



1 **COMP**  
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14 **EIGHTH JUDICIAL DISTRICT COURT**  
15 **CLARK COUNTY, NEVADA**

16 LINDA PERDUE also known as LINDA  
17 NAW, an individual; NAW REAL ESTATE  
18 INC., a Nevada corporation,

19 Plaintiffs,

20 v.

21 LINDSEY LICARI also known as LINDSEY  
22 ANTEE, an individual; DOES I through X,  
23 inclusive.

24 Defendants.

Case No.: A-18-786141-C  
Dept. No.:  
Department 17

**COMPLAINT**

**EXEMPT FROM ARBITRATION**  
**(Amount in Controversy Exceeds \$50,000)**

25 Plaintiffs, LINDA PERDUE also known as LINDA NAW (“Ms. Naw”) and NAW REAL  
26 ESTATE INC. (“NRE”) (collectively hereafter, “Plaintiffs”), by and through their counsel, the law  
27 firm of Shumway Van, hereby bring and allege this Complaint against Defendant LINDSEY  
28 LICARI also known as LINDSEY ANTEE (“Defendant”) as follows:

**THE PARTIES**

1. Ms. Naw is an individual and was, at all times material herein, a resident of Clark  
County, NV.

2. NRE is a Nevada corporation doing business in Clark County, Nevada.

...

...

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3. Defendant LINDSEY LICARI also known as LINDSEY ANTEE is an individual and upon information and belief was, at all times material herein, a resident of Clark County, Nevada.

4. Upon information and belief, Defendants DOES I through X, inclusive are and were, at all times material herein, individuals residing in Clark County, Nevada, with sufficient minimum contacts to Clark County, Nevada to subject them to the jurisdiction of this Court. The names of DOES I through X are unknown to the Plaintiffs at the present time, but Plaintiffs reserve the right to amend this Complaint if and when such names become known.

**JURISDICTION AND VENUE**

5. This Court has jurisdiction over this matter and venue is proper because the acts, transactions, and operations giving rise to this Complaint took place in Clark County, Nevada.

**GENERAL ALLEGATIONS**

6. Ms. Naw is a licensed real estate agent in Las Vegas, who does business through her corporation, NRE.

7. Defendant was referred to Ms. Naw as a customer interested in assistance with purchasing a home in Las Vegas with her husband, Bobby Antee (“Mr. Antee”), in November of 2017.

8. Between November 2017 and January 2018, Ms. Naw assisted Defendant and Mr. Antee through the process of finding and purchasing a home.

9. Despite complications with the lending process, Mr. Antee and Defendant ultimately purchased a home, and recorded the deed transferring title on January 19, 2018.

10. Upon information and belief, shortly after purchasing the home, Defendant and Mr. Antee began having marital issues, and Defendant filed for divorce on or about June 26, 2018.

11. Shortly thereafter, on or about July 6, 2018, Defendant filed a complaint with the Nevada Real Estate Division (“NRED”) falsely accusing Ms. Naw of forcing her to purchase the subject property, among other demonstrably false accusations of professional misconduct.

...  
...

1           12.    NRED opened an investigation, and issued its findings on September 17, 2018,  
2 dismissing the complaint. Specifically, NRED concluded that there was insufficient evidence to  
3 substantiate any violations of NRS or NAC 645.

4           13.    On August 13, 2018, Defendant also filed an ethics complaint against Ms. Naw  
5 with the Greater Las Vegas Association of REALTORS (“GLVAR”) again alleging numerous  
6 breaches of Ms. Naw’s duties as a licensed real estate professional.

7           14.    This complaint was also dismissed by the GLVAR ethics committee but was  
8 subsequently appealed by Defendant on September 13, 2018. This appeal is currently pending.

9           15.    Around this same time, Defendant began posting false and misleading statements  
10 on various websites about Ms. Naw’s services, including Facebook.com, Yelp.com, and  
11 Realtor.com.

12           16.    On or about December 3, 2018, Defendant posted on her Facebook profile, which  
13 had over 33,000 followers at that time, that she had filed a police report (falsely) accusing Ms.  
14 Naw of forging her name on a deed recorded against the subsequent party.

15           17.    In fact, Defendant did file an incident report with Las Vegas Metropolitan Police  
16 Department falsely accusing Ms. Naw of forgery and fraud on December 3, 2018.

17           18.    Defendant also filed a complaint form with the Secretary of State on December 3,  
18 2018, alleging that the deed is forged/fraudulent.

19           19.    On December 4, 2018, Defendant posted multiple times on her Facebook profile  
20 specifically falsely accusing Ms. Naw of forging her name on the recorded deed. These accusations  
21 were also directed at Mr. Antee and the notary that had notarized the deed, Nikki Sikalis Bott.

22           20.    Ms. Naw has a stellar professional reputation as a real estate agent, consistently has  
23 top ratings on online review platforms, and has received multiple awards within her industry for  
24 her professionalism.

25           21.    As a direct result of Defendant’s malicious actions, Plaintiffs have sustained  
26 damages in excess of Fifteen Thousand Dollars (\$15,000.00), the exact amount of which shall be  
27 proved at the time of trial in this matter.

28    ...

1           22.     It has become necessary for Plaintiffs to retain the services of an attorney to  
2 prosecute this matter and Plaintiffs are entitled to an award of their reasonable attorneys' fees and  
3 costs.

#### 4                                   **FIRST CAUSE OF ACTION**

#### 5                                   **Defamation**

6           23.     Plaintiffs hereby incorporate the allegations in the foregoing paragraphs as though  
7 fully set forth herein.

8           24.     Ms. Naw is a licensed real estate agent in Las Vegas, who does business through  
9 her corporation, NRE.

10          25.     Between November 2017 and January 2018, Ms. Naw assisted Defendant and Mr.  
11 Antee through the process of finding and purchasing a home.

12          26.     Upon information and belief, shortly after purchasing the home, Defendant and Mr.  
13 Antee began having marital issues, and Defendant filed for divorce on or about June 26, 2018.

14          27.     Shortly thereafter, on or about July 6, 2018, Defendant filed a complaint with  
15 NRED falsely accusing Ms. Naw of forcing her to purchase the subject property, among other  
16 demonstrably false accusations of professional misconduct.

17          28.     NRED opened an investigation, and issued its findings on September 17, 2018,  
18 dismissing the complaint. Specifically, NRED concluded that there was insufficient evidence to  
19 substantiate any violations of NRS or NAC 645.

20          29.     On August 13, 2018, Defendant also filed an ethics complaint against Ms. Naw  
21 with GLVAR again alleging numerous breaches of Ms. Naw's duties as a licensed real estate  
22 professional.

23          30.     This complaint was also dismissed by the GLVAR ethics committee but was  
24 subsequently appealed by Defendant on September 13, 2018. This appeal is currently pending.

25          31.     Around this same time, Defendant began posting false and misleading statements  
26 on various websites about Ms. Naw's services, including Facebook.com, Yelp.com, and  
27 Realtor.com, including that Ms. Naw had forced Defendant into the purchase of the subject  
28 property against her will.

1           32.     On or about December 3, 2018, Defendant posted on her Facebook profile, which  
2 had over 33,000 followers at that time, that she had filed a police report (falsely) accusing Ms.  
3 Naw of forging her name on a deed recorded against the subsequent party.

4           33.     In fact, Defendant did file an incident report with Las Vegas Metropolitan Police  
5 Department falsely accusing Ms. Naw of forgery and fraud on December 3, 2018.

6           34.     Defendant also filed a complaint form with the Secretary of State on December 3,  
7 2018, alleging that the deed is forged/fraudulent.

8           35.     On December 4, 2018, Defendant posted multiple times on her Facebook profile  
9 specifically falsely accusing Ms. Naw of forging her name on the recorded deed. These accusations  
10 were also directed at Mr. Antee and the notary that had notarized the deed, Nikki Sikalis Bott.

11          36.     Ms. Naw has a stellar professional reputation as a real estate agent, consistently has  
12 top ratings on online review platforms, and has received multiple awards within her industry for  
13 her professionalism.

14          37.     Defendant's public Facebook posts, and the incident report filed with the Las Vegas  
15 Metropolitan Police Department, falsely accuse Ms. Naw of committing the crime of forgery and  
16 openly and viciously attack Ms. Naw's business reputation.

17          38.     Defendant has over 33,000 followers on Facebook, many of whom commented on  
18 the defamatory posts, and/or shared those posts with others.

19          39.     Defendant knew or should have known that these accusations were untrue, based  
20 on her knowledge of and involvement in the underlying deed execution.

21          40.     Defendant's statements have damaged Plaintiffs' reputation in the community, and  
22 as a real estate professional, and resulted in actual damages to her business.

23          41.     As a direct and proximate result of Defendant's actions, Plaintiffs have sustained  
24 damages in excess of Fifteen Thousand Dollars (\$15,000.00), the exact amount of which shall be  
25 proved at the time of trial in this matter.

26          42.     As a direct and proximate result of Defendant's conduct, it has become necessary  
27 for Plaintiffs to retain the services of an attorney to prosecute this matter and Plaintiffs are entitled  
28 to an award of their reasonable attorneys' fees and costs.

**SECOND CAUSE OF ACTION**

**Defamation Per Se**

1  
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3 43. Plaintiffs hereby incorporate the allegations in the foregoing paragraphs as though  
4 fully set forth herein.

5 44. Ms. Naw is a licensed real estate agent in Las Vegas, who does business through  
6 her corporation, NRE.

7 45. Between November 2017 and January 2018, Ms. Naw assisted Defendant and Mr.  
8 Antee through the process of finding and purchasing a home.

9 46. Upon information and belief, shortly after purchasing the home, Defendant and Mr.  
10 Antee began having marital issues, and Defendant filed for divorce on or about June 26, 2018.

11 47. Shortly thereafter, on or about July 6, 2018, Defendant filed a complaint with  
12 NRED falsely accusing Ms. Naw of forcing her to purchase the subject property, among other  
13 demonstrably false accusations of professional misconduct.

14 48. NRED opened an investigation, and issued its findings on September 17, 2018,  
15 dismissing the complaint. Specifically, NRED concluded that there was insufficient evidence to  
16 substantiate any violations of NRS or NAC 645.

17 49. On August 13, 2018, Defendant also filed an ethics complaint against Ms. Naw  
18 with GLVAR again alleging numerous breaches of Ms. Naw's duties as a licensed real estate  
19 professional.

20 50. This complaint was also dismissed by the GLVAR ethics committee but was  
21 subsequently appealed by Defendant on September 13, 2018. This appeal is currently pending.

22 51. Around this same time, Defendant began posting false and misleading statements  
23 on various websites about Ms. Naw's services, including Facebook.com, Yelp.com, and  
24 Realtor.com, including that Ms. Naw had forced Defendant into the purchase of the subject  
25 property against her will.

26 52. On or about December 3, 2018, Defendant posted on her Facebook profile, which  
27 had over 33,000 followers at that time, that she had filed a police report (falsely) accusing Ms.  
28 Naw of forging her name on a deed recorded against the subsequent party.

1           53.     In fact, Defendant did file an incident report with Las Vegas Metropolitan Police  
2 Department falsely accusing Ms. Naw of forgery and fraud on December 3, 2018.

3           54.     Defendant also filed a complaint form with the Secretary of State on December 3,  
4 2018, alleging that the deed is forged/fraudulent.

5           55.     On December 4, 2018, Defendant posted multiple times on her Facebook profile  
6 specifically falsely accusing Ms. Naw of forging her name on the recorded deed. These accusations  
7 were also directed at Mr. Antee and the notary that had notarized the deed, Nikki Sikalis Bott.

8           56.     Ms. Naw has a stellar professional reputation as a real estate agent, consistently has  
9 top ratings on online review platforms, and has received multiple awards within her industry for  
10 her professionalism.

11          57.     Defendant's public Facebook posts, and the incident report filed with the Las Vegas  
12 Metropolitan Police Department, falsely accuse Ms. Naw of committing the crime of forgery and  
13 openly and viciously attack Ms. Naw's business reputation.

14          58.     Defendant has over 33,000 followers on Facebook, many of whom commented on  
15 the defamatory posts, and/or shared those posts with others.

16          59.     Defendant knew or should have known that these accusations of criminal activity  
17 and attacks on Ms. Naw's professional reputation were untrue, based on her knowledge of and  
18 involvement in the underlying deed execution.

19          60.     As a direct and proximate result of Defendant's actions, Plaintiffs have sustained  
20 damages in excess of Fifteen Thousand Dollars (\$15,000.00), the exact amount of which shall be  
21 proved at the time of trial in this matter.

22          61.     As a direct and proximate result of Defendant's conduct, it has become necessary  
23 for Plaintiffs to retain the services of an attorney to prosecute this matter and Plaintiffs are entitled  
24 to an award of their reasonable attorneys' fees and costs.

### THIRD CAUSE OF ACTION

#### **Business Disparagement**

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27          62.     Plaintiffs hereby incorporate the allegations in the foregoing paragraphs as though  
28 fully set forth herein.

1           63. Ms. Naw is a licensed real estate agent in Las Vegas, who does business through  
2 her corporation, NRE.

3           64. Between November 2017 and January 2018, Ms. Naw assisted Defendant and Mr.  
4 Antee through the process of finding and purchasing a home.

5           65. Upon information and belief, shortly after purchasing the home, Defendant and Mr.  
6 Antee began having marital issues, and Defendant filed for divorce on or about June 26, 2018.

7           66. Shortly thereafter, on or about July 6, 2018, Defendant filed a complaint with  
8 NRED falsely accusing Ms. Naw of forcing her to purchase the subject property, among other  
9 demonstrably false accusations of professional misconduct.

10          67. NRED opened an investigation, and issued its findings on September 17, 2018,  
11 dismissing the complaint. Specifically, NRED concluded that there was insufficient evidence to  
12 substantiate any violations of NRS or NAC 645.

13          68. On August 13, 2018, Defendant also filed an ethics complaint against Ms. Naw  
14 with GLVAR again alleging numerous breaches of Ms. Naw's duties as a licensed real estate  
15 professional.

16          69. This complaint was also dismissed by the GLVAR ethics committee but was  
17 subsequently appealed by Defendant on September 13, 2018. This appeal is currently pending.

18          70. Around this same time, Defendant began posting false and misleading statements  
19 on various websites about Ms. Naw's services, including Facebook.com, Yelp.com, and  
20 Realtor.com, including that Ms. Naw had forced Defendant into the purchase of the subject  
21 property against her will.

22          71. On or about December 3, 2018, Defendant posted on her Facebook profile, which  
23 had over 33,000 followers at that time, that she had filed a police report (falsely) accusing Ms.  
24 Naw of forging her name on a deed recorded against the subsequent party.

25          72. In fact, Defendant did file an incident report with Las Vegas Metropolitan Police  
26 Department falsely accusing Ms. Naw of forgery and fraud on December 3, 2018.

27          73. Defendant also filed a complaint form with the Secretary of State on December 3,  
28 2018, alleging that the deed is forged/fraudulent.



1 74. On December 4, 2018, Defendant posted multiple times on her Facebook profile  
2 specifically falsely accusing Ms. Naw of forging her name on the recorded deed. These accusations  
3 were also directed at Mr. Antee and the notary that had notarized the deed, Nikki Sikalis Bott.

4 75. Ms. Naw has a stellar professional reputation as a real estate agent, consistently has  
5 top ratings on online review platforms, and has received multiple awards within her industry for  
6 her professionalism.

7 76. Defendant's public Facebook posts, and the incident report filed with the Las Vegas  
8 Metropolitan Police Department, falsely accuse Ms. Naw of committing the crime of forgery and  
9 openly and viciously attack Ms. Naw's business reputation.

10 77. Defendant has over 33,000 followers on Facebook, many of whom commented on  
11 the defamatory posts, and/or shared those posts with others.

12 78. Defendant knew or should have known that these accusations were untrue, or  
13 publicly made same with a reckless disregard for their truth.

14 79. Upon information and belief, Defendant made the above-described accusations  
15 with the intent to harm Ms. Naw's professional reputation and business, NRE.

16 80. Defendant's statements have damaged Plaintiffs' reputation in the community, and  
17 as a real estate professional, and resulted in actual damages to her business.

18 81. As a direct and proximate result of Defendant's actions, Plaintiffs have sustained  
19 damages in excess of Fifteen Thousand Dollars (\$15,000.00), the exact amount of which shall be  
20 proved at the time of trial in this matter.

21 82. As a direct and proximate result of Defendant's conduct, it has become necessary  
22 for Plaintiffs to retain the services of an attorney to prosecute this matter and Plaintiffs are entitled  
23 to an award of their reasonable attorneys' fees and costs.

24 **FOURTH CAUSE OF ACTION**

25 **Injunctive Relief**

26 83. Plaintiffs hereby incorporate the allegations in the foregoing paragraphs as though  
27 fully set forth herein.

28 . . .

1           84. Ms. Naw is a licensed real estate agent in Las Vegas, who does business through  
2 her corporation, NRE.

3           85. Beginning in August 2018, Defendant began posting false and misleading  
4 statements on various websites about Ms. Naw's services, including Facebook.com, Yelp.com,  
5 and Realtor.com, including that Ms. Naw had forced Defendant into the purchase of the subject  
6 property against her will.

7           86. On or about December 3, 2018, Defendant posted on her Facebook profile, which  
8 had over 33,000 followers at that time, that she had filed a police report (falsely) accusing Ms.  
9 Naw of forging her name on a deed recorded against the subsequent party.

10          87. In fact, Defendant did file an incident report with Las Vegas Metropolitan Police  
11 Department falsely accusing Ms. Naw of forgery and fraud on December 3, 2018.

12          88. Defendant also filed a complaint form with the Secretary of State on December 3,  
13 2018, alleging that the deed is forged/fraudulent.

14          89. On December 4, 2018, Defendant posted multiple times on her Facebook profile  
15 specifically falsely accusing Ms. Naw of forging her name on the recorded deed. These accusations  
16 were also directed at Mr. Antee and the notary that had notarized the deed, Nikki Sikalis Bott.

17          90. Ms. Naw has a stellar professional reputation as a real estate agent, consistently has  
18 top ratings on online review platforms, and has received multiple awards within her industry for  
19 her professionalism.

20          91. Defendant's public Facebook posts, and the incident report filed with the Las Vegas  
21 Metropolitan Police Department, falsely accuse Ms. Naw of committing the crime of forgery and  
22 openly and viciously attack Ms. Naw's business reputation.

23          92. Defendant has over 33,000 followers on Facebook, many of whom commented on  
24 the defamatory posts, and/or shared those posts with others.

25          93. Defendant's statements have damaged Plaintiffs' reputation in the community, and  
26 as a real estate professional, and resulted in actual damages to her business, and will continue to  
27 do so until they are removed or otherwise taken down.

28          ...

1 94. These malicious and false accusations remain online and publicly available,  
2 resulting in continuing damage to Plaintiffs.

3 95. Upon information and belief, Defendant intends to leave the accusations online,  
4 and continue to make defamatory statements about Plaintiffs.

5 96. If Defendant is allowed to keep these statements online, and/or continue to make  
6 such statements, Plaintiffs will suffer irreparable harm.

7 97. Plaintiffs are entitled to a preliminary and permanent injunction prohibiting  
8 Defendant from continuing to make false and malicious accusations about Plaintiffs.

9 98. As a direct and proximate result of Defendant's conduct, it has become necessary  
10 for Plaintiffs to retain the services of an attorney to prosecute this matter and Plaintiffs are entitled  
11 to an award of their reasonable attorneys' fees and costs.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiffs, expressly reserving the right to amend this Complaint as  
14 necessary, pray for judgment against Defendants, individually or collectively, as follows:

- 15 1. For specific damages sustained by Plaintiff in an amount in excess of \$15,000.00;
- 16 2. For reasonable attorney fees and costs incurred in prosecuting this matter;
- 17 3. For a preliminary and permanent injunction prohibiting Defendant from continuing  
18 to make malicious and false accusations about Plaintiffs;
- 19 4. For pre-judgment and post-judgment interest until the judgment is paid in full; and
- 20 5. For such other and further relief as the Court deems just and proper.

21  
22 DATED this 13<sup>th</sup> day of December, 2018.

23 SHUMWAY VAN

24 

25 MICHAEL C. VAN, ESQ. #3876  
26 GARRETT R. CHASE, ESQ. #14494  
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28 Las Vegas, Nevada 89123  
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