

**Nevada Supreme Court**

**#81635**

**ANTEE V ANTEE**

**APPEAL**

**FAMILY COURT OF NEVADA**

**APPELLANT'S EMERGENCY MOTION  
AND REQUEST FOR INJUNCTION**

**Action needed by 11.24.2020**

**LINDSEY LICARI**

**9564 SCORPION TRACK CT.**

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**APPELLANT, IN PROPER PERSON**

IN THE SUPREME COURT OF THE STATE OF NEVADA

LINDSEY ANTEE, A/K/A

No. 81635

LINDSEY LICARI  
APPELLANT,  
vs.  
BOBBY ANTEE,  
RESPONDENT,

**APPELLANT'S EMERGENCY  
MOTION UNDER NRAP 27 (E)  
AND REQUEST FOR INJUNCTION  
RELIEF**

Action Needed by November 24, 2020

APPELLANT, LINDSEY ANTEE, hereby files this EMERGENCY MOTION UNDER NRAP 27 (E) AND REQUEST FOR INJUNCTION RELIEF, this motion is based upon the following Memorandum of Points and Authorities, attached exhibits, and any oral argument the court will allow.

Dated 17 day of November 2020

**LINDSEY LICARI**  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**1. Supported Facts**

On January 17, 2018 Respondent, Bobby Antee attended a closing in which Appellant, Lindsey Licari did not attend. The closing was held at National Title Company, in which, Ms. Licari's name was forged to a Quit Claim Deed by Nikki Sikalis Bott, who acted as the notary and Escrow agent for the purchase of 9564 Scorpion Track Ct. Las Vegas, NV 89178. National Title Company then illegally wired \$62k out of Ms. Licari's personal bank account, misrepresenting to Ms. LiCari that she would be listed on Title violation of NRS 205.380. Realtor Linda Naw also violated NRS 205.380 by having Ms. Licari sign gift letters with the

belief she would be listed on Title and was not, she also misrepresented in obtain Ms. Licari's signature for the gift letters. Pursuant to NRS 205.372 1 (a) (b) (c) (d) (e) Bobby Antee is guilty of Mortgage Fraud which is a class B Felony punishable by imprisonment. Bobby Antee then Slandered Title to 9564 Scorpion Track Ct Las Vegas, NV 89178, by knowingly receiving fraudulent conveyance pursuant to NRS 205.355. Bobby Antee lied on loan paperwork to obtain credit, omitting that he had an open child support case that would disqualify him. Pursuant to NRS 205.370 Bobby Antee knowingly swindled credit by false representations. National Title Company, Linda Naw, and Bobby Antee, knowingly committed Grand Larceny Pursuant to NRS 205.220(c) which Pursuant to NRS 205.222 Bobby Antee and all who knowingly concealed the Grand Larceny is guilty of a Class B Felony subject to imprisonment, and restitution. Appellant, Lindsey Licari did not find out about not being on Title of the home until June 6, 2018. Ms. Licari immediately asked for an Annulment due to fraud committed by Bobby Antee, and the two parties have not resided together since Ms. Licari found out about the fraud committed by Bobby Antee to obtain the marital home. Ms. Licari then went to LVMPD in June 2018(T18009881), and attempted to file a police report, in which LVMPD denied Ms. Licari her Fourteenth Amendment right to equal protection of the laws, and deprived Ms. Licari of life, liberty, and property without due process of the law. LVMPD had adequate evidence of Mortgage Fraud to act and uphold the rights owed to Ms. Licari pursuant to the Crime Victims Rights Act 18 U.S.C. section 3771(a) (1) the right to be protected from the accused, (2) The right to reasonable, accurate, and timely notice of any public court proceeding, involving the crime or of any release or escape of the accused.(3) The right to not be excluded from any such public court proceeding, unless the court, after receiving clear and convincing evidence, determines that testimony by the victim would be materially altered if the victim heard other testimony at the proceeding. (4) The right to be reasonably heard at any public proceeding in the district court involving release, plea, sentencing, or any parole proceeding. (5) The reasonable right to confer with the attorney for the Government in the case. (6) The right to full and timely restitution as provided by law. (7) The right to proceedings free from unreasonable delay. (8) The right to be treated with fairness and with respect for the victim's dignity and privacy. (9) The right to be informed in a timely manner of any plea bargain or deferred prosecution agreement. (10) The right to be informed of the rights under this section and the services described in section 503 (c) of the Victim's Rights Restitution Act of 1990 (42 U.S.C. 10607 (c) ) and provided contact information for the Office of Victim's Rights Ombudsman of the Department of Justice.

(b) RIGHTS AFFORDED- In any court proceeding involving an offense against a crime victim, the court shall ensure that the crime victim is afforded the rights

described in section (a). Before making a determination described in subsection (a) (3), the court shall make every effort to permit the fullest attendance possible by the victim and shall consider reasonable alternatives to the exclusion of the victim from the criminal proceeding. The reasons for any decision denying relief under this chapter shall clearly stated on the record.

(c) BEST EFFORTS TO ACCORD RIGHTS- (1) Government—Officers and employees of the Department of Justice and other departments and agencies of the United States engage in detention, investigation, or prosecution of a crime shall make their best efforts to see crime victims are notified of, and accorded, the rights described in subsection (a)

(d) ENFORCEMENT AND LIMITATIONS (1) RIGHTS—The crime victim or the crime victim's lawful representative, and attorney for the Government may assert the rights described in subsection (a) A person accused of the crime may not obtain any form of relief under this chapter.

(f) PROCEDURES TO PROMOTE COMPLIANCE- the Attorney General of the United States shall promulgate regulations to enforce the rights of crime victims and to ensure compliance by responsible officials with the obligations described in law respecting crime victims.

Pursuant to Article III of the US Constitution, it protects Ms. Licari's right to trial by jury in criminal cases.

Pursuant to NRS 205.120 a person authorized to take proof or acknowledgement of an instrument which by law may be recorded, who willfully certifies falsely that the execution therefor was proved, is guilty of a Category D felony, and shall be punished as provided in NRS 193.130. Pursuant to 205.125 (1) a person shall not willfully sign the name of another person, whether living or deceased, or a fictitious person to any petition. A person who violates this subsection is guilty of a Category D felony. Due to LVMPD refusing to take Ms. LiCari's police report and protect her as a victim of a crime, Ms. Licari was subjected to 3 years of abuse, embezzlement, and extortion, by those who she accused, with no protection from the law. On July 9, 2018, Ms. Licari reported the Mortgage Fraud and Forgery to NRED, in which Daryl McClosky knowingly concealed Mortgage Fraud and failed to report his findings to the proper authorities, taking no action against Nikki Sikalis Bott. On September 11, 2018 Ms. LiCari reported forgery and Mortgage Fraud to GLVAR, who violated Ms. Licari's civil rights by not reporting their findings that Escrow Agent Nikki Sikalis Bott acted as the Notary and Escrow Agent forging Ms. Licari's name to a Quit Claim Deed. It was the obligation of GLVAR to report Mortgage Fraud, and they knowingly concealed it. On January 15, 2019, the Mortgage Fraud and Forgery was reported to Nevada Secretary of State, in which they ignored clear convincing evidence of Nikki Sikalis Bott notarizing her own documents, and simply address that she did not turn in her

journal, knowingly concealing Mortgage Fraud. In December, 2018 Ms. LiCari reported again to LVMPD (llv200100031707) the findings and the conspiracy to conceal these crimes, in which LVMPD again failed to uphold the Victim's Rights owed to Ms. Licari, and took no action to seek justice on Ms. Licari's behalf. LVMPD then altered the police report submitted by Ms. Licari to further conceal the crimes committed against her. LVMPD was notified of NSOS, GLVAR, NRED, were denying Ms. Licari of her constitutional rights and took no action to enforce the policies. After filing an appeal with GLVAR, GLVAR sent Respondent docs from Bobby Antee, Linda Naw, Shumway Van, and Garrett Chase. Included in these documents was the Forged Deed and proof of Mortgage Fraud committed by National Title Company, ERA Brokers, Linda Naw, Bobby Antee, Nikki Bott, Valley West Mortgage, Drew Levy, Melissa Parker, and One Realty Group. Ms. Licari then took this information and filed for legal separation on February 13, 2019 providing Rena Hughes and Grayson Moulton with clear concise evidence of Mortgage Fraud and Forgery. Rena Hughes the violated Rule 2.6 of the Judicial Code of Conduct, which ensures Ms. Licari's right to be heard. Rena Hughes refused to hear the Motion and allowed Chris Tillman, and Grayson Moulton to continue conceal the Mortgage Fraud and Forgery and continue litigation that was clearly harassing and done with the intent to defraud and harm Ms. Licari further. Pursuant to Rule 2.15(b) (c) Rena Hughes should have reported the misconduct of Grayson Moulton, Chris Tillman, Nevada Secretary of State, GLVAR, NRED, and LVMPD based on the pleadings and exhibits filed into the Legal separation complaint D-18-581756-S, and failed to uphold her obligations and pursuant to Rule 2.11 should have disqualified herself from this matter, and failed to do so, instead she violated Rule 2.2 and by not upholding the law and performing all duties with impartiality and fairness, allowing the litigation to continue. Rena Hughes then violated Rule 2.3 (a) (b)(c) of Judicial Conduct by allowing Grayson Moulton to vexatiously litigate with intent to further defraud and harm Ms. Licari for an additional year, allowing abuse and depriving Ms. Licari of her freedom, liberties, and enjoyment of her property. Ms. Licari reported Chris Tillman to Nevada State Bar in January 2019, informing them of the unnecessary litigation, mortgage fraud, and forgery. Nevada State Bar took no action against Chris Tillman, and allowed Jennings and Fulton to take over divorce matter D-18-573154-D, while already litigating case A-18-786141-C over the same issue against realtor Linda Naw, and did nothing to stop the Legal Mal Practice before it occurred. Jennings and Fulton then took on both matters on January 9, 2019 in which they were informed of the Mortgage Fraud and Forgery committed by Bobby Antee and that the marital home was not community property, an Ms. Licari wanted an annulment. Jennings and Fulton knowingly concealed the Mortgage Fraud and Forgery, attempting to convince Ms. Licari that she was not entitled to

damages, restitution, or annulment. Pursuant to NRPC Rule 1.8 Jennings and Fulton and Shumway Van imposed a conflict of interest in litigating multiple matters over the same issue, in which both legal teams concealed the crimes committed against Ms. Licari, and violated her constitutional right to not have to face her accused, by protecting Bobby Antee from prosecution and allowing him to retain control over the marital home and Ms. Licari's sole and separate property. Pursuant to Rule 3.2 (a) Jennings and Fulton should have expedited litigation, in which they refused to litigate this matter as a crime to unjustly enrich, in which Rena Hughes knowingly allowed this to continue until February 2020, when the divorce was taken to trial again forcing Ms. Licari to face her accused violating Ms. Licari's rights as a victim of a crime. Jennings and Fulton litigated case D-18-573154-D without a retainer agreement and submitted no discovery or request for admissions on Ms. LiCari's behalf. Violating her Constitutional Right to due process and equal justice. Jennings and Fulton and Shumway Van forced Ms. Licari to sit through two days of trial, where she was harassed, called names, and allowed Linda Naw to sit in on the entire proceeding, when Ms. Licari asked Rena Hughes to have her leave due to the conflict of existing litigation, in which Rena Hughes Violated Ms. Licari's Rights as a Victim of a crime to not have to face those who victimized her. On February 12, 2020 at the conclusion of trial, Rena Hughes allowed Grayson Moulton, Logan Wilson, and Jared Jennings to remove all evidence submitted in case D-18-581756-S on December 20, 2018 in the trial binder as Plaintiff's Exhibit 6 prior to her ruling. In January, 2020 Jennings and Fulton filed case A-20-808737-C against Nikki Sikalis Bott and National Title Company, a year after retention, and purposely filed it into the wrong courts and assessed no damages, and submitted no evidence on my behalf. From February 2020 to May 2020, Rena Hughes did not issue an order, while Adam Fulton attempted to convince Ms. Licari that she was not entitled to any damages, and to sign a settlement with National Title Company and Linda Naw. Ms. Licari began to become untrusting of Jennings and Fulton and the advice being given to her, so she asked Adam Fulton to withdraw from all matters. The day after firing her counsel, Rena Hughes issued a fabricated ruling, not based on law or fact. Adam Fulton then threatened Ms. Licari that he would testify that she agreed to the settlement, knowing that it was unjust and would not make Ms. Licari whole for the crimes committed against her. Pursuant to NRS 205.320 is a category B felony, which was reported to Nevada Attorney Generals Office on two Occasions, once in June and again in October. Pursuant to NRS 598D.150 the Attorney General enforces crimes on Property in which he ignored the complaint twice, and all emails he was copied on informing him of the Concealment of Mortgage Fraud, Forgery, Judicial Corruption, and Legal Mal Practice, and knowingly also concealed the crimes committed against Ms. Licari and offered no protection

pursuant to 18 U.S.C. Section 3771 (b) (c) (1). Ms. Licari then filed several motions informing Rena Hughes of the Legal Mal Practice and that her evidence was removed from the trial binder. Rena Hughes denied Ms. Licari's Right to be Heard Rule 2.6 from February 2020 to October 2020 refusing to hear any motions, to correct her errors in law, and to provide protects owed to Ms. Licari through the US constitution. Rena Hughes then knowingly allowed Bobby Antee, and Linda Naw to use her fabricated ruling to slander and harm Ms. Licari, no longer performing judicial acts, but now individual acts that represent her own prejudice and goals. By refusing to hear any motions filed by Ms. Licari for 8 months knowingly ignoring Nevada State Statues, violating due process of law, and denied equal protection for Ms. Licari. Denial of Constitutional Rights is not a Judicial Function and conflicts with any definition of a Judicial function. Rena Hughes has acted as a Trespasser of Law by not following the law, so therefor should lose subject matter jurisdiction and her orders are now void and have no legal force or affect. Pursuant to (48A Corpus Juris Secundum Section 86) Rena Hughes is acting maliciously and corruptly and should incur liability for the pain she has caused Ms. Licari. *Kalb v Luce*, 291 N.W. 841, 234, WISC 509. Ms. Licari. Pursuant to Title 42 U.S. Code Section 1983 Rena Hughes has violated Ms. Licari's Civil Rights, depriving, her of property by attempting to now force the sale of the home, by issuing an additional order after receiving a Motion of Fraud on the Court to recuse herself and Jennings and Fulton and Shumway Van violation of NRS 205.365 (1). Rena Hughes was then notified of open litigation with Ms. LiCari and Grayson Moulton, counsel for Bobby Antee, and allowed Grayson Moulton to continue to litigate over an invalid instrument. Pursuant to NRS 205.170 an Expert may prove Forgery, in which Ms. Licari submitted the Letter from the Expert in May 2020, to Shumway Van and Rena Hughes, and they continue to litigate this matter as community property, knowing that they are concealing a crime. Rena Hughes is now Extorting Legal Fees on the behalf of Jennings and Fulton and Shumway Van, which she has no immunity when committing criminal acts and is guilty of a category B felony. Pursuant to Title 18, U.S.C. Section 242 Rena Hughes has not acted under the color of law, statue, or ordinance, regulation or custom and has willfully subjected or caused to be subjected any person different punishments, pains, or penalties, than those prescribed for punishment of citizens on account of such person being and alien or by reason of his/her color. Rena Hughes has now manipulated the cases of 3 African American Woman, clearly showing a pattern of being bias and unfair to African American woman. Pursuant to Title 42, U.S.C. Section 3631 makes it unlawful for any individual by the use of force or threatened force, to injure , intimidate, or interfere with any person's housing rights because of that person's race, color, religion, sex, handicap, familial status, or national origin. Rena Hughes has been given adequate evidence to prove Mortgage Fraud

and Forgery, but has changed nothing in her ruling to adjudicate justice properly, therefor making Rena Hughes also guilty for Mortgage Fraud and Forgery for her known concealment of the evidence submitted to her. Ms. Licari has filed several motions with Supreme Court informing the Court of the Judicial Misconduct, in which Supreme Court should have reported this Federal crime under Title 18 U.S.C 242 and has refused Ms. Licari's right to be heard, and stopping the Judicial Corruption when reported to Supreme Court on September 24, 2020 prior to Rena Hughes fabricating her ruling to interfere with Enterprise and Commerce, which is not a judicial function. Rena Hughes has now issued an order granting Grayson Moulton attorney fees for litigating over a Deed they both knew to invalid and forged in December of 2018. Rena Hughes is retaliating against Ms. Licari for demanding that her rights are upheld Pursuant to 18 U.S.C. Section 3771. In August of 2020, Ms. Licari filed a Motion to Stay the execution of the divorce decree with Supreme Court pursuant to Rule 8 (a) of the NRAP. Supreme Court knowing that Rena Hughes was violating the Civil and Constitutional Rights of Ms. Licari refused to grant the Motion to Stay the order and allowed Rena Hughes to continue to harass and manipulate the legal process. Ms. Licari did obtain a supersedeas bond to enforce the stay in which Rena Hughes ignored this information and attempted to enforce her fabricated ruling extorting legal fees, and awards to those who victimized Ms. Licari a violation of 18 U.S.C. Section 3771 (6) (8) (b) (d) which states that Bobby Antee cannot obtain any form of relief for the crimes he has committed.

## **2. Injunction Relief:**

Based on the violation of Ms. Licari's Civil and Constitutional Rights to due process, and equal justice, and the Judicial Misconduct of Rena Hughes Ms. Licari asks Supreme Court to grant Injunctive relief being that Ms. LiCari has filed these Motions in District court and Rena Hughes has refused to afford the relief requested. Rena Hughes has known since December 2018, that Ms. Licari was a victim of a crime and entitled to annulment and a Prosecuting Attorney to handle this matter. Ms. Licari has provided Grayson Moulton and Rena Hughes with a Letter from a Forensic Handwriting Expert, which proves forgery pursuant to NRS 205.085. Anyone who knowingly conceals forgery is guilty of that crime, in which this includes Jennings and Fulton, Shumway Van, Rena Hughes, and all other parties this has been reported to. Supreme Court denying this motion will allow more criminal acts against Ms. Licari to continue, and cause Ms. Licari severe losses and deriving her of her property, equity in her home, and equal justice. Ms. Licari also cares for her elderly mother, who is on 24 hour oxygen and cannot walk. To force Ms. Licari to sell a home that was obtained through fraud, that Ms. Licari has proven without a doubt, is a criminal act in itself. For 3 years everyone

in this matter from government workers, to judges, and lawyers have violated the Civil and Constitutional Rights of Ms. Licari, in which is the duty of the Supreme Court to administer justice fairly, and report any judicial misconduct. It is a fact that Nikki Bott and Nikki Sikalis Bott are the same person and therefor, Nikki Sikalis Bott acting as the Notary and Escrow Agent, clearly proves Mortgage Fraud, and the Expert Letter proves forgery. This is adequate evidence for Supreme Court to act, and issue the protections promised to Ms. Licari pursuant to 18 U.S.C. Section 3771 (c) in which all governments who engage in prosecution of crimes shall make their best effort to see that crime victims are notified of, and accorded, the rights described in subsection (a) of 18 U.S.C. section 3771, which also includes LVMPD. Rena Hughes has allowed Bobby Antee to evade prosecution for 3 years, while he has mocked Ms. Licari, stalked her, and deprived her of her property, we ask the court to allow Ms. Licari due process, and equal justice. Ms. Licari hereby certifies that to avoid irreparable harm relief is needed in less than 14 days.

### **3. Relief Requested**

1. Assign Court appointed Prosecuting Attorney for Ms. Licari pursuant to 18 U.S.C. section 3771
2. Recuse and Revoke all orders entered pertaining to D-18-573154-D pursuant to Title 42 1983
3. Issue a protection order on Ms. Licari's behalf pursuant to 18 U.S.C. section 3771 (c)
4. Report Judicial Misconduct and Legal Malpractice to appropriate authorities
5. Annul the marriage and dismiss divorce complaint
6. Order Shumway Van, Jennings and Fulton, and Bobby Antee to pay restitution
7. Criminally Prosecute Bobby Antee

Dated 17 of November 2020

*Lindsey Licari*\_\_ (Signature)

LINDSEY LICARI

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APPELLANT, LINDSEY LICARI, In Proper  
Person

**CERTIFICATE OF SERVICE**

Pursuant to N.R.C.P. 5(b), I hereby certify that I am Appellant, Lindsey Licari in proper person, and that on the 17th day of November, 2020, I caused a true and correct copy of the foregoing **APPELLANT'S EMERGENCY MOTION UNDER NRAP 27 (E) AND REQUEST FOR INJUNCTION RELIEF**

to be served as follows:

- \_\_\_\_\_ by depositing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, enclosed in a sealed envelope; or
- \_\_\_\_\_ by facsimile transmission, pursuant to E.D.C.R. 7.26, as indicated below; or
- x   by electronic service, pursuant to N.E.F.C.R. 9 and Administrative Order 14-2, as indicated below:

DATED this   17   day of NOVEMBER, 2020.

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

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Attorneys for Defendant

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

*Lindsey Licari*\_\_\_\_ (Signature)

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