10.0%	15.5%
<u>1960 to 1969</u>	1.7%	31.9%	14.0%
<u>1950 to 1959</u>	21.7%	4.3%	10.5%
<u>1940 to 1949</u>	20.5%	1.3%	5.1%
<u>1939 or Earlier</u>	38.4%	0.4%	12.9%







1 **EAPP**  
2 **TAMIKA JONES**  
3 **4730 East Craig Rd., Bldg. 15, #2088**  
4 **Las Vegas, NV 89115**  
5 **(313)452-5009**  
6 **TJones2@hcpnv.com**  
7 **Defendant *In Proper Person***

DISTRICT COURT, FAMILY DIVISION  
CLARK COUNTY, NEVADA

8 <b>TAMIKA JONES,</b>	CASE NO:
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	DEPT. NO: S
Plaintiff,	
vs.	
<b>CHRISTOPHER JUDSON,</b>	
Defendant.	

**EXPARTE APPLICATION FOR AN ORDER SHORTENING TIME IN WHICH  
TO HEAR PLAINTIFF'S MOTION TO RELOCATE AND OTHER RELIEF**

COMES NOW Plaintiff, **TAMIKA JONES**, *In Proper Person*, and hereby requests an *Order Shortening Time* in which to hear her *Motion* to relocate to Ferndale Michigan.

This *Application* is made and based on the *Declaration* of **TAMIKA JONES**, attached hereto, for good cause.<sup>1</sup> Plaintiff has good cause to request that this matter be

<sup>1</sup> **Rule 5.513. Orders shortening time for a hearing.**

(a) Unless prohibited by other rule, statute, or court order, a party may seek an order shortening time for a hearing.

(b) An *ex parte* motion to shorten time must explain the need to shorten the time. Such a motion must be supported by affidavit.

(c) Absent exigent circumstances, an order shortening time will not be granted until after service of the underlying motion on the nonmoving parties. Any motion for order shortening time filed before service of the underlying motion must provide a satisfactory explanation why it is necessary to do so.

1 heard as soon as possible, due to the fact that Defendant has tested positive for Cocaine  
2 and is using illegal drugs. Defendant will need comprehensive drug treatment and lied  
3 to this Honorable Court in his *Opposition and Countermotion*, alleging specifically that  
4 “[t]he Court should not have concerns about his drug history.”  
5

6 Defendant’s contact with the children will need to be supervised. He is not in a  
7 position to care for the minor children and Plaintiff is requesting to relocate to  
8 Michigan where she will have the positive support of her family. Plaintiff would like  
9 to move after winter break so that the children can start school with a clean break.  
10

11 DATED this 15<sup>th</sup> day of December, 2019.  
12

13 **TAMIKA JONES**  
14 /s/ Tamika Jones  
15 **4730 East Craig Rd., Bldg. 15, #2088**  
16 **Las Vegas, NV 89115**  
17 **(313)452-5009**  
18 **TJones2@hcpnv.com**  
19 **Defendant *In Proper Person***  
20  
21  
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26 (d) An order shortening time must be served on all parties promptly. An order that shortens the  
27 notice of a hearing to less than 10 calendar days may not be served by mail. In no event may a motion  
28 be heard less than 1 judicial day after the order shortening time is filed and served.

(e) Should the court shorten the time for the hearing of a motion, the court may direct that the  
subject matter of any countermotion be addressed at the accelerated time, at the original hearing time,  
or at some other time.

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**DECLARATION OF PLAINTIFF**

TAMIKA JONES, under penalty of perjury, declares and states as follows:

1. That I am over 18 years old and am competent to testify as to the matters contained herein. I am the Plaintiff in the above-entitled action and have read the above *Motion* and know the contents thereof; the same is true of my own knowledge, except for those matters therein stated on information and belief, and as to those matters, I believe them to be true;

2. I incorporate all of the factual assertions made in my *Motion* as though fully set forth herein. I learned on December 13, 2019 that Defendant tested positive in his urine for Cocaine. This comports with his behavior, which has become abusive and erratic. The Defendant has been physically abusive to our son; he's threatened me; and he has expressed suicidal thoughts. I don't want him around the children unsupervised;

3. That Defendant's lies to this Court are concerning. They are actions of someone who doesn't believe they have a problem and who is not ready to change. I am in need of familial support, as Defendant is not providing for the children and he is engaged in illegal activities of illicit drug use. It would not surprise me if he was dealing drugs to support his Cocaine habit. I therefore am requesting to immediately relocate to Ferndale, Michigan and I will comply with any Court Orders, including any orders to return later.

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

Executed on this 16 day of December, 2019.

  
TAMIKA JONES



NOW  
Kenneth M. Robbins, Esq.,  
Nevada Bar No. 133572  
732 South 6th Street, Suite #100  
Las Vegas, NV 89101  
(702) 400-0000 Telephone  
FamilyFirst@HalfPriceLawyers.com  
Unbundled Attorney for Defendant

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

TAMIKA JONES,

Plaintiff,

vs.

CHRISTOPHER JUDSON,

Defendant.

Case No.: D-19-594413-C  
Dept.: S

**NOTICE OF WITHDRAWAL OF  
ATTORNEY FOR DEFENDANT**

CLERK OF COURT:

TO: Tamika Jones, Plaintiff; and

TO: Christopher Judson, Defendant;

COMES NOW, Kenneth M. Robbins, Esq., who hereby withdraws as attorney for  
Defendant in the above-entitled action, pursuant to EDCR 5.209 of the Supreme Court  
of the State of Nevada, in that the attorney was hired to perform a limited service, and  
that work has been completed.

Further, that the last known address of Defendant is

Christopher Judson  
8427 Sequoia Grove Ave  
Las Vegas NV 89149  
(702) 888-7077

Dated this 2 day of January, 2020.



Kenneth M. Robbins, Esq.  
Nevada Bar No. 13572

**CERTIFICATE OF SERVICE**

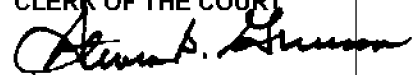
Hereby certify that on the 10 day of January, 2020, the foregoing **NOTICE**  
**OF WITHDRAWAL FOR DEFENDANT** was served upon the following persons and  
entities entitled to notice, by mailing a true and completed copy thereof, via US Mail,  
first class mail, postage prepaid, or by electronic service via the Eighth Judicial District  
Court E-Filing System to the following at their last known addresses:

Tamika Jones  
4730 E. Craig Rd #2088 Bldg 15  
Las Vegas, NV 89115  
*Plaintiff*

Christopher Judson  
8427 Sequoia Grove Ave  
Las Vegas NV 89149  
*Defendant*

Dated this 10 day of January, 2020.

  
Legal Assistant



1 **NOW**

2 JILLIAN M. TINDALL, ESQ.

3 Nevada Bar No. 7194

4 JILLIAN M. TINDALL, P.C.

5 3838 Raymert Dr., Ste. 20

6 Las Vegas, NV 89121

7 (702) 688-5716

8 *JillianTindall@Gmail.com*

9 Attorney for Plaintiff- *Unbundled Capacity*

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

12 **TAMIKA JONES,**

13 Plaintiff,

14 vs.

15 **CHRISTOPHER JUDSON,**

16 Defendant.

CASE NO: **D-19-594413-C**

DEPT. NO: S

DATE: 12/05/19

TIME: 1:45 PM

**NOTICE OF WITHDRAWAL**

17 To: **TAMIKA JONES**, Plaintiff

18 To: **CHRISTOPHER JUDSON**, Defendant

19 YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that JILLIAN  
20 M. TINDALL, ESQ., hereby withdraws as unbundled Counsel for Defendant  
21 pursuant to EDCR 5.209, which provides for the withdrawal of counsel in limited  
22 services contract cases. Ms. Tindall was engaged for *preparation and attendance for*  
23 *one hearing in this matter on December 5, 2019 at 1:45 pm*, in an unbundled  
24 capacity. Ms. Tindall further acted as scrivener only for Defendant's current *Motion*  
25 and has completed that work; however, Defendant has not engaged Ms. Tindall to  
26 appear at the hearing.  
27  
28

1 Ms. Tindall has completed all services, and has completed the proposed Order  
2 from the hearing that the Court directed her to prepare; opposing counsel did not sign  
3 off on said Order and has withdrawn. Said Order submitted, however, and Ms.  
4 Tindall will e-file it if the Court so requires. Exhibit 1.  
5

6 All services having been completed, until further notice, Defendant may now  
7 be contacted directly at the following address and telephone number: Tamika Beatrice  
8 Jones, 4730 E Craig Rd., Apt. 2088, Bldg,15, Las Vegas, NV 89115 313-452-5009.  
9

10 **I HEREBY CERTIFY** that on the 27<sup>th</sup> day of January, 2020, true and  
11 correct copies of the following was served by depositing in the US Mail, at Las  
12 Vegas, Nevada, priority first class postage fully prepaid thereon, to the Defendant, at  
13 the above address, and to the Plaintiff, at the following address:  
14

15  
16 Judson, Christopher Charles  
17 8447 Sequoia Grove Ave.  
18 Las Vegas, NV 89149

19 /s/ Jillian M. Tindall  
20 Employee- Jillian M. Tindall, P.C.  
21  
22  
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# **EXHIBIT 1**





J. T. <jilliantindall@gmail.com>

**VERY IMPORTANT FOR KENNETH ROBBINS Jones v. Judson D-19-594413-C  
Proposed Order**

1 message

J. T. <jilliantindall@gmail.com>

Tue, Dec 10, 2019 at 7:56 PM

To: FamilyFirst@halfpricelawyers.com

Dear Kenneth:

(He never signed off & withdrew. Pls enter)   
 --Thanks-- JT.

Please review and get back to me ASAP. I paid for the video so it should be available on the portal if you want to review the time stamps. We need this done ASAP or a separate stipulation so Mom can pick up the children from school and drop them off. Please review ASAP. Last week, the school would not release the children to mom.

Also, Dad is responsible for picking up and dropping off. Last week, Dad was of the opinion that Mom was to pick up, and that caused Mom to believe that it was not her time. There was some confusion and miscommunication over the timeshare. The school will not release the children to mom on Friday without an Order. Please provide a stipulation that I can get to the Court.

Thank you so much!!!! (Minutes are attached for your convenience)

Sincerely,

Jillian M. Tindall, Esq.

Tindalllaw.com

*This electronic message is confidential and is intended only for the use of the individual to whom it is addressed. The information also may be legally privileged. This transmission is sent in trust, for the sole purpose of delivery to the intended recipient. If you have received this transmission in error, you are hereby notified that any use, dissemination, distribution or reproduction of this transmission is strictly prohibited. If you are not the intended recipient, please immediately notify the sender and delete the message from your system.*

**2 attachments**

**Minutes in PDF.pdf**  
98K

**Order After hearing.pdf**  
99K

1 **ORDR**

2 JILLIAN M. TINDALL, ESQ.  
Nevada Bar No. 7194

3 JILLIAN M. TINDALL, P.C.

4 3838 Raymert Dr., Ste. 20

Las Vegas, NV 89121

5 (702) 688-5716

6 *JillianTindall@Gmail.com*

7 Attorney for Plaintiff- *Unbundled Capacity*

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

10 **TAMIKA JONES,**

11 Plaintiff,

12 vs.

13 **CHRISTOPHER JUDSON,**

14 Defendant.

CASE NO: **D-19-594413-C**

DEPT. NO: S

DATE: 12/05/19

TIME: 1:45 PM

**ORDER AFTER HEARING**

15 This cause, having come on for hearing on the above time and date for a  
16 RETURN HEARING FROM MEDIATION, Defendant, **CHRISTOPHER**  
17 **JUDSON**, appearing with his counsel, Kenneth Robbins, Esq. Nevada Bar No.  
18 13572, present in an *Unbundled Capacity*, the Plaintiff, **TAMIKA JONES**,  
19 appearing with her counsel, Jillian M. Tindall, Esq. Nevada Bar No. 7194, present in  
20 an *Unbundled Capacity*, the Court, having considered the pleadings and papers on  
21 file, the argument of counsel and representation made, being fully appraised of the  
22 subject matter herein, and good cause appearing:  
23  
24  
25

26 **THE COURT HEREBY FINDS AS FOLLOWS:**

- 27 1. [2:00:56] The parties were never married and have three minor children;  
28

- 1           2.     [2:04:10] That the parties have had an on again/off again relationship;
- 2           3.     [2:05:01] That the parties missed mediation twice; and
- 3
- 4           4.     [2:08:23] That the Court does not see the timeshare Mom is requesting to
- 5 be a big difference from the prior order, Mom is not working on Friday and Dad is
- 6 not working at all.
- 7

8           **NOW THEREFORE, IT IS HEREBY ORDERED ADJUDGED AND**  
9 **DECREED** as follows:

- 10           1.     [2:05:21] That the Court is not going to order mediation again.
- 11
- 12           2.     [2:11:59] That Plaintiff shall have exclusive possession of her apartment
- 13 as of today, and Defendant shall stay from Plaintiff's apartment. [2:14:57] If
- 14 Defendant is at Plaintiff's apartment any other times, it will be considered a violation
- 15 of this Court's *Order*.
- 16
- 17           3.     [2:08:26] That Plaintiff's timeshare with the children shall be from
- 18 Thursday at 6:00 PM until Sunday at 6:00 PM. Plaintiff shall get the children to
- 19 school on Friday on time. [2:12:08] Plaintiff shall be able to go onto the school
- 20 property and she shall be responsible for getting the children to and from school on
- 21 Friday on time and if they are tardy or absent on a Friday, the Court will know that it
- 22 occurred during her time. Defendant shall be responsible for getting the children to
- 23 and from school on Mondays-Thursdays, and time and if they are tardy or absent on
- 24 those days, the Court will know that it occurred during his time;
- 25
- 26
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1           4.     [2:13:21] That Defendant shall pick-up and drop off utilizing the Honk  
2 and Seatbelt rule. Defendant shall pull up and stay in the vehicle with his seatbelt on.  
3  
4 Plaintiff shall bring the children to the vehicle. The parties shall not have any  
5 discussion when picking-up and dropping off the children;

6           5.     [2:17:59] That this week Plaintiff shall only have timeshare Saturday at  
7 4:00 PM and Sunday.  
8

9           6.     [2:28:11] That for Christmas, Plaintiff shall get the children on  
10 Christmas Eve at noon until Christmas day 4:00 PM; then Defendant shall get  
11 timeshare on Christmas at 4:00 PM until 12/27/19 at noon, then back to the regular  
12 schedule;  
13

14           7.     [2:05:19] That the parties shall not do illegal drugs, marijuana, or alcohol  
15 12 hours before the parties have the children, and while they have the children they  
16 shall not do illegal drugs, marijuana or alcohol.  
17

18           8.     [2:14:25] That the parties shall utilize Talking Parents and the parties  
19 shall only contact each other by telephone for emergencies only;  
20

21           9.     [2:15:51] That Defendant shall file a Financial Disclosure Form and  
22 [2:26:10] Defendant is admonished to find work;  
23

24           10.    [2:16:04] That child support shall be dealt with at child support court;

25           11.    [2:33:06] That Plaintiff shall pick-up the children today and return the  
26 children to Defendant by 6:00 PM;  
27  
28

1           12. [2:16:16] That Plaintiff shall be responsible for health insurance.  
2 Anything not covered by health insurance as related to medical, dental and vision  
3 shall be divided 50/50;  
4

5           13. [2:23:06] That Plaintiff shall return Defendant's X Box;

6           14. [2:18:36] That Plaintiff shall get Defendant's permission or seek a Court  
7 order to relocate out of state;  
8

9           15. [2:33:06] That Defendant is referred to ATI for a full drug screen on hair  
10 and urine. Defendant must test today;  
11

12           16. [2:25:26] That Plaintiff shall pay for the drug test and shall have a week  
13 to pay. If Defendant is positive, he shall pay for the test;  
14

15           17. [2:23:11] That Ms. Tindall shall PREPARE the FINAL ORDER. Mr.  
16 Robbins shall REVIEW the ORDER then COUNTERSIGN;

17           18. [2:27:33] That there shall be a return hearing about the drug test results  
18 only on April 29, 2020 at 11:00 AM; and  
19

20           19. That the parties are on notice that they shall be subject to the following  
21 mandatory child custody notices:  
22

23 ///

24 ///

25 ///

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## CHILD CUSTODY NOTICES

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

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

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

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

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

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

**NOTICE IS HEREBY GIVEN** that the parties are subject to the relocation requirements of NRS 125C.006 & NRS 125C.0065.

1 If joint or primary physical custody has been established pursuant to an order, judgment or  
2 decree of a court and one parent intends to relocate his or her residence to a place outside of this  
3 State or to a place within this State that is at such a distance that would substantially impair the  
4 ability of the other parent to maintain a meaningful relationship with the child, and the relocating  
5 parent desires to take the child with him or her, the relocating parent shall, before relocating:

6 (a) attempt to obtain the written consent of the non-relocating parent to relocate with the  
7 child; and

8 (b) if the non-relocating parent refuses to give that consent, petition the court for permission  
9 to move and/or for primary physical custody for the purpose of relocating. A parent who desires to  
10 relocate with a child has the burden of proving that relocating with the child is in the best interest of  
11 the child. The court may award reasonable attorney's fees and costs to the relocating parent if the  
12 court finds that the non-relocating parent refused to consent to the relocating parent's relocation with  
13 the child without having reasonable grounds for such refusal, or for the purpose of harassing the  
14 relocating parent. A parent who relocates with a child pursuant to this section without the written  
15 consent of the other parent or the permission of the court is subject to the provisions of NRS  
16 200.359.

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

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

21 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, \_\_\_\_\_  
22 **DISTRICT COURT JUDGE**

23 Submitted by:  
24 **JILLIAN M. TINDALL, P.C.**

25 Reviewed and Approved by:  
26 **HALF PRICE LAWYERS**

27 *Jillian M. Tindall*  
28 **JILLIAN M. TINDALL, ESQ.**  
Nevada Bar No. 7194  
3838 Raymert Drive, Ste 20  
Las Vegas, NV 8912  
(702) 688-5716  
Attorney for Plaintiff  
JillianTindall@gmail.com  
*In an Unbundled Capacity*

**KENNETH ROBBINS, ESQ.**  
Nevada Bar No. 13572  
732 South 6<sup>th</sup> Street, Suite # 100  
Las Vegas, NV 89101  
(702) 400-0000  
Attorneys for Defendant  
FamilyFirst@HalfPriceLawyers.com  
*In an Unbundled Capacity*

*Steven D. Grierson*

1 **ORDR**

2 JILLIAN M. TINDALL, ESQ.

3 Nevada Bar No. 7194

4 JILLIAN M. TINDALL, P.C.

5 3838 Raymert Dr., Ste. 20

6 Las Vegas, NV 89121

7 (702) 688-5716

8 *JillianTindall@Gmail.com*

9 Attorney for Plaintiff- *Unbundled Capacity*

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

12 **TAMIKA JONES,**

13 Plaintiff,

14 vs.

15 **CHRISTOPHER JUDSON,**

16 Defendant.

CASE NO: **D-19-594413-C**

DEPT. NO: **S**

DATE: 12/05/19

TIME: 1:45 PM

**ORDER AFTER HEARING**

17 This cause, having come on for hearing on the above time and date for a  
18 RETURN HEARING FROM MEDIATION, Defendant, **CHRISTOPHER**  
19 **JUDSON**, appearing with his counsel, Kenneth Robbins, Esq. Nevada Bar No.  
20 13572, present in an *Unbundled Capacity*, the Plaintiff, **TAMIKA JONES**,  
21 appearing with her counsel, Jillian M. Tindall, Esq. Nevada Bar No. 7194, present in  
22 an *Unbundled Capacity*, the Court, having considered the pleadings and papers on  
23 file, the argument of counsel and representation made, being fully appraised of the  
24 subject matter herein, and good cause appearing:

25 **THE COURT HEREBY FINDS AS FOLLOWS:**

- 26 1. [2:00:56] The parties were never married and have three minor children;

27 1

RECEIVED

JAN 30 2020

28 224

DEPT. S



1           2.     [2:04:10] That the parties have had an on again/off again relationship;

2           3.     [2:05:01] That the parties missed mediation twice; and

3  
4           4.     [2:08:23] That the Court does not see the timeshare Mom is requesting to  
5 be a big difference from the prior order, Mom is not working on Friday and Dad is  
6 not working at all.

7  
8           **NOW THEREFORE, IT IS HEREBY ORDERED ADJUDGED AND**  
9 **DECREEED** as follows:

10           1.     [2:05:21] That the Court is not going to order mediation again.

11  
12           2.     [2:11:59] That Plaintiff shall have exclusive possession of her apartment  
13 as of today, and Defendant shall stay from Plaintiff's apartment. [2:14:57] If  
14 Defendant is at Plaintiff's apartment any other times, it will be considered a violation  
15 of this Court's *Order*.

16  
17           3.     [2:08:26] That Plaintiff's timeshare with the children shall be from  
18 Thursday at 6:00 PM until Sunday at 6:00 PM. Plaintiff shall get the children to  
19 school on Friday on time. [2:12:08] Plaintiff shall be able to go onto the school  
20 property and she shall be responsible for getting the children to and from school on  
21 Friday on time and if they are tardy or absent on a Friday, the Court will know that it  
22 occurred during her time. Defendant shall be responsible for getting the children to  
23 and from school on Mondays-Thursdays, and time and if they are tardy or absent on  
24 those days, the Court will know that it occurred during his time;

1           4.     [2:13:21] That Defendant shall pick-up and drop off utilizing the Honk  
2 and Seatbelt rule. Defendant shall pull up and stay in the vehicle with his seatbelt on.  
3  
4 Plaintiff shall bring the children to the vehicle. The parties shall not have any  
5 discussion when picking-up and dropping off the children;

6           5.     [2:17:59] That this week Plaintiff shall only have timeshare Saturday at  
7  
8 4:00 PM and Sunday.

9           6.     [2:28:11] That for Christmas, Plaintiff shall get the children on  
10 Christmas Eve at noon until Christmas day 4:00 PM; then Defendant shall get  
11 timeshare on Christmas at 4:00 PM until 12/27/19 at noon, then back to the regular  
12 schedule;  
13

14           7.     [2:05:19] That the parties shall not do illegal drugs, marijuana, or alcohol  
15  
16 12 hours before the parties have the children, and while they have the children they  
17 shall not do illegal drugs, marijuana or alcohol.

18           8.     [2:14:25] That the parties shall utilize Talking Parents and the parties  
19 shall only contact each other by telephone for emergencies only;  
20

21           9.     [2:15:51] That Defendant shall file a Financial Disclosure Form and  
22 [2:26:10] Defendant is admonished to find work;  
23

24           10.    [2:16:04] That child support shall be dealt with at child support court;

25           11.    [2:33:06] That Plaintiff shall pick-up the children today and return the  
26 children to Defendant by 6:00 PM;  
27  
28

1        12. [2:16:16] That Plaintiff shall be responsible for health insurance.  
2 Anything not covered by health insurance as related to medical, dental and vision  
3 shall be divided 50/50;  
4

5        13. [2:23:06] That Plaintiff shall return Defendant's X Box;  
6

7        14. [2:18:36] That Plaintiff shall get Defendant's permission or seek a Court  
8 order to relocate out of state;

9        15. [2:33:06] That Defendant is referred to ATI for a full drug screen on hair  
10 and urine. Defendant must test today;  
11

12        16. [2:25:26] That Plaintiff shall pay for the drug test and shall have a week  
13 to pay. If Defendant is positive, he shall pay for the test;  
14

15        17. [2:23:11] That Ms. Tindall shall PREPARE the FINAL ORDER. Mr.  
16 Robbins shall REVIEW the ORDER then COUNTERSIGN;

17        18. [2:27:33] That there shall be a return hearing about the drug test results  
18 only on April 29, 2020 at 11:00 AM; and  
19

20        19. That the parties are on notice that they shall be subject to the following  
21 mandatory child custody notices:  
22

23 ///

24 ///

25 ///

26 ///

1 **CHILD CUSTODY NOTICES**

2 **NOTICE IS HEREBY GIVEN** of the following provision of NRS  
3 125C.0045(6):  
4

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

14 **NOTICE IS HEREBY GIVEN** that the terms of the Hague Convention of  
15 October 25, 1980, adopted by the 14th Session of the Hague Conference on Private  
16 International Law, apply if a parent abducts or wrongfully retains a child in a foreign  
17 country. The parties are also put on notice of the following provision of NRS  
18 125C.0045(8):  
19

20 If a parent of the child lives in a foreign country or has significant commitments in a foreign  
21 country:

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

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

29 **NOTICE IS HEREBY GIVEN** that the parties are subject to the relocation  
30 requirements of NRS 125C.006 & NRS 125C.0065.

1 If joint or primary physical custody has been established pursuant to an order, judgment or  
2 decree of a court and one parent intends to relocate his or her residence to a place outside of this  
3 State or to a place within this State that is at such a distance that would substantially impair the  
4 ability of the other parent to maintain a meaningful relationship with the child, and the relocating  
5 parent desires to take the child with him or her, the relocating parent shall, before relocating:

6 (a) attempt to obtain the written consent of the non-relocating parent to relocate with the  
7 child; and

8 (b) if the non-relocating parent refuses to give that consent, petition the court for permission  
9 to move and/or for primary physical custody for the purpose of relocating. A parent who desires to  
10 relocate with a child has the burden of proving that relocating with the child is in the best interest of  
11 the child. The court may award reasonable attorney's fees and costs to the relocating parent if the  
12 court finds that the non-relocating parent refused to consent to the relocating parent's relocation with  
13 the child without having reasonable grounds for such refusal, or for the purpose of harassing the  
14 relocating parent. A parent who relocates with a child pursuant to this section without the written  
15 consent of the other parent or the permission of the court is subject to the provisions of NRS  
16 200.359.

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

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

21 DATED this 31 day of Jan 2020  
22 December, 2019.

23 Vincent Olson  
24 **DISTRICT COURT JUDGE**


25 Submitted by:  
26 **JILLIAN M. TINDALL, P.C.**

27 Reviewed and Approved by:  
28 **HALF PRICE LAWYERS**

29 Jillian M Tindall  
30 **JILLIAN M. TINDALL, ESQ.**

31 Nevada Bar No. 7194  
32 3838 Raymert Drive, Ste 20  
33 Las Vegas, NV 8912  
34 (702) 688-5716  
35 Attorney for Plaintiff  
36 JillianTindall@gmail.com  
37 In an Unbundled Capacity

38 Kenneth Robbins  
39 **KENNETH ROBBINS, ESQ.**  
40 Nevada Bar No. 13572  
41 732 South 6<sup>th</sup> Street, Suite # 100  
42 Las Vegas, NV 89101  
43 (702) 400-0000  
44 Attorneys for Defendant  
45 FamilyFirst@HalfPriceLawyers.com  
46 In an Unbundled Capacity



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3  
4 DISTRICT COURT  
5 CLARK COUNTY, NEVADA

6 \*\*\*\*

7 TAMIKA BEATRICE JONES,  
8 PLAINTIFF.  
9 VS.  
10 CHRISTOPHER CHARLES  
11 JUDSON, DEFENDANT.

CASE NO.: D-19-594413-C  
DEPARTMENT S  
Courtroom 7

12  
13 **NOTICE OF RESCHEDULING OF HEARING**

14 Please be advised that the date and time of a hearing set before the Honorable  
15 Vincent Ochoa, has been changed. The Return Hearing, presently  
16 scheduled for the 29th day of April, 2020, at 11:00 AM, has been  
17 rescheduled to the 15th day of April, 2020, at 11:00 AM at the Family  
18 Courts & Services Center, Courtroom 7.

19  
20 Honorable Vincent Ochoa

21 By: /S/ Deniece Lopez  
22 Judicial Executive Assistant  
23 Department S  
24  
25  
26  
27  
28

1  
2 **CERTIFICATE OF MAILING**

3 I hereby certify that the foregoing Notice of Rescheduling Hearing was:

4 ☐ E-served pursuant to NEFCR 9, or placed in the folder of counsel  
5 maintained in the Office of the Clerk of Court.

6 Tamika Beatrice Jones; Christopher Charles Judson

7 ☒ E-Served pursuant to NEFCR 9, or mailed, via first-class mail, postage fully  
8 prepaid to:

9 Christopher Charles Judson  
10 8447 Sequoia Grove AVE  
Las Vegas, NV 89149

11 Jillian M. Tindall  
12 3838 Raymert DR STE 20  
Las Vegas, NV 89121

13 Tamika Beatrice Jones  
14 4730 E Craig RD APT 2088Bldg15  
15 Las Vegas, NV 89115

16  
17 /S/ Deniece Lopez  
18 Judicial Executive Assistant  
19 Department S  
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OFFM

Electronically Filed  
4/15/2020 12:37 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

*James, Tamika Beatrice*

Plaintiff,

Case No. D-19-594413-C

vs.

*Judson, Christopher Charles*

Defendant.

Department S

ORDER FOR FAMILY MEDIATION  
CENTER SERVICES

Pursuant to Nevada Revised Statutes 3.475 and 125.480 IT IS HEREBY ORDERED by the Court that, regarding the child(ren) at issue, the Family Mediation Center (FMC) shall provide:

☒ Mediation. To place their agreement into a written form and to address holidays.

☐ Include Safety Protocol

☐ Child Interview. Name(s): \_\_\_\_\_

☐ Standard FMC Child Interview Questions

Additional questions/topics:

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

☐ Non-therapeutic Parent/Child Observation. No. of observation sessions: 1 ☐ 2 ☐ \_\_\_\_\_

Parent and Child Name(s): \_\_\_\_\_

IT IS FURTHER ORDERED that, if an interpreter is needed, it is the party's responsibility to pay the interpreter at the time services are rendered. The language needed is: ☐ Spanish ☐ Other: \_\_\_\_\_

☐ Good cause appearing, court interpreter fees waived by the Court.

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

IT IS FURTHER ORDERED that the parties must report to FMC at 601 N. Pecos Road, Las Vegas, NV 89101.

IT IS FURTHER ORDERED that, if the UNLV Mediation Clinic is in session, a referral is ☐ authorized ☐ not authorized.

DATED this 15 day of April, 2020.

YOUR RETURN COURT DATE IS:

Date: MA Time: \_\_\_\_\_

*Vincent Ochoa*

District Judge

Bar No. of Plaintiff's Attorney: pro-se

Bar No. of Defendant's Attorney: pro-se





1 **NOA**  
2 **DAMIAN R. SHEETS, ESQ.**  
3 Nevada Bar No. 10755  
4 **LESLEY E. COHEN, ESQ.**  
5 Nevada Bar No. 6605  
6 **NEVADA DEFENSE GROUP**  
7 714 South 4<sup>th</sup> Street  
8 Las Vegas, Nevada 89101  
9 (702) 988-2600  
10 lcohen@defendingnevada.com  
11 *Attorneys for Intervener*

12 **EIGHTH JUDICIAL DISTRICT COURT**  
13 **FAMILY DIVISION**  
14 **CLARK COUNTY, NEVADA**

15 **TAMIKA JONES,** ) **CASE NO.: D-19-594413-C**  
16 ) **DEPT.: S**  
17 **Plaintiff** )  
18 **vs.** )  
19 )  
20 **CHRISTOPHER JUDSON,** )  
21 **Defendant** )

22 **NOTICE OF APPEARANCE OF COUNSEL**

23 COMES NOW, Natural Grandmother, KIMBERLY WHITE, by and  
24 through her attorneys, Damian R. Sheets, Esq., and Lesley E. Cohen, Esq., of  
25 **NEVADA DEFENSE GROUP**, and hereby provides notice of their  
26 **APPEARANCE OF COUNSEL** in the above captioned matter.

27 ///

28 ///

///

1 All filings and correspondence should be forwarded to address provided  
2 herein.  
3

4 DATED this 19<sup>th</sup> day of June, 2020.  
5

6 /s/ Lesley E. Cohen, Esq. \_\_\_\_\_  
7 DAMIAN R. SHEETS, ESQ.  
8 Nevada Bar No. 10755  
9 LESLEY E. COHEN, ESQ.  
10 Nevada Bar No. 6605  
11 **NEVADA DEFENSE GROUP**  
12 714 South Fourth St.  
13 Las Vegas, Nevada 89101  
14 (702) 598-1299  
15 lcohen@defendingnevada.com  
16 Attorney for Intervener  
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**CERTIFICATE OF SERVICE**

I, HEREBY CERTIFY that on the 19<sup>th</sup> day of June, 2020, I caused to be served, the foregoing NOTICE OF APPEARANCE, to all interested parties as follows:

X By mail: Pursuant to NRCP 5(b), caused a true copy thereof to be placed in the U.S. Mail, enclosed in a sealed envelope, postage fully prepaid thereon, addressed as set forth below:

By ELECTRONIC MAIL: Pursuant to EDCR 7.26 and N.E.F.C.R Rule 9, I caused a true copy thereof to be served by electronic mail, via Odyssey eFile NV, to the following email address(es):

Christopher Charles Judson  
8447 Sequoia Grove Ave.  
Las Vegas, NV 89149

Tamika Beatrice Jones  
730 E Craig Rd., Apt. 2088, Bldg,15  
Las Vegas, NV 89115

/s/ Lesley E. Cohen

An Employee Of Nevada Defense  
Group



DAMIAN R. SHEETS, ESQ.  
Nevada Bar No. 10755  
LYNN CONANT, ESQ.  
Nevada Bar No. 8036  
**NEVADA DEFENSE GROUP**  
714 South 4<sup>th</sup> Street  
Las Vegas, Nevada 89101  
(702) 988-2600  
lconant@defendingnevada.com  
*Attorneys for Grandmother*

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

TAMIKA JONES,	)	CASE NO.: D-19-594473-C
	)	DEPT.: S
Plaintiff	)	
vs.	)	
CHRISTOPHER JUDSON,	)	
	)	
Defendant.	)	

**NOTICE:** You may file a written response to this motion with the Clerk of the Court and provide the undersigned with a copy of your response within 14 days of receiving this motion. Failure to file a written response with the Clerk of Court within 14 days of your receipt may result in the requested relief being granted by the Court without a hearing prior to the scheduled hearing date.

**(1) MOTION TO INTERVENE; (2) FOR AN ORDER TO PRODUCE THE CHILDREN, (3) SOLE LEGAL AND PRIMARY PHYSICAL CUSTODY OF THE MINOR CHILDREN; (4) FOR CHILD SUPPORT; (5) VISITATION FOR PLAINTIFF AND DEFENDANT; (6) FOR MEDICAL COVERAGE; (7) FOR CHILD SUPPORT AND ASSOCIATED CHILD REARING COSTS; OR IN THE ALTERNATIVE (8) FOR THIRD PARTY VISITATION; (9) FOR ATTORNEY'S FEES AND COSTS; AND, OTHER RELATED RELIEF.**

COMES NOW Intervener, and maternal grandmother, KIMBERLY WHITE ("Kimberly"), by and through her attorneys, DAMIAN R. SHEETS, ESQ., and LYNN CONANT, ESQ., of the law firm of NEVADA DEFENSE GROUP, and **(1) MOTION TO INTERVENE; (2) FOR AN ORDER TO PRODUCE THE CHILDREN, (3) SOLE LEGAL AND PRIMARY PHYSICAL CUSTODY OF THE MINOR CHILDREN; (4) FOR CHILD SUPPORT; (5) VISITATION FOR PLAINTIFF AND DEFENDANT; (6) FOR MEDICAL COVERAGE; (7) FOR CHILD SUPPORT AND ASSOCIATED CHILD REARING COSTS; OR IN THE ALTERNATIVE (8) FOR THIRD PARTY VISITATION; (9) FOR ATTORNEY'S FEES AND COSTS; AND, OTHER RELATED RELIEF,** and hereby moves this Court for the following relief:

1. For an Order permitting the Intervention of Kimberly White, the Paternal Grandmother into this case;

2. For an Order that the children are produced;

3. For an Order pursuant to NRS 125C.0035, granting the Intervenor's request for Legal and primary custody of the minor children;

4. For an Order awarding Plaintiff and Defendant visitation;

5. An Alternative Order for Third Party Visitation;

- 1           6. For an Order awarding Intervenor Child Support pursuant to NAC 425;  
2  
3           7. For an Order for medical coverage on behalf of the minor children;  
4  
5           8. For an Order awarding Intervenor cost associated with school;  
6  
7           9. For an Order awarding Intervenor's full attorneys' fees and costs  
8 associated with the filing of the instant motion;  
9  
10          10. For an Order granting Intervenor any further relief this Court deems just  
11 and proper.

12           This Motion is based upon the following Memorandum of Points and  
13 Authorities, papers and pleadings on file herein, the attached Affidavit of  
14 Intervenor, and any permitted by this Court at the time of Hearing.

15           DATED this 13th day of July, 2020.  
16

17  
18           /s/ Lynn Conant, Esq.  
19

20           DAMIAN R. SHEETS, ESQ.

21           Nevada Bar No. 10755

22           LYNN CONANT, Esq.

23           Nevada Bar No. 8036

24           NEVADA DEFENSE GROUP

25           714 South 4th Street

26           Las Vegas, Nevada 89101

27           (702) 988-2600

28           lconant@defendingnevada.com

Attorneys for Grandmother

///

///

**PLEADING  
CONTINUES  
IN NEXT  
VOLUME**