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8 **DISTRICT COURT**

9 **COUNTY OF CLARK, NEVADA**

10 JARED E. SHAFER; an individual,
11 SOLOMON DWIGGINS & FREER, LTD., a
Nevada professional limited partnership;
12 ALAN D. FREER, an individual; ROBERT D.
SIMPSON; an individual, PATIENCE
13 BRISTOL; an individual, AMY DEITTRICK,
an individual; PROFESSIONAL FIDUCIARY
14 SERVICES OF NEVADA, INC., a Nevada
corporation; AVID BUSINESS SERVICES
15 OF NEVADA, INC., a Nevada corporation;
GAMETT & KING, a Nevada corporation;
16 Plaintiffs;

17 vs.

18 REBECCA SCHULTZ, an individual; and
DOES 1 through 20, inclusive;

19 Defendant(s).

Case No.: A-12-671427-C

Dept.: XXXI

**PLAINTIFFS' OPPOSITION TO
DEFENDANT REBECCA SCHULTZ'S
MOTION TO DISMISS AND MOTION FOR
MORE DEFINITE STATEMENT**

Date of Hearing: October 15, 2013

Time of Hearing: 9:30 a.m.

21 Plaintiffs, JARED E. SHAFER, an individual; ALAN D. FREER, an individual; ROBERT D.
22 SIMPSON, an individual; PATIENCE BRISTOL, an individual; AMY DEITTRICK, an individual;
23 SHAWN KING, an individual; SOLOMON DWIGGINS & FREER, LTD., a Nevada professional
24 limited partnership; PROFESSIONAL FIDUCIARY SERVICES OF NEVADA, INC, a Nevada
25 corporation; AVID BUSINESS SERVES OF NEVADA, INC., a Nevada corporation; and GAMETT
26 & KING, a Nevada corporation (collectively, "Plaintiffs"), by and through their counsel of record,
27 Mark A. Solomon, Esq. and Ross E. Evans, Esq. of Solomon Dwiggins & Freer, Ltd., hereby
28

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1 respectfully submit the foregoing Opposition to Defendant Rebecca Schultz's Motion to Dismiss and
2 Alternative Motion for More Definite Statement ("Motion to Dismiss").

3 This Opposition is based upon the memorandum of points and authorities contained herein, the
4 pleadings and papers on file with the Court, and any oral argument that this Court may hear on the
5 date set for hearing.

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 **I.**

8 **INTRODUCTION**

9 Contrary to Defendant Schultz's characterization, this case concerns over one-hundred obscene
10 and defamatory postings to the website www.ripoffreport.com, which Plaintiffs believe were authored
11 and published by Defendant Schultz, under the cover of online anonymity and fictitious authorship.
12 Schultz authored these defamatory postings during the course of her father Guadalupe Olvera Mena's
13 guardianship proceeding after the Guardianship Court entered a bench warrant for her arrest.¹ Indeed,
14 as set forth herein and in the factual pleadings contained in the First Amended Complaint ("FAC"),
15 Plaintiffs have good reason to believe that Defendant Schultz individually authored each such
16 defamatory posting, or reviewed, edited, and/or otherwise coordinated the posting of the same
17 pursuant to a conspiracy to do so with other, as of this time, unknown individuals. Plaintiffs have not
18 taken any action, online or in reality, to bully Defendant Schultz in any conceivable manner, and,
19 therefore object to Defendant's characterization of this lawsuit as anything other than a good faith
20 proceeding initiated to vindicate, for once and for all, their reputations, and to mitigate the effects of
21 Defendant Schultz's reprehensible and cowardly actions.

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28 ¹ The Guardianship Proceeding of Guadalupe M. Olvera was maintained in the Eighth Judicial District Court for Clark County, Nevada, Case No. G-05-028163. See, First Amended Complaint ("FAC"), at p. 4, ¶ 17.

II.

STATEMENT OF RELEVANT FACTS

A. Facts Concerning the Olvera Guardianship Proceeding.

The defamation which is the subject of this action primarily concerns Jared Shafer ("Jared") while he served as a guardian of Defendant Rebecca Schultz's father, Guadalupe Olvera Mena.² The defamatory statements began appearing online, specifically the website <http://www.ripoffreport.com> ("ripoffreport.com"), during the course of the guardianship proceeding of Mr. Olvera.³ In fact, the defamatory statements correspond directly with events occurring during the guardianship proceeding (as perceived by Schultz), and specific allegations and arguments Schultz made during the course of the guardianship proceeding.

In her statement of facts, Schultz falsely claims that Jared caused at least \$300,000 to be charged and paid out of Mr. Olvera's estate.⁴ Schultz fails to acknowledge in her statement of facts, however, that she was the reason such a large amount of fees were incurred during the course of the guardianship proceeding, as the significant majority of fees were attorneys' fees associated with responding to, and opposing, Schultz's numerous and frivolous filings (such as responding to Schultz's kidnapping of Mr. Olvera from Nevada).⁵ While Schultz is correct that she and Jared initially arranged for a temporary guardianship, Jared became concerned that Schultz herself wanted to exploit her father's estate for her own personal benefit, and the fees were necessarily incurred to protect Mr. Olvera's estate from exploitation by Schultz.⁶ In fact, as soon as the temporary guardianship was established, Schultz attempted to take control of her father's estate by redirecting Mr. Olvera's VA benefits to herself, and subsequently attempted to redirect his pension benefits from

² The defamatory statements additionally concern persons directly or tangentially involved in Mr. Olvera's guardianship proceeding, including: PFSN, Jared's company; Patience Bristol; Alan D. Freer, Esq., Robert D. Simpson, Esq., and the law firm Solomon, Dwiggin, and Freer, Ltd., whom served as Jared's attorneys throughout the proceeding; AVID Business Services, Inc., a bookkeeping firm contracted with Jared and PFSN throughout the proceeding; the Guardianship Commissioner, Honorable Jon E. Norheim, and the Honorable Judge Charles J. Hoskin, before which Mr. Olvera's guardianship proceedings took place; Julie C. Arnold, Esq., and Carol A. Kingman, Esq., of the Southern Nevada Senior Citizens Law Project, who were appointed guardian ad litem at one point during Mr. Olvera's guardianship proceeding, and countless others.

³ See FAC at ¶¶ 23, 24, and 34.

⁴ See Motion to Dismiss at p. 3, ll. 8-10.

⁵ See FAC at ¶¶ 18-28, containing references to the various proceedings in both Nevada and California due in no uncertain terms solely to the actions and conduct of Defendant Schultz.

⁶ See FAC at ¶ 18.

Southwest Carpenters Pension Trust.⁷ In addition, Schultz expressed her desire to the Court that she wanted to relocate her father to California and use his assets to buy a large home in which she and her family could reside.⁸

Included in Schultz's numerous, and frivolous, filings were Schultz's specific allegations that Jared was engaged in selling securities without a license, excessive billing, violation of NRS 160 Veterans Guardianship Uniform Act, and removing the contents from Mr. Olvera's safe deposit box, each of which charge was rejected by the Guardianship Court.⁹ Schultz later recycled such specific allegations into the body of the defamatory postings she made to ripoffreport.com.¹⁰

Dissatisfied with the way the proceedings were going in Guardianship Court, on September 22, 2010, Schultz kidnapped her father and brought him with her to California.¹¹ Indeed, such kidnapping resulted in the Guardianship Commissioner finding Schultz in contempt of court, and issuing a bench warrant for Schultz's arrest in Nevada.¹² Immediately after the contempt hearing, Schultz unleashed her dissatisfaction with the Court proceedings by posting the first Ripoff Report containing defamatory statements concerning the Plaintiffs. Indeed, the defamatory statements Schultz posted on ripoffreport.com, and elsewhere, align with events occurring in Guardianship Court during the Olvera guardianship proceeding, including specifically, Schultz's allegations that Jared accepts to serve as a temporary guardian while intending to stay on as guardian permanently, that Jared is guilty of selling securities without a license, excessive billing practices, violations of NRS 160 Veterans Guardianship Uniform Act, and stealing personal property from Wards placed in his care, etc. Moreover, Schultz's statements identify and concern all of the Plaintiffs as they interacted with Mr. Olvera's guardianship proceeding, and the statements reflect general events and allegations she made during the course of the guardianship proceeding. For example, the following table demonstrates that beginning in September of 2010, after Schultz kidnapped Mr. Olvera, Schultz reacted to each event occurring in the Guardianship Proceeding by publishing one or more postings on Ripoffreport.com:

⁷ See FAC at ¶¶ 18 and 24.

⁸ See FAC at ¶ 18.

⁹ See FAC at ¶ 20.

¹⁰ See FAC at ¶¶ 27-29, 32, 34, and 44.

¹¹ See FAC at ¶ 21.

¹² See FAC at ¶ 22.

Date	Guardianship Event	Post No.
9/22/2010	Schultz kidnapped Mr. Olvera	
9/28/2010	Notice of Entry of Order Directing and Compelling Return of Ward and Setting Status Check Hearing	645331
9/29/2010	Hearing - Commissioner Norheim - Status Check re Return of Ward	
10/2/2010		646880
10/3/2010		647120
10/4/2010		647521
10/6/2010	Citation to Appear and Show Cause why Petitioner's Should not be Held in Contempt	
10/7/2010	Order to Show Cause why Rebecca Schultz Should not be Held in Contempt	648646
10/9/2010		649215
		649251
10/12/2010	Notice of Entry of Order to Show Cause why Rebecca Schultz and Ruth Carney Should Not be held in Contempt	650031
10/13/2010		650518
10/14/2010		650894
10/18/2010		652424
10/21/2010		653634
10/26/2010		655344
11/18/2010	Guardianship Commissioner's Report and Recommendation Regarding the Order to Show Cause Why Rebecca Schultz Should Not Be Held in Contempt	
11/25/2010		665359
11/26/2010		665516
12/13/2010	Schultz's Petition for Termination of Guardianship	
12/23/2010	Shafer's Objection to Petition for Termination of Guardianship	
12/28/2010		676021
		676163
1/5/2011		679116
1/7/2011	Schultz's Reply to Shafer's Response to Schultz's Objection to Guardianship Commissioner's Report and Recommendation re Order to Show Cause	680142
1/11/2011	Hearing - Judge Hoskin - All Pending Motions	681200
1/12/2011	Hearing - Commissioner Norheim - Schultz's Petition for Termination of Guardianship	
1/13/2011		682164
		682328
1/25/2011	Notice of Entry of Order Affirming and Adopting Report and Recommendation re Schultz's Report of Malfeasance	
1/26/2011		687273
4/1/2011	Notice of Entry of Order Authorizing Guardian to Retain California Counsel	
4/9/2011		715788
4/16/2011		718378
4/21/2011		720562
4/26/2011		722192
4/29/2011		723776
5/4/2011		725712
5/7/2011		726793
5/19/2011		731283

1	7/15/2011	Shafer's Petition for Ratification of Guardian Expenses and Petition for Ratification and Payment of Attorneys' Fees and Costs	
2	7/19/2011		755375
3	7/22/2011	Notice of Hearing of Shafer's Petition for Ratification of Guardian Expenses and Attorneys' Fees and Costs	
4	7/26/2011		756519
			756568
	7/30/2011		758600
5	8/3/2011	Hearing - Commissioner Norheim - Petition for Ratification of Guardian Expenses and Payment of Attorneys' Fees and Costs	
6	8/7/2011		762174
7	10/14/2011	Collucci's (Olvera's Attorney) - Application for Ratification and Payment of Attorneys' Fees	788796
8	10/18/2011		790337
9	10/20/2011	Hearing - Commissioner Norheim - All Pending Motions	
10	10/24/2011		791754
	10/27/2011		792863
	10/28/2011		792994
11	11/1/2011		794218
12	1/18/2012	Rebecca Schultz Complaint to Center for Guardianship Certification	
13	1/27/2012		829676
14	1/31/2012		832036
15	2/11/2012		837644
	2/21/2012		842669
	2/25/2012		844581

See, Register of Actions for Case No. G-05-028163, attached hereto as **Exhibit 1**. See also, **Exhibit 14**.¹³

In addition, the content of Schultz's ripoffreport postings correspond with her allegations in the Guardianship proceeding, as demonstrated by the following table:

Guardianship Argument / Allegation	Corresponding Ripoffreport.com Posting
3/22/2010 – Schultz filed her Petition to Remove Jared Shafer as Guardian. Schultz, in pertinent part, alleged a conflict of interest on the part of Jared's attorney, Elyse Tyrell, Esq. stating that "[a]fter meeting with Elyse Tyrell for the purpose of seeking a guardianship for her father, she was under the impression that Ms. Tyrell was her attorney." See, Exhibit 2 , at ¶ 9. In her Reply brief, Schultz argued that if Ms. Tyrell becomes a witness, she would be disqualified from representing Shafer pursuant to Rule 1.9. See, Exhibit 3 at ¶ 3.	On 1/26/2011 – Schultz published a ripoffreport.com posting, no. 687273, stating: Commissioner Norheim of the Las Vegas family court assigned Jared Shafer to act as [my sister's] guardian. I live in Jacksonville Florida and am not able to travel because of poor health. ... I hired Elyse Tyrell as my attorney. After several months it became very clear Tyrell was representing Jared Shafer at the same time she was representing me. I attempted to have her removed in Norheim's court. Norheim refused and the case went to Chuck Hoskin. Chuck Hoskin ruled it was within Nevada law to allow an attorney to represent parties in conflicts of interest. See, Exhibit 4 .

¹³ See **Exhibit 14**. The ripoffreport posting numbers can be looked up on the ripoffreport.com website; the majority, if not all, of which have already been disclosed by Plaintiffs to Defendant Schultz.

<p>4/28/2010 – The Guardianship Commissioner appointed Julie C. Arnold and Carol A. Kingman of the Southern Nevada Senior Citizen’s Law Project to serve as Guardian ad litem to interview the Ward at his residence, and determine where the Ward wants to live. See Exhibit 5.</p>	<p>On 1/13/2011 – Schultz published a ripoffreport.com posting, no. 682164, stating: Carol Kingman and Julie Arnold were appointed to interview my Mother. Carol Kingman said, You want your mother? We can make sure she goes with you back to Tampa. I believe you can afford \$25,000 and we will make sure Norheim grants your request. I refused this request and Norheim true to his usual form ruled my mother must remain in Nevada. See, Exhibit 6.</p>
<p>7/13/2010 – At a hearing before Judge Hoskin, Schultz, and her co-petitioner Ruth Carney, for the first time raised issues concerning possible violations of NRS Chapter 160 (Veterans’ Guardianship Uniform Act), such as failure to provide notice to the Dept. of Veterans’ Affairs. See, Exhibit 7. Further, on August 13, 2010 Schultz filed her Report of Malfeasance in support of her Petition to Terminate Jared’s letters of Guardianship, in which she further alleged violation of NRS Chapter 159 for failure to provide notice. See, Exhibit 8, at ¶¶ 4 and 9. Moreover, Schultz’s co-petitioner filed a joinder alleging Jared was in violation of NRS Chapter 160 because he was responsible for more than five wards. See, Exhibit 9, at ¶ 10. On September 8, 2010, Commissioner Norheim held a hearing in which he found that the Dept. of Veterans Affairs received actual notice, and further found that Jared Shafer came in under an exemption to NRS Chapter 160 because he was not receiving the Ward’s VA benefits directly, as the same were paid to the Ward’s Trust. See, Exhibit 10.</p>	<p>On 11/25/2010, Schultz published a ripoffreport.com posting, no. 665359, stating: “I filed an NRS Chapter 160 petition with the Nevada Family court. The statutes of 160 put restrictions on professional guardians who have a ward that is a veteran but the violations by Jared E. Shafer were rejected by Jon Norheim, the guardianship commissioner. Norheim said something like “if I allow you to win this case, guardians would have a difficult time conducting business in Las Vegas. I know we have laws on the books protecting veterans, but when they get in the way of a guardians earning a living, I will not enforce them.” See, Exhibit 11.</p>
<p>1/21/2011 through 1/25/2011 – Judge Hoskin entered a Bench Warrant for Rebecca Schultz’s arrest after she kidnapped her father to California; Also Notices of Entry of the Orders denying Schultz’s Petition to Terminate the Guardianship, and Affirming and Adopting the Guardianship Commissioner’s Report and Recommendation regarding Schultz’s Report of Malfeasance. See, Exhibit 1.</p>	<p>Schultz began identifying and defaming Judge Hoskin in the ripoffreport.com postings. On 1/26/2011, in report no. 687273, Schultz stated: Judge Chuck Hoskin takes bribes and evades taxes by banking offshore in Gran Cayman. See, Exhibit 4. On 1/31/2011, in report no. 689183, Schultz stated: Commissioner Norheim over my objections appointed Jared Shafer to act as his guardian because I wasn’t a resident of Nevada. Judge Chuck Hoskin affirmed Norheim’s ruling stating “non residents will not take care of families in this state.” I wanted to take Drew back to Idaho Falls, but Jared Shafer, Judge Chuck Hoskin, and Commissioner Jon Norheim wouldn’t allow it. See, Exhibit 12.</p>

B. Facts Giving Rise to this Court’s Personal Jurisdiction Over Defendant Schultz.

As set forth below, pursuant to Nevada law, and Supreme Court and Ninth Circuit precedent, Schultz’s factual allegations and characterizations concerning personal jurisdiction are irrelevant. Further, although Schultz asserts in her brief that “she appeared through Counsel in hearings pertaining to her father’s guardianship proceedings,” the fact is that Schultz routinely appeared

1 personally in the guardianship hearings in Clark County, Nevada alongside her counsel.¹⁴ Moreover,
2 Schultz filed numerous affidavits in the guardianship proceeding in support of her petitions. Such
3 appearances, testimony, and participation by Schultz in the guardianship proceeding became the
4 foundation for Schultz's knowledge and perception of events occurring in the guardianship proceeding
5 upon which all of her defamatory postings are based. In addition, Schultz's kidnapping of Mr. Olvera
6 resulted in Judge Hoskin issuing a bench warrant for Schultz's apprehension and arrest in Nevada.¹⁵
7 Accordingly, Schultz's participation in the guardianship proceeding, upon which Plaintiffs' claims for
8 defamation are based, demonstrate that Schultz had sufficient minimum contacts with the State of
9 Nevada to support personal jurisdiction over her.

10 Moreover, Defendant Schultz's defamatory statements target and attack the Plaintiffs' personal
11 and professional reputations in the State of Nevada, and, because the Plaintiffs reside and work in
12 Clark County, Nevada, and the majority of their business is conducted in Clark County, Nevada, the
13 resulting damage has occurred in Clark County, Nevada. Schultz made the following specific
14 statements in her defamatory ripoffreport.com postings, demonstrating that she targeted the individual
15 Plaintiffs in the State of Nevada:

16 (A) Ripoff Report No. 747145, published Wednesday, June 29, 2011 ("Statement A").

17 [http://www.ripoffreport.com/assisted-living-elderly-disabled/jared-e-shafer/jared-e-shafer-](http://www.ripoffreport.com/assisted-living-elderly-disabled/jared-e-shafer/jared-e-shafer-patience-bristo-8885c.htm)
18 [patience-bristo-8885c.htm](http://www.ripoffreport.com/assisted-living-elderly-disabled/jared-e-shafer/jared-e-shafer-patience-bristo-8885c.htm)

19 JARED E SHAFER PATIENCE BRISTOL JARED SHAFER TO USE
20 MY MOTHER AS A MEDICAL EXPEROMENT LAS VEGAS,
21 NEVADA

22 Jared Shafer threatened and killed my mother [sic] Jared E Shafer who
23 served as Las Vegas' public guardian threatened to have my mother killed
24 if our family refuse to drop our legal case against him.

25 See FAC at p. 8, ¶ 34.

26 (B) Ripoff Report No. 708711, published Monday, March 21, 2011 ("Statement B").

27 [http://www.ripoffreport.com/attorneys-legal-services/solomon-dwiggins-fre/solomon-dwiggins-](http://www.ripoffreport.com/attorneys-legal-services/solomon-dwiggins-fre/solomon-dwiggins-freer-mors-7d68b.htm)
28 [freer-mors-7d68b.htm](http://www.ripoffreport.com/attorneys-legal-services/solomon-dwiggins-fre/solomon-dwiggins-freer-mors-7d68b.htm)

¹⁴ See Exhibit 13, constituting a compilation of Minutes of Hearing dated April 28, 2010, Minutes of Hearing dated May 19, 2010, Excerpt of Transcript for Hearing dated May 19, 2010, Minutes of Hearing dated July 13, 2010, Minutes of Hearing dated September 8, 2010.

¹⁵ See FAC at p. 5, ¶ 22.

1 SOLOMON DWIGGINS FREER & MORSE ALAN D FREER, JARED
2 SHAFER, AND PATIENCE BRISTOL SENIOR RIP OFF
3 KIDNAPPING, FRAUD, MISUSE OF THE COURT SYSTEM LAS
4 VEGAS, NEVADA

5 Alan D. Freer of Solomon Dwiggins Freer & Morse is using the law to rob
6 from the elderly.

7 See FAC at pp. 9-10, ¶ 34.

8 (C) Ripoff Report No. 680142; published Friday, January 7, 2011 ("Statement C").

9 <http://www.ripoffreport.com/assisted-living-elderly-disabled/avid/avid-amy-deittrick-jared-shaf-4aea6.htm>

10 AVID AMY DEITTRICK, JARED SHAFER, PATIENCE BRISTOL
11 UNLICENSED BUSINESS, FRAUD, TAKING MONEY FROM THE
12 ELDERLY INTERNET LAS VEGAS, NEVADA

13 The court appointed Shafer and Deittrick to "protect" the estate. During
14 the next 23 months Ms. Deittrick and Mr. Shafer took \$327,442.38 for
15 questionable fees. Deittrick billed over \$100,000 in extraordinary fees.

16 She continued by stating "Jon Norheim Clark County's family court
17 commissioner is in our pocket."

18 See FAC at pp. 11-12, ¶ 34.

19 (D) Ripoff Report No. 762174, published Sunday, August 7, 2011 ("Statement D").

20 <http://www.ripoffreport.com/attorneys-legal-services/robert-simpson-attor/robert-simpson-attorney-alan-f-c4421.htm>

21 ROBERT SIMPSON ATTORNEY ALAN FREER, SOLOMON
22 DWIGGINS, & FREER ROBERT SIMPSON STOLE \$25,000 CASH
23 FROM MY DYING FRIEND LAS VEGAS, NEVADA

24 Robert Simpson admitted to stealing \$25,000 cash from my dying friend
25 Mrs. Finch.

26 Robert Simpson opened her jewelry box and found \$25,000 cash.
27 Simpson pocketed the money and reported it to Alan Freer. Freer told him
28 to split it with him.

See FAC, at pp. 12-13, ¶ 34.

Indeed, of the over one-hundred ripoffreport postings made by Schultz, nearly each and every posting identifies one or more of the Plaintiffs by name, accuses them of committing a crime in their professional capacities as attorneys, professional fiduciaries, accountants, or bookkeepers, and

1 identifies the location as Las Vegas, Nevada.¹⁶ Moreover, the fact that Schultz identifies the Plaintiffs
2 by name and includes Las Vegas, Nevada in the headlines of her defamatory postings, coupled with
3 the fact that the ripoffreport.com website advertises that “Your Ripoff Report will be discovered by
4 millions of consumers! Search engines will automatically discover most reports, meaning that within
5 just a few days or weeks, your report may be found on search engines when consumers search, using
6 key words relating to your Ripoff Report,”¹⁷ demonstrates that Schultz intentionally targeted the
7 Plaintiffs in Nevada, and that she intended that her defamatory postings would show up in search
8 results for the Plaintiffs names.

9 Thus, Clark County, Nevada, is the nexus of the underlying conduct and actions, upon which
10 Schultz’s defamatory statements are based, and upon which the Plaintiffs’ claims are based.
11 Moreover, Clark County, Nevada is the forum where the Plaintiffs have suffered the majority, if not
12 all, of their damages.

13 III.

14 LEGAL ARGUMENT

15 A. Standard for Motion to Dismiss Alleging Lack of Personal Jurisdiction.

16 When a party challenges personal jurisdiction, the plaintiff typically has the burden of producing
17 evidence that establishes a prima facie showing of jurisdiction. See *Trump v. District Court*, 109 Nev.
18 687, 692, 857 P.2d 740, 743 (1993). “[A] plaintiff may make a prima facie showing of personal
19 jurisdiction prior to trial and then prove jurisdiction by a preponderance of the evidence at trial.”
20 *Consipio Holding, BV v. Carlberg*, __ Nev. __, 282 P.3d 751 (2012); citing *Trump v. District Court*,
21 109 Nev. 687, 692, 857 P.2d 740, 743 (1993). “In determining whether a prima facie showing has
22 been made, the district court is not acting as a fact finder. It accepts properly supported proffers of
23 evidence by a plaintiff as true.” *Trump*, 109 Nev. at ___, 857 P.2d at ___. Indeed, “when factual
24 disputes arise in a proceeding that challenges personal jurisdiction, those disputes must be resolved in
25 favor of the plaintiff.” *Id.*

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28 ¹⁶ See, Spreadsheet of Ripofreport.com postings attached hereto as **Exhibit 14**.

¹⁷ See FAC at p. 14-15, ¶ 41. See also, ripoffreport.com home page, attached hereto as **Exhibit 15**.

1 **B. This Court's Exercise of Personal Jurisdiction Over Defendant Schultz Comports with Due**
2 **Process.**

3 Schultz's position is directly contrary to the United States Supreme Court and Ninth Circuit
4 rulings on this very issue. See, *Calder v. Jones*, 465 U.S. 783, 104 S.Ct. 1482, 79 L.Ed.2d 804 (1984),
5 *Fiore v. Walden*, 688 F.3d 558 (9th Cir. 2012), and *Brainerd v. Governors of the University of Alberta*,
6 873 F.2d 1257 (9th Cir. 1989). As set forth below, these Courts have held that due process permits
7 personal jurisdiction over non-resident defendants who purposefully direct their tortious conduct at
8 residents of the forum. Moreover, there is no question that "Nevada's long arm statute, NRS 14.065,
9 reaches the limits of due process set by the United States Constitution." See, *Baker v. Eighth Judicial*
10 *District Court ex rel. County of Clark*, 116 Nev. 527, 999 P.2d 1020 (Nev. 2000). Thus, it is clear that
11 this Court has jurisdiction over Defendant Schultz, if this Court finds that Schultz directed her tortious
12 conduct at Plaintiffs.

13 "Nevada's long-arm statute permits personal jurisdiction over a nonresident defendant unless the
14 exercise of jurisdiction would violate due process." See, *Consipio Holding, BV v. Carlberg*, __ Nev.
15 __, 282 P.3d 751 (2012); citing NRS 14.065(1). "Due process requires minimum contacts between the
16 defendant and the forum state such that the maintenance of the suit does not offend traditional notions
17 of fair play and substantial justice." *Id.*; citing *Trump v. Eighth Judicial Dist. Court of State of Nev. In*
18 *and For County of Clark*, 109 Nev. 687, 698, 857 P.2d 740, 747 (1993). "The defendant's conduct and
19 connection with the forum State [must be] such that he should reasonably anticipate being haled into
20 court there." See, *Consipio Holding, BV v. Carlberg*, __ Nev. __, 282 P.3d 751 (2012); citing *World-*
21 *Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297, 100 S.Ct. 559, 62 L.Ed.2d 490 (1980).

22 When "the cause of action arises from the defendant's contacts with the forum," Nevada permits
23 the exercise of personal jurisdiction. *Trump*, 109 Nev. at 699, 857 P.2d at 748. Specific personal
24 jurisdiction is appropriate when the defendant has "purposefully established minimum contacts" such
25 that jurisdiction would "comport with 'fair play and substantial justice.'" *Consipio Holding, BV v.*
26 *Carlberg*, __ Nev. __, 282 P.3d 751 (2012); citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462,
27 476, 105 S.Ct. 2174, 85 L.Ed.2d 528 (1985) (quoting *Internat. Shoe Co. v. Washington*, 326 U.S. 310,
28

320, 66 S.Ct. 154, 90 L.Ed. 95 (1945)). Specific jurisdiction may be exercised over a nonresident defendant where:

(1) the defendant purposefully avails himself of the privilege of serving the market in the forum or of enjoying the protection of the laws of the forum, or where the defendant purposefully establishes contacts with the forum state and affirmatively directs conduct toward the forum state, and (2) the cause of action arises from that purposeful contact with the forum or conduct targeting the forum.

Trump, 109 Nev. at 699-700, 857 P.2d at 748. (Emphasis added). Indeed, “the purposeful availment requirement may be satisfied **if the defendant intentionally directed his activities into the forum.**” See, *Firouzabadi v. First Judicial Dist. Court In and For Carson City*, 110 Nev. 1348, 885 P.2d 616 (1994); citing *Trump*, 109 Nev. at 700, 857 P.2d at 748, (quoting *Brainerd v. Governors of the University of Alberta*, 873 F.2d 1257, 1259 (9th Cir.1989)). (Emphasis added). Indeed, “[d]ue process permits the exercise of personal jurisdiction over a defendant who purposefully directs his activities at residents of a forum, **even in the absence of physical contacts with the forum.**” See, *Fiore v. Walden*, 688 F.3d 558 (9th Cir. 2012) (holding that personal jurisdiction was established over the defendant in Nevada). (Emphasis added). Moreover, the Ninth Circuit in *Fiore*, emphasized that “[i]ntentional torts, in particular, can support personal jurisdiction over a nonresident defendant who has no other forum contacts.” *Id.* (Emphasis added).

In the defamation context, the United States Supreme Court in *Calder v. Jones*, 465 U.S. 783, 787-89, 104 S.Ct. 1482, 1486-87, 79 L.Ed.2d 804 (U.S. 1984) implemented the “effects” test for determining purposeful availment upon which personal jurisdiction may be found over a nonresident defendant. In *Calder*, a reporter residing in Florida wrote an article for the National Enquirer about Shirley Jones, a well-known actress who lived and worked in California. 465 U.S. at 784-86. The president and editor of the National Enquirer, also a resident of Florida, reviewed and approved the article and the National Enquirer published the article. Jones sued, among others, the reporter and editor (individual defendants) for libel in California. *Id.* The individual defendants moved to quash service of process, contending lack of personal jurisdiction with California. *Id.* The United States Supreme Court disagreed and held that **California could exercise jurisdiction over the individual defendants “based on the ‘effects’ of their Florida conduct in California.”** *Id.* at 789 (emphasis

1 added). The Supreme Court found jurisdiction proper because "California [was] the focal point both
2 of the story and of the harm suffered." *Id.* To support this finding, the Supreme Court explained that:

3 The allegedly libelous story concerned the California activities of a
4 California resident. It impugned the professionalism of an entertainer
5 whose television career was centered in California...and the brunt of the
6 harm, in terms both of [Jones'] emotional distress and the injury to her
7 professional reputation, was suffered in California.

8 *Id.* at 788-89. The Supreme Court also noted that the individual defendants wrote or edited "an article
9 that they knew would have a potentially devastating impact upon [Jones]. And they knew that the
10 brunt of that injury would be felt by [Jones] in the State in which she lives and works and in which the
11 National Enquirer has its largest circulation." *Id.* at 789-90.

12 Accordingly, under the "effects" test established in *Calder*, "the defendant allegedly must have:
13 (a) committed an intentional act, (b) expressly aimed at the forum state, (c) causing harm that the
14 defendant knows is likely to be suffered in the forum state." *Id.* at 791; *see also, Pavlovich v. Superior*
15 *Court*, 29 Cal. 4th 262, 271, 58 P.3d 2, 8 (Cal. 2002) (stating that "...virtually every jurisdiction has
16 held that the *Calder* effects test requires intentional conduct expressly aimed at or targeting the forum
17 state in addition to the defendant's knowledge that his intentional conduct would cause harm in the
18 forum.") (emphasis omitted). After the Supreme Court's decision in *Calder*, the Ninth Circuit has
19 further emphasized that personal jurisdiction may be found over nonresident defendants "where there
20 was individual targeting of forum residents," i.e., where the relevant actions were "taken outside of the
21 forum state for the purpose of affecting a particular forum resident." *Fiore v. Walden*, 688 F.3d 558,
22 577 (9th Cir. 2012) (citations omitted).¹⁸ Indeed, the Ninth Circuit held that "the presence of
23 individualized targeting is what separates these cases from others in which [the Ninth Circuit] have
24 found the effects test unsatisfied." *Id.* at 578.

25 ¹⁸ *See also, Panavision Int'l, L.P. v. Toeppen*, 141 F.3d 1316, 1321 (9th Cir. 1998) (holding that personal
26 jurisdiction existed where "[t]he brunt of the harm ... was felt in California," and the defendant "knew
27 Panavision would likely suffer harm there because, although at all relevant times Panavision was a Delaware
28 limited partnership, its principal place of business was in California"); *Gordy v. Daily News, L.P.*, 95 F.3d 829,
833 (9th Cir. 1996) (finding personal jurisdiction where "[t]he prime targeting [arose] ... from the fact that
[plaintiff was] an individual who live[d] in California"); *Brainerd v. Governors of the Univ. of Alberta*, 873
F.2d 1257, 1259 (9th Cir. 1989) (holding that there was personal jurisdiction over a defendant who "knew the
injury and harm stemming from his communications would occur in Arizona, where [plaintiff] planned to live
and work"); *Lake v. Lake*, 817 F.2d 1416, 1423 (9th Cir. 1987) (holding that personal jurisdiction existed where
defendant "took those actions for the very purpose of having their consequences felt in the forum state" and
where those actions "amount[ed] to more than ... untargeted negligence").

1 The Ninth Circuit supported its holding in *Fiore, supra*, by frequently citing to its prior opinion
2 in another defamation case, *Brainerd v. Governors of the University of Alberta*, 873 F.2d 1257 (9th
3 Cir. 1989). In *Brainerd*, the plaintiff had accepted a tenured position with the University of Arizona,
4 and shortly thereafter the defendant made defamatory statements about plaintiff to plaintiff's new
5 employer. 873 F.2d at 1258. The Ninth Circuit determined that because the defendant, a resident of
6 Canada, knew of plaintiff's connection to Arizona, such fact was sufficient to establish personal
7 jurisdiction in Arizona over the defendant whose only contacts with Arizona consisted of his
8 defamatory communications with the University of Arizona regarding the plaintiff. *Id.* at 1258-59
9 (emphasis added). Indeed, the Ninth Circuit found that the defendant "knew the injury and harm
10 stemming from his communications would occur in Arizona, where Brainerd planned to live and
11 work." *Id.* at 1259 (emphasis added).

12 The Ninth Circuit in *Fiore, supra*, stated that "the critical factor is whether [the defendant],
13 knowing of [plaintiff]'s significant connections to Nevada, should be taken to have intended that
14 the consequences of his actions would be felt by them in that state." 688 F.3d at 580 (emphasis
15 added). The Ninth Circuit applied its precedents regarding personal jurisdiction in cases concerning
16 fraud or similar causes of action, to the defamation action before it, and concluded that the "case law
17 firmly establishes that if a defendant is alleged to have defrauded or similarly schemed against
18 someone with substantial ties to a forum, the 'expressly aimed' factor is met, even if all the defrauding
19 activities occur outside the forum." *Id.* Thus, the court in *Fiore* held that such reasoning likewise
20 applied to cases concerning causes of action for defamation. *Id.* at 581.

21 In the instant action, it is clear that this Court has personal jurisdiction over Defendant Schultz,
22 specifically due to Schultz having intentionally libeled, slandered and defamed the Plaintiffs, all of
23 whom are Nevada citizens, in the State of Nevada. *See, Fiore, supra*, 688 F.3d at 577 (stating that
24 "[i]ntentional torts, in particular, can support personal jurisdiction over a nonresident defendant who
25 has no other forum contacts.") (citations omitted). In fact, Schultz even identified the names of the
26 individual Plaintiffs and the location as Las Vegas, Nevada in the headlines of her defamatory
27
28

1 postings.¹⁹ Moreover, Plaintiffs have specifically alleged that “the Defendants [including Schultz],
2 targeted their actions to effect the Plaintiffs in the State of Nevada, and that the Defendants intended
3 to, and did, cause the Plaintiffs damage and injury in the State of Nevada.”²⁰

4 Accepting as true that Schultz is the author of the defamatory postings, this Court must conclude
5 that Schultz targeted the individual Plaintiffs and intended that the consequences of her defamatory
6 statements would be felt by Plaintiffs in Nevada. Indeed, each and every one of the defamatory
7 statements identifies one or more of the Plaintiffs by name and specifically defames the Plaintiffs by
8 accusing them of having committed crimes in the State of Nevada, including bribery of judges, theft
9 from Wards placed in their care, elder abuse, drug and alcohol dependence, and worse. Accordingly,
10 this Court can reasonably conclude that Schultz knew the injury stemming from her defamatory
11 postings would be felt by Plaintiffs in Nevada. Moreover, Defendant Schultz’s knowledge of
12 Plaintiffs’ connections with the State of Nevada, i.e. being the state where Plaintiffs live and conduct
13 the significant majority, if not all, of their business, demonstrates Schultz’s intent that the
14 consequences of her actions would be felt by Plaintiffs in Nevada. See, e.g. *Fiore*, supra.

15 **C. The Allegations Stated in the Complaint are Sufficient to State Causes of Action for**
16 **Defamation, Business Disparagement, Civil Conspiracy, Declaratory Relief, Injunctive**
17 **Relief, and Punitive Damages against Defendant Schultz.**

18 In reviewing a motion to dismiss for failure to state a claim, a court must determine whether or
19 not the challenged pleading sets forth allegations sufficient to make out the elements of a right to
20 relief. *Edgar v. Wagner*, 101 Nev. 226, 227, 699 P.2d 110, 111 (1985). A claimant must set forth
21 factual allegations, either direct or inferential, regarding each material element necessary to sustain
22 recovery under an actionable legal theory to successfully oppose a motion to dismiss for failure to
23 state a claim upon which relief may be granted. See, *Remco Distributors, Inc., v. Oreck Corp.*, 814
24 F.Supp. 171, 174, (D. Mass. 1992). “The test for determining whether the allegations of a complaint
25 are sufficient to assert a claim for relief is whether the allegations give fair notice of the nature and
26 basis of a legally sufficient claim and the relief requested.” *Breliant v. Preferred Equities Corp.*, 109
27 Nev. 842, 858 P.2d 1258 (1993).

28 ¹⁹ See, Exhibit 14.

²⁰ See FAC at pp. 3-4, ¶ 15.

1 In order to establish a prima facie case of defamation, a plaintiff must prove: a false and
2 defamatory statement by defendant concerning the plaintiff; an unprivileged publication to a third
3 person; fault, amounting to at least negligence; and actual or presumed damages. See, *Chowdhry v.*
4 *NLVH, Inc.*, 109 Nev. 478, 483, 851 P.2d 459 (1993) (citing Restatement (Second) of Torts, § 558
5 (1977)). “A statement is defamatory when it would tend to lower the subject in the estimation of the
6 community, excite derogatory opinions about the subject, and hold the subject up to contempt.” *K-*
7 *Mart Corporation v. Washington*, 109 Nev. 1180, 1191, 866 P.2d 274, 281-82 (1993) (citing *Las*
8 *Vegas Sun v. Franklin*, 74 Nev. 282, 287, 329 P.2d 867, 869 (1958)). In reviewing an allegedly
9 defamatory statement, “[t]he words must be reviewed in their entirety and in context to determine
10 whether they are susceptible of a defamatory meaning.” *Chowdhry v. NLVH, Inc.*, 109 Nev. 478, 484,
11 851 P.2d 459, 463 (1993). Whether a statement is defamatory is generally a question of law; however,
12 where a statement is “susceptible of different constructions, one of which is defamatory, resolution of
13 the ambiguity is a question of fact for the jury.” *Posadas v. City of Reno*, 109 Nev. 448, 453, 851 P.2d
14 438, 442 (1993) (quoting *Branda v. Sanford*, 97 Nev. 643, 646, 637 P.2d 1223, 1225-26 (1981)).

15 Defendant Schultz’s contention, that the one defamatory statement appearing in the First
16 Amended Complaint at pp. 7-8, ¶ 32, is not defamatory due to being an opinion, is simply without
17 merit. The disputed statement makes the following factual defamatory statements: (1) Plaintiff Jared
18 E. Shafer has bullied and threatened families; (2) Jared brags to victims about controlling and bribing
19 judges; (3) Jared has stolen millions of dollars from victims’ social security, retirement pensions and
20 veteran benefits; and (4) Jared’s wards mysteriously die days before their Medicare expires (implying
21 that Jared has caused their deaths). Each of such statements are capable of being proven true or false,
22 and therefore constitute statements of fact. Moreover, nothing in such statements would alert the
23 reader that Schultz was intending to convey her opinion, and therefore, a reasonable person would
24 understand the statements as ones of fact.

25 The Nevada Supreme Court has said that the test for whether a statement constitutes fact or
26 opinion is: “whether a reasonable person would be likely to understand the remark as an expression of
27 the source’s opinion or as a statement of existing fact.” See, *Lubin v. Kunin*, 117 Nev. 107, 17 P.3d
28 422 (2001). Notwithstanding, the Nevada Supreme Court acknowledged that “[i]n certain contexts,

1 however, a statement may be ambiguous or a 'mixed type,' which is an opinion, which gives rise to
2 the inference that the source has based the opinion on underlying, undisclosed defamatory facts." For
3 example, in *Nevada Independent Broadcasting Corp. v. Allen*, 99 Nev. 404, 664 P.2d 337 (1983), the
4 Nevada Supreme Court offered an example illustrated by the Restatement (Second) of Torts Section
5 566 comment b (1977): wherein it was stated that "it may be actionable to state an opinion that
6 plaintiff is a thief, if the statement is made in such a way as to imply the existence of information
7 which would prove plaintiff to be a thief." The Court in *Lubin* confirmed that "[i]n such situations,
8 where a statement is ambiguous, the question of whether it is a fact or evaluative opinion is left to the
9 jury." *Lubin*, 117 Nev. at 113, 17 P.3d at 426.

10 The statement contained in paragraph 32 of the Complaint are statements of fact, because they
11 are capable of being proven true or false (i.e. whether or not Jared has stolen monies, threatened
12 families, bragged about bribing judges, whether or not Jared's wards have died under mysterious
13 circumstances), and the statements do not contain expressions which would convey to the reader that
14 the author is stating an opinion (such as using the words: "I believe" or "in my opinion").
15 Accordingly, the reasonable interpretation of such statements is that they are statements of fact, or at
16 the very least the statements leave the reader to conclude that Schultz was basing such statements upon
17 underlying, undisclosed defamatory facts. Likewise, the exemplar set of defamatory statements
18 incorporated into paragraph 34 of the First Amended Complaint, are statements of fact, or at the very
19 least defamatory statements which leave the reader to conclude that they are based upon underlying,
20 undisclosed defamatory facts.²¹

21
22 ²¹ Indeed, by way of example, Statement A is expressly defamatory to Plaintiffs Shafer and Bristol, because it falsely
23 accuses Shafer and Bristol of making threats to the publisher of the statement constituting extortion, and implies that
24 Plaintiffs Shafer and Bristol used the publisher's mother as a medical experiment. Statement A is also defamatory per se
25 because it accuses Plaintiffs Shafer and Bristol of committing crimes, and adversely reflects on Shafer and Bristol's fitness
26 to conduct business as professional fiduciaries in the State of Nevada. Statement B is also defamatory per se because it
27 falsely accuses Plaintiffs Shafer, Freer, and Bristol of over-billing their clients and wards, and billing for services that were
28 not provided. Such accusations negatively reflect on such Plaintiffs fitness to conduct business as professional fiduciaries
and as an attorney. Moreover, Statement B falsely accuses Plaintiff Bristol of injecting a ward with the implication that
such action caused the ward's death. Statement C is defamatory per se because it falsely accuses Plaintiff Deitrick of
over-billing, or billing for services which were not rendered. Statement C additionally falsely accuses Plaintiff Deitrick of
being complicit in bribing judicial officers along with Plaintiff Shafer. Such accusations negatively reflect on Deitrick's
fitness to conduct business as a provider of professional services for professional fiduciaries. Statement D is defamatory
per se because it falsely accuses Plaintiffs Simpson and Freer of extorting legal fees from the families of wards under the
protection of Plaintiff Shafer. Statement D additionally falsely accuses Plaintiff Simpson of being under the influence of
drugs, committing thefts from wards, and splitting the proceeds of such thefts with Plaintiff Freer. Such accusations

The Nevada Supreme Court has held that “[i]n reviewing an allegedly defamatory statement, “[t]he words must be reviewed in their entirety and in context to determine whether they are susceptible of a defamatory meaning.” *Chowdhry v. NLVH, Inc.*, 109 Nev. 478, 484, 851 P.2d 459, 463 (1993). “A statement is defamatory when it would tend to lower the subject in the estimation of the community, excite derogatory opinions about the subject, and hold the subject up to contempt.” *K-Mart Corporation v. Washington*, 109 Nev. 1180, 1191, 866 P.2d 274, 281-82 (1993), *receded from on other grounds as stated in Pope v. Motel 6*, 121 Nev. 307, 317, 114 P.3d, 277, 283 (2005). The statement contained in paragraph 32, and the statements contained in paragraphs 34 are clearly defamatory on their face. Accordingly, this Court should conclude as a matter of law that the statements of which Plaintiffs complain and attribute to Schultz are statements of fact and capable of a defamatory meaning. Thus, Plaintiffs have properly stated a claim for defamation against Defendant Schultz. Likewise, Plaintiffs other claims are sufficient to state claims for relief, and Schultz has failed to provide any basis for dismissal of the same.

D. This Court Should Deny Defendant Schultz’s Request for a More Definite Statement.

In the Motion to Dismiss, Defendant argues that “there is only one specific statement in the First Amended Complaint that is attributable to Ms. Schultz,” and “[t]here is no mention in that statement of any Plaintiff other than Jared E. Shafer.” See, Motion, at p. 6, ll. 9-10. Accordingly, Defendant Schultz seeks dismissal of the other Plaintiffs’ claims. In addition, Defendant Schultz argues that even as to the one statement for which she is attributed, such statement constitutes an opinion which is not actionable. See, Motion, at p. 6, ll. 17-26. Schultz alternatively requests a more definite statement as to conduct that is attributable to her. See, Motion, at p. 7, ll. 1-6.

The factual allegations sufficiently allege that all of the Defamatory Statements, a small sample of which are stated in paragraph 34 of the Complaint, are attributable directly to Defendant Schultz or a co-conspirator of hers pursuant to a common scheme designed to maximize exposure of their defamatory statements and publications to the public.²² Plaintiffs specifically alleged that “[a]fter Schultz kidnapped [her father] on September 22, 2010, ... **she began to publish** certain false and

negatively reflect on Plaintiffs Simpson and Freer’s fitness to conduct business as attorneys, and negatively reflects on Plaintiff Shafer’s fitness to conduct business as a professional fiduciary. See FAC at pp. 13-14, ¶¶ 35-39.

²² See FAC at p. 3, ¶¶ 11, 13-14.

defamatory statements about Shafer and the remaining Plaintiffs... [s]pecifically, **the first Defamatory Statements known to Plaintiffs were published by Schultz** or a co-conspirator of hers, on September 28, 2010 on the website <http://www.ripoffreport.com/> ... just 10 days after Schultz kidnapped Mr. Olvera.²³ Plaintiffs further alleged that “[s]ince September 28, 2010, ... **Schultz or a co-conspirator of hers, continued to make Defamatory Statements** while Schultz tried to take control of her father’s estate.”²⁴ Plaintiffs specifically alleged that “[a]s part of her crusade to discredit Plaintiffs’ ... Schultz sent correspondence to the Center for Guardianship Certification and specifically referenced defamatory statements she herself had made to other individuals/entities, including the Center for Guardianship Certification.”²⁵ Plaintiffs alleged that “**Schultz uses [her familiarity with her father’s guardianship proceeding] to invent plausible sounding, but false, stories of fact** in which she or her co-conspirators claim to be relatives of victims who were abused and/or otherwise damaged by the Plaintiffs during various stages of invented guardianship proceedings.”²⁶

In the interest of brevity, Plaintiffs incorporated only four out of the over one-hundred defamatory statements they have discovered on the [ripoffreport.com](http://www.ripoffreport.com) website, to serve as a sample of the defamatory statements of which they attribute to Defendant Schultz, and her co-conspirators, if they exist.²⁷ Indeed, Plaintiffs attributed such statements directly to Defendant Schultz and her co-conspirators, stating that “**the Defamatory Statements were published by Defendant Schultz and her co-conspirators** because the Defamatory Statements follow the same theme[].”²⁸ Moreover, Plaintiffs alleged that “[a]lthough the Defamatory Statements were either published by the Defendants anonymously or under a fictitious name, **the common and reoccurring themes among the Defamatory Statements demonstrate that Defendant Schultz published each and every statement herself**, and/or that Defendant Schultz worked with a close-knit group of co-conspirators, cohorts and agents, whose names are not yet known to Plaintiffs, who acted pursuant to an agreement with or in concert with Defendant Schultz.”²⁹ After review of the First Amended Complaint, this Court should

²³ See FAC at p. 5, ¶ 23.

²⁴ See FAC at pp. 5-6, ¶ 24.

²⁵ See FAC at pp. 6-7, ¶ 27.

²⁶ See FAC at p. 7, ¶ 28.

²⁷ See FAC at pp. 8-13, ¶ 34. See also, **Exhibit 14**.

²⁸ See FAC at p. 15, ¶ 44.

²⁹ See FAC at p. 17, ¶ 45.

determine that the Complaint is much more detailed than it needs to be to comply with Nevada law as far as providing adequate notice to Defendant Schultz of the claims being made against her. Furthermore, Plaintiffs have already disclosed to Defendant Schultz a significant majority, if not all, of the actual defamatory statements which they attribute to her. See, Plaintiff's Initial NRCP 16.1 Disclosures, attached hereto as **Exhibit 16**.

Accordingly, the Complaint provides sufficient information to provide Schultz with fair notice of the nature and basis of the claims made against her, and for Schultz to respond as to whether she posted defamatory statements of the like and kind as demonstrated in the exemplar set of statements in paragraph 34 of the Complaint which concern the Plaintiffs to the website ripoffreport.com. Therefore, this Court should deny Schultz's alternative request for a more definite statement.

IV.

CONCLUSION

Wherefore, Defendant's Motion should be denied in its entirety.

DATED this 2nd day of October, 2013.

SOLOMON DWIGGINS & FREER, LTD.

By: 

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EXHIBIT 1

Skip to Main Content Logout My Account My Cases Search Menu New Family Record Search Refine Search Back

Location : Family Courts Images Help

REGISTER OF ACTIONSCASE No. 05G028163

In the Matter of the Guardianship of: Guadalupe Olvera, Adult Ward(s)

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3Case Type: **Guardianship of Adult**Subtype: **Person Only - Adult**Date Filed: **07/15/2005**Location: **Department E**Conversion Case Number: **G028163****PARTY INFORMATION**

Guardian	Olvera, Carmela F 2050 Mountain City St Henderson, NV 89052	DOD: 11/02/2009	Lead Attorneys Pro Se
Guardian of Person and Estate	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Objector	Chaddock, William		Michael J. Brock <i>Retained</i> 7029907272(W)
Petitioner	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Ward	Olvera, Guadalupe M P.O. Box 623 Caitola, CA 95010		Carmine James Colucci <i>Retained</i> 7023841274(W)

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS	
07/15/2005	Petition PETITION FOR APPOINTMENT OF GUARDIAN Fee \$0.00 SCH/PER Date: Blackstone OC:
07/15/2005	Petition CITATION TO APPEAR AND SHOW CAUSE SCH/PER Date: 08/10/2005 Blackstone OC: GR
07/15/2005	Waiver WAIVER OF NOTICE SCH/PER Date: 07/14/2005 Blackstone OC:
07/15/2005	Confidential Information Sheet - Guardianship CONFIDENTIAL INFORMATION SHEET FOR GUARDIAN SCH/PER Date: Blackstone OC:
07/15/2005	Confidential Information Sheet - Guardianship CONFIDENTIAL INFORMATION SHEET FOR WARD SCH/PER Date: Blackstone OC:
08/03/2005	Receipt of Copy RECEIPTS FOR CERTIFIED MAIL SCH/PER Date: 07/03/2005 Blackstone OC:
08/03/2005	Affidavit AFFIDAVIT OF MAILING SCH/PER Date: 07/19/2005 Blackstone OC: TP
08/10/2005	Citation (9:00 AM) (Judicial Officer Norheim, Jon) CITATION TO APPEAR AND SHOW CAUSE <u>Parties Present</u> <u>Minutes</u> Result: Granted
08/17/2005	Letters of Guardianship GENERAL LETTERS GUARDIANSHIP SCH/PER Date: 08/10/2005 Blackstone OC:
08/17/2005	Order ORDER APPOINTING GUARDIAN SCH/PER Date: Blackstone OC:
08/19/2005	Notice NOTICE OF ENTRY OF ORDER SCH/PER Date: 08/19/2005 Blackstone OC:
08/19/2005	Document Archive
12/30/2008	Administrative Reassignment Reassigned from Department H to Department B
05/08/2009	Administrative Reassignment Reassigned from Department B to Department E
11/17/2009	Notice of Hearing Petition for Appointment of Successor Temporary and Successor General Guardian
11/17/2009	Order Appointing Guardian of Person and / or Estate Temporary Guardian and Order Setting Hearing for Extension of
11/17/2009	Petition for Appointment OF SUCCESSOR TEMPORARY AND SUCCESSOR GENERAL GUARDIAN
11/17/2009	Letters of Guardianship - Temporary
11/18/2009	Notice of Entry of Order Appointing Temp. Guardian and Order Setting Hearing
11/20/2009	Affidavit of Mailing
11/24/2009	Notice of Hearing
11/25/2009	Hearing to Extend Temporary Guardianship (9:00 AM) (Judicial Officer Jensen, John T.)

Parties Present
Minutes
 Result: Granted
 12/02/2009 **Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
Petition for Appointment of Successor Temporary and Successor General Guardian
Minutes
 Result: Approved and Granted
 12/02/2009 **Order Appointing Guardian of Person and / or Estate**
SUCCESSOR GENERAL GUARDIAN
 12/03/2009 **Notice of Entry of Order**
 12/03/2009 **Filing**
OF UNITED STATES POSTAL SERVICE DOMESTIC RETURN RECEIPT
 12/04/2009 **Order**
EXTENDING TEMPORARY GUARDIANSHIP
 12/22/2009 **Letters of Guardianship**
GENERAL
 03/22/2010 **Petition**
Order Removing Jared Shafer as Successor General Guardian and Appointing Successor General Co-Guardians and for Revocation of Letters of General Guardianship to Jared Shafer and Issuance of Letters of General Co-Guardianship of Adult Ward
 03/22/2010 **Notice of Hearing**
 03/23/2010 **Affidavit**
Regarding Nomination and Appointment of Co-Guardian
 03/26/2010 **Response**
Petition for Order Removing Jared E. Shafer as Successor General Guardian and Appointing Successor General Co-Guardians and for Revocation of Letters of General Guardianship to Jared Shafer and Issuance of Letters of General Co-Guardianship of Adult Ward
 04/06/2010 **Citation to Appear and Show Cause**
 04/07/2010 **Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
 04/07/2010, 04/28/2010
Notice of Hearing on Petition for Order Removing Jared Shafer as Successor General Guardian and Appointing Successor Co-Guardians and for Revocation of Letters of General Guardianship to Jared Shafer and Issuance of General Co-Guardianship of Adult Ward
Minutes
 Result: Matter Continued
 04/07/2010 **Affidavit of Mailing**
 04/23/2010 **Reply**
in Support of Petition for Order Removing Jared Shafer as Successor General Guardian and Appointing Successor General Co-Guardians and for Revocation of Letters of General Guardianship to Jared Shafer and Issuance of Letters of General Co-Guardianship of Adult Ward
 04/27/2010 **Errata**
Errata to Reply in Support of Petition for Order Removing Jared Shafer as Successor General Guardian and Appointing Successor General Co-Guardians and for Revocation of Letters of General Guardianship to Jared Shafer and Issuance of Letters of General Co-Guardianship of Adult Ward
 04/28/2010 **Citation** (9:00 AM) (Judicial Officer Norheim, Jon)
Citation to Appear and Show Cause
Parties Present
Minutes
 Result: Hearing Set
 04/28/2010 **All Pending Motions** (9:00 AM) (Judicial Officer Norheim, Jon)
Parties Present
Minutes
 Result: Matter Heard
 05/19/2010 **Return Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
GAL REPORT
Parties Present
Minutes
 Result: Matter Heard
 05/21/2010 **Petition**
for Payment of Attorney's Fees and Costs and Petition for Payment of Guardians's Fees
 05/21/2010 **Notice of Hearing**
of Petition for Payment of Attorney's Fees and Costs and Petition for Payment of Guardian's Fees
 05/25/2010 **Affidavit of Mailing**
 06/02/2010 **Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
Petition for Payment of Attorney's Fees and Costs and Petition for Payment of Guardians's Fees
Minutes
 Result: Approved and Granted
 06/02/2010 **Order**
Order Authorizing Payment of Atty's Fees and Costs and Order Authorizing Payment of Guardian's Fees
 06/03/2010 **Notice of Entry of Order**
 06/09/2010 **Objection**
Guardianship Commissioner's Report and Recommendation
 06/16/2010 **Transcript of Proceedings**
Re: Citation, Wednesday, April 28, 2010
 06/16/2010 **Transcript of Proceedings**
Re: Return Hearing, Wednesday, May 19, 2010
 06/16/2010 **Final Billing of Transcript**
April 28, 2010 and May 19, 2010
 07/02/2010 **Supplemental**
Supplemental Points and Authorities to Objection to Guardianship Commissioner's Report and Recommendation
 07/09/2010 **Errata**
Errata to Objection to Guardianship Commissioner's Report and Recommendation
 07/09/2010 **Affidavit**
Affidavit Regarding Jared Shafer's Prevention of Guadalupe Mena Olvera From Attending Hearing
 07/09/2010 **Response**

07/13/2010 Response to Objection to Guardianship Commissioner's Report and Recommendation and Objection to Supplemental Points and Authorities to Objection to Guardianship Commissioner's Report and Recommendation
Objection (10:30 AM) (Judicial Officer Hoskin, Charles J.)
Rebecca Schultz's Objection to Guardianship Commissioner's Report and Recommendation
Parties Present
Minutes
 Result: Hearing Set
 07/19/2010 Substitution of Attorney
Substitution of Attorney
 07/19/2010 Report and Recommendations
 07/22/2010 Notice of Entry of Order
Notice of Entry of Order
 07/23/2010 Notice
Substitution of Attorney
 08/13/2010 Document Filed
Report of Malfeasance and Lack of Qualifications
 08/13/2010 Order
Co-Petitioner Ruth Carney's Joinder to Report of Malfeasance and Lack of
 08/16/2010 Errata
Errata to Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin
 08/17/2010 **Telephonic Hearing** (3:00 PM) (Judicial Officer Norheim, Jon)
Parties Present
Minutes
 Result: Hearing Continued
 08/18/2010 **Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
Remand
Minutes
 Result: Hearing Set
 08/25/2010 Opposition
Opposition to Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin and Co-Petitioner Ruth Carney's Joinder Thereto
 09/03/2010 Reply to Opposition
Co-Petitioner Ruth Carney's Reply To Opposition To Report Of Malfeasance And Lack Of Qualifications Pursuant To Order Of Remand By Judge Hoskin And Joinder Thereto
 09/08/2010 **Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
Alan Freer's Motion to Continue
Parties Present
Minutes
 Result: Hearing Set
 09/13/2010 Affidavit
Affidavit
 09/16/2010 **Minute Order** (10:30 AM) (Judicial Officer Norheim, Jon)
Parties Present
Minutes
 Result: Decision Made
 09/22/2010 **CANCELED Return Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
Vacated
counsel will re-set hearing with an Order.
 09/23/2010 Order
Order Directing and Compelling Return of Ward and Setting Status Check Hearing
 09/23/2010 Ex Parte Application
for Order Directing and Compelling Return of Ward and Setting Status Check Hearing
 09/28/2010 Notice of Entry of Order
Notice of Entry of Order Directing and Compelling Return of Ward and Setting Status Check Hearing
 09/29/2010 **Status Check** (9:00 AM) (Judicial Officer Norheim, Jon)
Parties Present
Minutes
 Result: Hearing Set
 10/04/2010 Order
Order Directing Guardian to Turnover Property
 10/04/2010 Notice of Entry of Order
Notice of Entry of Order
 10/06/2010 Citation to Appear and Show Cause
Citation to Appear at Hearing on November 3, 2010, and Show Cause Why Petitioner's Should Not Be Held in Contempt
 10/07/2010 Order to Show Cause
Order to Show Cause Why Rebecca Schultz and Ruth Carney Should not be Held in Contempt
 10/12/2010 Notice of Entry
Notice of Entry of Order to Show Cause Why Rebecca Schultz and Ruth Carney Should Not be Held in Contempt
 11/01/2010 Report and Recommendations
Guardianship Commissioner's Report and Recommendation Regarding Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin and Joinder Thereto
 11/02/2010 Declaration
Declaration of Rebecca Schultz
 11/02/2010 Statement
Rebecca Schultz's Preliminary Statement Regarding the November 3, 2010 Hearing Before Commissioner Norheim
 11/02/2010 Response
Co-Petitioner Ruth Carney's Response to Order to Show Cause Why Rebecca Schultz and Ruth Carney Should Not Be Held In Contempt
 11/03/2010 **Citation** (9:00 AM) (Judicial Officer Norheim, Jon)
Citation to Appear at Hearing on November 3, 2010, and Show Cause Why Petitioner's Should Not Be Held In Contempt
Minutes
 Result: Decision Made

11/03/2010 **Order to Show Cause** (9:00 AM) (Judicial Officers Norheim, Jon, Norheim, Jon)
on *Rebecca Shultz & Ruth Carney*
Minutes
Result: Decision Made

11/03/2010 **All Pending Motions** (9:00 AM) (Judicial Officer Norheim, Jon)
Parties Present
Minutes
Result: Decision Made

11/08/2010 Errata
Notice of Errata

11/15/2010 Objection
Co-Petitioner Ruth Carney's Objection to Guardianship Commissioner's Report and Recommendation Regarding Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand By Judge Hoskin and Joinder Thereto

11/17/2010 Joinder
Co-Petitioner Becky Schultz's Joinder to Ruth Carney's Objection to Guardianship Commissioner's Report and Recommendation Regarding Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand By Judge Hoskin and Joinder Thereto

11/18/2010 Report and Recommendations
Guardianship Commissioner's Report and Recommendation Regarding the Order to Show Cause Why Rebecca Schultz Should Not Be Held in Contempt

11/19/2010 Objection
Co-Petitioner Ruth Carney's Objection to Guardianship Commissioner's Report and Recommendation Regarding Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin

11/30/2010 Notice of Hearing
Notice of Hearing

12/06/2010 Certificate of Service
U.S. Mail

12/08/2010 Objection
Objection to Guardianship Commissioner's Report and Recommendation Regarding the Order to Show Cause Why Rebecca Schultz Should Not Be Held in Contempt.

12/09/2010 Notice of Hearing
Notice of Hearing on Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian

12/13/2010 Petition
Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian

12/13/2010 Petition
Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian

12/15/2010 **Hearing** (10:00 AM) (Judicial Officers Jensen, John T., Jensen, John T.)
12/15/2010, 01/11/2011
Ruth Carney's Hearing On Objection To Guardianship Commissioner's Report And Recommendation Re: Report Of Malfeasance & Lack Of Qualifications Pursuant To Order Of Remand By Judge Hoskin
Minutes
01/11/2011 Reset by Court to 01/11/2011
02/01/2011 Reset by Court to 01/11/2011
Result: Matter Continued

12/17/2010 Ex Parte
Ex Parte Application for Authority to Retain Counsel

12/20/2010 Supplement
Supplement to Ex Parte Application for Authority to Retain Counsel

12/21/2010 Response
Response to Rebecca Schultz's Objection to Guardianship Commissioner's Report and Recommendation Regarding the Order To Show Cause Why Rebecca Schultz Should Not be Held in Contempt

12/21/2010 Response
Response to Co-Petitioner Ruth Carney's Objection to Guardianship Commissioners' Report and Recommendation Regarding Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin and Joinder thereto and Response to Co-Petitioner Beck Schultz's Joinder Thereto

12/23/2010 Objection
Objection to Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian

01/06/2011 Order
Order Authorizing the Guardian of the Person and Estate to Retain California Counsel

01/06/2011 Response
Response to Objection to Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian

01/07/2011 Reply
Reply to Response to Objection to Guardianship Commissioner's Report and Recommendation Regarding the Order to Show Cause why Rebecca Schultz Should not be Held in Contempt

01/10/2011 Reply
Surreply to Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian and Counter-Petition for Declaratory Relief

01/11/2011 **Objection** (10:30 AM) (Judicial Officer Hoskin, Charles J.)
Rebecca Schultz's Objection To Guardianship Commissioner's Report & Recommendation Regarding The Order To Show Cause Why Rebecca Schultz Should Not Be Held In Contempt
Result: Denied

01/11/2011 **All Pending Motions** (10:30 AM) (Judicial Officer Hoskin, Charles J.)
Parties Present
Minutes
Result: Matter Heard

01/12/2011 **Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
Hearing On Petition For Termination Of Guardianship, Final Account And Discharge Of Guardian
Parties Present
Minutes
Result: Denied

01/21/2011	<u>Order</u> Order Affirming and Adopting Report and Recommendation Regarding Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hosking and Joinder Thereto 1/11/11
01/21/2011	<u>Order</u> Order Denying Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian 1/12/11
01/21/2011	<u>Order</u> Order Affirming and Adopting Report and Recommendation Regarding the Order to Show Cause why Rebecca Schultz Should Not Be Held in Contempt
01/21/2011	<u>Bench Warrant</u> Bench Warrant
01/24/2011	<u>Notice of Entry</u> Notice of Entry of Order Denying Petition for Termination of Guardianship of the Person and Estate of Guadalupe Mena Olvera, Final Account and Discharge of Guardian
01/24/2011	<u>Notice of Entry</u> Notice of Entry Of Order Affirming and Adopting Report and Recommendation Regarding the Order to Show Cause Why Rebecca Schultz Should Not Be Held in Contempt
01/25/2011	<u>Notice of Entry of Order</u> Notice of Entry Of Order Affirming And Adopting Report and Recommendation Regarding Report Of Malfeasance and Lack of Qualifications Pursuant to Order Of Remand By Judge Hoskin And Joinder Thereto
01/31/2011	<u>Ex Parte</u> Ex Parte Application for Authority to Retain Counsel
02/07/2011	<u>Order</u> Order Authorizing the Guardian of the Person and Estate to Retain California Counsel
02/22/2011	<u>Notice of Appearance</u>
02/22/2011	<u>Notice of Entry</u> Notice of Entry of Appearance
02/28/2011	<u>Certificate of Mailing</u> Certificate of Mailing
03/08/2011	<u>Citation</u> Citation to Appear and Show Cause
03/08/2011	<u>Notice of Hearing</u> Notice of Hearing on Petition for Termination of Guardianship
03/14/2011	<u>Order Confirming</u> Order Confirming Counsel
03/14/2011	<u>Substitution of Attorney</u> Substitution of Counsel
03/25/2011	<u>Acceptance of Service</u> of Citation
03/29/2011	<u>Opposition</u> Opposition to Petition to Terminate Guardianship and Counter Petition for Order Directing The Ward to Return to Nevada
03/30/2011	<u>Citation</u> (9:00 AM) (Judicial Officer Norheim, Jon) Citation to Appear and Show Cause <u>Minutes</u> Result: Deferred Ruling
03/30/2011	<u>Hearing to Terminate Guardianship</u> (9:00 AM) (Judicial Officer Norheim, Jon) Hearing on Petition for Termination of Guardianship <u>Minutes</u> Result: Deferred Ruling
03/30/2011	<u>All Pending Motions</u> (9:00 AM) (Judicial Officer Norheim, Jon) <u>Parties Present</u> <u>Minutes</u> Result: Deferred Ruling
04/01/2011	<u>Notice of Entry</u> Notice of Entry of Order Authorizing the Guardian of the Person and Estate to Retain California Counsel
06/24/2011	<u>Order Shortening Time</u> Motion and Order Shortening Time for Hearing on Motion to Withdraw as Counsel for Guadalupe Mena Olvera
07/01/2011	<u>Notice</u> Notice of Non-Opposition to Motion and Order Shortening Time For Hearing on Motion to Withdraw as Counsel For Guadalupe Mena Olvera
07/06/2011	<u>Motion for Withdrawal</u> (9:00 AM) (Judicial Officer Norheim, Jon) Lawrence J. Semenza's Motion To Withdraw As Counsel <u>Minutes</u> Result: Granted
07/07/2011	<u>Order</u> Order Granting Motion to Withdraw as Counsel for Guadalupe Mena Olvera 7/7/11
07/07/2011	<u>Notice of Entry of Order</u> Notice of Entry of Order
07/15/2011	<u>Petition</u> Petition for Ratification of Guardian Expenses and Petition for Ratification and Payment of Attorneys fees and Costs
07/22/2011	<u>Notice</u> Notice of Hearing of Petition for Ratification of Guardian Expenses and Petition for Ratification of Attorneys Fees and Costs
08/02/2011	<u>Ex Parte Application</u> Ex Parte Application for Appointment of Counsel to Represent the Ward
08/02/2011	<u>Notice of Appearance</u> Notice of General Appearance
08/03/2011	<u>Hearing</u> (9:00 AM) (Judicial Officer Norheim, Jon) Hearing On Petition For Ratification Of Guardian Expenses And Petition For Ratification Of Attorney's Fees And Costs <u>Parties Present</u> <u>Minutes</u> Result: Hearing Set
08/09/2011	<u>Opposition</u> Opposition to and Application for Stay of Proceeding on Guardian's Petition for Ratification of Guardian Expenses and Petition for Ratification of Attorney's Fees and Costs

08/25/2011 Document Filed
Creditor's Claim - Legal Fees and Costs

09/07/2011 Return Hearing (9:00 AM) (Judicial Officer Norheim, Jon)
09/07/2011, 10/05/2011, 10/20/2011
Possible opposition to Fee Request by Mr. Colucci
Parties Present
Minutes
Result: Matter Continued

09/07/2011 Stipulation and Order

10/14/2011 Supplement
Supplement to Opposition to and Application for Stay of Proceeding on Guardian's Petition for Ratification of Guardian Expenses and Petition for Ratification of Attorney's Fees and Costs

10/14/2011 Application
Application for Ratification and Payment of Attorney's Fees

10/19/2011 Supplemental
Supplemental Certificate of Service for Response to Supplement to Opposition to and Application for Stay of Proceeding on Guardian's Petition for Ratification of Guardian Expenses and Petition for Ratification and Payment of Attorney Fees and Costs

10/19/2011 Stipulation and Order
Stipulation and Order

10/19/2011 Response
Response to Supplement to Opposition to and Application for Stay of Proceeding on Guardian's Petition for Ratification of Guardian Expenses and Petition for Ratification and Payment of Attorneys Fees and Costs

10/20/2011 Hearing (1:30 PM) (Judicial Officer Norheim, Jon)
Carmine J. Colucci's Application For Ratification And Payment Of Attorney's Fees
Minutes
Result: Granted

10/20/2011 All Pending Motions (1:30 PM) (Judicial Officer Norheim, Jon)
Parties Present
Minutes
Result: Matter Heard

11/04/2011 Order
Order Authorizing Payment of Fees to Counsel for Ward

11/07/2011 Notice of Entry
Notice of Entry of Order

11/15/2011 Final Billing of Transcript
September 8, 2010

11/15/2011 Transcript of Proceedings
Re: Hearing Wednesday, September 8, 2010

11/23/2011 Certificate of Mailing
Certificate of Mailing of Notice of Hearing and Petition for Approval and Payment of Attorneys Fees and Costs

11/23/2011 Report and Recommendations
Guardianship Commissioner's Report and Recommendation Regarding Petition for Ratification of Guardian Expenses and Petition for Ratification and Payment of Attorney Fees and Costs

11/23/2011 Petition for Approval
Petition for Approval and Payment of Attorneys Fees and Costs

11/28/2011 Notice of Hearing
on Petition for Approval and Payment of Attorneys Fees and Costs

11/30/2011 Certificate of Mailing
Amended Certificate of Mailing of Notice of Hearing and Petition for Approval and Payment of Attorneys Fees and Costs

12/14/2011 Hearing (9:00 AM) (Judicial Officer Norheim, Jon)
Petition For Approval And Payment Of Attorneys Fees And Costs
Minutes
Result: Granted

12/14/2011 Order Granting
Order Granting Petition for Payment and Approval of Attorneys Fees and Costs

12/16/2011 Notice of Entry of Order
Notice of Entry of Order

12/22/2011 Order
Order Affirming and Adopting Report and Recommendation REgarding Petition for Ratification of Guardian Expenses and Petition for Ratification and Payment of Attorneys Fees and Costs 10/20/11

12/23/2011 Petition
Petition for Payment of Attorney's Fees and Costs

12/30/2011 Notice of Hearing
Notice of Hearing on Petition for Payment of Attorney's Fees and Costs

01/04/2012 Notice of Entry of Order
Affirming and Adopting Report and Recommendation Regarding Petition for

01/04/2012 Notice
Notice of Non-Opposition to Petition for Payment of Attorney's Fees and Costs

01/11/2012 Hearing (10:00 AM) (Judicial Officer Norheim, Jon)
Hearing On Petition For Payment Of Attorney's Fees & Costs
Minutes
Result: Granted

01/17/2012 Notice of Withdrawal
Ruth Carney's Notice of Withdrawal as Co-Petitioner to Terminate Guardianship

01/17/2012 Order
Order Approving Petition for Payment of Attorney's Fees and Costs

01/17/2012 Notice of Entry of Order
Notice of Entry of Order

03/12/2012 Petition
Petition for Payment of Attorney's Fees

03/19/2012 Notice of Hearing
Notice of Hearing on Petition for Payment of Attorney's Fees

03/21/2012 Certificate of Service

04/06/2012 Facsimile
Opposition
Opposition to Petition for Payment of Attorney's Fees

04/09/2012 Receipt of Copy
Receipt of Copy of Opposition to Petition for Payment of Attorney's Fees

04/11/2012 Hearing (9:00 AM) (Judicial Officer Norheim, Jon)
Hearing On Petition For Payment Of Attorney's Fees
Parties Present
Minutes
Result: Approved and Granted

04/16/2012 Order Approving
Order Approving Petition for Payemtn of Attorney's Fees and Costs

10/09/2012 First and Final Account/Report
First and Final Account of Guardian, Report of Guardian and Petition for Distribution, Fees and Discharge

10/09/2012 Notice of Hearing
Notice of Hearing on First and Final Account of Guardian, Report of Guardian and Petition for Distribution, Fees and Discharge

10/11/2012 Application
Application for Ratification and Payment of Attorney's Fees

10/11/2012 Notice of Hearing
Notice of Hearing on Application for Ratification and Payment of Attorney's Fees

10/24/2012 Hearing (9:00 AM) (Judicial Officer Norheim, Jon)
10/24/2012, 11/21/2012, 12/26/2012, 01/30/2013
First and Final Account of Guardian, Report of Guardian and Petition for Distribution, Fees and Discharge
Parties Present
Minutes
Result: Matter Continued

10/24/2012 Hearing (9:00 AM) (Judicial Officer Norheim, Jon)
10/24/2012, 11/21/2012
Hearing On Application For Ratification & Payment Of Attorney's Fees
Minutes
Result: Matter Continued

10/24/2012 **All Pending Motions (9:00 AM)** (Judicial Officer Norheim, Jon)
Minutes
Result: Matter Continued

11/16/2012 Errata
Errata to Petition for First and Final Account of Guardian Report of Guardian and Petition for Distribution, Fees and Discharge

11/21/2012 **All Pending Motions (9:00 AM)** (Judicial Officer Norheim, Jon; Magistrate Norheim, Jon)
Parties Present
Minutes
Result: Matter Heard

11/28/2012 Order
Order Approving Application for Ratification and Payment of Attorney's Fees

12/05/2012 Order Approving
Order Approving Petition for Fees and Setting Hearing

12/05/2012 Notice of Entry of Order
Notice of Entry of Order Approving Petition for Fees and Setting Hearing

12/21/2012 Objection
Objection to Final Accounting, Request for Order to Produce Documents and to Reset Hearing Date for Approval of Final Accounting

01/29/2013 Errata
Errata to Petition for First and Final Account of Guardian Report of Guardian and Petition for Distribution, Fees and Discharge for Solomon Dwiggin & Freer, Ltd.

02/01/2013 Application
Application for Ratification and Payment of Attorney's Fees

02/01/2013 Notice of Hearing
Notice of Hearing on Application for Ratification and Payment of Attorney's Fees

02/06/2013 Objection
Objection to Errata to Petition for First and Final Account of Guardian Report of Guardian and Petition for Distribution, Fees and Discharge for Solomon Dwiggin & Freer, Ltd.

02/14/2013 **Hearing - HM (1:30 PM)** (Magistrate Norheim, Jon)
Notice of Hearing on Application for Ratification and Payment of Attorney's Fees
Minutes
Result: Approved and Granted

02/14/2013 Order Approving
Order Approving Petition for Fees and Setting Hearing

02/15/2013 Reply
Reply to Objection to Errata to Petition for First and Final Account of Guardian Report of Guardian and Petition for Distribution, Fees and Discharge for Solomon Dwiggin & Freer, Ltd.

02/21/2013 Notice of Entry of Order
Notice of Entry of Order Approving Petition for Fees and Setting Hearing

02/21/2013 Certificate of Mailing
Certificate of Mailing

02/27/2013 Order Approving
Order Approving Application for Ratification and Payment of Attorney's Fees

03/01/2013 Receipt
Receipt for Payment for Attorneys Fees and Costs

03/15/2013 Notice of Hearing
Notice of Hearing on Errata to Petition for First and Final Account of Guardian Report of Guardian and Petition for Distribution, Fees and Discharge of Solomon Dwiggin & Freer, Ltd.

04/03/2013 **Hearing - HM (9:00 AM)** (Magistrate Norheim, Jon)
Hearing On Errata To Petition For First And Final Account Of Guardian Report Of Guardian And Petition For Distribution, Fees And Discharge For Solomon Dwiggin & Freer, Ltd
Parties Present

	<u>Minutes</u>	
	Result: Granted in Part	
04/11/2013	<u>Petition</u>	
	<i>Petition to Continue Guardianship</i>	
04/19/2013	<u>Objection</u>	
	<i>Objection to Petition to Continue Guardianship</i>	
04/26/2013	<u>Stipulation and Order</u>	
	<i>Stipulation and Order to Terminate Guardianship</i>	
04/26/2013	<u>Notice of Entry of Stipulation and Order</u>	
	<i>Notice of Entry of Stipulation and Order</i>	
05/01/2013	<u>Receipt of Copy</u>	
	<i>Receipt of Copy of Check (Jared Shafer)</i>	
05/01/2013	<u>Receipt of Copy</u>	
	<i>Receipt of Copy of check (Solomon Dwiggins & Freer)</i>	
05/02/2013	<u>Notice of Entry of Stipulation and Order</u>	
	<i>Notice of Entry of Stipulation and Order</i>	
05/10/2013	<u>Request</u>	
	<i>Request to Withdraw Petition to Continue Guardianship</i>	
05/13/2013	<u>Receipt</u>	
	<i>Receipt of Documents</i>	
06/19/2013	<u>Receipt</u>	
	<i>Receipt of Documents</i>	

FINANCIAL INFORMATION

	Attorney Freer, Alan D.		
	Total Financial Assessment		157.00
	Total Payments and Credits		157.00
	Balance Due as of 10/02/2013		0.00
01/14/2011	Transaction Assessment		57.00
01/14/2011	Payment (Window)	Receipt # 2011-01788-FAM	(57.00)
01/25/2011	Transaction Assessment		100.00
01/25/2011	Payment (Window)	Receipt # 2011-03096-FAM	(100.00)
	Attorney Tyrell, Elyse, ESQ		
	Total Financial Assessment		15.00
	Total Payments and Credits		15.00
	Balance Due as of 10/02/2013		0.00
12/22/2009	Transaction Assessment		15.00
12/22/2009	Payment (Window)	Receipt # 2009-77620-FAM	(15.00)
	Guardian of Person and Estate Shafer, Jared E		
	Total Financial Assessment		752.00
	Total Payments and Credits		752.00
	Balance Due as of 10/02/2013		0.00
11/17/2009	Transaction Assessment		223.00
11/17/2009	Payment (Window)	Receipt # 2009-69432-FAM	(223.00)
11/17/2009	Transaction Assessment		6.00
11/17/2009	Payment (Window)	Receipt # 2009-69454-FAM	(6.00)
12/01/2009	Transaction Assessment		20.00
12/01/2009	Payment (Window)	Receipt # 2009-72516-FAM	(20.00)
04/01/2010	Transaction Assessment		223.00
04/01/2010	Wiznet	Receipt # 2010-19902-FAM	(223.00)
06/10/2010	Transaction Assessment		14.00
06/10/2010	Payment (Window)	Receipt # 2010-31745-FAM	(14.00)
01/05/2011	Transaction Assessment		74.00
01/05/2011	Payment (Window)	Receipt # 2011-00381-FAM	(74.00)
01/07/2011	Transaction Assessment		3.00
01/07/2011	Payment (Window)	Receipt # 2011-00893-FAM	(3.00)
01/21/2011	Transaction Assessment		18.00
01/21/2011	Payment (Window)	Receipt # 2011-02735-FAM	(18.00)
01/25/2011	Transaction Assessment		9.00
01/25/2011	Payment (Window)	Receipt # 2011-03178-FAM	(9.00)
01/25/2011	Transaction Assessment		58.00
01/25/2011	Payment (Window)	Receipt # 2011-03188-FAM	(58.00)
02/07/2011	Transaction Assessment		3.00
02/07/2011	Payment (Window)	Receipt # 2011-05040-FAM	(3.00)
10/10/2011	Transaction Assessment		5.00
10/10/2011	Payment (Window)	Receipt # 2011-39887-FAM	(5.00)
12/15/2011	Transaction Assessment		3.00
12/15/2011	Payment (Window)	Receipt # 2011-48272-FAM	(3.00)
05/03/2013	Transaction Assessment		3.00
05/03/2013	Payment (Window)	Receipt # 2013-11939-FAM	(3.00)
10/02/2013	Transaction Assessment		90.00
10/02/2013	Payment (Window)	Receipt # 2013-27083-FAM	(90.00)

	Objector Chaddock, William			
	Total Financial Assessment			223.00
	Total Payments and Credits			223.00
	Balance Due as of 10/02/2013			0.00
02/07/2013	Transaction Assessment			223.00
02/07/2013	Wiznet	Receipt # 2013-16325-CCCLK	Chaddock, William	(223.00)
	Other Schultz, Rebecca			
	Total Financial Assessment			223.00
	Total Payments and Credits			223.00
	Balance Due as of 10/02/2013			0.00
12/13/2010	Transaction Assessment			223.00
12/13/2010	Wiznet	Receipt # 2010-69508-CCCLK	Schultz, Rebecca	(223.00)
	Ward Olvera, Guadalupe M			
	Total Financial Assessment			30.00
	Total Payments and Credits			30.00
	Balance Due as of 10/02/2013			0.00
02/04/2010	Transaction Assessment			10.00
02/04/2010	Payment (Window)	Receipt # 2010-07993-FAM	John H Root	(10.00)
05/03/2010	Transaction Assessment			20.00
05/03/2010	Payment (Mail)	Receipt # 2010-25637-FAM	John H Root	(20.00)

EXHIBIT 2


CLERK OF THE COURT

1 PETN
Mark J. Connot (10010)
2 Stephen J. Mayfield (10138)
HUTCHISON & STEFFEN, LLC
3 Peccole Professional Park
10080 West Alta Drive, Suite 200
4 Las Vegas, NV 89145
(702) 385-2500
5 (702) 385-2086
smayfield@Hutchlegal.com

6 *Attorneys for Petitioners*

7
8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 In the Matter of the Person and Estate of
11 GUADALUPE MENA OLVERA
12 Adult Ward.
13
14

Case No.: G28163
Dept. No.: E

15 **PETITION FOR ORDER REMOVING JARED SHAFER AS SUCCESSOR**
16 **GENERAL GUARDIAN AND APPOINTING SUCCESSOR GENERAL CO-**
17 **GUARDIANS AND FOR REVOCATION OF LETTERS OF GENERAL**
GUARDIANSHIP TO JARED SHAFER AND ISSUANCE OF LETTERS OF
GENERAL CO-GUARDIANSHIP OF ADULT WARD

18 Rebecca Schultz and Ruth Carney, by and through their attorneys at Hutchison &
19 Steffen, LLC, Petitions this Honorable Court for an Order removing Jared Shafer as
20 Successor General Guardian and for Revocation of Letters of General Guardianship issued
21 to Jared Shafer, and Issuance of Letters of General Co-Guardianship of Adult Ward
22 GUADALUPE MENA OLVERA and respectfully represents the following to this Honorable
23 Court:

24 1. Petitioner, Rebecca Schultz, is the daughter of the Ward, whose address is
25 P.O. Box 217 Aptos (Santa Cruz County), California 95001, and Petitioner, Ruth Carney,
26 whose address is 1443 Hwy 395 South, Gardnerville, Nevada 89410, and who is nominated
27 by Rebecca Schultz to serve as a co-guardian, as the qualified Nevada resident.
28

HUTCHISON & STEFFEN

A PROFESSIONAL LLC

PECCOLE PROFESSIONAL PARK
10080 WEST ALTA DRIVE, SUITE 200
LAS VEGAS, NV 89145

1 2. Petitioners have not been judicially determined to have committed abuse,
2 neglect or exploitation of a child, spouse, parent or other person and Petitioners have never
3 been convicted of a felony.

4 3. Petitioners have not been suspended for misconduct or disbarred from the
5 practice of law, the practice of accounting or any other profession, which involves the
6 management or sale of money, investments, securities or real property and requires licensure
7 in Nevada or any other state.

8 4. Rebecca Schultz seeks to become the co-guardian for her father to simplify
9 the guardianship established for the Ward, to personally provide for his long term and full
10 time care, and to prevent unnecessary expense to the estate of the Ward.

11 5. On December 2, 2009, this Court entered an Order appointing Jared Shafer
12 as the successor general guardian of the Ward. Mr. Shafer has been acting as the Ward's
13 guardian of his person and estate since that time.

14 6. Mr. Shafer was originally appointed as temporary guardian in order to protect
15 the Ward from Cathy Elliot-Richardson, who just prior to the appointment of Mr. Shafer, had
16 been exploiting the Ward.

17 7. Prior to her death on November 3, 2009, the Ward's spouse, Carmela Olvera,
18 was serving as the Ward's guardian.

19 8. Upon learning of her mother's death on November 3, 2009, Rebecca Schultz
20 came to Las Vegas from California (from where her parents had relocated) as soon as she
21 could, but she was unable to find her father for several days. The Ward was ultimately found
22 with Cathy Elliot-Richardson. Recognizing the need to establish a guardianship for the
23 protection and care of her father Rebecca Schultz inquired of and sought the assistance of
24 the Guardianship office. At that time she was referred to discuss the matter with Mr. Shafer.

25 ★ 9. Rebecca Schultz was not advised to seek her own counsel with regard to this
26 matter. After meeting with Elyse Tyrell for the purpose of seeking a guardianship for her
27 father, she was under the impression that Ms. Tyrell was her attorney. However, it was not
28 until later, during the guardianship application process, that she understood that Ms. Tyrell

1 represented the guardianship estate and Mr. Shafer as the appointed guardian.

2 10. At the time Mr. Shafer was appointed as the successor guardian Rebecca
3 Schultz misunderstood that she could have been appointed as co-guardian with Mr. Shafer
4 (or another Nevada Resident).

5 11. Despite the Court appointing Mr. Shafer as the successor guardian for the
6 Ward, it was Rebecca Schultz's intention from the beginning to become her father's
7 guardian. Had she fully understood the process and her ability to serve as a co-guardian with
8 a Nevada resident she would not have approved Mr. Shafer acting as sole guardian.

9 12. Rebecca Schultz seeks the removal of Mr. Shafer as successor guardian to the
10 Ward due to a lack of communication regarding her father's condition and finances, and his
11 general uncooperative demeanor. Additionally, the current guardianship is resulting in
12 unnecessary expense and depletion of the Ward's estate due to employment of a private care
13 giver through the agency known as Keep You Company, and payment to Mr. Shafer for
14 acting as guardian in his capacity as a professional guardian and private fiduciary.
15 Employment of the private care giver is costing the Ward's estate approximately \$7,000 per
16 month. This expense will be avoided or substantially reduced when Rebecca Schultz is
17 appointed as her father's guardian and she takes him to live with her in California. The Ward
18 lived in California for nearly sixty years prior to his relocation to Nevada in 2003.

19 13. Rebecca Schultz, is the daughter of the Ward and under NRS 159.061, has
20 priority to serve as a co-guardian with a Nevada Resident. Petitioner Rebecca Schultz seeks
21 to become the guardian of her father, the Ward, in order to relocate him to California where
22 she resides, and to enable her to be with her father for the remainder of his life. Rebecca
23 Schultz was unable to be with her mother for the end of her life and feels strongly about
24 caring for and being with her father for the remainder of his natural life.

25 14. Rebecca Schultz visited her father, the Ward, numerous times since Mr.
26 Shafer was appointed as Successor Guardian. The Ward's response to her has been positive,
27 and he expressed his desire to live with Rebecca Schultz.

28

EXHIBIT 3

HUTCHISON & STEFFEN

A PROFESSIONAL LLC

PECCOLE PROFESSIONAL PARK
10080 WEST ALTA DRIVE, SUITE 200
LAS VEGAS, NV 89145

1 PETN

Mark J. Connot (10010)

2 Stephen J. Mayfield (10138)

HUTCHISON & STEFFEN, LLC

3 Peccole Professional Park

10080 West Alta Drive, Suite 200

4 Las Vegas, NV 89145

(702) 385-2500

5 (702) 385-2086

smayfield@Hutchllegal.com

6 Attorneys for Petitioners

DISTRICT COURT

CLARK COUNTY, NEVADA

10 In the Matter of the Person and Estate of)

Case No.: G28163

Dept. No.: E

11 GUADALUPE MENA OLVERA

12 Adult Ward.

15 **REPLY IN SUPPORT OF PETITION FOR ORDER REMOVING JARED**
 16 **SHAFFER AS SUCCESSOR GENERAL GUARDIAN AND APPOINTING**
 17 **SUCCESSOR GENERAL CO-GUARDIANS AND FOR REVOCATION OF**
LETTERS OF GENERAL GUARDIANSHIP TO JARED SHAFFER AND
ISSUANCE OF LETTERS OF GENERAL CO-GUARDIANSHIP OF ADULT
WARD

18 Rebecca Schultz and Ruth Carney, by and through their attorneys of Hutchison &
 19 Steffen, LLC, hereby reply to the response filed by Jared Shafer in support of their petition
 20 for order removing Jared Shafer as Successor General Guardian and for revocation of Letters
 21 of General Guardianship issued to Jared Shafer, and issuance of Letters of General Co-
 22 Guardianship of Adult Ward GUADALUPE MENA OLVERA and respectfully represent
 23 the following to this Honorable Court:

24 I. Jared Shafer was recommended by Petitioner to become guardian of the Ward
 25 on a temporary basis for the protection of the Ward from a woman named Cathy Elliot, who
 26 effectively kidnaped the Ward from his home. When guardianship proceedings were
 27 initiated time was of the essence to protect the Ward from Ms. Elliot. Now, due to the
 28 establishment of the guardianship over the Ward the need for Mr. Shafer to continue as

guardian is non-existent and Petitioner seeks to take her rightful statutorily preferred place as the guardian of her father.

2. Despite communications by Elyse Tyrell to Petitioner Rebecca Schultz that she was counsel for Jared Shafer and not Petitioner early in the process of seeking guardianship for the protection of her father, Petitioner reasonably misunderstood that Elyse Tyrell was her attorney. See initial invoice from Ms. Tyrell attached as **Exhibit 1**, wherein Petitioner is identified as Guardian (and client of Ms. Tyrell). Furthermore, Petitioner subjectively believed that Ms. Tyrell was her attorney during the initiation of the guardianship proceedings. Regardless of whether Petitioner was fully informed by Ms. Tyrell of whom she represented, the need for Mr. Shafer to continue as guardian has passed, and Petitioner is willing and able to be guardian and act in the best interests of the Ward.

★ 3. Mr. Shafer's response contains reports by Ms. Tyrell wherein she makes statements as to conversations she had with Petitioner. Such statements reflect conversations Ms. Tyrell had with Petitioner at times before it was clear to Petitioner that Ms. Tyrell solely represented Mr. Shafer, and at times when there may in fact have been an attorney-client relationship between Ms. Tyrell and Petitioner. Similarly, such statements are inadmissible hearsay. If Ms. Tyrell seeks to be identified as a witness in this matter she may be subject to disqualification as Counsel for Mr. Shafer under NRPC 1.9.

4. In paragraph 4 of Mr. Shafer's response, he admits that Petitioner could serve as the Ward's Co-Guardian. As stated above, the extenuating circumstances that necessitated his involvement are no longer at issue, and it is no longer in the Ward's best interest to have a professional guardian and home care provider, rather than his own daughter, act as his guardian. Particularly since the engagement of a 24 hour caregiver is costing the estate of the Ward in excess of \$7,000 monthly, not including the fees Mr. Shafer is charging the Ward's estate for services Petitioner will provide at no cost to her father. Petitioner is the daughter of the Ward with statutory priority and she has a genuine desire to care for her father for the remainder of his life. There is a presumed preference for a family member to serve as guardian, particularly where that family member will care for the Ward in a manner

1 that will not result in excessive expense to the estate of the Ward, as is occurring with the
2 current guardian.

3 5. Mr. Shafer's statement that Petitioner did not have a relationship with the
4 Ward and his pre-deceased spouse is patently false and outrageous. The evaluation by Dr.
5 Louise G. Sherk purported as evidence of this false claim was not created for the purpose of
6 determining the Ward's relationship with the Petitioner and is otherwise inadmissible
7 hearsay. Therefore the evaluation has no merit or bearing upon the reality of the relationship
8 between Petitioner and her parents.

9 6. Petitioner had a long lasting and loving relationship with her parents and
10 maintained that relationship with them until her mother's death and the establishment of the
11 guardianship for her father. Petitioner corresponded regularly with her parents for the past
12 decade. Copies of letters sent from Petitioner's mother are attached as Exhibit 2. Similarly
13 Petitioner regularly communicated with her parents by email, copies of some of which are
14 attached as Exhibit 3.

15 7. Petitioner's close relationship with her parents is also confirmed by her
16 friends and family. For example, Petitioner's friend Barbara M. Reynoso provided a letter
17 explaining her interaction with Petitioner's mother on the occasion of Petitioner visiting her
18 parents in May 2008. On that occasion Petitioner came to Las Vegas for 10 days to be with
19 her mother after she had fallen and injured her leg. In her letter, Ms. Reynoso also describes
20 her personal interaction with Petitioner's mother and the trip Petitioner made to Las Vegas
21 in November of that year to be with her parents on Thanksgiving. A copy of Ms. Reynoso's
22 letter is attached as Exhibit 4. Petitioner's healthy relationship with her parents is also
23 described in a letter from Donald Ketchel, who is a neighbor of Petitioner's parents since
24 2003. A copy Mr. Ketchel's letter is attached as Exhibit 5. Additionally, pictures taken of
25 Petitioner with her parents are attached as Exhibit 6. The pictures are indicative of a loving
26 family relationship, especially between the Ward and Petitioner.

EXHIBIT 4

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Complaint Review: Judge Chuck Hoskin

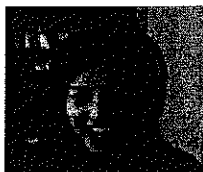
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Submitted: Wednesday, January 26, 2011 **Last Posting:** Sunday, August 21, 2011
Reported By: Catharine B. — Jacksonville Florida U.S.A.

Judge Chuck Hoskin
601 North Pecos Road
Internet, las vegas Nevada 89101
United States of America

Phone: 702-455-1500
Web: www.lasvegasfamilycourt.gov
Category: [Government Corruption](#)

**Judge Chuck Hoskin Elyse Tyrell, Jared
Shafer Chuck Hoskin takes bribes, breaks
the law, and takes money from families
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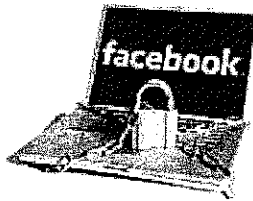
Judge Chuck Hoskin takes bribes and evades
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When my sister became ill in 2010 Commissioner
Norheim of the Las Vegas family court assigned

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Amendment and have a chilling effect on consumers first amendment right to speak out.

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Mitt Romney Jon Huntsman A Mormon (LDS Church Affiliate) Presidential Candidate Rips Off Americans - Why a Mormon (LDS) should not be president of the United States. Internet

Jared Shafer to act as her guardian. I live in Jacksonville Florida and am not able to travel because of poor health. After six months I received a call from a family located in Henderson, Nevada who had been robbed by Jared Shafer for over \$600,000. I hired Elyse Tyrell as my attorney. After several months it became very clear Tyrell was representing Jared Shafer at the same time she was representing me. I attempted to have her removed in Norheim's court. Norheim refused and the case went to Chuck Hoskin.

Chuck Hoskin ruled it was within Nevada law to allow an attorney to represent parties in conflicts of interest. Hoskin said "we do things our way in Nevada. If you are unhappy with my ruling go to the supreme court", Hoskin said. Gammet and King provided an accounting of my sister's finances. We discovered Jared Shafer had removed \$325,000 in a period of six months. Hoskin ruled in the same hearing that Jared Shafer's fees were not unreasonable. Chuck Hoskin said Jared Shafer has been practicing as a guardian in Nevada since 1979. In my opinion he can do no wrong. I looked up 20 cases where Hoskin acted as chief judge. All of these cases ruled in favor of Jared Shafer and against the families who wanted to challenge his large bills. This prompted me to hire a private investigator. The investigator learned Chuck Hoskin has a joint offshore account in Grand Cayman Island at Credit Swiss with Elyse Tyrell. The person in charge of the Chuck Hoskin account at Credit Swiss is George Benet. Chuck Hoskin visits Gran Cayman twice per year. I have good reason to believe he is hiding money, which he obtained through Jared Shafer. This money is from hard working families who only wanted justice. Chuck Hoskin, Elyse Tyrell, and Jared Shafe need to be brought to justice. The IRs, State Department and the Nevada attorney general are investigating the activities of these criminals. Stop Judge Hoskin before it is too late.

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REGISTER OF ACTIONS

CASE NO. 05G028163

In the Matter of the Guardianship of: Guadalupe Olvera, Adult
Ward(s)

05/15/2005 09:00 AM

Case Type: Guardianship of Adult

Subtype: Person Only - Adult

Date Filed: 07/15/2005

Location: Department E

Conversion Case Number: G028163

PARTY INFORMATION

Guardian	Olvera, Carmela F 2050 Mountain City St Henderson, NV 89052	DOD: 11/02/2009	Lead Attorneys Pro Se
Guardian of Person and Estate	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Objector	Chaddock, William		Michael J. Brock <i>Retained</i> 7029907272(W)
Petitioner	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Ward	Olvera, Guadalupe M P.O. Box 623 Caitola, CA 95010		Carmine James Colucci <i>Retained</i> 7023841274(W)

EVENTS & ORDERS OF THE COURT

04/28/2010 All Pending Motions (9:00 AM) (Judicial Officer Norheim, Jon)

Minutes

04/28/2010 9:00 AM

- Steve Mayfield, Bar#10138, Present The Guardianship Commissioner was sitting under direction and in lieu of the Guardianship Judge. Ms. Tyrell agreed to the Sr. Citizen's Law Project being appointed as Guardian Ad Litem (GAL) at the ward's expense. The ward wants to relocate back to California. COMMISSIONER RECOMMENDED; Hearing Set for 5/19/10 @ 9:00am for GAL REPORT. Sr. Citizen's Law Project APPOINTED as Guardian Ad Litem to interview ward and determine what his wishes are and whether he is clear about what he wants.

Parties Present

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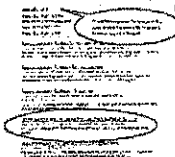
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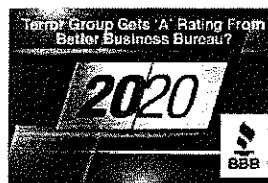
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Carol A. Kingman and Julie C. Arnold represent the Las Vegas Senior Citizen Law project. They attempted to extort \$25,000 from me to write a favorable report allowing my mother Helen Clark to return with me to Tampa Florida. Mom spent the last four years of her life living in Henderson Nevada because she always loved the desert. When she was diagnosed with Alzheimers disease, Jon Norheims friend Patience Bristol recommended Jared Shafer to act as her guardian. Shafer isolated mom from her family and began removing large amounts of money from her bank accounts. In addition Jared Shafer sold off \$150,000 in U.S. government securities.

I discovered Jared Shafer, Los Vegas' most corrupt guardian had taken over \$350,000 from my mother. We began a court proceeding. Carol Kingman and Julie Arnold were appointed to interview my Mother. The interview was conducted at my mother's Henderson Nevada home. I videotaped the interview and have a full account of mom saying, I want to return to Florida with my daughter. Carol Kingman said no you dont you really want to remain in Nevada where Jared Shafer and Patience can protect you. You are a victim of your daughter's mind control. When the interview ended I was outside and Kingman and Arnold didnt know I had videoed the interview. Carol Kingman said, You want your mother? We can make sure she goes with you back to Tampa. I believe you can afford

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\$25,000 and we will make sure Norheim grants your request. I refused this request and Norheim true to his usual form ruled my mother must remain in Nevada. I have an eye phone recording of Arnold's extortion. Both recordings have been sent directly to the Department of justice. I've been assured by the department a full investigation is now in progress. They are looking into the activities of Carol Kingman and Julie Arnold. Jon Norheim is also named along with Jared Shafer. This investigation may take several months to complete due to the high level of corruption in the Las Vegas Family Court system. I am posting this report to warn families about Carol Kingman and Julie Arnold. If these ladies are appointed to interview with your family member, please video tape it for your protection. The Department of justice is looking for evidence about these two well known extortionists.

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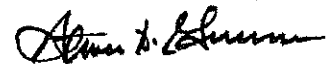
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EXHIBIT 7

THE UNIVERSITY OF CHICAGO

Case Type: **Guardianship of Adult**
 Subtype: **Person Only - Adult**
 Date Filed: **07/15/2005**
 Location: **Department E**
 Case Number: **G028163**

EXHIBIT 8



CLERK OF THE COURT

1 **REP**
2 Mark J. Connot (10010)
3 Stephen J. Mayfield (10138)
4 HUTCHISON & STEFFEN, LLC
5 Peccole Professional Park
6 10080 West Alta Drive, Suite 200
7 Las Vegas, NV 89145
8 (702) 385-2500
9 (702) 385-2086
10 smayfield@Hutchlegal.com

11 *Attorneys for Rebecca Schultz*

12 **DISTRICT COURT**
13 **CLARK COUNTY, NEVADA**

14 In the Matter of the Person and Estate of)

15 GUADALUPE MENA OLVERA)

16 Adult Ward.)

Case No.: G 28163
Dept. No.: E

Date of Hearing: August 18, 2010
Time of Hearing: 9:00 a.m.

17 **REPORT OF MALFEASANCE AND LACK OF QUALIFICATIONS**
18 **PURSUANT TO ORDER OF REMAND BY JUDGE HOSKIN**

19 Rebecca Schultz, daughter of Guadalupe Mena Olvera, an Adult Ward, by and her
20 attorneys of record of the law firm of Hutchison & Steffen, LLC, files this Report of
21 Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin
22 issued on July 13, 2010. This report is based specifically on the following issues:

23 1. Judge Hoskin affirmed and adopted the Commissioner's Report and
24 Recommendation and remanded the issues raised before Judge Hoskin which previously
25 were not brought before Commissioner Norheim;

26 2. Rebecca Schultz also addresses several issues of malfeasance by Jared Shafer
27 which disqualify him to continue to serve as guardian for the estate and person of the Adult
28 Ward.

3. Mr. Shafer violated NRS 159.185.5 and 6 when he intentionally or negligently
prevented the Adult Ward from attending the hearing before this Court on April 28, 2010.
This was also a violation of NRS 199.230 by Mr. Shafer.

HUTCHISON & STEFFEN

A PROFESSIONAL LLC
PECCOLE PROFESSIONAL PARK
10080 WEST ALTA DRIVE, SUITE 200
LAS VEGAS, NV 89145

1 It is settled law under NRS 159 that an adult ward is entitled to attend any hearings
2 related to his guardianship. As stated in the words of Mr. Shafer's own former attorney,
3 Elyse Tyrell¹, in her email to Ms. Schultz on November 20, 2009, "[e]ven though he has been
4 deemed incompetent, the court still has to listen to his objections and the court has to ask him
5 if he wants an attorney of his own and if he says yes, the court has to appoint one for him."

6 Notwithstanding the due process rules permitting an adult ward to attend hearings
7 related to his guardianship, in this case the Ward was prevented from attending both the
8 April 28th hearing and the May 19th hearing by Mr. Shafer. When the April 28th hearing
9 date was set Ms. Schultz informed her father of her petition to become his guardian and
10 asked him whether he had heard anything about her petition and whether he wanted to attend
11 the hearing. The Ward told her that he did not hear anything or see any notice of the hearing,
12 but that he did want to attend.

13 Upon learning of Ms. Schultz's intention to accompany her father to the April 28th
14 hearing Mr. Shafer had his employee Patience Bristol send a text message on April 27, 2010,
15 to the Ward's full-time care give, Leilani Agbunag, informing her that she was not to allow
16 Ms. Schultz to take her father to the hearing. An affidavit from Ms. Schultz regarding these
17 events of April 27, 2010 is attached as **Exhibit A**. Leilani Agbunag confirmed to counsel
18 for Ms. Schultz that she received this text message and she will testify to the same.

19 By preventing the Ward from attending the hearings Mr. Shafer violated NRS
20 199.230, which reads in pertinent part:

21 A person who, by persuasion, force, threat, intimidation, deception or
22 otherwise, and with the intent to obstruct the course of justice, **prevents or**
23 **attempts to prevent another person from appearing before any court,**
24 or person authorized to subpoena witnesses, as a witness in any action,
25 investigation or other official proceeding, or causes or induces another
26 person to be absent from such a proceeding or evade the process which
27 requires the person to appear as a witness to testify or produce a record,
28 document or other object, shall be punished:


¹ Elyse Tyrell withdrew as counsel to Mr. Shafer at the hearing on July 13, 2010 before Judge Hoskin due to conflict of interest under Nevada Rule of Professional Conduct 1.9. Ms. Tyrell represented Mr. Shafer against Ms. Schultz despite having established an attorney-client relationship with Ms. Schultz, having obtained confidential information from Ms. Schultz through that relationship and then representing Mr. Shafer in a matter that was directly adverse to Ms. Schultz effort to have Mr. Shafer removed as guardian.

1 1. Where physical force or the immediate threat of physical force is used,
2 for a category D felony as provided in NRS 193.130.

3 2. Where no physical force or immediate threat of physical force is
4 used, for a gross misdemeanor.

5 Mr. Shafer did not physically restrain the Ward but by instructing Ms. Agbunag that
6 she was not to allow Ms. Schultz to take her father to the hearing was an action of coercion.
7 Ms. Agbunag would not let Ms. Schultz take her father to the hearing due to her fear that she
8 would lose her job as the Ward's primary care giver if she let the Ward go to the hearing.
9 Mr. Shafer's actions in preventing the Ward from attending those hearing is a gross
10 misdemeanor under NRS 199.230 and certainly is an act of malfeasance under NRS 159
11 sufficient to warrant his removal as guardian of the Ward.

12 Ms. Schultz has yet been unable to obtain a copy of the text message sent by Ms.
13 Bristol to Ms. Agbunag, but at a minimum this matter should be opened for discovery for
14 confirmation of that nefarious act, as well as other allegations of malfeasance against Mr.
15 Shafer as stated below.

16  4. On a related topic, upon information and belief Ms. Schultz understands that
17 Mr. Shafer failed to comply with NRS 159.0475.3, which requires that a citation be issued
18 to the Department of Veterans Affairs. Alvin G. Friedman of Allied Veterans Organization,
19 a non-profit organization that works with the Department of Veterans Affairs to ensure that
20 receive the benefits to which they are entitled, has taken an interest in this case due to his
21 concerns that Mr. Shafer is not taking care of the Ward consistent with laws set up for the
22 protection of the Ward as a veteran. Mr. Friedman, after communications with the
23 Department of Veterans Affairs confirmed to counsel for Ms. Schultz that no notice or
24 citation was ever received regarding the change of guardianship for the Ward. Failure of Mr.
25 Shafer to provide notice to the Department of Veterans Affairs regarding the guardianship
26 for the Ward is violation of his duty to the Ward .

27 5. At no time has the Ward been permitted by Mr. Shafer to appear before the
28 Commissioner to express himself as to who he wants to act as his guardian. Since Mr.
Shafer was appointed as the Ward's guardian, the Ward repeatedly expressed his desire to

1 attend hearings related to his guardianship and for Ms. Schultz to become his guardian, with
2 Ruth Carney, acting as co-guardians as the Nevada resident.

3 The Ward is competent to make decisions regarding where he wants to be and who
4 he wants to act as his guardian. The Ward also has sufficient competence, "to amend or
5 change his trust and/or will . . ." See the evaluation report provided by Dr. Louise G. Sherk,
6 M.D. attached as **Exhibit B**. Furthermore, attorneys Carol Kingman and Julie Arnold of the
7 Clark County Senior Citizen's Law Project provided in their oral report in the second hearing
8 of May 19, 2010, ". . . we were confident in - in visiting with Guadalupe, that he - he was
9 capable of expressing his wishes. . . . We were - we were confident that he was freely
10 expressing to us what he really wanted, and that he could clearly express those wishes." See
11 page 6, line 11 of the Transcript to the May 19, 2010 hearing attached as **Exhibit C**.

12 The Ward will be in attendance at the hearing on August 18, 2010 and this Court
13 should make every effort to determine who he wants to act as his guardian and whether he
14 wants Ms. Schultz and Ms. Carney to care for him in that capacity.

15 6. Mr. Shafer needs to answer as to the whereabouts of the contents of the safe
16 deposit box he inventoried on March 5, 2010. To date no inventory of the contents of the
17 Ward's safe deposit box has been provided to the Ward.

18 On August 10, the Ward, accompanied by his full time care giver, Ms. Agbunag,
19 went to the Wells Fargo branch located at 2658 W. Horizon Ridge Parkway, Henderson, NV,
20 where he understood his safe deposit box was located. Upon entering the branch he was
21 informed that he had no such safe deposit box. Despite the fact that Mr. Shafer provided an
22 invoice dated May 21, 2010, wherein he indicated that he inventoried a safe deposit box of
23 the Ward on March 5, 2010, Wells Fargo currently has no record any such safe deposit box
24 in the Ward's name. A copy of the invoice from Mr. Shafer is attached as **Exhibit D**.
25 Counsel for Ms. Schultz spoke with Eve S. Mills, Trust & Fiduciary Specialist of Wells
26 Fargo Private Bank on August 11, 2010, and Ms. Mills confirmed that there is no current safe
27 deposit box in the Ward's Name or held beneficially on his behalf.

28

1 Mr. Shafer must explain where the safe deposit box is located, provide the inventory
2 and if the box was closed out, he must inform the Ward where his property which was
3 located within the box is currently located.

4 7. The invoice included in **Exhibit D** also refers to Mr. Shafer meeting with Ms.
5 Schultz and discussing her father's condition and future living arrangements. Ms. Schultz
6 met with Mr. Schultz at her father's home on the date in question, but she denies that
7 conversations regarding her father's condition and his future living arrangements ever took
8 place. Billing the Ward's estate for activity that was not done is an act of malfeasance.


9 Despite not having discussed the Ward's condition and his future living arrangements
10 Mr. Shafer did engage in a dialogue wherein he indicated that he has a unique relationship
11 with the Court. Mr. Shafer told Ms. Schultz "I don't even have to show up in court, the
12 judge always gives me what I want." Ms. Schultz provided an affidavit to the effect of this
13 conversation attached as **Exhibit E**. Any person who suggests that they are above the law
14 or that they have a special relationship with the Court so as to allow them to bypass the
15 general requirements for guardianship appointment and administration should be
16 automatically disqualified as a guardian as unsuitable.

17 8. Mr. Shafer's statements on November 25, 2010, to Ms. Schultz are consistent
18 with statements Mr. Shafer made to Charles Pascal related to the *Marcy DuDeck* matter, of
19 which this Court is familiar. On December 8, 2008 around 4.45 P.M, Mr. Pascal received
20 a call from Mr. Shafer, where he essentially threatened Mr. Pascal and indicated he would
21 not follow any orders of the California courts. Mr. Shafer then informed Mr. Pascal that any
22 action initiated in Nevada would not be successful because, in his words, "the Nevada courts
23 let me do what I want and non-residence can't say shit in this state."

24 Mr. Pascal stated he would report the conversation to Commissioner Norheim. Mr.
25 Shafer's response in typical fashion was that, "these judges do what I want. When I say jump
26 Norheim and Ritchie ask how high." Mr. Shafer also went on to say that "if the California
27 case wasn't dropped, it would be very unpleasant for Marcy DuDeck and we wouldn't want
28 that." A copy of Mr. Pascal's affidavit is attached as **Exhibit F**. Mr. Pascal is aware of two

1 people, Heidi Pascal and Arif Sayed, who overheard and can corroborate this conversation
2 between Mr. Shafer and Mr. Pascal.

3 Certainly counsel for Mr. Shafer will object to these statements as out of court
4 statements that constitute hearsay. However, these statements are not offered for the proof
5 of the matter asserted, that Mr. Shafer has an inappropriate relationship with the Court, or
6 that the Court will simply do what he asks. Rather, the statements indicate that Mr. Shafer
7 has a complete disregard for the process and his role as a guardian of a person in need. His
8 statements clarify that his purpose in acting as guardian is not to protect the best interest of
9 the Ward, but only to serve the best interest of Jared Shafer.

10  9. These are serious allegations of malfeasance and improper actions befitting
11 a guardian, and they warrant this Court taking every measure necessary to ascertain whether
12 Mr. Shafer is indeed abusing his power as guardian and manipulating and coercing the Wards
13 in his care and their respective families. NRS 159 is all about protecting the Wards and
14 ensuring that their best interests are protected. Assuming these allegations are true, the Adult
15 Ward and the other Wards under Mr. Shafer's care are in danger.

16 In this case Mr. Shafer failed to provide adequate notice as required to the VA,
17 declared that Commissioner will do whatever he wants, abused his power with regard to the
18 Ward's safe deposit box, and deliberately prevented the Ward from attending hearings by
19 coercion and intimidation. There can be no question that it is time for Mr. Shafer to be
20 removed as guardian for the Adult Ward.

21 10. It will be in the best interest of the Ward for Ms. Schultz and Ms. Carney to
22 become the Ward's co-guardians. They are eager and suitable to assist in the actual care
23 giving of the Ward. Their plan is for Ms. Agbunag to remain as the primary care giver
24 during the week, and for Ms. Schultz and Ms. Carney to alternate staying with him on the
25 weekends at no charge to the Ward. Ms. Carney is a Nevada resident who resides at 8175
26 Arville St., Las Vegas, NV 89139, so any concerns raised previously that she is not a Las
27 Vegas resident and that she would not be able to attend to the needs of the Ward are
28 unjustified.

1 By removing Mr. Shafer and taking the responsibility of personally caring for the
2 Ward on weekends, Petitioners stand to save the Ward perhaps thousands of dollars on a
3 monthly basis. As the Ward is in good health at 90 years old, with an expectation that he will
4 live possibly several years more, it is very important to reduce costs in order to ensure that
5 his assets will be sufficient to cover his care for the remainder of his life. At the current rate
6 of expenses due to the personal care situation coupled with the fees that Mr. Shafer is
7 charging, Ms. Schultz is concerned the Ward's liquid assets will be exhausted within three
8 years. Removal of Mr. Shafer will save the Ward money and have the long term positive
9 effect of stretching out his resources longer than is foreseeable under the existing
10 guardianship. Certainly minimizing cost and maximizing the Ward's resources for his long
11 term care is in his best interest.

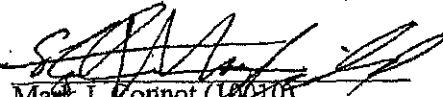
12 It simply makes no sense to continue with a professional guardian who does not
13 personally care for the Ward, does not have a relationship with the Ward and whose sole
14 purpose it seems is to collect a fee for services that are making no difference in the life of the
15 Ward, especially when the Ward's own daughter, who has statutory preference to begin with,
16 and Ms. Carney are willing to do everything and more than Mr. Shafer is doing at no cost to
17 the Ward.

18 CONCLUSION

19 Based on the above and foregoing, Rebecca Schultz and Ruth Carney request that
20 Jared Shafer be removed as the guardian for the Ward due to malfeasance and unsuitability
21 and that they be confirmed as co-guardians.

22 DATED this 13th day of August, 2010.

23 HUTCHISON & STEFFEN, LLC

24 
25 Mark J. Connot (10010)
26 Stephen J. Mayfield (10138)
27 Peccole Professional Park
28 10080 West Alta Drive, Suite 200
Las Vegas, NV 89145

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VERIFICATION

STATE OF NEVADA

COUNTY OF CLARK

}
SS:
}

Rebecca Schultz, being first duly sworn under penalty of perjury, declares the following: That she is the Petitioner herein; that she has read the foregoing REPORT OF MALFEASANCE AND LACK OF QUALIFICATIONS PURSUANT TO ORDER OF REMAND BY JUDGE HOSKIN and knows the contents thereof, and that the contents are true of her own knowledge, except for those matters stated on information and belief, and as to those matters she believes them to be true.


REBECCA SCHULTZ

EXHIBIT 9

1 **JOIN**
2 **BOGGESS & HARKER**
3 D. Brian Boggess, Esq.
4 Nevada Bar No. 004537
5 5550 Painted Mirage, Suite 255
6 Las Vegas, Nevada 89149
7 (702)233-5040
8 (f) (702)233-2209
9 (e) bboggess@boggessharker.com
10 Attorneys for Co-Petitioner

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 In the Matter of the Person and Estate of
14
15 **GUADALUPE MENA OLVERA,**
16
17 Adult Ward.

CASE NO. G 28163
DEPT. NO. E

18 **CO-PETITIONER RUTH CARNEY'S JOINDER TO REPORT OF**
19 **MALFEASANCE AND LACK OF QUALIFICATIONS PURSUANT TO**
20 **ORDER OF REMAND BY JUDGE HOSKIN**

21 Date of Hearing: August 18, 2010
22 Time of Hearing: 9:00 a.m.

23 COMES NOW, the Co-Petitioner, Ruth Carney, by and through her attorneys, D. Brian
24 Boggess, Esq. and Boggess & Harker, and hereby submits her Joinder to the Report of Malfeasance
25 and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin, and the other pleadings
26 and papers filed in this matter on her behalf and on behalf of her Co-Petitioner, Rebecca Schultz.
27 Her Joinder is based upon the following points, authorities and issues:

28 **A. General Background and Procedural History**

1. Co-Petitioner Ruth Carney has retained the undersigned as separate counsel to represent her in
this matter. This Joinder, together with Ms. Carney's Joinder to the Objection to Guardianship
Commissioner's Report and Recommendation and the Supplemental Points and Authorities to
Objection to Guardianship Commissioner's Report and Recommendation filed in this matter on or
about July 9, 2010, provides the Court and all parties notice of said Counsel's appearance in this
matter.

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2. Co-Petitioner Ruth Carney formally joins in the arguments, points and authorities set forth in the Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge Hoskin filed in this matter. In addition, Ms. Carney adds the following additional points and authorities.

3. At the May 19, 2010 Commissioner Hearing on this matter, the Guardianship Commissioner refused to review the circumstances surrounding the creation of the Guardianship, even though substantial evidence was presented in the pleadings and was proffered at the Hearing. The Commissioner determined that the only proceeding before him was a removal action pursuant to NRS 159.185, and that the Co-Petitioners had not shown any conditions in the statute in order to consider the removal of Jared E. Shafer as the ward's General Guardian. *See Report and Recommendation at p. 2, ll. 3-5, on file herein.*

4. At the Hearing on Co-Petitioners' Objections before Judge Hoskin on July 13, 2010, Judge Hoskin affirmed much of the Report and Recommendation, but referred this matter back to the Guardianship Commissioner for his consideration of the violations of N.R.S. Chapter 160 raised by Ms. Carney's Joinder. Judge Hoskin determined that those issues, although mentioned tangentially in the prior hearings, were not set forth in the pleadings sufficiently to make the Guardianship Commissioner aware of the NRS 160 issues raised by the Co-Petitioners.

5. NRS 159.185 provides that this Court "may remove a guardian if the court determines that . . . [t]he guardian has intentionally failed to perform any duty as provided by law or by any lawful order of the court, regardless of injury . . ." *N.R.S. § 159.185(6) (2010)*. Co-Petitioner Ruth Carney respectfully submits that Mr. Shafer has intentionally failed to perform his duties as provided by law in a host of verifiable instances.

B. Violations of NRS Chapter 160 by the Current Guardian

6. The adult ward, Guadalupe Mcna Olvera, is a Veteran who served in the United States Army from August 15, 1941 through October 4, 1945. Attached hereto as Exhibit "1" is a true and correct copy of Mr. Olvera's Certification of Military Service. He also served in the United States Air Force between August 29, 1946 and August 28, 1949. Much of the discussion during the May 19, 2010 Hearing involved the alleged redirection of certain Veterans' Administration benefits payable to Mr. Olvera. While the Commissioner did not really delve into the allegations or give the Co-Petitioners

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1 sufficient opportunity to respond to such baseless claims, there can be no dispute that the adult ward
2 is, indeed, a veteran who receives income from the United States Department of Veterans' Affairs.

3 7. The current Guardian has long known of Mr. Olvera's veteran status. Attached hereto as
4 Exhibit "2" is a true and correct copy of PFSN, Inc. Invoice # 100505, dated May 21, 2010. This
5 invoice reflects billings from November 17, 2009 through April 28, 2010. The invoice establishes
6 that on November 25, 2009, Mr. Shafer billed for time conversing with Mr. Olvera regarding "How
7 he is doing, how does he like his caregiver, *WWII*, his daughter, etc. . . ." *See Exhibit "2"*
8 *(emphasis added)*.

9 8. ~~X~~ There is no evidence that the current Guardian ever served a citation upon the United States
10 Department of Veterans' Affairs, pursuant to NRS 159.0475(4). *See N.R.S. § 159.0475(4)*. The
11 current Guardian's failure to properly notify the Department of Veterans' Affairs has resulted in Mr.
12 Olvera receiving extra payments to which he is no longer entitled. He will be required to repay these
13 excess sums, most likely with interest and fees attached thereto.

14 9. Nevada has adopted the Uniform Veterans' Guardianship Act, which places private
15 professional guardians such as the current Guardian under additional requirements and scrutiny when
16 they are appointed or seek to be appointed guardians over veterans. *See N.R.S. §§ 160.010 through*
17 *160.190 (2010)*.

18 10. ~~X~~ The current Guardian is ineligible to serve as Mr. Olvera's guardian. NRS 160.040 places a
19 jurisdictional limitation on the number of wards to which a private, professional guardian of a
20 Veteran may oversee. That section provides, in pertinent part, as follows:

21 Except as otherwise provided in this section, it is unlawful for any person to accept
22 appointment as guardian of any ward if the proposed guardian is at that time acting
23 as guardian for five wards. In any case, upon presentation of a petition by an attorney
24 of the Department of Veterans Affairs pursuant to this section alleging that a guardian
25 is acting in a fiduciary capacity for more than five wards and requesting his or her
26 discharge for that reason, *the court, upon proof substantiating the petition, shall*
27 *require a final accounting from the guardian and shall discharge the guardian in*
28 *the case.*

1 *N.R.S. § 160.040 (emphasis added).*

2 11. Here, there can be no dispute that Mr. Shafer acts in a fiduciary capacity for more than five
3 wards. Attached hereto as Exhibit "3" is a true and correct copy of a NVCLARKPROD Cases by
4 Name Listing Report for Jared Shafer.¹ That Report, although incomplete, shows that Mr. Shafer is
5 currently Guardian for no fewer than twenty-four (24) different wards, not including Mr. Olvera.
6 Accordingly, the Court must require a final accounting from Mr. Shafer and discharge him in the
7 case as being unfit to serve as Guardian for a veteran.

8 12. In addition to the express violation of NRS 160.040, the conduct of Mr. Shafer since learning
9 of Mr. Olvera's veteran status has been remarkable for its brazen disregard of the law. As mentioned
10 above, Mr. Shafer knew of Mr. Olvera's status as a Veteran as early as November 25, 2009, *eight (8)*
11 *days after being appointed Temporary Guardian and seven (7) days BEFORE he was appointed*
12 *Successor General Guardian!*

13 In other words, before the Guardianship Commissioner had entered an Order appointing Mr.
14 Shafer as Successor General Guardian, Mr. Shafer knew that he was not legally qualified to assume
15 that post, pursuant to the jurisdictional limitations of NRS 160.040. Yet no mention of Mr. Olvera's
16 veteran status was raised in Mr. Shafer's pleadings nor in oral argument at the hearings appointing
17 him General Guardian. He did not revise his Affidavits or pleadings to make the Court aware of this
18 critical fact.

19 On November 16, 2009, the current Guardian verified and signed his Petition for
20 Appointment of Successor Temporary and Successor General Guardian. *See Exhibit "4", attached*
21 *hereto.* In paragraph 10 of that Petition, the current Guardian states that he "is competent and
22 capable of acting as the Temporary and General Guardian of the person and estate of Guadalupe
23 Mena Olvera" Even if Mr. Shafer believed that statement to be true as of November 16, 2009,
24 he knew that the statement was patently false as of November 25, 2009, when he learned that Mr.
25 Olvera was a Veteran and that Mr. Shafer was no longer "competent and capable" of serving as Mr.
26 Olvera's guardian pursuant to NRS 160.040 due to the number of Wards under his guardianship.

27
28 ¹This Report is admittedly incomplete, as it does not list the instant case or several others which
the Co-Petitioners know to be currently before this Court. The list is sufficient to demonstrate that Mr.
Shafer currently serves as Guardian for far more than five (5) Wards.

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1 He patently failed to demonstrate candor before this Court, assuming that he could "pull a
2 fast one" on the Guardianship Commissioner and Mr. Olvera's family. Mr. Shafer's silence in the
3 face of such damning facts—knowing that the Guardianship Commissioner was relying upon his
4 verified Petition at the December 2, 2009 hearing to consider him as Successor General Guardian—is
5 nothing short of perjury.

6 Mr. Shafer's motive is easy to spot. The current Guardian has billed for and received untold
7 thousands of dollars pursuing a Guardianship which was unlawful from the beginning. This callous
8 disregard for Mr. Olvera, his estate, his family and the express mandates of NRS Chapter 160 should
9 automatically and immediately disqualify Mr. Shafer from continuing as the Guardian for Mr.
10 Olvera. It also should subject Mr. Shafer to sanctions, including disgorgement of any fees earned or
11 funds wrongfully diverted from Mr. Olvera's estate.

12 13. Several other provisions of Chapter 160 have yet to be addressed by the Guardianship
13 Commissioner and are raised for consideration. NRS 160.050 expresses preference for appointment
14 as guardians "any person who under existing law is entitled to priority of appointment." *N.R.S.*
15 *160.050(1) (2007)*. In this instance, the persons entitled to priority of appointment under existing
16 law are the Co-Petitioners, particularly Co-Petitioner Rebecca Schultz. The Guardianship
17 Commissioner, having been advised that Mr. Olvera is a Veteran, must now consider the priority of
18 Co-Petitioners to appointment. In essence, the Commissioner should now treat this matter not only
19 as a removal Petition, but rather as commencement of a proceeding under NRS 160.

20 14. The current Guardian's compensation is believed to be dramatically higher than that
21 authorized by statute. NRS 160.120 provides in pertinent part that

22 Compensation payable to a guardian *must not exceed 5 percent of the income of the*
23 *ward* during any year. In the event of extraordinary services rendered by any guardian,
24 the court may, upon petition and after hearing thereon, authorize additional
25 compensation therefor payable from the estate of the ward. Notice of such petition
26 and hearing must be given to the proper office of the Department of Veterans Affairs
27 in the manner provided in NRS 160.100. *No compensation may be allowed on the*
28 *corpus of an estate* received from a preceding guardian. The guardian may be allowed

1 from the estate of the ward of the guardian reasonable premiums paid by him or her to
2 any corporate surety upon his or her bond.

3 *N.R.S. 160.120 (emphasis added)*. The Co-Petitioners believe that Mr. Shafer's compensation vastly
4 exceeds five (5) percent of Mr. Olvera's income. Accordingly, this Court should demand a full and
5 final accounting, and Order that Mr. Shafer disgorge any funds received above and beyond this
6 statutory compensation limit.

7 **C. Other Examples of the Current Guardian's Misconduct**

8 15. The Report of Malfeasance and Lack of Qualifications Pursuant to Order of Remand by Judge
9 Hoskin filed by Co-Petitioner Rebecca Schultz herein is replete with examples of the current
10 Guardian engaging in acts of malfeasance, neglect or outright criminality in this and other cases. Co-
11 Petitioner Ruth Carney joins in such a listing, and adds the following additional matters with which
12 the Guardianship Commissioner should be concerned.

13 16. Upon information and belief, the current Guardian is or was a Defendant in Case No. 2:09-cv-
14 393, filed in United States District Court for the District of Utah. Mr. Shafer was sued individually
15 in his capacity as Trustee of the Kathryn Waldman Charitable Remainder Trust. The Complaint
16 against Mr. Shafer alleges that he had referred investors—believed to be wards and estates for which
17 he served in a fiduciary capacity—to VesCor Capital Corp., a ponzi scheme now in receivership. *See*
18 *Exhibit "5", attached hereto*. The Complaint specifically alleges that "Defendant Jared Shafer also
19 referred investors to VesCor, and was paid at least \$20,338.50 in commissions from VesCor for
20 these referrals." *Id. at ¶ 31*.

21 Case No. 2:09-cv-393 is one of dozens of cases filed by VesCor's Receiver under the
22 umbrella of Case No. 1:08cv00012 filed in the United States District Court for the District of Utah.
23 On October 1, 2009, the Receiver for VesCor submitted his Status Report. *See Exhibit "6",*
24 *attached hereto*. The Receiver's Status Report notes that, for Case No. 2:09-cv-393, a settlement
25 agreement was reached with Defendant Jared Shafer and that the agreement was approved by the
26 Court on September 22, 2009. *See Exhibit "6" at p. 6*.

27 Upon information and belief, Mr. Shafer was ordered to pay a restitution or a fine in the
28 amount of \$20,338.50, the amount which he wrongfully received as commission for the sale of

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1 securities through the VesCor ponzi scheme. It is important to note that Mr. Shafer does not hold a
2 securities license, and so his receipt of commissions for the sale of securities is a violation of both
3 federal and state securities laws, civil and criminal. These actions, again not brought to the attention
4 of the Guardianship Commissioner, call into question Mr. Shafer's fitness to serve as Guardian in
5 this matter or a fiduciary in any matter.

6 In Mr. Shafer's verified Petition in this matter, signed November 16 and filed November 17,
7 2009, the current Guardian "confirms that he has never been convicted of a felony or judicially been
8 determined to have committed abuse, neglect or exploitation of a child, spouse, parent or other
9 person." See Exhibit "4" at ¶ 13. In light of what we know from the VesCor case, Court approval
10 of the Settlement Agreement may well have judicially determined that Mr. Shafer has committed
11 abuse, neglect or exploitation of the beneficiaries of the Kathryn Waldman Charitable Remainder
12 Trust. He should be Ordered by the Guardianship Commissioner to produce a copy of the Settlement
13 Agreement, the Order approving the same, and any other documents relevant to Case No. 2:09-cv-
14 393 so that the Co-Petitioners can review the evidence supporting the allegations in the Complaint.

15 At a minimum, the existence of the settlement—in which the current Guardian returned illegal
16 commissions earned by directing investments of fiduciary funds under his control—provides strong
17 evidence that Mr. Shafer acted in a self-serving and self-dealing fashion. His fitness to serve as
18 Guardian for Mr. Olvera and his estate is very much in question.

19 17. Alarming allegations pertaining to the current Guardian's conduct are coming out of the *Marcy*
20 *DuDeck* matter, Case No. G29530, a pending matter of which this Court is familiar. In that case, the
21 heirs of Marcy DuDeck are asserting that Mr. Shafer engaged in significant violations of the
22 suitability rules applicable to stock brokers and fiduciaries by operating a margin account for Ms.
23 DuDeck, a ninety-plus year old Ward of Mr. Shafer.

24 The suitability rules governing stock transactions and other investments are imposed by both
25 state and federal law. They generally hold that those who make investment decisions for others,
26 including brokers, trustees and guardians, must make investment decisions which are "suitable" for
27 the specific circumstances of the beneficiary. In the *DuDeck* case, the heirs of Ms. DuDeck are
28 alleging that Mr. Shafer's operation of a margin account with estate funds is wildly unsuitable for the

1 needs and risk tolerance of a ninety-plus year old beneficiary. These allegations, if true, again
2 demonstrate that Mr. Shafer feels himself to be above the law, able to essentially gamble with the
3 funds entrusted to him as a fiduciary.

4 **D. Conclusion**

5 The current Guardian is serving in direct violation of NRS 160.040. He has failed to served a
6 citation upon the United States Department of Veterans' Affairs, pursuant to NRS 159.0475(4). He
7 failed to notify the Court of Mr. Olvera's Veteran status, even though he knew of that status before
8 he was appointed Successor General Guardian. His perjury by silence and/or lack of candor to this
9 Court allowed him to collect fees for nine (9) months, all the while depleting an estate to which he
10 was legally and jurisdictionally incapable of oversceeing. His fees for the wrongful guardianship
11 greatly exceed the statutory limitations set forth in NRS 160.120. Mr. Shafer failed to notify this
12 Court that he had been forced to pay a restitution/fine/judgment in settlement of a federal lawsuit
13 which directly alleged him to have engaged in unethical conduct by wrongfully receiving
14 commissions for the unlicensed sale of securities using money he controlled in his role as a fiduciary.
15 He is alleged to have engaged in highly risky margin trading using the funds reserved for Marci
16 DuDeck.

17 In short, Jared Shafer must be immediately removed as Guardian of the person and estate of
18 Guadalupe Olvera and replaced by Co-Petitioners. Enough is enough.

19 For the reasons set forth above, Co-Petitioner Ruth Carney requests the relief as set forth
20 above and as sought elsewhere by the Co-Petitioners.

21 DATED this 13th day of August, 2010.

22 BOGGESS & HARKER

23
24 By: 

25 D. Brian Boggess, Esq.
26 Nevada Bar No. 004337
27 5550 Painted Mirage, Suite #255
28 Las Vegas, Nevada 89149
Attorneys for Co-Petitioner Ruth Carney

BOGGESS & HARKER
5550 Painted Mirage, Suite 255
Las Vegas, Nevada 89149
(702) 233-5040 • Fax 233-2209

EXHIBIT 10

[illegible]

Case Type: Guardianship of Adult
Subtype: Person Only - Adult
Date Filed: 07/15/2005
Location: Department E
Case Number: G028163

Guardian	Olvera, Carmela F 2050 Mountain City St Henderson, NV 89052	DOD: 11/02/2009	Lead Attorneys Pro Se
Guardian of Person and Estate	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Objector	Chaddock, William		Michael J. Brock <i>Retained</i> 7029907272(W)
Petitioner	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Ward	Olvera, Guadalupe M P.O. Box 623 Caitola, CA 95010		Carmine James Colucci <i>Retained</i> 7023841274(W)

09/08/2010	Hearing (9:00 AM) (Judicial Officer Norhelm, Jon) Alan Freer's Motion to Continue
------------	--

Minutes

09/08/2010 9:00 AM

Stephan Mayfield, Bar#10138 Patience Bristol, Private Guardian, Present The Guardianship Commissioner was sitting under direction and in lieu of the Guardianship Judge. Arguments by Mr. Mayfield regarding the issues in this case. Court noted, It is not as concerned with the lack of Notice to Veterans Affairs (VA) as the Court believes the VA did have actual Notice. However, the Court did state there potentially being an issue with regard to NRS 160-040 and whether or not it acts as an absolute preclusion to Mr. Shafer serving in this case. Arguments by Mr. Boggess regarding NRS 160-40, Counsel stated he feels it does act as an absolute preclusion. Counsel cited the details of the statute and noted the issues. The Court stated the issues with the statute and noted the VA's interpretation of it. Further, the statute has not been interpreted in the way being presented by counsel nor has it been common practice. Further arguments regarding the issues and recent changes in circumstances and the ward's desire not to have Mr. Shafer as guardian and wishes to relocate to California. Ward stated his wishes to relocate to California and advised the Court he did not want Mr. Shafer's services. Mr. Mayfield requested an independent third party do the investigation. Ms. Camastro volunteered to do the investigation. Mr. Freer requested there be a 48 hour no contact by family or Mr. Shafer with the ward prior to the investigation.

COMMISSIONER RECOMMENDED; Return Hearing SET for 9/22/10 at 9:00am for GAL Report. Denise Camastro is

APPOINTED as Guardian Ad Litem to determine what the ward's wishes are. Ms. Camastro shall give the parties a 48 hour Notice prior to conducting her investigation. There shall be no contact by family or the guardian 48 hours prior to the investigation. Mr. Freer shall prepare the Report and Recommendation and submit it to opposing counsel for review and signature.

Parties Present

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1 TRANS

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Ann L. Blum
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2
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5 EIGHTH JUDICIAL DISTRICT COURT
6 FAMILY DIVISION
7 CLARK COUNTY, NEVADA
8

9 IN THE MATTER OF THE)
10 GUARDIANSHIP OF:)

CASE NO. 05G028163

11 GUADALUPE OLVERA,)

DEPT. GDN

12 Adult Ward.)
13

14
15 BEFORE THE HONORABLE JON NORHEIM,
16 DISTRICT COURT COMMISSIONER

17 TRANSCRIPT RE: HEARING
18

19 WEDNESDAY, SEPTEMBER 8, 2010
20
21
22
23
24

1 MR. BOGGESS: I think he would --

2 THE COURT: But --

3 MR. BOGGESS: -- like to.

4 THE COURT: But Mr. Freer's right in that that's not
5 actually in front of me today and -- and -- and -- but I -- I,
6 you know, I'll -- he's here, I'm -- I'm happy to -- to listen
7 to him. The -- the other thing that differentiates this case
8 from -- from other cases at large is that the VA money
9 actually isn't in Mr. Shafer's control.

10 ★ We have a bank, Wells Fargo, they have a statutory
11 exemption under NRS 160.04 -- 40. Here's bottom line what
12 you're probably going to get out of me today. And, again, I
13 recognize that this -- the main argument needs to be in front
14 of Judge Hoskin.

15 I -- I -- my recommendation today is -- is going to
16 be go ahead and -- and -- and -- and continue with Mr. Shafer
17 as -- as guardian and find that the -- basically that -- that
18 he's using Wells Fargo to come under an exemption, and -- and
19 I'll -- and I'll shoehorn that in. That may not fly at a
20 level above me.

21 And -- and, again, I'm -- I'm trying to do what's
22 right for the ward. I'm trying to perform equity here.

23 MR. BOGGESS: And -- and if he --

24 THE COURT: If it turns out that the ward really

EXHIBIT 11

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Report: #665359

Complaint Review: Jared Shafer

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Anti Slapp laws and why we need them. NOTICE to all consumers! Junk lawsuits targeting free speech are a major threat to the First Amendment and have a chilling effect on consumers first amendment right to speak out.

Privacy Invasion WARNING

Submitted: Thursday, November 25, 2010 **Last Posting:** Thursday, November 25, 2010 **Reported By:** Outraged Veteran — Boston Massachusetts USA

Jared Shafer
3642 RICK STRATTON DRIVE , NEVADA
891
LAS VEGAS Nevada 89120
United States of America

Phone: 702-456-8323, 702-456-5152
Web: [www.pfsn.com](#)
Category: [Assisted Living Elderly & Disabled](#)

Jared Shafer Professional Fiduciary Services of Nevada, Inc. or PFSN, Inc. Jared Shafer Rips Off of Veterans of Their Pensions & Disability Benefits LAS VEGAS, Nevada

***UPDATE by author: Jared Shafer Professional Fiduciary Services of Nevada, Inc. or PFSN, Inc. Jared Shafer Rips Off Veterans of Their Pensions & Disability Benefits**

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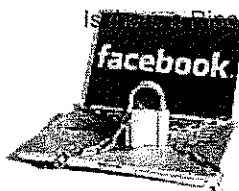
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Jared E. Shafer is a professional guardian who is robbing my Uncle of his Veterans benefit money. My Uncle, who is 85, fought in the Korean War.

3 **0** **0**
Author Consumer Employee/Owner

PL-000113



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Terry Allison
womanizer player bad boy Las Vegas, Nevada



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Internet

bustedmugshots.com - Star Nine Ventures - KGP Media LLC Star Nine is the Parent Company 512-538-2215: Kyle Prall, Jeremy Brooks, Ryan Russell, Ace Elliot.

He moved to Nevada to retire and enjoy the desert sun and dry weather. Unfortunately, he developed Alzheimer's disease five years after moving to Henderson.

Jared E. Shafer was appointed as my uncle's guardian by Commissioner Jon Norheim. My uncle has no immediate family, which makes me his only living relative and I do not live in Nevada. When I finally got a look at Shafer's accounting, I discovered over \$315,000 was taken away from my uncle's trust in a time period of 15 months in very questionable guardian fees and several billings by AVID Business Services, which apparently is a friend of his. After some checking, I discovered that AVID Business services is not licensed by the state or county. I also noticed that the trust was making payments in the name of Jared Shafer and his assistant, Patience Bristol, rather than making payments to the business name he is licensed under and also quite obviously printed on his invoices. I think the IRS should look into Mr. Shafer's billing practices.

I filed an NRS Chapter 160 petition with the Nevada Family court. The statutes of 160 put restrictions on professional guardians who have a ward that is a veteran but the violations by Jared E. Shafer were rejected by Jon Norheim, the guardianship commissioner. Norheim said something like "if I allow you to win this case, guardians would have a difficult time conducting business in Las Vegas. I know we have laws on the books protecting veterans, but when they get in the way of a guardians earning a living, I will not enforce them." This was the most outrageous thing I've ever heard and very hard to take because the NRS statutes regulate the amount a guardian may charge, which is no more than 5% of the Veteran's annual income. Commissioner Norheim's refusal to follow these regulations allows guardians like Shafer to take all of their money. To hear a family court commissioner (he's not really a judge) actually state that he cares more about a guardian making money (and at the ward's expense) is outrageous and criminal. Since when is a family court more interested in protecting the income of a guardian over the income of an elderly ward who served his country?

Commissioner Norheim's statements greatly angered me because I fought in the Tet Offensive of 1968 and lost the use of my left arm.

To add insult to injury, when Jared E. Shafer heard Norheim's ruling, he began to smile, more like smirking. After we left the court, Patience Bristol, his obvious protege, said, "don't fight Jared, he always wins. I work for winners and that is my boss. Give it up, we'll wear you down and make you spend all your money and we'll bill your uncle for our attorney fees and leave him a poor man." The state of Nevada allows the guardians to bill the ward's for their over priced, cut-throat attorneys, depleting the ward's money. This is one of the reasons Jared E. Shafer has gotten away with his exploiting of veterans and other elders because he doesn't have to pay for his attorneys.

A week later Jared E. Shafer contacted me by phone. He said "stop this stupid Vet stuff, if you don't your uncle will die a poor old man."

Jared E. Shafer delights in ripping off veterans. The Internet is full of postings that accurately detail the fraud and exploitation committed by Shafer against families who do not have the means to fight. Commissioner Norheim does what Shafer wants, which brings to question, why? What is Jared E. Shafer doing for him? It doesn't matter if the ward has placed his/her life in danger for our country, these people have no respect for

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our veterans. Stop Jared E. Shafer and Commissioner Norheim before more innocent families fall under the control of this corrupt system.

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This report was posted on Ripoff Report on 11/25/2010 2:42:24 AM and is a permanent record located here: <http://www.ripoffreport.com/assisted-living-elderly-disabled/jared-shafer/jared-shafer-professional-fidu-36f26.htm>.

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Author Consumer Employee/Owner

#1 Update By Author

Jared E. Shafer, Guardian, Exploits Pensions & Disability Benifits From Veterans

AUTHOR: Outraged Citizen - Boston (USA)

SUBMITTED: Thursday, November 25, 2010

Jared E. Shafer is a professional guardian who is robbing my Uncle of his Veterans benefit money. My Uncle, who is 85, fought in the Korean War. He moved to Nevada to retire and enjoy the desert sun and dry weather. Unfortunately, he developed Alzheimer's disease five years after moving to Henderson.

Jared E. Shafer was appointed as my uncle's guardian by Commissioner Jon Norheim. My uncle has no immediate family, which makes me

PL-000115

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Complaint Review: Judge Chuck Hoskin

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them. NOTICE to all consumers!
Junk lawsuits targeting free speech
are a major threat to the First

Submitted: Monday, January 31, 2011 **Last Posting:** Wednesday, June 29, 2011
Reported By: Teri M — Idaho Falls Idaho U.S.A.

Judge Chuck Hoskin
601 North Pecos Road
Internet Internet 89101
United States of America

Phone: 702-455-1500
Web: www.hoskinlaw.com
Category: [Court Judges](#)

Judge Chuck Hoskin Jared Shafer Patience Bristol Judge Hoskin, Jared Shafer & Patience Bristol committed fraud in taking my brother's money , Internet

***Consumer Comment: Judge Hoskin Misconduct Action.....**

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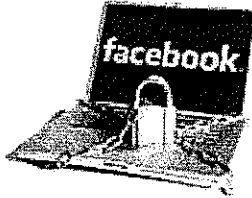
Judge Chuck Hoskin and Jared Shafer took all of my brother's money. During my life I had two very close friends my brother Drew, and the love of my life my husband Sam. Both are dead now. Drew died a poor man thanks to the treatment imposed on him by Judge Chuck Hoskin and his pal / private guardian Jared E. Shafer. In 2006 Drew was injured in a car accident

1 1 0
Author Consumer Employee/Owner

PL-000185

Amendment and have a chilling effect on consumers like amendment right to speak out.

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Lucille Prince aka: Lucille McElroy Scams, fraud, bad checks, slander Los Angeles, California

while traveling on highway 15. Drew's injuries were to his head. After the accident he lost all of

his short term memory and needed help making decisions. Commissioner Norheim over my objections appointed Jared Shafer to act as his guardian because I wasn't a resident of Nevada. Judge Chuck Hoskin affirmed Norheim's ruling stating "non residents will not take care of families in this state." I wanted to take Drew back to Idaho Falls, but Jared Shafer, Judge Chuck Hoskin, and Commissioner Jon Norheim wouldn't allow it. Shafer took over my brother's account, which had about \$850,000. Jared Shafer began paying himself large amounts of money. In 2009 after discovering over \$450,000 had been taken by Jared Shafer I appealed Norheim's ruling to Judge Chuck Hoskin. Hoskin ruled removing over one hundred thousand per year in guardian fees from Drew's Wells Fargo bank account was not unreasonable. The fact care for Drew cost \$8000 per month only added to my brother's financial problems. Drew ran out of Money on October 1, 2010 and was placed into a facility recommended by Jared Shafer, which handled indigent patients. Drew died in one month. The autopsy stated the cause of Drew's death was dehydration. In simple terms, Jared Shafer's facility just didn't feed him.

Shafer would never communicate with me. Patience Bristol, his young thirty-five year old assistant handled all of my calls. I have recordings of Patience Bristol saying "don't fight my boss; your brother will die a poor man if you continue this foolishness." Patience was 100% correct. Judge Hoskin and Jared Shafer are arrogant about what they do. When I spoke to Patience she acted as if the mistreatment of older people was an every-day occurrence, just part of doing business. Hoskin and Shafer need to be stopped before more innocent seniors are harmed or killed as it happened in the case of my brother Drew. For those of you who have read this report for the first time, please understand the laws in Las Vegas are set up to work against any family who believes in fighting for their rights. Jared Shafer and Chuck Hoskin will bleed the accounts until nothing is left. Unfortunately this stealing is totally legal. Judge Hoskin will not enforce laws, which are on the books, especially if they interfere with a guardian making a living. Write your congress person, state legislator, city government officials and let them know about this horrible situation in Nevada. The rip-off report contains stories about federal investigations. I hope they will convict these thieves soon before more seniors are seriously harmed.

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CASE NO. 05G028163

In the Matter of the Guardianship of: Guadalupe Olvera, Adult
 Ward(s)

§
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1

Case Type: **Guardianship of Adult**

Subtype: **Person Only - Adult**

Date Filed: **07/15/2005**

Location: **Department E**

Conversion Case Number: **G028163**

PARTY INFORMATION

Guardian	Olvera, Carmela F 2050 Mountain City St Henderson, NV 89052	DOD: 11/02/2009	Lead Attorneys Pro Se
Guardian of Person and Estate	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Objector	Chaddock, William		Michael J. Brock <i>Retained</i> 7029907272(W)
Petitioner	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Ward	Olvera, Guadalupe M P.O. Box 623 Caltola, CA 95010		Carmine James Colucci <i>Retained</i> 7023841274(W)

EVENTS & ORDERS OF THE COURT

04/28/2010 All Pending Motions (9:00 AM) (Judicial Officer Norhelm, Jon)

Parties Present

04/28/2010 9:00 AM

Other

Connot, Mark J - Attorney
 Guardian of Person and Estate
 Tyrell, Elyse, ESQ - Attorney

Other

Schultz, Rebecca
 Connot, Mark J - Attorney

Minutes

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REGISTER OF ACTIONS

CASE NO. 05G028163

In the Matter of the Guardianship of: Guadalupe Olvera, Adult
Ward(s)

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Case Type: Guardianship of Adult
Subtype: Person Only - Adult
Date Filed: 07/15/2005
Location: Department E
Conversion Case Number: G028163

PARTY INFORMATION

Guardian	Olvera, Carmela F 2050 Mountain City St Henderson, NV 89052	DOD: 11/02/2009	Lead Attorneys Pro Se
Guardian of Person and Estate	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Objector	Chaddock, William		Michael J. Brock <i>Retained</i> 7029907272(W)
Petitioner	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Ward	Olvera, Guadalupe M P.O. Box 623 Caitola, CA 95010		Carmine James Colucci <i>Retained</i> 7023841274(W)

EVENTS & ORDERS OF THE COURT

05/19/2010 **Return Hearing** (9:00 AM) (Judicial Officer Norheim, Jon)
GAL REPORT

Parties Present

05/19/2010 9:00 AM
Guardian of Person and Estate
Shafer, Jared E
Tyrell, Elyse, ESQ - Attorney
Other
Carney, Ruth
Other
Schultz, Rebecca
Petitioner
Shafer, Jared E
Tyrell, Elyse, ESQ - Attorney

Minutes

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JUN 16 2010

John L. Shafer
CLERK OF COURT

TRANS

ORIGINAL

EIGHTH JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

In the Matter of the Guardianship)
of the person and estate of) CASE NO. 05G028163
GUADALUPE MENA OLVERA,) DEPT. GDN
An Adult Ward.)

BEFORE THE HONORABLE JON NORHEIM, HEARING MASTER

TRANSCRIPT RE: RETURN HEARING

WEDNESDAY, MAY 19, 2010

APPEARANCES:

The Guardian: JARED E. SHAFER
For The Guardian: ELYSE M. TYRELL, ESQ.
Trent, Tyrell & Phillips
11920 S. Highlands Pkwy, #200
Las Vegas, Nevada 89141
(702) 382-2210

The Petitioners: REBECCA SCHULTZ
RUTH CARNEY
For The Petitioners: STEPHEN J. MAYFIELD, ESQ.
Hutchison & Steffen, LLC
10080 Alta Drive, #200
Las Vegas, Nevada 89145
(702) 385-2500

ALSO PRESENT: CAROL KINGMAN, ESQ.
JULIE C. ARNOLD, ESQ.
Senior Citizens Law Project
PATIENCE BRISTOL, Case Manager
for Jared Shafer's office.

1 Honor. You said it in a previous hearing.

2 MS. SCHULTZ: That's what he said.

3 MR. MAYFIELD: If he wants Becky to be his guardian,
4 that's really what matters. And you said it earlier this
5 morning. What the Ward wants, with regard to who his guardian
6 is, should be paramount.

7 Now, I understand that he said, I want Becky to be
8 my guardian. If he wants to stay in California -- or stay in
9 Nevada, that's fine. There's no reason to move him at this
10 time. But if he wants specifically for Becky, his daughter,
11 to be his guardian, then The Court should take that very
12 seriously, regardless of whether there's a guardianship in
13 place. Because who he wants to be his guardian is very
14 important.

15 Now, my client wishes to make a statement, Your
16 Honor.

17 MS. SCHULTZ: The only reason Jared Shafer is guardian is
18 because after my mother died last November I came down here to
19 see my father, and I couldn't find him. He was being hidden
20 by a woman who had --

21 THE COURT: I know.

22 MS. SCHULTZ: -- befriended by parents. Okay.

23 THE COURT: I was here.

24 MS. SCHULTZ: So I called the County office, and somebody

1 gave me Mr. Shafer's number.

2 THE COURT: Um-hmm.

3 MS. SCHULTZ: I had no idea who he was. I had to get on
4 a plane after four days of looking for my father. I called
5 him at -- it turned out it was his home number, which I didn't
6 know; and he wasn't happy about that. He said, call me at my
7 office. I call his office. He says, you need an attorney. I
8 thought he was sending me to someone that was going to help
9 me, but he sent me to his attorney. And they put this
10 guardianship in place, which was supposed to be temporary,
11 just to rescue my father from this person who was -- had
12 exploited my parents and hiding my father from me.

13 More -- I'm upset. I'm very stressed out. So I go
14 along with the whole thing, thinking that I'm going to get --
15 become co-guardian with him. And then I find out after the
16 fact he never does co-guardianship.

17 THE COURT: Right.

18 MS. SCHULTZ: So his attorney, and he himself the day I
19 met him, told me that they'd be more than happy to, you know,
20 hand over the guardianship after paperwork, things are put in
21 place, whatever. And it never happened.

22 I mean, my father loves me and he misses me. And if
23 he doesn't want to move, I would never force him to move.
24 Ideally, of course I would love him to be in California with

1 his granddaughter, his great granddaughter, me and my husband.
2 But I would never force him to move. And they've been use --
3 playing that card and -- and -- and cramming that California
4 issue, and using that --

5 THE COURT: But it's in your most recent petition.

6 MS. SCHULTZ: Right.

7 THE COURT: It's not like it --

8 MS. SCHULTZ: No. I --

9 THE COURT: -- went away.

10 MS. SCHULTZ: -- I don't -- I would like --

11 MR. MAYFIELD: So --

12 MS. SCHULTZ: -- I would love him to be near me and his
13 only living family. My father has no friends and no relatives
14 here. So why should he --

15 THE COURT: But -- but he wants to stay.

16 MS. TYRELL: Because he wants to.

17 MS. SCHULTZ: Well, he wants to stay --

18 MR. MAYFIELD: Well, and that's --

19 MS. SCHULTZ: -- in his home.

20 MR. MAYFIELD: -- fine, Your Honor.

21 MS. SCHULTZ: He's ninety years old.

22 MR. MAYFIELD: Your Honor, that's fine. If he wants to
23 stay, that's fine. But the statute provides that if at some
24 point it's in his best interest to move him to California, six

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REGISTER OF ACTIONS

CASE NO. 05G028163

In the Matter of the Guardianship of: Guadalupe Olvera, Adult
Ward(s)

§
106.081
NRS

Case Type: **Guardianship of Adult**

Subtype: **Person Only - Adult**

Date Filed: **07/15/2005**

Location: **Department E**

Conversion Case Number: **G028163**

PARTY INFORMATION

Guardian	Olvera, Carmela F 2050 Mountain City St Henderson, NV 89052	DOD: 11/02/2009	Lead Attorneys Pro Se
Guardian of Person and Estate	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Objector	Chaddock, William		Michael J. Brock <i>Retained</i> 7029907272(W)
Petitioner	Shafer, Jared E PO BOX 50762 HENDERSON, NV 89016		Alan D. Freer <i>Retained</i> 702-853-5483(W)
Ward	Olvera, Guadalupe M P.O. Box 623 Caltola, CA 95010		Carmine James Colucci <i>Retained</i> 7023841274(W)

EVENTS & ORDERS OF THE COURT

07/13/2010 **Objection (10:30 AM)** (Judicial Officer Hoskin, Charles J.)
Rebecca Schultz's Objection to Guardianship Commissioner's Report and Recommendation

Parties Present

07/13/2010 10:30 AM

Guardian of Person and Estate

Shafer, Jared E

Tyrell, Elyse, ESQ - Attorney

Other

Carney, Ruth

Other

Schultz, Rebecca

Petitioner

Shafer, Jared E

Tyrell, Elyse, ESQ - Attorney

Minutes

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REGISTER OF ACTIONS

CASE NO. 05G028163

In the Matter of the Guardianship of: Guadalupe Olvera, Adult
Ward(s)

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EXHIBIT 14

	A	B
1	Post Number	Title of Post
2	645331	JARED SHAFER Nevada Guardian Jared Shafer, Nevada Guardian Las Vegas, Nevada
3	646880	Jared E Shafer Clark County Public Administrator/Guardian Jared Evan Shafer He Stole Our Estate & Abused My Parent Las Vegas, Nevada
4	647120	Jared shafer patience bristol guardian, elder abuse, fraud Las Vegas Internet, Nevada
5	647521	Jared E Shafer professional fiduciary services of Nevada guardian elder abuse las vegas nevada Henderson, Nevada
6	648646	AVID Business Service of Nevada Amy Viggiano Deittrick, Jared Shafer, Patience Bristol elder abuse, fraud, tax evasion InternetLas Vegas, Nevada
7	649215	Patience Bristol ~ Amy Viggiano Deittrick ~ Jared Shafer robs from innocent seniors, keeps money for herself las vegas Nevada
8	649251	Keep You Company Patience Bristol, Jared Shafer, Amy Deittrick horrible care of an elderly person InternetLas Vegas, Nevada
9	650031	Patience Bristol Jared Shafer guardian licensing fraud violation of Rico Act Internet Las Vegas, Nevada
10	650518	Oasis Home Health Inc. Holly Kay Montano, Jared Shafer, Patience Bristol medicare ripoff InternetLas Vegas, Nevada
11	650894	Oasis Home Health Inc Holly K Montano, Jared Shafer, and Patience Bristol medicare fraud, elder abuse, exploitation Internet Las Vegas, Nevada
12	652424	Jared E Shafer Shelly, Patience Bristol Mr. Shafer bribed my attorney with future cases Internet Las Vegas, Nevada
13	653634	Jared E Shafer John Norheim, Patience Bristol elder abuse, fraud, exploitation of seniors Internet Las Vegas, Nevada
14	655344	www.Gammett And King Gammett, King, Shafer, Norheim investment fraud, rip-off, misrepresentation Henderson, Nevada
15	663155	Patience Bristol jared shafer Patience swindled my son out of \$200,000 in false restaurant las vegas, Nevada
16	665359	Jared Shafer Professional Fiduciary Services of Nevada, Inc. or PFSN, Inc. Jared Shafer Rips Off of Veterans of Their Pensions & Disability Benefits LAS VEGA
17	665516	Jared E. Shafer Professional Fiduciary Services of Nevada, Inc. or PFSN, Inc. Guardian Exploitation of Veterans, Elderly & Disabled Las Vegas, Nevada
18	676021	alan d freer Solomon Dwiggins & Freer fraud, robbing innocent families, & misrepresentation Internetlas vegas, Nevada
19	676163	Alan D. Freer Solomon, Dwiggins Freer & Morse, Ltd. Steals Money From Senior Citizens By Excessive Billings To Estates Of Wards On Behalf Of Corrupt Gu
20	679116	Shelley Krohn Jared Shafer, Holly K Montano Shelley Krohn caused my sister to end her life Las Vegas, Nevada
21	680142	AVID Amy Deittrick, Jared Shafer, Patience Bristol unlicensed business, fraud, taking money from the elderly Internet las vegas, Nevada
22	681200	Attorney Alan D. Freer Financial Exploitation & Abuse of Elders, Las Vegas, Nevada
23	682328	Kerrie Hutchings, Jared Shafer, Judy Johnston Seized and stole our assets, forced us out of our home and circumvented our will Las Vegas, Nevada
24	687273	Judge Chuck Hoskin Elyse Tyrell, Jared Shafer Chuck Hoskin takes bribes, breaks the law, and takes money from families Internet las vegas, Nevada
25	689183	Judge Chuck Hoskin Jared Shafer Patience Bristol Judge Hoskin, Jared Shafer & Patience Bristol committed fraud in taking my brother's money, Internet
26	696610	Judge Chuck Hoskin Jared Shafer Patience Bristol cashing my dead father's social security checks, fraud, rip-off InternetLas Vegas, Nevada
27	699517	Jared E. Shafer, former Clark County Public Administrator/Guardian, Professional Fiduciary Services of Nevada, Krohn-ies and other associates appear to h
28	699576	Commissioner Jon Norheim Jared Shafer and Patience bristol Jon Norheim and Jared Shafer take money from sick old people. Fraud, lies, and threats Inter
29	702089	Jared Shafer robbed my elderly parent of her life savings Henderson, Nevada
30	705474	Sun Dance Medical of Las Vegas thomas Peters, Jared Shafer, Patience Bristol Sun dance Medical engages in Medicare Fraud, taxpayer rip offs, and kick ba
31	705994	Jared E. Shafer, PFSN, and others used the court system and charged fees to deprive my father and our family of our rights, assets and property. Internet
32	708711	Solomon Dwiggins Freer & Morse Alan D Freer, Jared Shafer, and Patience Bristol senior rip off kidnapping, fraud, misuse of the court system Las Vegas, N
33	712130	Patience M. Bristol Jared Shafer and Judge Chuck Hoskin Patience M. Bristol killed my father las vegas, nevada
34	715788	Jared E Shafer David Cabral, Danica L. Shafer, Barry Isaac Shafer, Claire A. Shafer The Shafer family care guilty of fraud, elder abuse, and theft against my c
35	718378	Clair A Shafer Patience Bristol, Jared Shafer, Danica Csukor, Barry I Shafer Claire Shafer steals money from disabled seniors in Nevada Las Vegas, Nevada
36	720562	Jared E Shafer Claire Shafer, Patience Bristol, Barry Shafer, Danica Csukor Jared Shafer, a poem about elder abuse, fraud, and exploitation Las Vegas, Neva
37	722192	Elyse M Tyrell Jared Shafer, Danica Csukor, Jon Norheim, Alan Freer Elyse M Tyrell ESQ uses her legal knowledge to exploit seniors Las Vegas, Nevada
38	723776	Patience M Bristol jared Shafer Patience Bristol takes from old people to support her stoli habit Las Vegas, Nevada
39	725712	Solomon Dwiggins Freer & Morse Jared Shafer, Patience Bristol Double dealing, fraud, and misrepresentation are the products of Solomon Dwiggins Freer
40	726793	Jared E Shafer Patience Bristol Jared Shafer has stole from seniors for thirty years, but he brags it is perfectly legal Las Vegas, Nevada
41	731283	Jared Shafer Gammett and King, Alan Freer Jared Shafer stole \$40,000 using fraud, lying, & trickery Las Vegas, Nevada
42	735473	Jared Shafer Professional Fiduciary Services of Nevada Stealing Trust Monies and misappropriation of authority Henderson , Nevada
43	738955	Jared Shafer Guardian Patience Bristol, Jump for Joy Care, and Jon Norheim Jared Shafer caused my mother's suicide because of cruel treatment Las Vega
44	740207	Solomon Dwiggins Freer & Morse, Ltd. - Las Vegas, Nevada-Lionel Sawyer and Collins-, Abbi Friedman 9/11 race profiling on Muslim wife and family. Who
45	741766	Jon Norheim Jared Shafer, Patience Bristol Jon Norheim is a corrupt public official who takes bribes Las Vegas, Nevada

	A	B
46	742707	Jon W Norheim Acorn, Jared Shafer, Chuck Hoskin Jon Norheim Clark County discovery Commissioner confesses he is part of the mob Las Vegas, Nevada
47	742747	Jared E Shafer guardian Acorn, Jon Norheim, Alan Freer Jared Shafer steals from seniors, I can prove it Las Vegas, Nevada
48	747145	Jared E Shafer Patience bristol Jared Shafer to use my mother as a medical experoment Las Vegas, Nevada
49	747558	Jared Shafer Guardian Patience Bristol, Judge Chuck Hoskin, & Jon Norheim Jared Shafer murdered my father by making him a medicle experiment against
50	748729	Jared E Shafer Jon Norheim, Judge Chuck Hoskin Jared Shafer uses his wards for black market medicle experiments Las Vegas, Nevada
51	752615	Jared E Shafer Alan Freer, Judge Chuck Hoskin Jared Shafer caught in Black Market medical Experiment rip off las vegas, Nevada
52	755375	Kim Boyer Jared Shafer Kim Boyer was caught helping Jared Shafer in black market medical experiments Las Vegas, Nevada
53	756519	Patience Bristol Jared E Shafer Patience Bristol killed my Aunt Las Vegas, Nevada
54	756568	Alan D Freer Attorney Jared E Shafer, solomon dwiggins Freer & Morse Alan Freer helps Jared Shafer murder seniors with black market medical experimen
55	758600	Commissioner Jon W Norheim Jared Shafer, Patience bristol Commissioner Jon Norheim solicits Bribes Internetlas vegas, Nevada
56	762174	Robert Simpson Attorney Alan Freer, Solomon Dwiggins , & Freer Robert Simpson stole \$25,000 cash from my dying friend Las Vegas, Nevada
57	764745	attorney Alan Freer Jared E Shafer, Solomon Dwiggins Freer & Morse Alan Freer & Jared Shafer practice racist Rip Offs Las Vegas, Nevada
58	765019	Alan D Freer attorney Jared Shafer, Solomon Dwiggins Freer & Morse Alan Freer & Jared Shafer's bullying killed my Uncle Frank Las Vegas, Nevada
59	767196	Jared E Shafer Patience Bristol, Alan D Freer Jared E Shafer's corruption killed my father Las Vegas, Nevada
60	767380	Jared Shafer Danica Csukor, Patience Bristol Jared uses his daughter to steal from the old and sick Las Vegas, Nevada
61	768321	Jared Shafer Patience Bristol Alan Freer Jared Shafer rips off and hates Muslims Las Vegas, Nevada
62	778703	Jared Shafer Patience Bristol Jared Shafer & Patience Bristol caused my son to kill himself Las Vegas, Nevada
63	785544	Jared Shafer nevada Clare Shafer Jared Shafer Killed Thomas Gaule's mother in 1998 Las Vegas, Nevada
64	788796	Claire Shafer Jared Shafer, Patience Bristol Claire Shafer struck my sister with a coat hanger, she is now dead Las Vegas, Nevada
65	790337	Patience Bristol guardian Jared Shafer Patience Bristol stole \$75,000 from my sick grandmother Las Vegas, Nevada
66	791754	jared shafer guardian Patience Bristol FBI investigates Jared Shafer for wire fraud Las Vegas, Nevada
67	792863	www.pfsn.com patience bristol, jared shafer Patience you caused my mother to die in agony Henderson, Nevada
68	792994	Patience Bristol pfsn jared e shafer Patience Bristol unethical guardian killed mother Henderson , Nevada
69	794218	Patience Bristol guardian Jared Shafer Patience M Bristol caused my Aunt's death Henderson, Nevada
70	795446	Jared E Shafer Alan D Freer Jared Shafer runs a Ponzi Scheme Henderson, Nevada
71	799302	Patience M Bristol Jared Shafer Patience Bristol molested my son and took my father's money Las Vegas, Nevada
72	799847	Jared E shafer guardian Alan D Freer, Patience Bristol Jared Shafer's rip-off cruelty kills another US. Vet Las Vegas, Nevada
73	800976	Jared Shafer fiduciary Claire Shafer, Patience Bristol Fiduciary Jared Shafer brags about ripping of Senior citizens at high school reunion Las Vegas, Nevada
74	802955	Alan D Freer Jared Shafer, Commissioner Jon Norheim, Alan D freer Las Vegas Lawyer admits to bribing family court judges Las Vegas, Nevada
75	807677	Gamett and King Shawn King, Jared Shafer Gamett and King embezzle senior accounts for Jared Shafer Henderson, Nevada
76	810796	National Association to Stop Guardian Abuse Jared Shafer, Patience Bristol Jared Shafer Rips Off National Association to Stop Guardian Abuse Members M
77	813544	Jared E Shafer Patience M Bristol, Alan D Freer Jared Shafer committed fraud and stole from my father Las Vegas, Nevada
78	816348	Jared E Shafer Patience M Bristol Jared Shafer starved my mother to death in Las Vegas senior home Las Vegas, Nevada
79	820548	Patience m Bristol Jared Shafer Patience Bristol's Facebook pages admits to ripping of my grandfather along with Jared Shafer Las Vegas, Nevada
80	822376	Jared E Shafer Claire A Shafer, Patience Bristol Jared Shafer fraud, lier, crook, and rip off guardian las vegas, Nevada
81	823692	Patience M Bristol Jared E Shafer Patience Bristol's Face Book photo celebrates her ability to kill my mother slowly Las Vegas, Nevada
82	829676	Jared Shafer Patience Bristol Jared Shafer's guardianship kills another helpless senior las vegas, Nevada
83	832036	Patience M Bristol Jared E Shafer Patience Bristol's Face Book page proves she stole from my brother and he died of a broken heart Las Vegas, Nevada
84	837644	Patience Bristol Jared Shafer, Alan D Freer Patience Bristol Las Vegas Thief steals from helpless Nevada seniors Las Vegas, Nevada
85	842669	Jared Shafer Jon Norheim, Patience Bristol Jared Shafer Las Vegas is a senior rip off pedophile who killed my father Las Vegas, Nevada
86	844581	Lance DuDeck Marisa DuDeck, Patience Bristol, Jared Shafer Lance DuDeck steals money he took \$1500 from me Las Vegas, Nevada
87	855731	Jared Shafer Patience Bristol Jared Shafer is a rip off guardian child molestor who killed my sister Las Vegas, Nevada
88	866946	Patience M Bristol Jared Shafer, Alan D Freer, Jon Norheim Patience Bristol murdered my mother for profit Las Vegas, Nevada
89	874404	Alan D Freer Jared Shafer, Patience Bristol Alan D freer is a scam attorney who kills Seniors for profit Las Vegas, Nevada
90	880826	Jared Shafer Alan D Freer attorney Clark County Board of Equalization allows Jared Shafer to steal from hard working people Las Vegas, Nevada

	A	B
91	682164	Senior Citizen Law Project Carol A. Kingman, Julie C. Arnold Extortion, fraud, and filing false documents with a court are the acts of these ladies InternetLas
92	872950	Jared E. Shafer Corruptive, Dishonest unbecoming Ethics behavior of this unprofessional fiduciary/guardian Las Vegas, Nevada
93	901541	Patience Bristol Jared Shafer Patience Bristol is a private Nevada guardian whose rip-off killed my father Las Vegas, Nevada
94	910998	Jared Shafer Patience bristol, Jared Shafer is a private guardian crook. He charged me \$5,000 cash to visit my Uncle Las Vegas, Nevada
95	913842	Jared Shafer Bruce Gamett and Shawn King Jared Shafer rips-off North Las Vegas Pension funds through bad investments Las Vegas, Nevada
96	927871	Center for Guardian Certification Denise Calabrese, Jared Shafer The CGC helped one of their guardian members rip off \$250,000 from my uncle and this c
97	949910	Jared Shafer Patience Bristol Jared Shafer & Patience Bristol ripped off and murdered my sister Clare. Las Vegas, Nevada
98	952552	Jared E Shafer Patience M Bristol Jared E Shafer ripped off and Killed my brother Steve Las Vegas, Nevada
99	961732	Jon W Norheim Jared E Shafer, Patience Bristol Commissioner Jon W Norheim's court killed my father Las Vegas, Nevada
100	965077	Jared Shafer Alan D Freer, Patience Bristol jared shafer porno guardian stole \$1,000,000 from my dying brother las vegas, Nevada
101	980706	Professional Fiduciary Services of Nevada/PFSN Jared Shafer PFSN & Jared Shafer Las Vegas steal from seniors. Las Vegas, Nevada
102	986287	Jared Shafer PFSN, Patience Bristol Jared Shafers guardian rip off Crimes Las Vegas, Nevada
103	989571	Jared Shafer Jared Shafer fiduciary embezzler Las Vegas, Nevada
104	995353	Jared Shafer Jared Shafer is a guardian fraud crook who stole my dad's money Henderson, Nevada
105	999462	PatienceBristol Jared Shafer Patience Bristol in Las Vegas is a crook. Las Vegas, Nevada
106	1006962	jared shafer patience Jared Shafer las vegas crook pig Las Vegas, Nevada
107	1012391	Jared Shafer Patience M Bristol Jared E Shafer guardian bully Las Vegas stole \$429,000 from my Aunt Las Vegas, Nevada
108	1018391	Jared E Shafer Patience Bristol, Alan D Jared E Shafer guardian ripped off & killed my cousin Las Vegas, Nevada
109	1022221	Jared E Shafer guardian stole \$107,000 from my father Las Vegas, Nevada
110	1026537	Alan D Freer Solomon Dwiggins & Freer Alan D Freer Attorney stole \$85,000 from my father by refusing to pay him back Las Vegas, Nevada
111	1042575	guardianship Solutions Inc. Patience Bristol Patience Bristol, Guardianship Solutions INC. stole \$250,000 from my Uncle Las Vegas, Nevada

	C	D	E	F	G	H	I	J	K	L	M	N	O
1	URL												
2	http://www.ripoffreport.com/r/JARED-SHAHER/Las-Vegas-Nevada-89120-2645/JARED-SHAHER-Nevada-Guardian-Jared-Shafer-Nevada-Guardian-Las-Vegas-Nevada-645331												
3	http://www.ripoffreport.com/r/jared-e-shafer-clark-county-public-administratorguardian/las-vegas-nevada-/jared-e-shafer-clark-county-public-administratorguardian-jared-evan-shafer-he-stole-646880												
4	http://www.ripoffreport.com/r/jared-shafer/Las-VegasInternet-Nevada-89120/jared-shafer-patience-brystol-guardian-elder-abuse-fraud-Las-Vegas-Internet-Nevada-647120												
5	http://www.ripoffreport.com/r/Jared-E-Shafer/Henderson-Nevada-89016/Jared-E-Shafer-professional-fiduciary-services-of-Nevada-guardian-elder-abuse-las-vegas-ne-647521												
6	http://www.ripoffreport.com/r/AVID-Business-Service-of-Nevada/InternetLas-Vegas-Nevada-89119/AVID-Business-Service-of-Nevada-Amy-Viggiano-Deitrick-Jared-Shafer-Patience-Bristol-eld-648646												
7	http://www.ripoffreport.com/r/Patience-Bristol/las-vegas-Nevada-89118/Patience-Bristol-Amy-Viggiano-Deitrick-Jared-Shafer-robs-from-inocent-seniors-keeps-649215												
8	http://www.ripoffreport.com/r/Keep-You-Company/InternetLas-Vegas-Nevada-89104/Keep-You-Company-Patience-Bristol-Jared-Shafer-Amy-Deitrick-horrible-care-of-an-elderly-649251												
9	http://www.ripoffreport.com/r/patience-bristol/internet-las-vegas-nevada-/patience-bristol-jared-shafer-guardian-licensing-fraud-violation-of-rico-act-internet-las-650031												
10	http://www.ripoffreport.com/r/Oasis-Home-Health-Inc/InternetLas-Vegas-Nevada-89146/Oasis-Home-Health-Inc-Holly-Kay-Montano-Jared-Shafer-Patience-Bristol-medicare-ripoff-l-650518												
11	http://www.ripoffreport.com/r/Oasis-Home-Health-INc/InternetLas-Vegas-Nevada-89146/Oasis-Home-Health-INc-Holly-K-Montano-Jared-Shafer-and-Patience-Bristol-medicare-fraud-650894												
12	http://www.ripoffreport.com/r/Jared-E-Shafer/InternetLas-Vegas-Nevada-89120/Jared-E-Shafer-Shelly-Patience-Bristol-Mr-Shafer-bribed-my-attorney-with-future-cases-l-652424												
13	http://www.ripoffreport.com/r/Jared-E-Shafer/Internet-Las-Vegas-Nevada-89120/Jared-E-Shafer-John-Norheim-Patience-Bristol-elder-abuse-fraud-exploitation-of-seniors-653634												
14	http://www.ripoffreport.com/r/wwwGammett-And-King/Henderson-Nevada-89074/wwwGammett-And-King-Gammett-King-Shafer-Norheim-investment-fraud-rip-off-misrepresen-655344												
15	http://www.ripoffreport.com/r/Patience-Bristol/las-vegas-Nevada-89118/Patience-Bristol-jared-shafer-Patience-swindled-my-son-out-of-200000-in-false-restaurant-663155												
16	http://www.ripoffreport.com/r/Jared-Shafer/LAS-VEGAS-Nevada-89120/Jared-Shafer-Professional-Fiduciary-Services-of-Nevada-Inc-or-PFSN-Inc-Jared-Shafer-RI-665359												
17	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120/Jared-E-Shafer-Professional-Fiduciary-Services-of-Nevada-Inc-or-PFSN-Inc-Guardian-Exp-665516												
18	http://www.ripoffreport.com/r/alan-d-freer/Internetlas-vegas-Nevada-89129/alan-d-freer-Solomon-Dwiggins-Freer-fraud-robing-inocent-families-misrepresentation-676021												
19	http://www.ripoffreport.com/r/Alan-D-Freer/Las-Vegas-Nevada-89129/Alan-D-Freer-Solomon-Dwiggins-Freer-Morse-Ltd-Steals-Money-From-Senior-Citizens-By-676163												
20	http://www.ripoffreport.com/r/Shelley-Krohn/Las-Vegas-Nevada-89134/Shelley-Krohn-Jared-Shafer-Holly-K-Montano-Shelley-Krohn-caused-my-sister-to-end-her-life-679116												
21	http://www.ripoffreport.com/r/AVID/Internetlas-vegas-Nevada-89119/AVID-Amy-Deitrick-Jared-Shafer-Patience-Bristol-unlicensed-business-fraud-taking-mone-680142												
22	http://www.ripoffreport.com/r/Attorney-Alan-D-Freer/Las-Vegas-Nevada-89129/Attorney-Alan-D-Freer-Financial-Exploitation-Abuse-of-Elders-Las-Vegas-Nevada-681200												
23	http://www.ripoffreport.com/r/Kerrie-Hutchings-Jared-Shafer-Judy-Johnston/Las-Vegas-Nevada-89106/Kerrie-Hutchings-Jared-Shafer-Judy-Johnston-Seized-and-stole-our-assets-forced-us-out-682328												
24	http://www.ripoffreport.com/r/Judge-Chuck-Hoskin/Internet-las-vegas-Nevada-89101/Judge-Chuck-Hoskin-Elyse-Tyrell-Jared-Shafer-Chuck-Hoskin-takes-bribes-breaks-the-law-a-687273												
25	http://www.ripoffreport.com/r/Judge-Chuck-Hoskin/Internet/Judge-Chuck-Hoskin-Jared-Shafer-Patience-Bristol-Judge-Hoskin-Jared-Shafer-Patience-Bri-689183												
26	http://www.ripoffreport.com/r/Judge-Chuck-Hoskin/InternetLas-Vegas-Nevada-89101/Judge-Chuck-Hoskin-Jared-Shafer-Patience-Bristol-cashing-my-dead-fathers-social-security-696610												
27	http://www.ripoffreport.com/r/Jared-E-Shafer/nationwide/Jared-E-Shafer-former-Clark-County-Public-AdministratorGuardian-Professional-Fiduciary-699517												
28	http://www.ripoffreport.com/r/Commissioner-Jon-Norheim/Internetlas-vegas-Nevada-89101/Commissioner-Jon-Norheim-Jared-Shafer-and-Patience-bristol-Jon-Norheim-and-Jared-Shafer-ta-699576												
29	http://www.ripoffreport.com/r/Jared-Shafer/Henderson-Nevada-89016/Jared-Shafer-robbd-my-elderly-parent-of-her-life-savings-Henderson-Nevada-702089												
30	http://www.ripoffreport.com/r/Sun-Dance-Medical-of-Las-Vegas/Las-Vegas-Nevada-89125/Sun-Dance-Medical-of-Las-Vegas-Thomas-Peters-Jared-Shafer-Patience-Bristol-Sun-Dance-Med-705474												
31	http://www.ripoffreport.com/r/Jared-E-Shafer-PFSN/Internet/Jared-E-Shafer-PFSN-and-others-used-the-court-system-and-charged-fees-to-deprive-my-fa-705994												
32	http://www.ripoffreport.com/r/Solomon-Dwiggins-Freer-Morse/Las-Vegas-Nevada-89129/Solomon-Dwiggins-Freer-Morse-Alan-D-Freer-Jared-Shafer-and-Patience-Bristol-senior-ri-708711												
33	http://www.ripoffreport.com/r/Patience-M-Bristol/las-vegas-Nevada-89108/Patience-M-Bristol-Jared-Shafer-and-Judge-Chuck-Hoskin-Patience-M-Bristol-killed-my-fath-712130												
34	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120-2645/Jared-E-Shafer-David-Cabral-Danica-L-Shafer-Barry-Isaac-Shafer-Claire-A-Shafer-The-Sh-715788												
35	http://www.ripoffreport.com/r/Claire-A-Shafer/Las-Vegas-Nevada-89120/Claire-A-Shafer-Patience-Bristol-Jared-Shafer-Danica-Csukor-Barry-I-Shafer-Claire-Shafe-718378												
36	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120-2645/Jared-E-Shafer-Claire-Shafer-Patience-Bristol-Barry-Shafer-Danica-Csukor-Jared-Shafer-720562												
37	http://www.ripoffreport.com/r/Elyse-M-Tyrell/Las-Vegas-Nevada-89141/Elyse-M-Tyrell-Jared-Shafer-Danica-Csukor-Jon-Norheim-Alan-Freer-Elyse-M-Tyrell-ESQ-use-722192												
38	http://www.ripoffreport.com/r/Patience-M-Bristol/Las-Vegas-Nevada-89128/Patience-M-Bristol-jared-Shafer-Patience-Bristol-takes-from-old-people-to-support-her-stol-723776												
39	http://www.ripoffreport.com/r/Solomon-Dwiggins-Freer-Morse/las-Vegas-Nevada-89128/Solomon-Dwiggins-Freer-Morse-Jared-Shafer-Patience-Bristol-Double-dealing-fraud-and-m-725712												
40	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89128/Jared-E-Shafer-Patience-Bristol-Jared-Shafer-has-stolen-from-seniors-for-thirty-years-but-726793												
41	http://www.ripoffreport.com/r/Jared-Shafer/Las-Vegas-Nevada-89120/Jared-Shafer-Gammett-and-King-Alan-Freer-Jared-Shafer-stole-40000-using-fraud-lying--731283												
42	http://www.ripoffreport.com/r/Jared-Shafer/Henderson-Nevada-89016/Jared-Shafer-Professional-Fiduciary-Services-of-Nevada-Stealing-Trust-Monies-and-misappr-735473												
43	http://www.ripoffreport.com/r/Jared-Shafer-Guardian/Las-Vegas-Nevada-89120/Jared-Shafer-Guardian-Patience-Bristol-Jump-for-Joy-Care-and-Jon-Norheim-Jared-Shafer-ca-738955												
44	http://www.ripoffreport.com/r/Solomon-Dwiggins-Freer-Morse-Ltd-Las-Vegas-Nevada-Lionel-Sawyer-and-Collins-/Las-Vegas-Nevada-89121/Solomon-Dwiggins-Freer-Morse-Ltd-Las-Vegas-Nevada-Lionel-S												
45	http://www.ripoffreport.com/r/Jon-Norheim/Las-Vegas-Nevada-89101/Jon-Norheim-Jared-Shafer-Patience-Bristol-Jon-Norheim-is-a-corrupt-public-offical-who-tak-741766												

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46	http://www.ripoffreport.com/r/Jon-W-Norheim/Las-Vegas-Nevada-89101/Jon-W-Norheim-Acorn-Jared-Shafer-Chuck-Hoskin-Jon-Norheim-Clark-County-discovery-Commiss-742707												
47	http://www.ripoffreport.com/r/Jared-E-Shafer-guardian/Las-Vegas-Nevada-89120/Jared-E-Shafer-guardian-Acorn-Jon-Norheim-Alan-Freer-Jared-Shafer-steals-from-seniors-l-742747												
48	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120/Jared-E-Shafer-Patience-bristol-Jared-Shafer-to-use-my-mother-as-a-medical-experoment-Las-747145												
49	http://www.ripoffreport.com/r/Jared-Shafer-Guardian/Las-Vegas-Nevada-89120/Jared-Shafer-Guardian-Patience-Bristol-Judge-Chuck-Hoskin-Jon-Norheim-Jared-Shafer-mur-747558												
50	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120/Jared-E-Shafer-Jon-Norheim-Judge-Chuck-Hoskin-Jared-Shafer-uses-his-wards-for-black-marke-748729												
51	http://www.ripoffreport.com/r/Jared-E-Shafer/las-vegas-Nevada-89120/Jared-E-Shafer-Alan-Freer-Judge-Chuck-Hoskin-Jared-Shafer-caught-in-Black-Market-medical-752615												
52	http://www.ripoffreport.com/r/Kim-Boyer/Las-Vegas-Nevada-89135/Kim-Boyer-Jared-Shafer-Kim-Boyer-was-caught-helping-Jared-Shafer-in-black-market-medical-e-755375												
53	http://www.ripoffreport.com/r/Patience-Bristol/Las-Vegas-Nevada-89120/Patience-Bristol-Jared-E-Shafer-Patience-Bristol-killed-my-Aunt-Las-Vegas-Nevada-756519												
54	http://www.ripoffreport.com/r/Alan-D-Freer-Attorney/Las-Vegas-Nevada-89135/Alan-D-Freer-Attorney-Jared-E-Shafer-solomon-dwiggins-Freer-Morse-Alan-Freer-helps-Jare-756568												
55	http://www.ripoffreport.com/r/Commissioner-Jon-W-Norheim/internet/Commissioner-Jon-W-Norheim-Jared-Shafer-Patience-bristol-Commissioner-Jon-Norheim-solicit-758600												
56	http://www.ripoffreport.com/r/Robert-Simpson-Attorney/Las-Vegas-Nevada-89129/Robert-Simpson-Attorney-Alan-Freer-Solomon-Dwiggins-Freer-Robert-Simpson-stole-25000-762174												
57	http://www.ripoffreport.com/r/attorney-Alan-Freer/Las-Vegas-Nevada-89120/attorney-Alan-Freer-Jared-E-Shafer-Solomon-Dwiggins-Freer-Morse-Alan-Freer-Jared-Shaf-764745												
58	http://www.ripoffreport.com/r/Alan-D-Freer-attorney/Las-Vegas-Nevada-89120/Alan-D-Freer-attorney-Jared-Shafer-Solomon-Dwiggins-Freer-Morse-Alan-Freer-Jared-Shaf-765019												
59	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120/Jared-E-Shafer-Patience-Bristol-Alan-D-Freer-Jared-E-Shafers-corruption-killed-my-father-767196												
60	http://www.ripoffreport.com/r/Jared-Shafer/Las-Vegas-Nevada-89120/Jared-Shafer-Danica-Csukor-Patience-Bristol-Jared-uses-his-daughter-to-steal-from-the-old-767380												
61	http://www.ripoffreport.com/r/Jared-Shafer/Las-Vegas-Nevada-89120/Jared-Shafer-Patience-Bristol-Alan-Freer-Jared-Shafer-rips-off-and-hates-Muslims-Las-Vegas-768321												
62	http://www.ripoffreport.com/r/Jared-Shafer/Las-Vegas-Nevada-89118/Jared-Shafer-Patience-Bristol-Jared-Shafer-Patience-Bristol-caused-my-son-to-kill-himself-778703												
63	http://www.ripoffreport.com/r/Jared-Shafer-nevada/Las-Vegas-Nevada-89120/Jared-Shafer-nevada-Claire-Shafer-Jared-Shafer-Killed-Thomas-Gaules-mother-in-1998-Las-Veg-785544												
64	http://www.ripoffreport.com/r/Claire-Shafer/Las-Vegas-Nevada-89120/Claire-Shafer-Jared-Shafer-Patience-Bristol-Claire-Shafer-struck-my-sister-with-a-coat-ha-788796												
65	http://www.ripoffreport.com/r/Patience-Bristol-guardian/Las-Vegas-Nevada-89120/Patience-Bristol-guardian-Jared-Shafer-Patience-Bristol-stole-75000-from-my-sick-grandmo-790337												
66	http://www.ripoffreport.com/r/Jared-Shafer-guardian/Las-Vegas-Nevada-89120/Jared-Shafer-guardian-Patience-Bristol-FBI-investigates-Jared-Shafer-for-wire-fraud-Las-Ve-791754												
67	http://www.ripoffreport.com/r/wwwpfnsncom/Henderson-Nevada-89120/wwwpfnsncom-patience-bristol-jared-shafer-Patience-you-caused-my-mother-to-die-in-agony-792863												
68	http://www.ripoffreport.com/r/Patience-Bristol-pfsn/Henderson-Nevada-89119/Patience-Bristol-pfsn-jared-e-shafer-Patience-Bristol-unethical-guardian-killed-mother-Hen-792994												
69	http://www.ripoffreport.com/r/Patience-Bristol-guardian/Henderson-Nevada-89119/Patience-Bristol-guardian-Jared-Shafer-Patience-M-Bristol-caused-my-Aunts-death-Henderson-794218												
70	http://www.ripoffreport.com/r/Jared-E-Shafer/Henderson-Nevada-89118/Jared-E-Shafer-Alan-D-Freer-Jared-Shafer-runs-a-Ponzi-Scheme-Henderson-Nevada-												

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91	http://www.ripoffreport.com/r/Senior-Citizen-Law-Project/InternetLas-Vegas-Nevada-89101/Senior-Citizen-Law-Project-Carol-A-Kingman-Julie-C-Arnold-Extortion-fraud-and-filing-682164												
92	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89016/Jared-E-Shafer-Corruptive-Dishonest-unbecoming-Ethics-behavior-of-this-unprofessional-f-872950												
93	http://www.ripoffreport.com/r/Patience-Bristol/Las-Vegas-Nevada-89120/Patience-Bristol-Jared-Shafer-Patience-Bristol-is-a-private-Nevada-guardian-whose-rip-off-901541												
94	http://www.ripoffreport.com/r/jared-shafer/las-vegas-nevada-89120/jared-shafer-patience-bristol-jared-shafer-is-a-private-guardian-crook-he-charged-me-5-910998												
95	http://www.ripoffreport.com/r/jared-shafer/las-vegas-nevada-89120/jared-shafer-bruce-gamett-and-shawn-king-jared-shafer-rips-off-north-las-vegas-pension-fun-913842												
96	http://www.ripoffreport.com/r/Center-for-Guardian-Certification/Harrisburg-Pennsylvania-17110/Center-for-Guardian-Certification-Denise-Calabrese-Jared-Shafer-The-CGC-helped-one-of-the-927871												
97	http://www.ripoffreport.com/r/jared-shafer/las-vegas-nevada-89120/jared-shafer-patience-bristol-jared-shafer-patience-bristol-ripped-off-and-murdered-my-s-949910												
98	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89120/Jared-E-Shafer-Patience-M-Bristol-Jared-E-Shafer-ripped-off-and-Killed-my-brother-Steve-L-952552												
99	http://www.ripoffreport.com/r/Jon-W-Norheim/Las-Vegas-Nevada-89101/Jon-W-Norheim-Jared-E-Shafer-Patience-Bristol-Commissioner-Jon-W-Norheims-court-killed-m-961732												
100	http://www.ripoffreport.com/r/jared-shafer/las-vegas-nevada-89120/jared-shafer-alan-d-freer-patience-bristol-jared-shafer-porno-guardian-stole-1000000-f-965077												
101	http://www.ripoffreport.com/r/Professional-Fiduciary-Services-of-NevadaPFSN/Las-Vegas-Nevada-89016/Professional-Fiduciary-Services-of-NevadaPFSN-Jared-Shafer-PFSN-Jared-Shafer-Las-Vegas-980704												
102	http://www.ripoffreport.com/r/jared-shafer/las-vegas-nevada-89120/jared-shafer-pfsn-patience-bristol-jared-shafers-guardian-rip-off-crimes-las-vegas-neva-986287												
103	http://www.ripoffreport.com/r/jared-shafer/las-vegas-nevada-89120/jared-shafer-jared-shafer-fiduciary-embezzler-las-vegas-nevada-989571												
104	http://www.ripoffreport.com/r/Jared-Shafer/Henderson-Nevada-89106/Jared-Shafer-Jared-Shafer-is-a-guardian-fraud-crook-who-stole-my-dads-money-Henderson-N-995353												
105	http://www.ripoffreport.com/r/PatienceBristol/Las-Vegas-Nevada-89120/PatienceBristol-Jared-Shafer-Patience-Bristol-in-Las-Vegas-is-a-crook-Las-Vegas-Nevada-999462												
106	http://www.ripoffreport.com/r/jared-shafer/Las-Vegas-Nevada-89016/jared-shafer-patience-Jared-Shafer-las-vegas-crook-pig-Las-Vegas-Nevada-1006962												
107	http://www.ripoffreport.com/r/Jared-Shafer/Las-Vegas-Nevada-89118/Jared-Shafer-Patience-M-Bristol-Jared-E-Shafer-guardian-bully-Las-Vegas-stole-429000-fro-1012391												
108	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89118/Jared-E-Shafer-Patience-Bristol-Alan-D-Jared-E-Shafer-guardian-ripped-off-killed-my-c-1018391												
109	http://www.ripoffreport.com/r/Jared-E-Shafer/Las-Vegas-Nevada-89118/Jared-E-Shafer-guardian-stole-107000-from-my-father-Las-Vegas-Nevada-1022221												
110	http://www.ripoffreport.com/r/Alan-D-Freer/Las-Vegas-Nevada-89135/Alan-D-Freer-Solomon-Dwiggins-Freer-Alan-D-Freer-Attorney-stole-85000-from-my-father-b-1026537												
111	http://www.ripoffreport.com/r/guardianship-Solutions-Inc/Las-Vegas-Nevada-89118/guardianship-Solutions-Inc-Patience-Bristol-Patience-Bristol-Guardianship-Solutions-INC-1042575												

EXHIBIT 15

Ripoff Report | Complaints Reviews Scams Lawsuits Frauds Reported. File your review. Consumers educating consumers.™

By consumers, for consumers...

Don't let them get away with it! Let the truth be known!™

[Home](#) [Help](#)[Register to File a Report](#)[Login](#)Total Visits since 1998: **8,818,183,945**Estimated money Consumers saved since 1998: **\$15,431,821,904.54**Reports filed: **1,698,164****FILE A
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Company Name or Report #

■ Ripoff Report protects consumers first amendment right to free speech

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Campaign to scare parents of children defamed online

Search Reports

Search Reports by Company, Individual or Report Number:

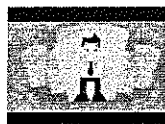
Search

1,698,164 REPORTS FILED

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Corporate Advocacy Program

Ripoff Report Corporate Advocacy Business Remediation & Customer Satisfaction Program / Consumer Awareness Videos

Ripoff Report Verified™ ... part of Ripoff Report Corporate Advocacy Business Remediation & Customer Satisfaction Program. A program that benefits the consumer, assures them of confidence when doing business with a member business. ...yes, a long name for a program that does a lot for both consumers and businesses alike.

Is there a Ripoff Report about you? [SEO Reputation Management WARNING!](#) [Click](#)

Ripoff Report® is a worldwide consumer reporting web site and publication, by consumers, for consumers, to file and document complaints about companies or individuals. While we encourage and even require authors to only file truthful reports, Ripoff Report does not guarantee that all reports are authentic or accurate. Be an educated consumer. Read what you can and make your decision based upon an examination of all available information.

Unlike the Better Business Bureau, Ripoff Report does not hide reports of "satisfied" complaints. ALL complaints remain public and unedited in order to create a working history on the company or individual in question.

Ripoff Reports cover every category imaginable! You can [Browse](#) the latest Reports, [Search](#) the Reports, or [Submit](#) your report now for FREE, by clicking on [File Report](#).

By filing a Ripoff Report it's almost like creating your own web site

Newest Ripoff Reports

10/02/13 | Costa Mesa, California
Michael Roberts, Rextfield, Google-side: The Full Story Progenex leaders Adam Stuart Zuckerman, Ryan Page - Michael Roberts, Rextfield, Progenex Managers Adam Zuckerman and Ryan Page negotiate contract with Rextfield online reputation management Michael Roberts in attempt to commercialize injection source code. The code purportedly offered consumers negative report removal from Ripoff Report and Google online property Blogspot. Recent Fox News exclusive has also exposed a plan called Googlecide - a campaign designed to scare parents of children defamed online into purchasing the services offered by the new online reputation enterprise. Experts cited by Fox News have said altering websites by injecting source code is illegal. Costa Mesa, California

10/02/13 | Carson City, Nevada
united cash loans - united cash loans Rip off carson city Nevada

10/02/13 | Lawrence, Pennsylvania
lawrence wingfield - lawrence wingfield the hammer -x driver total lie , what a joke lawrence Pennsylvania

10/02/13 | , Select State/Province
get emerald deluxe - get emerald deluxe e-cigarette company emerald deluxe cannot get ahold of them for refund california

10/02/13 | Las Vegas, Nevada
Glen Lemer | Ripoff Report Verified™ ... businesses you can trust. Glen Lemer Injury Attorneys, Phoenix Criminal Attorneys, Military Injury Lawyers. Experienced lawyers getting most compensation available to cover clients expenses, damages, future medical requirements, pain & suffering. Injured while serving your country? You may be eligible for up to \$100,000 Monetary Compensation. - Glen Lemer Injury Attorneys REVIEW: Glen Lemer Committed to customer satisfaction National law firm for injured people. One of the largest plaintiff's law firms in the nation with offices located in Nevada, Arizona, Louisiana, Minnesota, Illinois, Florida. No case is too large or too small to represent or review. This law firm receives a positive rating for their commitment to Ripoff Report's Corporate Advocacy Business Remediation & Customer Satisfaction Program. Glen Lemer Injury Attorneys made a serious commitment. The law firm's free initial consultation practice allows potential clients the opportunity to establish comfort levels prior to representation and their "no fee, unless they win" claim lets people know that the firm is not out to take advantage of them when they need help. Glen Lemer Ripoff Report Verified™.

10/02/13 | Akron, Ohio
Sprint - Sprint worst cell service ever very unhelpful akron Ohio

10/02/13 | Wilmington, Delaware
barclay's bankcards delaware - barclay's bankcards delaware disclosure statement doesn't specify what type of credit check it does Wilmington Delaware

10/02/13 | Benicia, CA 94510, California
tires-easy.com - tires-easy.com Dellicom North America INC. This company will not honor their warranty Benicia, CA 94510 California

10/2/13

Ripoff Report | Scams, reviews, complaints, lawsuits and frauds. File a report, post your review. Consumers educating consumers.

And, it's FREE.

Your Ripoff Report will be discovered by millions of consumers! Search engines will automatically discover most reports, meaning that within just a few days or weeks, your report may be found on search engines when consumers search, using key words relating to your Ripoff Report.

Helping you, the consumer...

Search the Ripoff Report before you do business with retail stores with bad return policies, checking & credit theft, rebate fraud or other unscrupulous business policies such as phony auto repairs, auto dealer bait-and-switch tactics, restaurants with bad service or food, corrupt government employees & politicians, police corruption, home builders, contractors, unethical doctors & lawyers, online stores that sell non-existent products, dead beat dads & moms, landlords & tenants, fraudulent employment & business opportunities, and individual con artists who scam consumers.

Filing a class action lawsuit & notifying the authorities

Many law firms and law enforcement agencies utilize Ripoff Report to aid in their investigations of business practices. By filing a report, your information may aid in pursuing civil or criminal proceedings against companies engaged in wrongdoing.

Ripoff Report has been contacted by almost every state Attorney Generals office, U.S. Postal Inspectors office, the Justice Department, Homeland Security, FBI, FTC and local and state authorities, including those in Canada, UK, Australia, and other government agencies around the world.

Media attention

Quite often the media is interested in the reports you filed and ask us to assist in their investigations giving you the publicity needed to help your cause. In the event your Ripoff Report is of interest to the media, we will put you in contact with them.

We also supply story ideas along with victim information to every network and most local affiliates and to every major TV News Magazine including Dateline, 20/20, 48 Hours, 60 Minutes, Inside Edition, W2 Canada, CNN, along with most major news papers including, NY Times, Wall Street Journal, Forbes, Money, Inc. and hundreds of others.

Helping you, the reported business or individual

My company has been reported! How do I respond?

If you are a business with one or more reports filed against you, you can make it right. If handled correctly, Ripoff Report(s) filed against you can actually help improve your credibility and reputation. We offer you the opportunity to file a REBUTTAL to any report. (See the RESPOND rebuttal box at the end of the specific Ripoff Report you wish to comment on). Every company receives complaints, but how they handle those complaints separates good business from bad business.

If you want to do more than file a rebuttal, you might consider using Ripoff Report's VIP Arbitration Program. The arbitration program gives you the opportunity to prove that the report about you is false.

We developed the program in response to phone calls and emails from businesses like you – those who have worked hard to create a good reputation and are having that reputation unjustly tarnished because of a false posting on Ripoff Report.

Because Ripoff Report has never had the internal resources to investigate reports that a business claims is false, it has always permitted the subject of the report to file its own, free, rebuttal. But some of you feel that is not enough. You have asked for more. You want the ability to prove it is false. You want an independent investigation. Perhaps most importantly, you want the false statements of fact removed. We listened to your concerns and launched VIP Arbitration in response.

Here's how it works. We have contracted with private arbitrators who have extensive experience, including experience as judges in court. Once the program builds momentum, we will add other highly qualified arbitrators to our panel. You submit a written arbitration statement identifying the false statements in the report, or explaining that the report was posted by a competitor pretending to be a customer. You are also given the opportunity to support your position with documentary evidence and/or sworn affidavits. There is a filing fee of \$2,000 to pay for the arbitrator's time and for administration of the program. The author of the report is then given the opportunity respond and you are given the opportunity to reply.

The arbitrator then reviews all of the submissions and renders a written decision. In the event that the arbitrator determines that the Report is true, there will be no updates or changes to the website. If the Arbitrator finds that statements in the report are false, the title of the report will be updated, posting this phrase BEFORE the original title: "Notice of Arbitrator Decision: A neutral and independent arbitrator has determined that the following Report contained one or more false statements of fact. The false statements have been redacted." The arbitrator's decision will be posted in its entirety after the title and before the original content of the report. Any statements of fact that the arbitrator determines to be false will be removed from the original report.

If you think this program may be right for you and you would like more information, click here to request a copy of the complete rules and an arbitration agreement. arbitration@ripoffreport.com

www.ripoffreport.com

10/02/13 | Select State/Province
Chase Agency - Chase Agency Chase Carmen Hunter InsuranceChase financial serviceschsecarmenhunterinsurance.com scandalous evasive shady internet

10/02/13 | Blaine, Washington
Randy Charach - Randy Charach Crooks, Corrupt, Money Launderers, Ripoff Blaine Washington

10/02/13 | Nationwide
Ashley Furniture - Ashley Furniture via The Furniture Services via Value City Office and Distribution Center Horrible Warranty Experience Nationwide

10/02/13 | Longview, Texas
Patterson Nissan - Patterson Nissan Unethical dealership who takes advantage of elderly and woman Longview Texas

10/02/13 | Select State/Province
Allegiant Van Lines - Allegiant Van Lines Liberty Relocation Before you dare use this company... Eugene OR

10/02/13 | Internet
dish network - dish network false and/or misleading info in mail brochjres internet

10/02/13 | Select State/Province
moneyplussaver - moneyplussaver connected to cash.com connected to csh.com and tried to say i authorized them to take out 89.00 they lied internet

10/02/13 | Denver, Colorado
Century Link - Century Link Quest failure to repair customer service night mare no credit inept support Denver Colorado

10/02/13 | Manassas, Virginia
Kitchen Cabinet Wharehouse - Kitchen Cabinet Wharehouse Better Granite Place, Unorganized, billing for unfinished kitchen projects Manassas Virginia

10/02/13 | Irving, Texas
Driveline Retail - Driveline Retail Stopped Paying me Irving Texas

10/02/13 | www.brickhousesecurity.com, Internet
Brickhouse Security - Brickhouse Security camera setup program is MALWARE www.brickhousesecurity.com Internet

10/02/13 | Tucker, Georgia
madaris home improvement - madaris home improvement daniel haynes they scam the customers and employees tucker Georgia

10/02/13 | Select State/Province
Spirit Airlines - Spirit Airlines Bag fees- rip off Nationwide

10/02/13 | Chicago, Illinois
Eddie Zs Blinds & Drapery - Eddie Zs Blinds & Drapery Unilaterally Rescinded "Lifetime" Guarantee Chicago Illinois

10/02/13 | Coresgold, California
Chuckhansi Gold Resort and Casino - Chuckhansi Gold Resort and Casino BEDBUGS. THEY HAVE BEDBUGS. BEWARE OF THE BEDBUGS coresgold California

10/02/13 | New York, New York
<http://www.liveperson.com/Experts> - <http://www.liveperson.com/Experts> <http://www.liveperson.com/BEWARE>: This site is a fraud. Full of Scams New York New York

10/02/13 | Internet
The Michael Kors Fashion Store - The Michael Kors Fashion Store/ The Dress I received a MK handbag that was not the size stated in their advertisement. Qingdao Shandong China

Ripoff Report in the Media



Ripoff Report on CBS 19



Ripoff Report on CBS 19 - Global Marketing Alliance

Another option is the Corporate Advocacy Program. Businesses that want to make a real difference should read about the very successful, groundbreaking and innovative program that both businesses and consumers are raving about. This program is a way businesses can turn negatives into a positive. Ripoff Report Corporate Advocacy Business Remediation and Customer Satisfaction Program is a program that benefits the consumer, assuring them of complete satisfaction and confidence when doing business with a member business. For more information, visit our [Corporate Advocacy](#) section.

Thinking of suing Rip-off Report?

YOU CAN SUIT US BUT YOU'LL LOSE. Ripoff Report is a public forum for consumers to share their experiences with businesses. We are not a business and we do not have a business purpose. We are a public forum for consumers to share their experiences with businesses. We are not a business and we do not have a business purpose.

Employee insider / ex-employee information

If you are an employee or ex-employee with information about a reported company or individual, please click on the REBUTTAL box at the end of the Ripoff Report to post your comments. This sort of information is often very helpful to an investigation.

Whistleblowers

Employees who want to expose corruption may file a Ripoff Report. Any employees who do so should be protected by Federal Whistleblower Laws, and Ripoff Report treats all victims as a confidential source. Remember, we are a publication, just like a major newspaper, and we will never voluntarily reveal your identity. Instead we will protect our sources under the First Amendment of the U.S. Constitution.

DOING BUSINESS WITH THE COMPANY OR INDIVIDUAL REPORTED

Consumers, just because a company or individual is reported on Rip-off Report does not necessarily mean you should not do business with them. In many cases, it's just the opposite. Just because a company is posted on Rip-off Report does not mean they are "bad". At some point in time, everyone has felt like they've been ripped off, when that may not have been the case. Not everything published on the Internet, or local newspapers, or local TV news is always true. Many stories, no matter where you see them, may have a bias slant. Being short on space or only having less than 2 minutes to do a story where important facts are left out can change the entire story. Rip-off Report feels consumers reading the unedited experiences of other consumers, without editorial involvement, are getting the best consumer opinion/news available. Our detractors would like to tell you differently. Savvy consumers need to take in all the information they can find and use it as an advantage. Consumers who investigate and obtain information about a company from a number of sources will be able to make more educated decisions, because they know what to watch for. By reading Rip-off Report, or any other publication containing information about businesses, you, the consumer, now know more about that business than its competitors. More than likely the competitor has the same issues. Let the reported business know you've read complaints about them, that you would like to do business with them, and get affirmation from the company that if you do business with them, they will do right by you. Let them know that if they treat you right, you will log on to Rip-off Report and tell the world what a great experience you've had. All companies make mistakes. It is the ones that learn from their mistakes that will benefit the consumers the most. *"An educated consumer is our best reader"*

USE YOUR REPORT TO GET WHAT IS COMING TO YOU

Faxing your Ripoff Report to the company or individual you have just reported can serve as a very valuable negotiating tool. Include in your negotiation that you have the ability to UPDATE your Report and reflect their good business practices by explaining that their eagerness to satisfy the complaint and make things right will be seen by the entire world. Also, explain that failure to respond/rectify the situation will also be seen.

YOU MUST NOT call them threatening to file a report if they do not comply with your demands, as this may be construed as blackmail! You must first file a Ripoff Report, then fax them a copy, offering them a chance to rectify the wrong that they did to you. Explain that then, and only then, you will UPDATE your Ripoff Report in a positive way, if deserved.

Organizing class action lawsuits

Victims & lawyers who want to sue companies or individuals reported

Victims & attorneys who are interested in pursuing litigation against a particular company reported on this website must [contact us](#) directly. It is inappropriate to solicit business using this website other than through prior arrangement. This is largely because we need to ensure, the best we can, that our readers are not being taken advantage of again.

If you are interested in filing a class action lawsuit based on Reports you've seen posted, and you want to identify a class representative, we can help by e-mailing those victims that gave permission and asking them to contact you. In this way, we protect victim identities while allowing them to make the decision as to whether to participate or not.

Additionally, if you would like to know whether any new reports are being posted AS THEY GET POSTED, such as during the early stages of an investigation, you may be interested in our upcoming Ripoff Alerts program. We'll update you shortly on how you can participate in these valuable programs.

We are anxious and willing to join forces with victims and attorneys to stand up for the rights of consumers and help them get justice. Both victims and attorneys should send their e-mails to: Legal@RipoffReport.com.

Ripoff Report on ABC 15 - Smart Shopper



Ripoff Report - Girls Gone Wild



Ripoff Report on Fox 11 - Car Repair



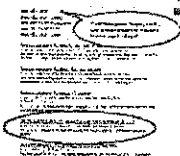
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Featured Ripoff Reports



Ben Smith Sac County Iowa Attorney prosecutorial misconduct, improper relationship with star witnesses, allowing witnesses to knowingly lie. Tracay Richter Roberts falsely convicted, overwhelming evidence leads to estranged husband Michael Roberts, Rexxfield failed polygraph, witness intimidation, evidence tampering. Iowa Division of Criminal Investigation corruption.

The New "Digital Extortion" Is there a Ripoff Report on you?



Reputation Management SEO WARNING! They might contact you next!

Past Featured Reports

Ripoff Reports



Michael Roberts, Rexxfield, Propanex Managers Adam Zuckerman and Ryan Pace negotiate contract with Rexxfield online reputation management Michael Roberts in attempt to commercialize injection source code. The code purportedly offered consumers negative report removal from Ripoff Report and Google online property Blogspot. Recent Fox News exclusive has also exposed a plan called Googlecide - a campaign designed to scare parents of children defamed online into purchasing the services offered by the new online reputation enterprise. Experts cited by Fox News have said altering websites by injecting source code is illegal. Costa Mesa, California



Glen Lemer Injury Attorneys REVIEW: Glen Lemer Committed to customer satisfaction National law firm for injured people. One of the largest plaintiff's law firms in the nation with offices located in Nevada, Arizona, Louisiana, Minnesota, Illinois, Florida. No case is too large or too small to represent or review. This law firm receives a positive rating for their commitment to Ripoff Report's Corporate Advocacy Business Remediation & Customer Satisfaction Program. Glen Lemer Injury Attorneys made a serious commitment. The law firm's free initial consultation practice allows potential clients the opportunity to establish comfort levels prior to representation and their "no fee, unless they win" claim lets people know that the firm is not out to take advantage of them when they need help. **Glen Lemer Ripoff Report Verified!**



Century Link Ques failure to repair customer service night
man no credit inapt support Denver Colorado

It's important to file on Ripoff Report because we're important to government and media agencies

Many sites and organizations (like the BBB) are in place to collect information from you, the consumer, but in many cases, those reports never become available for others to see. Listing your complaint on Ripoff Report insures that your report will be seen, and not just placed in a database where only privileged eyes can see them. Making your report available on Ripoff Report helps educate consumers.

Many government agencies come to the Ripoff Report for information. We have assisted, and continue to assist, many government agencies, including local and state police departments, the FBI, FTC and Attorney General offices from around the country.

Since all the Reports are out in the open, consumers, journalists, attorneys and investigators from all types of agencies can research existing problems and anticipate potential problems. We provide immediate access to all kinds of fraud and scams, all out in the open, all unedited and all for FREE.

Reporting your experiences on Ripoff Report is the next best thing to getting your story on TV or in a newspaper. In fact, many national TV networks and several local TV stations from all around the country come to the Ripoff Report for information. They do this because they know other agencies are not as reliable or as cooperative a source as the Ripoff Report. News stations know that they will get information from us that is unobtainable elsewhere.

By filing a Ripoff Report, you might be contacted by one of us to notify you to make contact with a law firm that has shown interest in your case. We get requests every week for class action lawsuits, bringing victims together with lawyers willing to sue the company after reading your Ripoff Report.

Get a company or individual listed on Top Ripoff Report Links

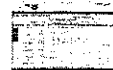
If there are more than five (5) Reports filed from different consumers on a company or individual then you can request they be added to the list. Ripoff Report will verify that the Reports are filed by different people. Send request to Editor@RipoffReport.com.

Ripoff Report | Scams, reviews, complaints, lawsuits and frauds. File a report, post your review. Consumers educating consumers.

Ripoff Report Directory

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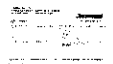
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[Oleda Electrical Services Emilio Oleda Centeno, Oleda, Emilio, Electrician, Brian McPherson, SUFFOLK Construction Company, McP Emilio Oleda is a fraud and a forger, Emilio Oleda is deceitful and is working with his Daughter and a one Brian McPherson to commit fraud against property owners. Do not hire or come close to Emilio Oleda, he is a blatant liar, a fraud, a cheat and a common supreme, North Brookfield and Weymouth, Massachusetts Massachusetts](#)



EXHIBIT 16

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LAS VEGAS, NEVADA 89129
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Attorneys for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

JARED E. SHAFER; an individual,
SOLOMON DWIGGINS & FREER, LTD., a
Nevada professional limited partnership; ALAN
D. FREER, an individual; ROBERT D.
SIMPSON; an individual, PATIENCE
BRISTOL; an individual, AMY DEITTRICK,
an individual; PROFESSIONAL FIDUCIARY
SERVICES OF NEVADA, INC., a Nevada
corporation; AVID BUSINESS SERVICES OF
NEVADA, INC., a Nevada corporation;
GAMETT & KING, a Nevada corporation;

Plaintiff;

vs.

REBECCA SCHULTZ, an individual; and
DOES 1 through 20, inclusive;

Defendant(s).

Case No. A-12-671427-C

Dept. XXXI

PLAINTIFFS' INITIAL NRCP 16.1
DISCLOSURES

Plaintiffs, JARED E. SHAFER, ALAN D. FREER, ROBERT D. SIMPSON, PATIENCE
BRISTOL, AMY DEITTRICK, SOLOMON DWIGGINS & FREER, LTD., PROFESSIONAL
FIDUCIARY SERVICES OF NEVADA, INC., AVID BUSINESS SERVES OF NEVADA, INC.,
SHAWN KING, and GAMETT & KING (hereinafter "Plaintiffs"), by and through their counsel of
record, Mark A. Solomon and Ross E. Evans of Solomon Dwiggins & Freer, Ltd., hereby submit their
initial disclosures pursuant to NRCP 16.1 as follows:

I.

PERSONS WITH KNOWLEDGE

1. JARED E. SHAFER, individually and on behalf of Professional Fiduciary Services of Nevada, Inc. Mr. Shafer is anticipated to testify as to his knowledge concerning who made the defamatory statements, the contents of the defamatory statements, the falsity of the defamatory statements, and the effect and damage caused by the publication and dissemination of the defamatory statements.

2. ALAN D. FREER, individually and on behalf of Solomon, Dwiggins & Freer, Ltd. Mr. Freer is anticipated to testify as to his knowledge concerning who made the defamatory statements, the contents of the defamatory statements, the falsity of the defamatory statements, and the effect and damage caused by the publication and dissemination of the defamatory statements.

3. ROBERT D. SIMPSON, individually and on behalf of Solomon, Dwiggins & Freer, Ltd. Mr. Simpson is anticipated to testify as to his knowledge concerning who made the defamatory statements, the contents of the defamatory statements, the falsity of the defamatory statements, and the effect and damage caused by the publication and dissemination of the defamatory statements.

4. PATIENCE BRISTOL, individually and on behalf of Professional Fiduciary Services of Nevada, Inc. Ms. Bristol is anticipated to testify as to her knowledge concerning who made the defamatory statements, the contents of the defamatory statements, the falsity of the defamatory statements, and the effect and damage caused by the publication and dissemination of the defamatory statements.

5. AMY DEITTRICK, individually and on behalf of AVID Business Services, Inc. Ms. Deittrick is anticipated to testify as to her knowledge concerning who made the defamatory statements, the contents of the defamatory statements, the falsity of the defamatory statements, and the effect and damage caused by the publication and dissemination of the defamatory statements.

6. SHAWN KING, individually and on behalf of GAMETT & KING. Mr. KING is anticipated to testify as to his knowledge concerning who made the defamatory statements, the contents of the defamatory statements, the falsity of the defamatory statements, and the effect and damage caused by the defamatory statements.

7. REBECCA SCHULTZ, individually. Ms. Schultz is anticipated to testify as to her knowledge concerning who made the defamatory statements, her knowledge concerning persons she conspired with to make and publish the defamatory statements, her intent to publish the defamatory statements, and her knowledge of the falsity of the defamatory statements.

Plaintiffs reserve the right to supplement this list of witnesses as additional witnesses are discovered, or as otherwise permitted by the Nevada Rules of Civil Procedure.

II.

PRODUCTION OF DOCUMENTS

1. Defamatory Statements and Defamatory Publications, Bates-stamped PL-000001-PL-001398;
2. Complaint and Correspondence to Center for Guardianship Certification, Bates-stamped PL-001399-PL-001697; and
3. News publications relating to the Defamatory Statements, Bates-stamped PL-001698-PL-001731.

Plaintiffs reserve the right to supplement this list of documents as additional documents are discovered, or as otherwise permitted by the Nevada Rules of Civil Procedure.

DATED this 22nd day of August, 2013.

SOLOMON DWIGGINS & FREER, LTD.

By 

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Attorneys for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

JARED E. SHAFER; an individual,
SOLOMON DWIGGINS & FREER, LTD., a
Nevada professional limited partnership; ALAN
D. FREER, an individual; ROBERT D.
SIMPSON; an individual, PATIENCE
BRISTOL; an individual, AMY DEITTRICK,
an individual; PROFESSIONAL FIDUCIARY
SERVICES OF NEVADA, INC., a Nevada
corporation; AVID BUSINESS SERVICES OF
NEVADA, INC., a Nevada corporation;
GAMETT & KING, a Nevada corporation;

Plaintiff;

vs.

REBECCA SCHULTZ, an individual; and
DOES 1 through 20, inclusive;

Defendant(s).

Case No. A-12-671427-C

Department No.: XXXI

RECEIPT OF A COPY

OF PLAINTIFFS' INITIAL NRCP 16.1 DISCLOSURES

RECEIPT OF A COPY of PLAINTIFFS' INITIAL NRCP 16.1 DISCLOSURES is hereby

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LAS VEGAS, NEVADA 89129
TEL: (702) 853-5483 | FAX: (702) 853-5485

acknowledged this 22nd day of August, 2013.

BOGGESS & HARKER

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