

Nevada Supreme Court
#82568

LICARI VS ANTEE ET AL

APPEAL
DISTRICT COURT OF NEVADA

APPELLANTS EMERGENCY PETITION FOR WRIT OF MANDAMUS
PURSUANT TO 18 USC S 3771

AND

APPELLANT'S MOTION FOR PROTECTION ORDER

AND

PETITION FOR WRIT OF ARREST FOR LINDA NAW, BOBBY ANTEE,
NIKKI SIKALIS BOTT, MELANIE TREANOR, MELISSA PARKER,
DREW LEVY

AND

APPEALANTS MOTION TO DEBAR GARRETT CHASE, GRAYSON
MOULTON, JARED JENNINGS, LOGAN WILSON, ADAM FULTON,
AND MICHAEL VAN, ANGELA OCHOA

AND

MOTION TO CONSOLIDATE ALL APPEALS

AND

MOTION FOR FULL BRIEFING IN PLACE OF FAST TRACK
STATEMENT

(ACTION NEEDED BY 4/20/2021)

LINDSEY LICARI
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APPELLANT/PETITIONER, IN PROPER PERSON

IN THE SUPREME COURT OF THE STATE OF NEVADA

LINDSEY ANTEE, A/K/A LINDSEY
LICARI

APPELLANT/PETITIONER,

vs.

DAVID JONES , DISTRICT COURT
JUDGE DEPT 28 AND THE EIGHTH
JUDICIAL COURT OF THE STATE OF
NEVADA, IN AND FOR THE COUNTY
OF CLARK,

RESPONDENTS,

BOBBY ANTEE, ET AL,

REAL PARTY IN INTEREST,

No. 82568

DIST. Ct. # A-20-820980-C

APPELLANT'S/PETITIONER
EMERGENCY PETITION UNDER NRAP
27 (E) FOR WRIT OF MANDAMUS
AGAINST DAVID JONES PURSUANT TO
18 U.S.C. Section 3771

AND
MOTION FOR PRO BONO COUNSEL
PURSUANT TO 18 U.S.C SECTION 2263

AND
MOTION FOR PROTECTION ORDER

AND
PETITION FOR WRIT OF ARREST FOR
LINDA NAW, BOBBY ANTEE, NIKKI
SIKALIS BOTT, MELANIE TREANOR,
MELISSA PARKER, DREW LEVY

AND
MOTION FOR DEBARMENT OF
GARRETT CHASE AND MICHAEL VAN,
LOGAN WILSON, ADAM FULTON,
JARED JENNINGS, AND GRAYSON
MOULTON

AND
MOTION TO CONSOLIDATE ALL
APPEALS

AND
MOTION FOR FULL BRIEFING IN
PLACE OF FAST TRACK STATEMENT

Action needed by April 20, 2021

APPELLANT/PETITIONER, LINDSEY LICARI, hereby files this this
petition is based upon the following Memorandum of Points and Authorities,
attached exhibits, and any oral argument the court will allow.

Dated 13 day of April 2021

LINDSEY LICARI

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I.

RELIEF SOUGHT BY PETITIONER

1. An Order directing District Court Judge David Jones to recuse himself from this matter.
2. An Order directing District Court to follow the Constitution 18 USC Section 3771 (c) Crime Victim Rights Act 1983.
3. An Order Reversing all Orders of Rena Hughes and David Jones that violate Ms. Licari's Rights pursuant to 18 USC section 3771 (d) (5) (a) granting a new trial on the grounds 2263
4. An Order directing Nevada Attorney General to investigate Mortgage Fraud and file civil actions on the behalf of Petitioner, Lindsey Licari Pursuant to NRS 598D.150 pursuant to his oath of the Constitution.
5. An Order directing the State Bar to Discipline or alternatively debar, Grayson Moulton, Garrett Chase, Logan Wilson, Jared Jennings, and Adam Fulton, Michael Van, and Angela Ochoa and issue a Pro Bono Attorney to conclude these matters on Ms. Licari's behalf.
6. An Order directing Nevada Secretary of State to report the Fraud and Forgery by Nikki Sikalis Bott and Melanie Treanor to District Attorney, pursuant to the 18 USC S 3771 (c) (1)
7. An Order directing LVMPD to arrest Bobby Antee, Linda Naw, and Nikki Sikalis Bott for Mortgage Fraud and Forgery pursuant to 18 USC s 3771 (a) (1)
9. An Order directing LVMPD to comply with Crime Victims' Act and provide Ms. Licari with the protection she deserves as a victim of a crime pursuant to 18 USC s 3771 (c) (1)
10. An Order issuing Protection for Lindsey LiCari from Bobby Antee, Grayson Moulton, Garrett Chase, Linda Naw, Rena Hughes, Logan Wilson, Jared Jennings,

and Adam Fulton, Nikki Siklais Bott, and Melanie Treanor pursuant to 18 U.S.C Section 3771 (a) (1) (d) (1)

11. An Order assigning Ms. Licari a Pro Bono Federal Prosecution Attorney pursuant to 18 U.S.C Section 3771 (a) (1)(4) (5) (6) (8) (d) (1)

12. An Order issuing Quiet Title on Ms. Licari's home 9564 Scorpion Track Ct. Las Vegas, NV 89178 being that this court knows Ms. Licari is not receiving due process in any District Court, which has had a year to administer justice fairly pursuant to 18 UCS s 3771 (6) (7)

13. An Order directing Bobby Antee, Jennings and Fulton, and Shumway Van to pay Ms. Licari restitution for the crimes committed against her pursuant to 18 USC Section (a) (1) (6) (8) (9) (c) (1) (d) (1) (a) and issue prohibition from Bobby Antee collecting any proceeds from the Marital Home due to his role in the fraud.

14. An Order issuing Annulment from Bobby Antee because District court refuses to follow the law. 18 USC Section 3771 (d) (4) and proceedings should no longer be delayed pursuant to 18 USC section 3771 (a) (7)

15. A Writ of Prohibition from any Defendant in this matter collect attorney fees or judgements pursuant to 18 USC s 3771 (d) (1) (a)

II.

ISSUES PRESENTED

1. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminally and or capricious manner when she dismissed case D-18-581756-S Legal separation Complaint, without hearing or consolidating the matter into D-18-573154-D and did David Jones conceal these actions?

2. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminal, or capricious manner when she denied Ms. Licari's Motion for Spousal Support on 9.18.2018 and did David Jones conceal these actions?

3. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminal, or capricious manner when she allowed Shumway Van and Jennings and Fulton to litigate vexatiously knowing that mortgage fraud had occurred as of December of 2018? NRPC Rule 3.4, Rule 3.2, Rule 4.1, Rule 1.8, Rule 1.5 and David Jones conceal these actions?

4. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminal, or capricious manner when adjudicating case D-18-573154-D and D-18-581756-S two cases over the same issue in which Rena Hughes imposed a conflict of interest.

NCJC Rule 1.3, Rule 2.2, Rule 2.3, Rule 2.6, Rule 2.7, Rule 2.9, Rule 2.11, and Rule 2.15 and David Jones conceal these actions and did David Jones conceal these actions?

5. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminal, or capricious manner when she granted Defendant Bobby Antee Attorney Fees knowing that Bobby Antee committed Mortgage Fraud and Grayson Moulton encouraged Bobby Antee to commit fraud to conceal the Mortgage Fraud by ERA Brokers, and National Title Company and did David Jones conceal these actions?

6. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminal, or capricious manner when she denied Ms. Licari's Motion for a New Trial? 18 U.S.C section 3771 (d) (5) 2263 and did David Jones conceal these actions?

7. Did Rena Hughes, Family Court Judge, act in an arbitrary, criminal, or capricious manner when she granted Bobby Antee reimbursements for bills, he did not pay? 18 USC section 3771 (d) (1) and did David Jones conceal these actions?

8. Did Nevada Secretary of State arbitrary, criminal, or capricious manner when they refused to report Nikki Sikalis Bott and Melanie Treanor to the DA and did not respond to the complaints within 15 days of receiving it? Also failing to report the violations to the Attorney General. Sec. 53 NAC 240.250, NRS 240.010 8 (a) NRS 205.372 (a) (b) and did David Jones conceal these actions?

9. Did the Clark County Recorder arbitrary, criminal, or capricious manner when she refused to Revoke the Forged Deed when presented with clear and concise evidence and a Board-Certified Handwriting Expert? NRS 247.410 (1) (2) (3), NRS 205.372 (a) (b) , 18 USC section 3771 (c) (1) and did David Jones conceal these actions?

10. Did the Rena Hughes, Family Court Judge act arbitrary, criminal, or capricious manner when she refused to Revoke the Forged Deed when presented with clear and concise evidence and a Board-Certified Handwriting Expert? NRS 205.372 (1) (a) (b) and did David Jones conceal these actions?

11. Did the Rena Hughes, Family Court Judge, act arbitrary, criminal, or capricious manner when she denied Ms. Licari's Attorney Fees and Costs on 10.19.2020 after being presented with evidence of Mortgage Fraud, Forgery, and Concealment and did David Jones conceal these actions?

12. Did the LVMPD arbitrary, criminal, or capricious manner when they refused to make an arrest to protect Ms. Licari when the Forged Deed was presented to them with clear and concise evidence of Mortgage Fraud, and a Board-Certified Handwriting Expert? NRS 205.170, NRS 205.372 , NRS 205.355, NRS 205.085,

NRS 205.0828, NRS 205.220, NRS 205.320, NRS 205.265, NRS 205.0832 and did David Jones conceal these actions?

13. Did the Rena Hughes, Family Court Judge, act arbitrary, criminal, or capricious manner when she denied Ms. Licari's Motion for Annulment and Attorney Fees and Costs on 10.19.2020. 18 UCS S 3371 (a) (1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (b) (c) (1)(d) (1) (3)(5) and did David Jones conceal these actions?

14. Did the Rena Hughes, Family Court Judge, act arbitrary, criminal, or capricious manner when she allowed Garrett Chase to represent Bobby Antee on 10.19.2018 and then allowed Grayson Moulton to litigate from the same firm, over the same issue while Garrett Chase then began to represent Linda Naw in case A-18-786141-C over the same issue. NRPC Rule 1.8, Rule 2.9 and did David Jones conceal these actions?

15. Did the Rena Hughes, Family Court Judge, act arbitrary, criminal, or capricious manner when she knowingly violated Ms. Licari's Civil and Constitutional Rights as a victim of a crime and did Rena Hughes give Ms. Licari the right of Due Process? 18 UCS S 3371 (a) (1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (b) (c) (1)(d) (1) (3)(5) and did David Jones conceal these actions?

16. Did the Rena Hughes, Family Court Judge, act arbitrary, criminal, or capricious manner when she denied Ms. Licari the right to Trial By Jury? Sixth Amendment Right and did David Jones conceal these actions?

17. Did Nevada Secretary of State arbitrary, criminal, or capricious manner when they ignored and took no action when informed of Nikki Sikalis Bott notarizing her own documents and Fraudulently Conveying Title into Bobby Antee's name? NRS 240.061 2, NRS 240.065 (a) , NRS 240.075 (1) (2) (3) (8) (10) , NRS 240.120 (1), NRS 240.130, NRS 240.147, NRS 240.150, NRS 240.155 and did David Jones conceal these actions?

18. Did the Nevada Attorney Generals Office act arbitrary, criminal, or capricious manner when they refused to make an arrest or stop Rena Hughes, to protect Ms. Licari when the Forged Deed was presented to them with clear and concise evidence of Mortgage Fraud, Judicial Misconduct, and a Board-Certified Handwriting Expert? NRS 598D. and did David Jones conceal these actions?

19. Did LVMPD act arbitrary, criminal, or capricious manner when they refused to arrest Nikki Sikalis Bott and Melanie Treanor did not respond to the complaints within 15 days of receiving it? Also failing to report the violations to the Attorney General. Sec. 53 NAC 240.250, NRS 240.010 8 (a) and did David Jones conceal these actions?

20. Did David Jones refuse to give Ms. Licari due process?
21. Are Ms. Licari's rights being upheld in District Court or Family Court?
22. Did David Jones act as a trespasser of Law, knowingly concealing Legal Malpractice, and Mortgage Fraud pursuant to NRS 205.372 (1) (a) (b)
23. Is David Jones a trespasser of Law?

III.

MEMORANDUM OF POINTS AND AUTHORITES

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 state 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.

IV.

STATEMENT OF REASONING FOR THE ISSUANCE OF WRIT

Pursuant to Article 6, Section 4 of the Nevada Constitution “ [t]he court shall also have power to issue writs of mandamus, certiorari, prohibition, quo warranto, and habeas corpus and also all writs necessary or proper to the complete exercise of its appellate jurisdiction. David Jones has improperly exercise of his jurisdiction. *NRS 34.320 Smith v Dist. Ct., 107 Nev. 674, 818 P.2d 849 (1991)* NRS 34.160 provides that [t]he writ [of mandamus] may be issued by the Supreme Court, therefor Ms. Licari submits this Emergency Motion for Writ of Mandamus to the Supreme Court to hereby notify the court of violations of 18 U.S.C. section 3771 being that in every matter heard in District and Family Court Ms. LiCari has been deprived of justice and due process. Ms. Licari asks that this court issue to arrest the proceedings of the District Court exercising her judicial functions, being that proceedings being held by Rena Hughes and Dawn Thorne are in excess of the jurisdiction of the Family Court and clearly an attempt to defraud and harm Ms. Licari by the abuse of her Judicial Powers and David Jones has the power to issue a Writ of Mandamus but knowingly upheld a ruling he knew to be false. *Smith v Dist. Ct., 107 Nev. 674, 818 P.2d 849 (1991)* Rena Hughes must know the limits of its own jurisdiction and stay within those limits. *Pengilly v. Rancho Santa Fe HOA, 116 Nev. 646, 5 P.3d 569 (2000)* A writ of prohibition will lie to prevent a district court from exceeding its jurisdiction and or violating the rules of Judicial Conduct as Rena Hughes, David Jones, Elizabeth Gonzalez, Mary Kay Holtus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Isreal, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle have all proven to refuse to follow the law and adjudicate this matter fairly. *Cunningham v. Dist. Ct., 102 Nev. 551, 560, 729, P.2d1328,1334 (1986)* Ms. Licari has appealed Rena Hughes Final Judgement, in which Dawn Thorne, David Jones, Elizabeth Gonzalez, Mary Kay Holtus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Isreal, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, Arron Ford, District Attorney, and Kathy Hardcastle continues to issue orders, and allow Grayson Moulton and now Garrett Chase, Angela Ochoa and Michael Van to stalk, harass, and threaten Ms. Licari to

conceal their concealment of Mortgage Fraud. Pursuant to 18 U.S.C. 3771 (b) Rena Hughes ,Dawn Thorne, David Jones, Elizabeth Gonzalez, Mary Kay Holtus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Isreal, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle, should have offered Ms. Licari protection from Grayson Moulton, Garrett Chase, Michael Van , Shumway Van, and Bobby Antee but is still knowingly allowing Garrett Chase to violate Ms. Licari's rights as a victim of a crime and refusing to report the legal misconduct to the State Bar or DA. Ms. Licari has filed several Motions to Rena Hughes, providing a Board-Certified Handwriting Expert to confirm Forgery, which also proves Mortgage Fraud in May of 2020, in which Rena Hughes has refused to hear the motions, and correct her ruling to embezzle funds through the legal system. Rena Hughes, Dawn Thorne, David Jones, Elizabeth Gonzalez, Mary Kay Holtus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Isreal, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle are no longer performing judicial acts, but not knowingly committing criminal acts by depriving me of my home and allowing the embezzlement of Legal fees, by Jennings and Fulton, Chris Tillman, Angela Ochoa, and Grayson Moulton, and now also Garrett Chase and Michael Van who consistently threaten and harasses Ms. Licari and now labeling her as Vexatious to again attempt to deprive her of Justice, Due Process, and restitution and her Constitutional Right to be heard. Rena Hughes is knowingly allowing Civil Court Judges to use her ruling knowing that it is fabricated and drafted to conceal the crimes of ERA Brokers and National Title Company. I have now lost \$205k in funding due to Rena Hughes ruling that would have helped thousands of families. Dawn Thorne then took over the matter, again refusing Ms. Licari's right to be heard, right to due process, and right to annulment and is still allowing the legal malpractice of Shumway Van an drefusing my right to representation and to unseal D-18-573154-D and D-18-581756-S both sealed illegally to conceal Rena Hughes actions. Ms. Licari has sought every legal remedy pertaining to David Jones , in which David Jones refuses to abide by the law. Therefor there is no legal remedy in District Court, and extraordinary relief is justified in this matter. *Zhang v. Dist. Ct., 103 P.3d 20 (Nev. 2004)* abrogated on other grounds by, *Buzz Stew, LLC v. City of N. Las Vegas, 181 P.3d. 670 (Nev. 2008)* This Petition if being filed because there is no "plain, speedy, and adequate remedy" at Law. *State ex rel Dep't Transp. V Thompson, 99 Nev. 358, 662 P.2d 1138 (1983)* This has no gone on in appeals for a year giving District court plenty of time to correct the orders. Dawn Thorne and Shumway Van are attempting to force the sale of Ms. Licari's home is a violation of Ms. Licari's Civil and Constitutional Rights and pursuant to 18 USC. Section 3771 (c) (1) even though Supreme Court already Stayed the Sale of the home, Dawn Thorne refuses to rule

fairly and is allowing me to be abused daily now since she took her seat. Which also means who ever is watching over Dawn Thorne and David Jones are also not upholding the Constitution. This is a case in where there is “no question of fact, and in which a clear question of law, dispositive of the suit, [is] presented for your review. *Poulos v. Eighth Judicial Dist. Court of State of Nev. In & For Clark County.*, 98 Nev. 453, 455, 652 p.2d 117,1178 (1982) Citing *Bottorff v. O’Donnell*, 96 Nev. 606, 614 P.2d 7 (1980) Pursuant to 18 USC Section 3771 (d) (4) this is an appeal in a criminal matter that all defendants have attempted to conceal, the Government may assert as error the district courts denial of any crime victim’s right in the proceeding to which the appeal relates. Rena Hughes has known since December of 2018 of the Mortgage Fraud and Forgery and knowingly allowed the abuse to continue, depriving Ms. Licari of her freedom and liberties. Ms. Licari has now been deprived of her property for over 3 years and has notified every judge David Jones, Elizabeth Gonzalez, Mary Kay Holtus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Isreal, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, Rena Hughes, and Kathy Hardcastle. David Jones has denied the payout of the Notary Bonds for both notaries then awarded them sanctions for me following the process correctly in retaliation for me asking for justice, which violates NRJC Rule 1.3, Rule 2.2, Rule 2.3, Rule 2.4, Rule 2.5, Rule 2.6, Rule 2.7, Rule 2.9, Rule 2.11, and Rule 2.15 and every judge in this matter continues to freely violate my civil rights under the Color of law, which is a Title 42 violation with no immunity, and this court has watched them do this for a year refusing to take any action as my damages and losses compound. Pursuant to NRPC Rule 1.8 David Jones is allowing Shumway Van and Garrett Chase to represent Bobby Antee after representing Linda Naw Perdue in the same matter Uttering a forged deed to be true, making Shumway Van, Michael Van, Garrett Chase, Bobby Antee and Linda Naw Perdue all guilty of Mortgage Fraud NRS 205.372, Forgery, and concealment. Michael Van and Garrett Chase continue to attempt to illegally sale the home again and Extort Legal fees from the proceeds, even after receiving a Stay from Nevada Supreme Court while David Jones attempted to dismiss the complaint and help criminals evade prosection. When Rena Hughes was recused due to Federal Filing, Dee Butler heard nothing, and recused herself from both D-18-573154-D and D-18-581756-S, where it was then sent to Dawn Thorne, who ignored all filings as Rena Hughes did and deprived me of justice again, litigating both cases and illegally sealing them. David Jones is acting as a trespasser of Law, and clearly has an agenda that is imposing a conflict of interest so great he cannot be trusted to litigate this matter fairly.

V.

Legal Argument and Authorities

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, weather 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 (11v200100031707) 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 and Garrett Chase with Shumway Van ,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 General's 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 Malpractice 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 and has allowed the misconduct to continue wit David Jones and ob

Bare n this matter. 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. Based on the violation of Ms. Licari's Civil and Constitutional Rights to due process, and equal justice, and the Judicial Misconduct of David Jones Ms. Licari asks Supreme Court to grant Writ of Mandamus being that Ms. LiCari has filed these Motions in District court and David Jones 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, David Jones, Elizabeth Gonzalez, Mary Kay Holthus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Israel, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle 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, David Jones, Elizabeth Gonzalez, Mary Kay Holthus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Israel, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle, 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 the damage has already been irreparable, the damage to Ms. Licari's business has been irreparable to the point where she has had to move to Georgia for protection from the accused, and no one is being ordered to make Ms. Licari whole at all. Ms. Licari has lost her 9th Amendment Right to basic liberties, like going to her office, the doctor, and protection from criminals who attacked her. Every judge in this matter Rena Hughes, David Jones, Elizabeth Gonzalez, Mary Kay Holthus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Israel, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle are illegally awarding attorney fees to the accused or watching it happen without reporting it pursuant to NRJC Rule 2.15 and the Oath they took to uphold the Constitution , causing Ms. Licari severe losses and deriving her of her property, equity in her home, restitution, and equal justice and have made it clear to Ms. Licari also cares for her elderly mother, who is on 24 hour oxygen and cannot walk. Ms. Licari's Mother is 69 years old, with diabetes, COPD, Heart Failure, and soars all over her body, in which Ms. Licari is the Primary Caregiver to her mother, and litigating all these matters is destroying her ability to care for her mother, run her nonprofit, and to financially provide for herself. Ms. Licari has spent \$7000 on appeals alone, for the clerk to return

everything, and break laws to again try to help the Defendants evade prosecution. Elizabeth Brown cashes the checks for the appeals and then sends a form stating she is closing them out and has done this 3 times now. David Jones is denying the enforcement of Notary Bonds to be paid, when it was to be heard on 11.17.20, in which Rob Bare refused to hear the motion, and months later David Jones rules on it labeling Ms. Licari Vexatious when he has never held a hearing or even met Ms. Licari. David Jones is threatening Ms. Licari and allowing legal malpractice of Shumway Van, Jennings and Fulton, and Lipson Neilson. 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. Pursuant to 18 USC Code s 242 all judges and government workers in this matter are depriving Ms. Licari of her rights under the color of law, and the Supreme Court has allowed this for a year, when they had full jurisdiction to act and refused to do so, which is also a Title 42 Violation. Pursuant to 42 US Code s 1989 Cam Ferenbach, and Gloria Navarro should have acted quickly with clear and concise evidence, but have still not heard one Emergency Motion for a case filed in October of Last Year, this is clear evidence that due process isn't being given to me and Supreme Court has full power to uphold my rights according to the Constitution and also has power to assign a Government Attorney to ensure I am made whole. 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. There is also clear evidence of a second notary Melanie Treanor, and she is the neighbor of Nikki Bott, very clear fraud, yet David Jones is refusing to order the bond payments are paid out and the insurance companies are illegally denying to pay the bonds owed to me for a year now. Nor has any one address the legal malpractice of my counsel who never instructed me to get a letter from an expert prior to Rena Hughes unnecessary trial. 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 and Dawn Thorne, David Jones, Elizabeth Gonzalez, Mary Kay Holtus, Mark Denton, Treavor Atkins, Dawn Thorne, Ronald Isreal, Kristina Pickering, Gloria Navarro, Cam Ferenbach, Dee Butler, Eric Johnson, Rob Bare, and Kathy Hardcastle have allowed Bobby Antee, Linda Naw, Nikki Bott, Drew Levy, and Melissa Parker to evade prosecution for 3 years, while they all have mocked Ms. Licari, stalked her, and deprived her of her property, and

slandered her work that helps sick children, so we ask the court to allow Ms. Licari due process, and equal justice, and intervene its been 3 years of abuse of a grieving mother, people have killed themselves from this kind of bullying and abuse. The Supreme Court is fully aware that Ms. Licari's constitutional rights are being violated in family court, so to continue to ignore these emergency motions and allow District court to label Ms. Licari Vexatious for filing for annulment and Quiet Title with their only intent to deprive Ms. Licari of justice is a violation of their oath to the US Constitution. Each District Court Judge using the fabricated ruling of Rena Hughes that isn't even a valid or stamped decree of divorce, is knowingly depriving Ms. Licari of justice and subjecting her to irreparable damage to her property, credit, and business. The Order placed by Rena Hughes is so damaging Ms. Licari could loose her nonprofit, not be able to adopt children, work for the government, or foster, to allow this to conceal crimes and allowing the vulgar attacks on a innocent person is evil. Ms. Licari has spent \$7000 on appeals, in which the Nevada Supreme court has taken no action against the judicial misconduct of any judge or lawyer involved in this matter and every matter pertaining to the forged deed, and is allowing the judicial misconduct and awarding legal fees to them illegally and to retaliate for Ms. Licari seeking justice for the crimes committed against her. Shumway Van is being sued by Ms. Licari for the Legal Malpractice that occurred in the Trial held 2-7-2020 and 2-12-2020 in Federal case 2:20-cv-02114-GMN-VCF so is still imposing a conflict of interest in their endless representation of Bobby Antee who is not even paying for their legal representation, and is also a Defendant in this matter so cannot represent Linda Naw or Bobby Antee. Angela Ochoa is also a Defendant in the Federal matter for her misconduct, therefor cannot represent Nikki Bott or National Title Company anymore, but Cam Ferenbach is allowing it, and Ms. Licari never requested the Federal case be transferred to a Magistrate, again this is the Defendants picking another judge to deprive me of justice and hurt me. This case has now been to appeals 10 times in multiple matters over the same deed and 60 day marriage, with clear and concise evidence, Nevada Supreme Court has been notified through appellate briefs, docket statements, emergency motions, and now a petition of 5000 signatures of supporters who also clearly see the fraud and corruption in this matter. There remains a statutory mechanism to get the court involved. Ms. Licari herby certifies that to avid irreparable harm relief is needed in less than 14 days.

VI. Damages

Damages Legal Fees: \$47500 • D-18-573154-D (Antee vs Antee) - Fees Paid to Chris Tillman: \$4500 - Fees Paid to Jennings & Fulton: \$33000 Ms. Licari

and Mr. Antee had no children in common, and the home was obtained through fraud and forgery. Ms. Licari was put through 2 years of unnecessary litigation and forced to go to trial for a marriage based on fraud. Mr. Antee was able to pay off multiple debts without the consent of Ms. Licari, including \$8k through escrow for Mr. Antee's student loans. Mr. Antee then spent 6 months making Ms. Licari sleep in her car, and changing the locks to a home bought with her money, without gift letters, and this was done a month after the loss of her only child due to cancer. Ms. Licari told Mr. Antee and Ms. Naw to cancel the purchase, in which they proceeded with the purchase illegally, with One Realty, Melissa Parker, Valley West Mortgage, Vatche Satplan, Drew Levy, ERA Brokers, Linda Naw, Nikki Bott, and National Title Company. Ms. Licari nor Mr. Antee ever had any interactions with One Realty or Melissa Parker, nor does Melissa Parker have a broker on the CD she should have been working under. Ms. Licari is now requesting Melissa Parker and One Realty explain why they are even listed on the CD, and why they proceeded with a closing without Ms. Licari Present, and the full amount of fees taken at closing. • A-18-786141-C (Naw vs Licari) - Fees Paid to Jennings & Fulton: \$5000 To avoid a hearing at GLVAR to take away Linda Naw's MLS Access, Linda Naw filed this false Defamation case, falsely accusing Ms. Licari of Defamation for leaving accurate reviews of her work and the fraud committed. For two years, Ms. Naw has tried to avoid prosecution of the proper parties, by filing under LINDA NAW REAL ESTATE, which had nothing to do with the transaction in question. Ms. Licari has now filed a Third Party Complaint to ensure all responsible parties are held accountable and proper damages are accessed. • A-20-808737-C (Licari vs Nikki Bott & National Title Company) - Fees Paid to Jennings & Fulton: \$5000 Ms. Licari's name was forged to a Quit Claim Deed on 1/17/2018 for the financial gain of all parties involved. Ms. Licari made GLVAR aware of Nikki Bott who was the Escrow agent on the file, who notarized her own file, for her financial gain, forging Ms. Licari's name to the Quit Claim to close the sale. This stole Ms. Licari's SOLE and Separate Property and forced her to remain in a home she did not agree to buy for two years, forced to pay all costs associated with the home and maintain her foundation, with no access to any of her resources. Nikki Bott has publicly slander Ms. Licari, her work, and the loss of her son, as well as Ms. Naw and Mr. Antee all in an attempt , to conceal their crimes. Copy/Scan Fees: \$1,500 Car Robbery: \$10,000 Ms. Licari was not listed on the Homeowners Insurance, when she held this fraudulent closing and suffered a loss of \$10000 in a Car robbery that would have been covered had Ms. Licari been properly listed on the homeowners insurance. Even after Mr. Antee was ordered to include her on the homeowners policy, he did not and a major loss was suffered. Defamation/ Slander: \$500,000 Ms. Licari has lost over 200k followers/supporters on social media due to the lies and slander and actions of

Linda Naw, and Third Party Defendants in this case. Ms. Licari is the President of a Charity foundation, built on trust and integrity, in which her reputation has been severely damaged falsely, that will take her years to rebuild that support. Loss of Revenues/Donations: \$80,000 Through False Statements and the failure to act on GLVAR, NRED, and the fraud committed at closing, Ms. Licari has lost a substantial amount of supporters who once donated and supported Ms. Licari's cause. Ms. Naw has made public statements trying to conceal her crimes, and has gone to many of Ms. Licari's donors with false information to damage those relationships. Restitution: \$500,000 Ms. Licari would like restitution from all parties involved. To go through three years of Cancer treatment and to watch her son pass away caused severe PTSD, Anxiety, and Depression for Ms. Licari. To Immediately be a victim of fraud and have to spend the next two years, not just grieving the loss of her son, but now fighting court cases and a divorce based on fraud, has severely worsened Ms. Licari's conditions, and she will need years of ongoing treatment and support to be made whole again. Loss of work: \$27,000 Ms. Licari has spent over 1000 over the last two years defending herself, missing work, missing appearances, unable to do videos to build support for her foundation due to depression and now severe trust issue. Ms. Licari has had to prepare and file her own motions taking her away from her work and giving back to the community.

VII.

Conclusion

In Accordance with the foregoing, Ms. Licari respectfully request this Honorable Court for a Writ of Mandamus. Ms. Licari has been a victim of a crime since 1.17.2018, in which her civil and constitutional rights have been violated by, Dawn Thorne, Rena Hughes, LVMPD, Attorney General's Office, Nevada Secretary of State, and Clark County Recorder, and David Jones all attempting to conceal the crimes and ensure that justice is not served for Ms. Licari and will do it at the expense of Ms. Licari and the Cancer Children of Nevada. Rena Hughes ruling has promoted abuse, neglect, and embezzlement, and every judge in each matter have lost their ability to adjudicate without being bias, harassing, or unfair to protect each other. Ms. Licari has been forced to communicate, attend proceedings, and even pay fees to those who committed crimes against her due to the Judicial Misconduct and personal goals of now David Jones. David Jones has allowed Grayson Moulton, Garrett Chase, Angela Ochoa, and Michael Van to continually harass Ms. Licari and now is allowing Shumway Van to attempt to Evict Ms. Licari out of a home, she solely paid for. Refusing to Quiet the title, transfer the Title, being that Ms. Licari is fully capable of taking over the loan on the home she was forced to buy and live in. Each government agency has received

clear and concise evidence of Mortgage Fraud pursuant to NRS 205.085 and have refused to offer Ms. Licari the rights and protections promised to her in the Constitution of Nevada and the United States, and are now being protected and defended by the Nevada Attorney General, who is also knowingly attacking Ms. Licari and depriving her of justice, restitution, and protection. The level of Judicial and Legal Misconduct is overwhelming and Ms. Licari's life and liberty are now at risk due to Judicial Misconduct and Dawn Thorne again attempting to force the sale of the home that is clearly not Community Property pursuant to 205.265. Rena Hughes is a monster, who has put Ms. Licari through litigation for 3 years to help her friends evade prosecution, and she needs to be stopped. Ms. Licari has now informed the Supreme Court 9 times of the Legal Malpractice and Judicial Misconduct. Ms. Licari has given the Supreme Court the Letter from the Forensic, Board/Court Certified Expert that confirms forgery, and no one has taken any steps to offer Ms. Licari the protections she deserves. Ms. Licari has done nothing but follow the process of this court and every court in this matter for 3 years. Ms. Licari has been abused, lied about and now stolen from, while the Nevada Supreme Court has refused to take any action. The Nevada Supreme Court has full jurisdiction to uphold the Constitution and has allowed my rights to be violated to the point where I have been forced to leave the State of Nevada, as Arron Ford allows the judicial misconduct, legal malpractice, and the abuse and retaliation from every court, allowing me as a victim of a crime to have my dignity and privacy taken from me publicly. I have notified the Supreme Court of each judge who is dismissing valid cases, and then accusing me of crimes I did not commit, such as filing frivolous lawsuits, when the only people who have abused the legal system when the Constitution states that I should be protected from the accused and I have not. I am entitled to speedy restitution in which it has now been 3 years and I have spent \$7000 on appeals, I have spent \$20000 on legal fees to Jennings and Fulton and Chris Tillman, in which neither firm has been reprimanded or forced to repay any of the legal fees stolen from me for needless representation. They allowed me to pay \$37k in mortgage payments I wasn't entitled to pay because I was entitled to Lis Pendens for the fraud in the transaction, but my own counsel protected these criminals and took my money to do it. I reported both law firms to Nevada State Bar, in which they refuse to hold any attorney in this matter accountable and are now defending them in Federal Court along with Arron Ford. I reported the Misconduct of the Secretary of State Lenora Muller, County Recorder Deborah Conway, and NRED and GLVAR to Arron Ford in which he is now also defending them in their attacks against me and is allowing every court and judge to delay proceedings. I have the right as a victim of crime to be treated with fairness, in the Nevada Supreme Court has seen and acknowledge I have not been treated fairly and the bullying and harassment has only worsened as I continue to simply

ask people to follow the law and do their job. I have spent over \$10000 on Copy, Fax, and Scan Fees, and Elizabeth Gonzales has awarded Nikki Bott's lawyer over \$9k in legal fees, and Melanie Treanor the second notary \$800 in legal fees, after receiving clear evidence of fraud and refusing to give me due process. I have been denied both notary bonds, even though I gave clear evidence of the fraud conducted by Melanie Treanor and Nikki Siklais Bott, as there would never need to be two notaries on one loan file and they also reside on the same street but they are permitted to go online and bash me to try to slander my character when they should have been in prison for their crimes. All defendants knew where I lived, so I had to move and stop going to my office to be protected from them and the police department trying to conceal this fraud. This is a very clear case of fraud, and I completely understand that everyone in this matter thought I would be overcome by grief so long that I would never catch everyone. But I did, and I am entitled to be treated fairly and made whole. I am clearly learning that this is not a fair process, and the law has nothing to do with any order being entered by Dawn Thorne or Rena Hughes, or David Jones the agenda is to ensure ERA Brokers, One Realty Group, Valley West Mortgage, and National Title Company and their employees are not held accountable for their crimes, at my expense. I have now had to rent a new apartment to house my mother, because my home at 9564 Scorpion Track ct Las Vegas, NV 89178 was no longer safe for me to live in. I have now had to pay over \$5000 to rent an apartment and relocate my mother to a safe home. I will now have to pay \$15000 to end the lease at my office early due to my concerns for my own safety. I am still not listed on the homeowner's insurance, in which I have been the only person to pay for the home and occupy the home for the last 3 years. I have had no medical insurance for a year as Bobby Antee canceled it violating Rena Hughes Order to keep it current. I lost over \$10k in a car robbery in 10/2019 when Jennings and Fulton knowingly still had not added me to the Homeowners insurance. I have lost over 200k supporters over 3 years due to the lies, and abuse from Bobby Antee, Linda Naw and Shumway Van, while Jennings and Fulton withheld evidence given to them in 2018, didn't get an expert and didn't advocate when every government office refused to do their job. I have been forced to remain with Bobby Antee's name which has caused me to not be able to have a child, seek IVF, or remarry a man who loves me. I have spent two years paying off my credit by working nights, for every judge to continue to impose fees upon me in retaliation for me asking for due process and justice. I spent 3 years fighting Cancer with my son, and I did it alone, as a single mom. I worked two jobs and never missed one doctor's appointment or dose of my son's medication, Bobby wasn't part of any of this. I then spent time in the hospitals learning about the families and the resources they needed, and while Ayden was fighting, together, Ayden and I built his foundation. We started this foundation of

\$200 and used it to make snack bags. I then worked on Ayden's Foundation formation for two years, teaching myself everything about nonprofits, websites, and compliance. Ayden then chose our logo, and we spent the last year of Ayden's life giving back. Bobby Antee was nowhere during these times, he showed up a week prior to Ayden's death and defrauded me with the help of Linda Naw, when I was in the most venerable broken place a mother could be in. After defrauding me, Bobby Antee destroyed my property, stole my money in savings, and took all community property and conspired with Shumway Van to steal more from me. Bobby Antee mocked the Mormon religion and told me to "have those white people stop coming over" yet the same people are protecting this scum. I had faith in Jared Jennings and Logan Wilson as they attended the same church I was born into Church of Jesus Christ of Latter Day Saints, so I knew going to court with the priesthood behind me I would prevail, to only find out they never had any intention of every helping me and they not only defrauded me, they helped Shumway Van and Linda Naw harass me through Harassing litigation, never once reporting the conflict of interest or the fact that the Notary Nikki Sikalis Bott notarized her own document producing my forged signature. In Fact they lied to me and told me it was legal in the Real Estate field, which is clear misconduct and they should be debarred. NRS 205.172 states an expert proves forgery and I provided that, yet every law firm and judge continue to ignore this evidence and fulfill their own agenda. I have received no representation since finding out and reporting the legal malpractice, so I have been forced to litigate 10 matters and 9 appeals by myself, when the Constitution promises me a government attorney and protection from Bobby Antee. Arron Ford has ensured I am blackballed from representation while Shumway Van delays ending the divorce to ensure I have no access to my sole and separate money that was my sons, to again ensure I can't use it for my defense. The decree of divorce created by Rena Hughes is all lies, lies that are being used to dismiss case after case, when each judge has the obligation to review every motion and exhibit given to them, and they refuse to do so, ruling in chambers and basing their rulings on no evidence or case law at all. I have now been bullied to the point where I fear for my life and the safety of me and my mother. For 3 years, I have ran my foundation alone, grieved the loss of my son alone, paid for my legal fees alone, and paid all costs for my home alone, and cared for my mother alone, while I can barely get through a day without my son. Bobby Antee has been allowed to cancel my medical insurance multiple times, in which I have over \$6k in medical bills from 2018-2019 that he was ordered to maintain health insurance and did not. Bobby Antee not only mocked the death of my son, but he also mocked my faith in the Mormon religion and requested I have them stop coming to the home and going to church, yet these are the same people helping him evade prosecution. I have begged for help in every court, I have felt hopeless, and at times wanted to

end my own life from this abuse. I do not understand why concealing the crimes of criminals is worth hurting innocent people, and people who have proven to give back and strengthen our community. I am again pleading with Nevada Supreme Court to stop this abuse and offer me the protections owed to me in the constitution and give me vailed reasons for each order or who does have the jurisdiction to enforce that Bobby Antee, Nikki Sikalis Bott, and Linda Perdue are held accountable for the crimes they committed. I have no desire to continue to write the same motions over and over to be bounced around from court to court. Jennings and Fulton have now recorded a false settlement with National Title Company with the IRS, in which I again reported the organized crime to the IRS, and FBI again and will continue to report to anyone who will listen and create a youtube channel with a split screen to clearly show the misconduct and deprivation of my property and rights. I clearly see that many will not be held accountable for the crimes committed against me, because the agenda means more than my rights, but to now allow these lawyers and judges to impose sanctions, penalties, and legal fees against me for doing nothing, is victimizing me again, and the Supreme Court has every right to stop it now, it's a been a year of refusing to correct anything and now my damages are irreparable and I have spent my entire savings and now they are attempting to steal the money stolen in 2017. My last Emergency Motion was ignored, in which I requested the Supreme Court to uphold my Constitutional Rights, which is within your jurisdiction. 18 U.S. Code § 242 - Deprivation of rights under color of law

Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.

According to the Constitution no one has immunity in this matter, and all those who continue to deprive me of justice, due process, and restitution are guilty of

these violations under the color of law, and as the Supreme Court should have immediately acted without delay, and still has done nothing to ensure I get justice, or I am treated fairly. I am asking again for the Supreme Court to consolidate all my appeals, as this is all the same case, and every single case is now in appeals. The following Case Numbers pertain to the forged deed in question and the misconduct over the last 3 years from the concealment of all defendants.

D-18-576154-D- Appeals 81635, 82166

D-18-581756-S- Appeals 82483

A-18-786141-C- Appeals 82039

A-20-820980-C- Appeals 82568

A-20-808737-C- Appeals 81942,82155

A-20-821757-J-

A-20-820963-C- Appeals 82156

A-20-820446-C- Appeals 82096

The Following Judges have refused my right to be heard and my right to due process based on the fabricated ruling of Rena Hughes.

Eric Johnson

Dawn Thorne

David Jones

Ronald Isreal

Mary K Holthus

Elizabeth Gonzalez

Mark Denton

Rob Bare

Dee Butler

Kathy Hardcastle

Gloria Navarro

Cam Ferenbach

Rena Hughes

Treavor Atkins

Kristina Pickering

The same Nevada Supreme Court Judges (Silver, Stiglich, Gibbons) are hearing every appeal and therefor I ask that all the appeals be combined, and a pro bono counsel is assigned to ensure I get justice and restitution through settlement to no longer delay proceedings. I have no need to continue to expose and publicize this matter, I will agree to remove all post, evidence, and comments from all matters and defendants if a fair settlement is made, and this court can allow whoever they like to evade prosecution for their crimes. I simply want to move on with my life and help children. I have had no peace for 6 years; I have not been able to attend therapy or any healing retreats to help me through my grief. For a year of litigating my own matters, I no longer have friends, my relationships have all fallen part due to my PTSD and this abuse and me refusing to allow each defendant to evade prosecution for this crime. I have no time to work or enjoy any part of life, because I spend all my time learning law to be ignored and lied about over and over for a year. I cannot adopt a child without a valid decree of annulment in which the decree provided by Rena Hughes and upheld by every District Court judge, is not valid, and isn't stamped, and I prove to be lies. I should not have to produce a decree for the rest of my life that is untrue, and will cause me and my work irreparable harm. I simply want my name back and the money my son died raising back. I do not know why I do not matter to anyone in this situation and why the pain I have already suffered is not enough pain. I am tired, I am growing ill from constant stress, I have been deprived of the money my son raised for 3 years, when I could have taken a trip to heal or find peace or used it to build his legacy. Instead, Bobby Antee, Linda Naw, and Shumway Van have had complete control over my assets and my freedom. Last week I finally took a trip because I felt like I was losing all hope. I prayed to God to help me understand why everyone has chosen me to hurt. In my quest for understanding and peace, I found an orphan child. A child that feels just as hopeless as me, just as lonely, hurt, abandoned, and abused. A Child that has no mother and no father and has never even taken a warm bath. As I spent time with this child, I began to realize how much I need happiness and love in my life, and if the only way I can help this child, is to allow everyone to pretend like they did not hurt me, then fine, let them all be free to do this over and over again, and boast that they have enough friends to hurt anyone freely. But do not let them take what my son earned, don't let them take more resources away from sick children. Don't let them take my ability to be a mother again and love a child as much as I still love Ayden. Enforce that the full proceeds of my home are returned to me, and settlements are made, and we can all move on. I cannot adopt this child without an annulment decree, I cannot renew my passport, I cannot apply

for a VISA for this child and I cannot buy a home, even though I have saved for two years and paid all my own debt honestly to do so. I cannot buy a home when Bobby Antee and Shumway Van have all of my money and want me to pay all fees to sell the home and give Bobby Antee half of the equity for the abuse he has allowed. I have an amazing ability to help others, and it has been halted and plagued by this matter for 3 years. My mother has felt suicidal watching me endure this pain and abuse, while trying to maintain my work and deal with the loss of Ayden. Please allow me to move on with my life, without the lies Rena Hughes created to bully and intimidate me into settlements with all defendants. 18 USC SECTION 3771 (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.

The Constitution states I am entitled to representation, restitution, and protection and I am now again for the 10th time asking Supreme Court to uphold my rights with no further delay or excuses, it is completely within the jurisdiction of the Supreme Court to debar attorneys for misconduct, issue Writs, and Prohibitions to ensure my constitutional rights are upheld. Being that there is so much corruption in this matter I request to have a full briefing in place of the fast track statement.

Dated 13 of April 2021

Exhibit 1: Expert Letter confirming forgery

Exhibit 2: Secretary Of State Findings

Exhibit 3: Rena Hughes unstamped fabricated ruling, IRS Confirming Rena Hughes Lied

Exhibit 4: Text Messages from Linda

Exhibit 5: Text Messages from Bobby confirming I wasn’t at closing

Exhibit 6: Respondent docs exposing notary fraud and legal malpractice of Shumway Van

Exhibit 7: reports to AG and emails

Exhibit 8: Register of actions proving judicial misconduct and legal malpractice

Exhibit 9: Motion to Enforce Notary Bonds and motion for Lis Pendens/Quiet Title

Exhibit 10: Police Reports

Exhibit 11: HOA threatening to sale home.

Exhibit 12: Supreme Court refusing to act

Exhibit 13: Ignored Annulment Complaint

**Nevada Supreme Court
#82568**

LICARI VS ANTEE ET AL

**APPEAL
DISTRICT COURT OF NEVADA**

APPELLANTS APPENDIX FOR:

**EMERGENCY PETITION FOR WRIT OF MANDAMUS PURSUANT TO
18 USC S 3771**

AND

APPELLANT'S MOTION FOR PROTECTION ORDER

AND

**PETITION FOR WRIT OF ARREST FOR LINDA NAW, BOBBY ANTEE,
NIKKI SIKALIS BOTT, MELANIE TREANOR, MELISSA PARKER,
DREW LEVY**

AND

**APPEALANTS MOTION TO DEBAR GARRETT CHASE, GRAYSON
MOULTON, JARED JENNINGS, LOGAN WILSON, ADAM FULTON,
AND MICHAEL VAN, ANGELA OCHOA**

AND

MOTION TO CONSOLIDATE ALL APPEALS

AND

**MOTION FOR FULL BRIEFING IN PLACE OF FAST TRACK
STATEMENT**

(ACTION NEEDED BY 4/20/2021)

**LINDSEY LICARI
9564 SCORPION TRACK CT
LAS VEGAS, NV 89178
702-577-6657**

LINDSEYLICARI14@AOL.COM

APPELLANT/PETITIONER, IN PROPER PERSON

APPELLANT'S APPENDIX FOR:
APPELLANTS EMERGENCY PETITION FOR WRIT OF MANDAMUS
PURSUANT TO 18 USC S 3771
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APPEALANTS MOTION TO DEBAR GARRETT CHASE, GRAYSON
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AND MICHAEL VAN, ANGELA OCHOA
AND
MOTION TO CONSOLIDATE ALL APPEALS
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STATEMENT