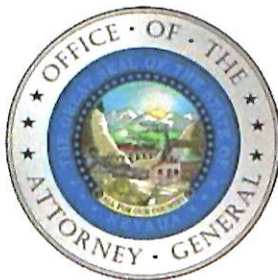


**STATE OF NEVADA**  
**OFFICE OF THE ATTORNEY GENERAL**

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: Nikki Bott, Tracy Bouchard-National Title Company, ERA Brokers, Linda Naw, Bobby Antee, Valley West Mortgage, Drew Levy, GLVAR- Ingrid Truillo, NRED, SOS			
ADDRESS:		CITY:	STATE: ZIP:
TELEPHONE NUMBER:		EMAIL:	
WEBSITE:			
DATE ALLEGED VIOLATION OCCURRED: <b>01/17/2018</b>			
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? GLVAR, NRED, SOS, FBI, LVMPD, Business & Industry			
HAVE YOU HIRED AN ATTORNEY? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF SO, PROVIDE ATTORNEY'S CONTACT INFORMATION: I let them go because they became part of the fraud, and threw my trial to protect the Title Company and Real Estate Agent			
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? <b>65,000</b>		HOW MUCH DID YOU ACTUALLY PAY? <b>62000</b>	
DATE OF PAYMENT: <b>01/17/2018</b>		PAYMENT METHOD: <b>Wire</b>	

Continue to Section 4 to describe complaint.

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## SECTION 4: DESCRIBE YOUR COMPLAINT:

➤ (to add attachments, see Section 5)

In November of 2017 I retained Linda Naw to assist me and Bobby Antee in a purchase of a home. I explained to Linda Naw prior to her accepting to help us find a home, that we would both be on Title of the home as a married couple. Bobby would be on the loan alone, but because we had just got married and all of the money was coming from me, that I would only commit to this purchase if we would both be on Title. Linda Naw agreed to these terms and begin helping us select a home. Bobby and I discussed his car needing to be paid off to qualify for the home, so prior to even retaining Linda Naw, I paid off the car to help Bobby Qualify. This is the only debt I ever agreed to pay, and the only debt ever disclosed to me. Bobby began the approval process, and we all began looking at homes. At no time did Linda Naw or Valley West Mortgage ever ask me to pay any additional debts, nor did they ever tell me that Bobby did not qualify due to his debt to income ratio. Linda Naw acted as if he simply qualified and we could select a home. I at no time ever saw Bobby's loan applications nor did I ever meet with the lender. Once we selected a home at 9564 Scorpion Track Ct. Linda then explained that we would need a down payment of \$65k, and because Bobby was holding the loan, I would need to sign a gift letter so he would qualify. I then signed the gift letter with the same conditions, we would both be on the Title of the home. Linda Naw then asked us to come in to talk about the 10 days leading up to closing, and the earnest deposit. I gave Bobby \$3000 for the Earnest Deposit, and Linda Naw then told me it had to come from the same account as the down payment, so that day in her office, I wrote another check for \$3000 and signed a gift letter for the \$3000, again only with the same conditions that we would both be listed on the Title of the home. At no time did Linda Naw ever say I would not be on Title or that I would need to sign a "Quit Claim" giving my entire sole and separate property to Bobby Antee to qualify for the home, had she ever said this I would have laughed at them both and stopped the entire transaction at that point. As the qualifying process continued, the gift letters were becoming repetitive, the process was becoming stressful, and way more money was being spent that I was comfortable with. Linda Naw began discounting my request, informing me when I went to real estate school, I would understand everything better. I requested to speak with the underwriter to know exactly what was going on, and Linda denied that right to me. I was no longer being included in the process, none of her dates of closing were happening on time, and she was trying to convince us to rent the home from the seller until she could close. I told her this was ridiculous, and I no longer wanted this home. I would speak to my lawyer about getting our earnest deposit back. I clearly in writing told her to cancel the sale and she responded that she was sending cancellation docs. I thanked her and never spoke to her again. I then flew to Washington DC where I was off my phone for the entire day. When I returned on the 17 of January, I told Bobby I would not go to the closing, I didn't trust him or Linda and I went to work. Bobby proceeded to beg me to at least look at the docs before saying no. He also asked for another duplicate gift letter. I told him I would not sign another gift letter without him clearly knowing these were not gifts, only simply to qualify us to be homeowners. So to further protect myself, I sent Bobby a letter of agreement that he would acknowledge my contributions as Sole and Separate Property in the event of divorce. After he agreed and sent back the signed agreement, I again completed the gift letter for the car, again only with the agreement we would both be listed on the Title of the home. Linda Naw was very clear that this would be the only way I would participate in the sale, evening confirming in text that we would both come in to sign the Title of the home. I told Bobby I would go look at the documents and then make a decision on whether to continue with the purchase. Bobby then gave me wire instructions. When I finished work I went to the bank and provided the instructions, with the belief that no money would move until I made a choice to continue or not. I then went to the Title Company and asked to look at the docs. The lady then took the paperwork out of my hand and told me there was nothing for me to see or sign. I left extremely upset and went home. The next morning, I woke up and the \$62k had come out of my account. I immediately asked Bobby for a divorce. Bobby moved into the home alone in which I did not return to the home for about a week. I knew I could not just reverse a home sale, and I wanted my marriage to work, so I returned home, still not knowing I wasn't on Title or the debts paid off to qualify him. From January until June Bobby proceeded to kick me out of the home, forcing me to sleep in my car or office. I could not understand why he felt as if he had this control, until June 26th when I looked up the home and saw I was not listed on Title. I thought this was impossible because I knew as a married couple he could not purchase without my consent. Soon after I found out that Bobby never qualified. That he has many debts that were paid off through escrow without my consent. I then found out that there was a Quit Claim, and my name was forged to this document. I then immediately texted Linda Naw, because I was very clear about the fact that we would both be listed on Title or I would not have even started this sale. When I confronted Bobby about this, he then told me, he didn't know I wasn't on the Title, and what was the big deal. I then filed for divorce and began to report Linda Naw to the NRED and GLVAR. Once I submitted the complaint, Linda Naw then referred Bobby to her own Lawyer, and they begin to conspire how to cover this up. I then reported the forgery to National Title Company and they completely ignored me. Every complaint to submitted was followed up with lies and false documentation from Linda Naw Bobby Antee and Nikki Bott and National Title Company. NRED told me they would not hear the complaint because "I was not part of sale" and GLVAR said that if I filed a lawsuit, they could not investigate the case, so I waited. They scheduled a hearing, and in an effort to avoid that hearing Linda Naw filed a false slander suit and stopped the hearing. Bobby Antee then proceeded to write false statements on the behalf of Linda Naw to cover their fraud. Linda Naw was very clear that I would never pay off anymore debt for Bobby nor would I buy him a home. So she then reached out to National Title Company and Nikki Bott to facilitate the forgery of the Deed to close the sale. I reported Nikki Bott to the Secretary of State in which she could not provide the journal, and the ID she provided was a copy of my VOIDED ID submitted in my original complaint to the SOS. I surrendered my ID Reading Lindsey Licari to Nevada DMV Dec 26, I was then issued an ID that read my married name Lindsey Antee. So there is no way I could have ever signed that quit claim with and invalid ID. Nikki Bott then went on social media denying the repo cautions taken by the SOS, and then threatening me to call the police. I had provided mounds of evidence to prove this is exactly what happened. Linda Naw has lied in her statements to GLVAR and NRED and has used Bobby to write false statements as well. In court Linda Naw admitted to knowing of Bobby's debt, and lied about telling me about a quit claim. Linda Naw then came to my divorce hearing laughing in the back. She also stated that she saw the letter of agreement, voiding all the gift letters and still continued to process the sale. Linda Naw sought out National Title Company and Nikki Bott because she knew she would falsify the documents to close the loan. They are equally responsible for this fraud and forgery.

[EMAIL\\_AGCOMPLAINT@ag.nv.gov](mailto:EMAIL_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.

Documents submitted to judge as evidence. 301 pages and 65 pieces of evidence. Expert Opinion, Audio file also given to the judge and all agencies.

## SECTION 6: WITNESSES

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

Jasmine Pittman, 7022458751

Roberta Licari 7023447442

## 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:

*Roberta Licari*

PRINTNAME:

*Roberta Licari*

DATE:

*6-5-2020*

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➤ SECTION 8: OPTIONAL INFORMATION

**GENDER:** ☐ MALE ☒ FEMALE

**ETHNICITY:**

<input 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 type="checkbox"/> CALLED/VISITED OUR CARSON CITY OFFICE	<input type="checkbox"/> SEARCH ENGINE
<input type="checkbox"/> CALLED/VISITED OUR LAS VEGAS OFFICE	<input type="checkbox"/> AG SOCIAL MEDIA SITE
<input 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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[EMAIL\\_AGCOMPLAINT@ag.nv.gov](mailto:EMAIL_AGCOMPLAINT@ag.nv.gov) to submit any additional information

## ADDITIONAL COMMENTS:

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

I want everyone who has put me through this to be held accountable.

-Tracy Bouchard for attempting to help Nikki Bott cover it up and not acting once he was notified. I want him charged with consiricy to conseal a crime.

-Linda Naw- Breached Contract by Omitting me from the Title and continued with the sale after I cancelled and she confirmed cancelation. She was informed I wasnt in town, which was why i didnt respond, being my phone was off, as they continued the transaction. She was very clear that as a married couple we were both on title and I never agreed to every gift Bobby Antee a house. I want her prosecuted for Breach of Contract, defamation, and conspiracy to cover up a crime and her licenses taken away.

Nikki Bott- Notarized her own Escrow file, and then forged my name to the Quit Claim. I want her prosecuted and put in jail for forgery, consealing a crime, defamation, and Felony theft. Take away her license so she can never do this to another mom again.

Bobby Antee- I want his prosecuted for theft, consealing a crime, defamation, and forced to repay me everything he stole.

Jarded Jennings/Logan Wilson/Adam Fulton- I want my lawyers fined for throwing my case to help the title company and real estate agent get away with a crime. I want all of the money I paid them repaid back to me, and me be allowed to have a newtrial in which I can defend myself.

ERA Brokers- Forced to pay restituiton and damages.

Valley West Mortgage- Forced to repay all money paid out without gift letters. Fire Drew Levey and take away his licenses.

LVM?D - Fire Decteeve Willson - she didnt act with plenty of proof the accused me of filing a false police report.

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