

**STATE OF NEVADA**  
**OFFICE OF THE ATTORNEY GENERAL**

100 N. CARSON ST., CARSON CITY, NV 89701 – TEL# 775-684-1100 – FAX# 775-684-1108  
555 E. WASHINGTON AVE., STE 3900, LAS VEGAS, NV 89101 – TEL# 702-486-3420 – FAX# 702-486-3768



**COMPLAINT FORM**

*The information you provide on this form may be used to help us investigate violations of state laws. **Please be sure to complete all required fields.** The length of this process can vary depending on the circumstances and information you provide. The Attorney General's office may contact you if additional information is needed. Supplemental materials can be attached to Section 6 of this complaint form, and if additional supplemental materials are acquired after submitting this form, please email them to [AGCOMPLAINT@ag.nv.gov](mailto:AGCOMPLAINT@ag.nv.gov) with COMPLAINT in the subject line.*

**\*\*\*ONLY COMPLAINTS THAT ARE SIGNED WILL BE PROCESSED\*\*\***

HAVE YOU PREVIOUSLY FILED A COMPLAINT WITH OUR OFFICE? ☒ YES ☐ NO  
If so, what are the approximate dates of previously filed complaint(s)?

**SECTION 1: COMPLAINANT INFORMATION**

LAST NAME: Licari		FIRST NAME: Lindsey		M.I. S	
ORGANIZATION:					
ADDRESS: 9564 Scorpion Track ct		CITY: Las Vegas	STATE: NV	ZIP: 89178	
PHONE/MOBILE: 7025776657		EMAIL: lindseylicari14@aol.com			
AGE GROUP:	<input type="checkbox"/> UNDER 18	<input checked="" type="checkbox"/> 18 to 59	<input type="checkbox"/> 60 AND OVER		
PRIMARY LANGUAGE: English					

**SECTION 2: TYPE OF COMPLAINT**

<input type="checkbox"/> GENERAL INVESTIGATIONS	<input type="checkbox"/> MISSING CHILDREN	<input type="checkbox"/> TICKET SALES
<input type="checkbox"/> HIGH TECH CRIME	<input checked="" type="checkbox"/> MORTGAGE FRAUD	<input type="checkbox"/> WORKERS COMP FRAUD
<input type="checkbox"/> INSURANCE FRAUD	<input type="checkbox"/> OPEN MEETING LAW	<input type="checkbox"/> OTHER
<input type="checkbox"/> MEDICAID FRAUD	<input type="checkbox"/> PUBLIC INTEGRITY	



### SECTION 3: MY COMPLAINT IS AGAINST

<input checked="" type="checkbox"/> INDIVIDUAL <input checked="" type="checkbox"/> BUSINESS <input type="checkbox"/> AGENCY NAME OF INDIVIDUAL/BUSINESS/AGENCY: <small>Bobby Antee, Nikki Bott, Linda Naw, National Title Company, ERA Brokers, Jennings and Fulton LTD, Shumway Van, Nevada SOS, GLVAR, NRED, Lipson Neilson LTD</small>			
ADDRESS: 8915 S. Pecos Rd Unit 20A		CITY: Henderson	STATE: NV ZIP: 89074
TELEPHONE NUMBER: 7025776657		EMAIL: lindseylicari14@aol.com	
WEBSITE:			
DATE ALLEGED VIOLATION OCCURRED: 1/17/2018			
WAS A CONTRACT SIGNED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
HAVE YOU CONTACTED ANOTHER AGENCY FOR ASSISTANCE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF SO, WHICH AGENCY? NRED, GLVAR, Nevada SOS, LVMPD			
HAVE YOU HIRED AN ATTORNEY? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF SO, PROVIDE ATTORNEY'S CONTACT INFORMATION: <small>They also tried to conaseal the crimes of all involved</small>			
IS COURT ACTION PENDING? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
DID YOU MAKE ANY PAYMENTS TO THE INDIVIDUAL OR BUSINESS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
HOW MUCH WERE YOU ASKED TO PAY? 65000		HOW MUCH DID YOU ACTUALLY PAY? 62261.08	
DATE OF PAYMENT: 01/17/2018		PAYMENT METHOD: wire	

Continue to Section 4 to describe complaint.

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## SECTION 4: DESCRIBE YOUR COMPLAINT:

➤ (to add attachments, see Section 5)

I filed a complaint 2 previous times. Pursuant to NRS 205.372 (5), NRS 598D.150 (1) (2) (3) the Attorney General has jurisdiction over Mortgage Fraud. Pursuant to NRS 598D.150 (3) it is not the responsibility of any local Government agency to regulate issues of mortgage fraud, it is the responsibility of the Attorney General. On 1/17/2018 my name was forged to quit claim, in which I have attached that complaint as well. I then followed up several times, with emails and more evidence. The Attorney General's Office had adequate information to act and failed to do so. Due to the Attorney General not acting, I was put through stalking, harassment, embezzlement, fraud, while the AG has allowed Nevada Secretary of State to not act against notary Nikki Sikalis Bott who acted as the escrow agent and the notary in the mortgage fraud transaction. This alone revokes the deed, and being that Bobby Antee was part of the Mortgage Fraud Pursuant to NRS 205.0832 1 (a), NRS 208.085, NRS 205.090, NRS 205.110, NRS 205.220 1(c), so has no legal right as community property pursuant to NRS 205.265 part ownership is not a defense for theft. I reported the Mortgage Fraud to GLVAR, NRED, in which they also took no action which also makes all parties involved that chose to conceal the acts of Bobby Antee, Linda Naw, ERA Brokers, National Title Company, One Realty Group, Valley West Mortgage, Melissa Parker, Tracy Bouchard, Jeff Moore. I also copied my legal counsel Jennings and Fulton LTD on every email to GLVAR, NRED, SOS, in which they committed Legal Malpractice by allowing these agencies to conceal Mortgage Fraud, which in turn also makes them guilty of Mortgage Fraud Pursuant to NRS 205.372 (a) Shumway Van then litigated on the behalf of my now Ex Husband for 3 years, when on 11/20/2018 Shumway Van counsel of Bobby Antee submitted respondent docs to GLVAR that produced the Mortgage Fraud and proof that Nikki Sikalis Bott Notarized her own document and acted as the Notary and Escrow Agent. National Title Company then allowed Melanie Treanor, Nikki Botts Neighbor to notarized the Deed of Trust slandering Title into Mr. Antee's name. Pursuant to NRS 205.330 Every person at the closing who knowingly Fraudulently Conveyed Title is Guilty of Fraud. Pursuant to NRS 205.355 Bobby Antee knowing recieved Fraudulent Conveyance and pursuant to NRS 205.370 (1) Bobby Antee swindled credit, by not disclosing his open child support case in 2017, and was instructed by Valley West Mortgage to lie on his loan application. This is a Category D Felony, yet he has not been arrested nor has Nikki Bott, Linda Naw. Bobby Antee's counsel submitted the evidence of Mortgage Fraud, then frivolously filed a complaint on the behalf of Linda Naw knowing that she was clearly part of the mortgage fraud and continued to litigate a divorce, which was a annulment and Lis Pendens. I originally hired Chris Tillman who knew of the mortgage fraud and continued to litigate for his own unjust enrichment and to help conceal the crimes of ERA Brokers and National Title Company. After 6 months of litigating the divorce, I fired Chris Tillman and reported him to the Bar, in which they took no action and continued to let Jennings and Fulton litigate 3 separate matters over one issue. Jennings and Fulton had one retainer for A-18-786141-C, in which they litigated A-20-806737-C and D-18-573154-D over the same issue but failed to produce the evidence given to them at trial, or in discovery. Logan Willson, Adam Fulton, and Jared Jennings lied to me for 2 years, insisting I had no damages and not advocating on my behalf at all to obtain justice. Pursuant to NRS 205.380 1 (a) are guilty of obtaining money from me with the intent to defraud. Pursuant to NRS 205.390 (1) Linda Naw obtained my signature on gift letters with the promise I would be listed on title as a owner, she failed to list me as a owner so is guilty of NRS 205.395 1 (a). These are all deceptive trade practices pursuant to NRS 598.0903 to 598.0999 which are matters explicitly handled by the Attorney General. Jennings and Fulton then filed A-20-806737-C a year after retaining them and providing them with clear evidence of mortgage fraud. Adam Fulton spent two years threatening me, lying to me, and misleading my cases. Logan Willson was copied on emails to GLVAR, LVMPD, Bond Companies, and refused to represent me honestly. Jennings and Fulton Embezzled \$16k in legal fees, and Shumway Van, Garret Chase, Grayson Moulton, are not trying to extort \$44k in legal fees, with the judicial abuse of Rena Hughes. Pursuant to NRS 205.372 (a) (b) they are all guilty of Mortgage Fraud for their concealment. The Attorney General had all of this information since 6/5/2020 and prior, and failed to act. Pursuant to 205.372 (5) the attorney general should have investigated and prosecuted all parties involved in the fraudulent closing and those who choose to conceal it after the fact. I filed 3 police reports, in which LVMPD has taken to action and has also tried to conceal the Mortgage Fraud, in turn making LVMPD guilty of Mortgage Fraud. Shumway Van and Grayson Moulton continue to harass me on a daily basis, they have kept my assets trapped in litigation to prevent me from obtaining adequate counsel. Although they have known of the mortgage fraud since 12/2018, Pursuant to NRS 205.365 is Rena Hughes, Bobby Antee, and Grayson Moulton sell my home without my consent, they are committing a Category D felony and the AG needs to prosecute. Pursuant to NCJC Rule 2.2 a Judge must remain impartial and fair, in which Rena Hughes failed to do. Rena Hughes then fabricated her ruling to conceal the Forgery and fraud committed by Nikki Bott and Linda Naw, which her concealment makes her part of Mortgage Fraud, in which she has no immunity when committing criminal acts. Pursuant to NCJC Rule 2.3 (a) (b) (c) a judge must refrain from allowing lawyers to harass litigants, in which she allowed Shumway Van and Jennings and Fulton to harass and defraud me, by litigating a divorce when she recived clear and consise evidence in 12/2018 that Fraud and Forgery has occurred. Jennings and Fulton and Shumway Van then went to trial where they unjustly enriched for pointless litigation, then removed all of my evidence out of the trial binder that had bee on file for over a year. They then turned in no evidence given to them or witnesses, but allowed Linda Naw to testify and sit in on trial D-18-573154-D even though they were litigating case A-18-786141-C over the same matter, Jennings and Fulton knew Bobby Antee and Linda Naw were conspiring to conceal their actions and utilizing the same counsel which pursuant to NRPC Rule 1.8 imposed a clear conflict of interest. Every one has attempted to cover up this fraud for 3 years, in which no one has cared about me at all. I have been harassed, slandered, and at times have felt suicidal from the torture I have experienced. I have now also obtained a letter from a handwriting expert which also confirms forgery, and is a clear sign of legal mal practice because I should have been told to do it prior to trial. Shumway Van and Jennings and Fulton have known for 2 years of Mortgage Fraud and continued to litigate and lie. I want the Attorney General to take action. I have reported it to every agency possible, even Deborah Conway the County recorder knew of the fraud and refused to revoke the deed. The lawyers have broken the law numerous times Rule 2.9 (a) states a judge must not have communications that arent disclosed to all parties. In which Rena Hughes continues to have Ex Parte Communications which I have filed Fraud on the Court which means any order entered by Rena Hughes is not valid and pursuant to NRJC Rule 2.11 (a) (1) she should have recused herself, which she refuses. I have submitted evidence to contradict her ruling and she has refused to correct it knowingly interfering with Commerce Interstate, in which she has no ammunty. Elizabeth Gonzales then Dismissed case A-20-806737-C in which she saw the clear legal malpractice of Jennings and Fulton and did not report them or Rena Hughes as required by Rule 2.15. I would like to stop getting the run around and Attorney General act and prosecute all involved.

EMAIL [AGCOMPLAINT@ag.nv.gov](mailto:AGCOMPLAINT@ag.nv.gov) to submit any additional information



## SECTION 5: EVIDENCE

List and attach photocopies of any relevant documents, agreements, correspondence or receipts that support your complaint. Copy both sides of any canceled checks that pertain to this complaint.

**I have emailed AG numerous time with evidence**

## SECTION 6: WITNESSES

List any other known witnesses or victims. Please provide names, addresses, phone numbers, email address and website information.

Larry Bradley 7026068217

Roberta Licari 7198215824

Jasmine Pittman 7022458751

## SECTION 7: SIGN AND DATE THIS FORM

(The Attorney General's Office will not process any unsigned, incomplete or illegible complaint forms)

I understand that the Attorney General is **not my private attorney**, but rather represents the public by enforcing laws prohibiting fraudulent, deceptive or unfair business practices. I understand that the Attorney General does **not** represent private citizens seeking refunds or other legal remedies. I am filing this complaint to notify the Attorney General's Office of the activities of a particular business or individual. I understand that the information contained in this complaint may be used to establish violations of Nevada law in both private and public enforcement actions. In order to resolve your complaint, we may send a copy of this form to the person or firm about whom you are complaining. I authorize the Attorney General's Office to send my complaint and supporting documents to the individual or business identified in this complaint. I also understand that the Attorney General may need to refer my complaint to a more appropriate agency.

I certify under penalty of perjury that the information provided on this form is true and correct to the best of my knowledge.

**\*\*\*\*ONLY COMPLAINTS THAT ARE SIGNED WILL BE PROCESSED\*\*\*\***

SIGNATURE:

PRINTNAME:

DATE: 10-31-2020

*Roberta Licari*  
Roberta Licari

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➤ SECTION 8: OPTIONAL INFORMATION

GENDER: ☐ MALE ☒ FEMALE

ETHNICITY:

<input checked="" type="checkbox"/> WHITE/CAUCASIAN	<input checked="" type="checkbox"/> BLACK/AFRICAN AMERICAN	<input type="checkbox"/> HISPANIC/LATINO
<input type="checkbox"/> NATIVE AMERICAN/ALASKAN	<input type="checkbox"/> ASIAN/PACIFIC ISLANDER	<input type="checkbox"/> OTHER:

HOW DID YOU HEAR ABOUT OUR COMPLAINT FORM (CHOOSE ONE):

<input checked="" type="checkbox"/> CALLED/VISITED OUR CARSON CITY OFFICE	<input checked="" type="checkbox"/> SEARCH ENGINE
<input checked="" type="checkbox"/> CALLED/VISITED OUR LAS VEGAS OFFICE	<input checked="" type="checkbox"/> AG SOCIAL MEDIA SITE
<input checked="" type="checkbox"/> CALLED/VISITED OUR RENO OFFICE	<input type="checkbox"/> ATTENDED AN AG PRESENTATION
<input checked="" type="checkbox"/> NEVADA OFFICIAL/ELECTED OFFICIAL	<input type="checkbox"/> OTHER

MARK ALL THAT APPLY

<input checked="" type="checkbox"/> INCOME BELOW POVERTY LEVEL	<input type="checkbox"/> MILITARY SERVICEMEMBER
<input type="checkbox"/> DISASTER VICTIM	<input type="checkbox"/> IMMEDIATE FAMILY OF SERVICEMEMBER/VETERAN
<input checked="" type="checkbox"/> PERSON WITH DISABILITY	<input type="checkbox"/> VETERAN
<input type="checkbox"/> MEDICAID RECIPIENT	<input type="checkbox"/> OTHER:

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## ADDITIONAL COMMENTS:

*What are you hoping the Attorney General's office can do for you?*

I have filed this complaint with AG 3 times now. This is very clear mortgage fraud, in which many people have worked together to conceal this crime. I am one person, I lost my son, which was the worst experience any one can go through. From the moment I lost my son, I have been a target to everyone, while I have endlessly poured my heart into bettering this community. I was married to Bobby Antee for 1 month and have been put through 3 years of pain and suffering and endless litigation. with not one person caring about me as a person, or my well being. I am entitled to justice, and I should not be allowed to be stalked, harassed, abused, and lied about to cover up the criminal acts of others. This is not the responsibility of the mortgage division, but is solely the responsibility of Aaron Ford acting as Attorney General. All parties involved made the choice to commit or conceal Fraud and that a crime. It should not matter who these people know, they are criminals and deserve to be treated as such.

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