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DISTRICT COURT – FAMILY COURT
CLARK COUNTY, NEVADA

In the Matter of the Parental Rights of:

Case No.: D-25-XXXXXX-R

Dept. No.: A

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXX Minors

ORAL ARGUMENT REQUESTED

 x Yes No

**RESPONDENT BRAD BELLISARIO’S OPPOSITION TO THE MAY 17, 2026, MOTION TO
UNSEAL CASE FILE, AND COUNTERMOTION FOR PROTECTIVE ORDER**

COMES NOW, Respondent, BRAD BELLISARIO, by and through his attorney,
CHASE R. BANTON, ESQ., of ONELLO LAW GROUP, and submits this *Opposition to the
May 17, 2026, Motion to Unseal Case File, and Countermotion for Protective Order*,
and requests the following orders at hearing on this matter:

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- 1 1. DENY the Motion to Unseal Case File filed by Our Nevada Judges, Inc. on May 17,
2 2026, in its entirety;
- 3 2. Alternatively, GRANT Respondent's Countermotion for Protective Order
4 establishing the conditions on public access set forth below;
- 5 3. MAINTAIN the existing protective framework established through the Notice of
6 Coverage Policies, with such enhancements as the Court deems appropriate; and
7
- 8 4. GRANT any other Relief that the Court Deems Proper.
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10 This Opposition is made and based upon the pleadings on file herein, together with
11 the attached Points and Authorities, as well as oral arguments of counsel to be heard at the
12 time of hearing.
13

14 DATED June 3rd, 2026.
15

16 ONELLO LAW GROUP

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I. INTRODUCTION

This Court faces a critical question: whether a nonparty media organization may circumvent Nevada's statutory confidentiality protections for termination of parental rights proceedings by seeking to unseal case files, disseminate judicial audio-visual recordings, and broadcast proceedings involving three minor children. The answer should be no. Here, Our Nevada Judges, Inc. ("ONJ") seeks relief that would fundamentally undermine the protective purposes of Nevada law and expose vulnerable children to foreseeable and substantial harm. This Opposition addresses three critical deficiencies in ONJ's motion: (1) ONJ's request directly violates Nevada's mandatory statutory confidentiality regime for parental rights termination proceedings; (2) ONJ has failed to demonstrate compelling governmental interests sufficient to overcome the State's compelling interest in protecting minor children; and (3) ONJ's proposed electronic media coverage, governed by ONJ's own unilateral internal policies rather than court authorization, is not narrowly tailored to serve any legitimate purpose and creates unacceptable risks of harm to the children who are the central subjects of these proceedings.

Termination of parental rights proceedings are categorically different from divorce, custody disputes, or trust matters. In TPR cases, the State exercises its *parens patriae* authority to permanently sever the legal parent-child relationship—the most extreme intervention into family autonomy recognized under law. The minor children are not peripheral parties whose interests can be balanced against media access; they are

1 the subjects of state intervention whose privacy and welfare constitute the very purpose
2 of the proceeding.

3 **a. THE STATUTORY FRAMEWORK IS DISPOSITIVE**

4 Nevada law establishes that hearings in termination of parental rights proceedings
5 must be held in closed court and that case files and records are not open to inspection
6 except upon an express court order entered upon petition setting forth reasons. This is
7 not a discretionary guideline; it is a mandatory statutory requirement. ONJ's argument
8 that no sealing order exists mischaracterizes the statute. Confidentiality is the default
9 rule established by statute, not a condition requiring affirmative judicial action.
10 Nevertheless, to eliminate any ambiguity and to ensure compliance with the statute's
11 protective purposes, this Court should enter an express order confirming that the case file
12 remains sealed and confidential.
13

14 **b. THE PRESUMPTION OF OPENNESS¹ DOES NOT APPLY UNIFORMLY TO**
15 **ALL PROCEEDINGS**

16 While Nevada recognizes a presumption of openness in civil and family
17 proceedings, this presumption is not absolute; it should yield when more compelling
18 governmental interests are at stake.² Termination of parental rights proceedings occupy a
19 uniquely sensitive category because the minor children are not merely incidental parties
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25 ¹ Movant's motion is deficient because it never addresses the threshold framework for
26 determining whether a constitutional presumption of access applies to this category of
27 proceeding or to these records, and it offers no developed analysis of those factors as applied
28 here. The Court should decline to supply arguments Movant did not make and deny the requested
relief on that basis.

² *Nester v. The Eighth Judicial District Ct. in the State of Nevada (and Cody Gamble)*, 141 Nev.
Adv. Op. No. 4, 562 P.3d 1071 (2025).

1 but are the central subjects whose fundamental privacy interests and welfare are directly
2 implicated. The cases cited by ONJ (*Falconi*³ and *New York Times*⁴) involved divorce
3 proceedings and trust records, not parental rights termination proceedings affecting
4 named minor children; that distinction is legally and factually significant and compels a
5 different analysis.
6

7 **c. ONJ'S OWN POLICIES DEMONSTRATE INADEQUATE SAFEGUARDS**

8
9 ONJ has issued and filed its own internal Coverage Policies document, not an
10 Order of this Court, which reveals the inadequacy of any proposed safeguards. ONJ has
11 determined that it will not redact Respondent (the father) under a futility exception, while
12 redacting the minor children; this policy choice demonstrates that ONJ intends to identify
13 and publicly associate the father with this termination of parental rights proceeding.
14
15 Given that the case caption already identifies the three minor children by name,
16 identification of their father creates an inevitable pathway for identifying the children
17 through public records, social media, and community knowledge. ONJ's promise to
18 delete unedited footage within 72 hours provides no meaningful protection once materials
19 are published or copied by members of the public.
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21

22 **d. ELECTRONIC MEDIA COVERAGE IS A SEPARATE DISCRETIONARY**
23 **PRIVILEGE**

24 Electronic media coverage is not coextensive with the public's right to attend
25 proceedings or inspect records; it constitutes a separate privilege governed by specific
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28 ³ *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev., Adv. Op. 8 (2024).

⁴ *NY Times Co. v. Dist. Ct. (Doe I trust)*, Nev. Adv. Op. 71 (Dec. 23, 2025).

1 rules and the Court's inherent authority to manage its courtroom and protect vulnerable
2 parties. The sensitive nature of the evidence in this termination of parental rights
3 proceeding, which will necessarily address child-related facts, creates a compelling
4 reason to restrict electronic coverage as pled in ONJ's instant Motion. The presence of
5 cameras and the knowledge that testimony will be broadcast may chill candid testimony
6 from witnesses and transform the proceeding from a forum focused on the best interests
7 of the children into a public spectacle.
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10 **e. RESPONDENT'S INTERESTS ALIGN WITH THE STATE'S *PARENS***
11 ***PATRIAE* POWER**

12 Respondent, as the father of the three minor children, has a legitimate interest in
13 protecting their privacy and welfare. This interest aligns with the State's fundamental
14 *Parens Patriae* power and its duty to protect children's welfare. Because the minor
15 children cannot consent to public exposure and cannot protect their own privacy
16 interests, the Court must exercise its authority to protect them.
17

18 **f. THE REQUESTED RELIEF IS NARROWLY TAILORED TO SERVE**
19 **COMPELLING INTERESTS**

20 Should the Court determine that some degree of public access is required,
21 Respondent proposes narrowly tailored alternatives that would accommodate any
22 legitimate public interest while protecting the minor children's privacy and welfare.
23 These alternatives include maintaining sealing of substantive filings and videos, limiting
24 access to parties and counsel, permitting public access only to non-identifying minute
25 entries or redacted written orders, prohibiting dissemination of audiovisual recordings,
26 and using initials or pseudonyms for minor children in any public documents.
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1 For these reasons, this Court should deny ONJ's Motion to Unseal Case File and
2 grant Respondent's Countermotion to Seal the Case File and Prohibit Electronic Media
3 Coverage. The statutory mandate of confidentiality, the compelling state interest in
4 protecting minor children, the inadequacy of ONJ's proposed safeguards, and the
5 availability of narrowly tailored alternatives all compel this result.
6

7 II. FACTS

8 a. PARTIES AND NATURE OF PROCEEDINGS

9
10 This case involves parental rights termination proceedings in the Family Division
11 of the Eighth Judicial District Court, Clark County, Nevada. The parties are unmarried
12 and have three (3) minor children in common: [REDACTED], [REDACTED], and
13 [REDACTED]. These proceedings are scheduled for calendar call on January 21,
14 2027, at 10:00 a.m., with evidentiary hearings scheduled for February 5, 2027, and
15 February 12, 2027, both at 9:00 a.m., in Department A, Courtroom No. 2.
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18 Parental rights termination proceedings are inherently sensitive and involve
19 intimate family matters, including testimony regarding parental fitness, family history,
20 and the circumstances necessitating termination of parental rights. Unlike divorce
21 proceedings, which primarily affect the legal relationship between spouses, parental
22 rights termination proceedings directly determine the legal status, custody, and welfare
23 of minor children. The children are not merely incidental parties but are the central
24 subjects of these proceedings.
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1 **b. ONJ'S MOTION TO UNSEAL AND REQUEST FOR MEDIA COVERAGE**

2 On May 17, 2026, ONJ filed a Motion to Unseal Case File seeking the following
3 relief: 1.) Unsealing of the entire case file, including JAVS videos; 2.) Restoration of
4 public access to court indices; 3.) Permission for electronic media coverage at the
5 January 21, 2027, February 5, 2027, and February 12, 2027, evidentiary hearing dates.
6

7 ONJ is a Nevada non-profit corporation represented by counsel Luke A. Busby,
8 Esq. ONJ describes itself as an organization that monitors court proceedings for
9 electronic coverage and has previously obtained permission for coverage in other cases
10 involving Respondent, including criminal proceedings and divorce proceedings.
11

12 Accordingly, ONJ represents that it has published a total of 105 videos related to
13 Respondent's various legal proceedings in other matters. ONJ's motion cites *Falconi* and
14 *NY Times* for the proposition that civil proceedings, including family court proceedings,
15 are presumptively open to the public under the First Amendment.⁵ ONJ argues that the
16 case lacks a sealing order and that the court should conduct a strict scrutiny analysis
17 under NRS 128.090(7)(b) to determine whether compelling privacy interests warrant
18 closure.
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22 **c. ONJ'S COVERAGE POLICIES DOCUMENT ON-FILE**

23 Contemporaneously with filing its Motion to Unseal, ONJ served a document
24 titled "Notice of Coverage Policies," dated June 17, 2026, but electronically served on
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28 ⁵ *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev., Adv. Op. 8 (2024).; *NY Times Co. v. Dist. Ct. (Doe I trust)*, Nev. Adv. Op. 71 (Dec. 23, 2025).

1 May 17, 2026.⁶ This document is critically important because it reveals ONJ's actual
2 intentions and demonstrates the absence of this Court's authorization for ONJ's proposed
3 coverage. The Coverage Policies document is ONJ's internal policy, not an Order from
4 this Court. Put another way, it has not been authorized by this Court and was issued
5 unilaterally by ONJ without seeking or obtaining court approval for its use as written.
6 The document establishes ONJ's internal procedures for electronic coverage of the
7 domestic relations matter (Case No. D-25-XXXXXXX-R) and contains the following key
8 provisions:
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- 11 1. Coverage will focus on educational and limited informational purposes, which
12 requires visual and aural redaction of parents and children.
- 13 2. ONJ has determined that the futility exception will apply and shall preclude
14 redaction of Bradley Bellisario. This means ONJ intends to identify Respondent
15 in its coverage.
- 16 3. The document indicates that the minor children will be redacted from coverage.
- 17 4. Unedited footage will be irretrievably deleted within 72 hours of publication.
- 18 5. Parties and counsel may request additional redaction if they believe particularly
19 identifying information may be broadcast.
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24 The fact that ONJ has issued this Coverage Policies document⁷ as its own internal policy,
25 without prior authorization from this Court, demonstrates that ONJ is attempting to
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27 ⁶ See Exhibit A – “Notice of Coverage Policies” at RESP_001.

28 ⁷ Which is impossibly dated in the future on June 17, 2026, despite clearly being marked with an e-Service timestamp of “5/17/2026 2:43 PM.” See Exhibit A at RESP_001.

1 establish its own authority for media coverage rather than seeking explicit court
2 authorization. This is a critical procedural defect that undermines ONJ's motion.

3 **d. PRIOR COVERAGE BY ONJ**

4 ONJ's motion notes that various judicial officers have previously allowed
5 comprehensive electronic coverage of Respondent's proceedings. Specifically, ONJ
6 represents that:
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9 1. Justices of the Peace Elana Graham, Diana Sullivan, and Ann Zimmerman have
10 allowed electronic coverage of Respondent's criminal proceedings;
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- 12 2. District Court Judges Ellie Roohani, Crystal Eller, and Michael Villani have
13 allowed electronic coverage of Respondent's criminal proceedings;
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- 15 3. District Court Judge Robert Teuton unsealed JAVS videos of corresponding
16 divorce proceedings;
- 17 4. ONJ has published a total of 105 videos related to Respondent's various legal
18 proceedings.
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20 However, those prior cases referenced involved criminal proceedings and divorce
21 proceedings, not the parental rights termination proceedings affecting these minor
22 children. The nature of the present proceedings, involving the termination of parental
23 rights and directly affecting the legal status and welfare of three named minor children,
24 presents fundamentally different privacy considerations than the prior cases.
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1 e. **SENSITIVE NATURE OF PARENTAL RIGHTS TERMINATION**
2 **PROCEEDINGS**

3 Parental rights termination proceedings involve intimate family matters and
4 sensitive information regarding: 1.) The respondent's fitness as a parent; 2.) Family
5 history and circumstances; 3.) The reasons necessitating termination of parental rights
6 for Respondent; 4.) The children's living arrangements, placements, and welfare;
7 5.) Potentially traumatic events or circumstances affecting the children. Public exposure
8 of this sensitive information through electronic media coverage would expose the minor
9 children to public scrutiny, potential harassment, and stigmatization. The children could
10 be identified by peers, teachers, and community members through media coverage,
11 leading to social ostracism and psychological harm.
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13 f. **RESPONDENT'S POSITION AND INTERESTS IN THIS MATTER**

14 Respondent has a legitimate interest in protecting the privacy and welfare of the
15 minor children because he is the father of the three minor children and has a direct
16 interest in the outcome of these proceedings. Respondent's interests align with the state's
17 *Parens Patriae* power and its duty to protect children's welfare. For the sake of clarity,
18 Respondent has not consented to electronic media coverage of these proceedings and has
19 not authorized ONJ to publish videos or other materials related to the proceedings on his
20 behalf. Therefore, Respondent believes that regardless of ONJ's opinion on the parties
21 themselves, there is no legitimate reason for these TPR proceedings to be published, and
22 that public exposure of the proceedings would cause significant harm to the minor
23 children.
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1 **III. LEGAL ARGUMENT.**

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3 **A. STATUTORY CONFIDENTIALITY UNDER NRS 128.090 MANDATES DENIAL**
4 **OF ONJ’S MOTION TO UNSEAL AND SUPPORT GRANTING RESPONDENT’S**
5 **COUNTERMOTION**

6 Nevada law establishes a mandatory regime of confidentiality for termination of
7 parental rights proceedings. The statute provides that hearings held pursuant to NRS
8 128.005 through NRS 128.150 are confidential and must be held in closed court without
9 the admittance of any person other than specified parties except by order of the court.⁸
10 The statute further provides that files and records of the court in a TPR proceeding are
11 not open to inspection by any person except the petitioner, a person intending to file a
12 response, or upon an order of the court expressly permitting inspection pursuant to a
13 petition setting forth reasons.⁹
14
15

16 This statutory language establishes a clear default rule: TPR hearings are
17 confidential proceedings closed to the public absent an express court order. The statute’s
18 use of the word “must” indicates a mandatory requirement, not a discretionary
19 guideline.¹⁰ The statutory framework creates two layers of protection: first, closed
20 hearings; and second, restricted access to court files and records. Both protections
21 operate by default unless the court enters an express order permitting otherwise.
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27 ⁸ NRS 128.090.

28 ⁹ NRS 128.090(7) and (a)-(b).

¹⁰ NRS 128.090(5).

1 **B. THE STATUTORY SCHEME REFLECTS A LEGISLATIVE PURPOSE TO**
2 **PROTECT MINORS AND PRESERVE THE INTEGRITY OF CHILD-WELFARE**
3 **PROCEEDINGS**

4 The confidentiality mandate in NRS 128.090 serves critical protective purposes;
5 by restricting access to TPR hearings and records, the statute protects the privacy and
6 welfare of minor children who are the subjects of these proceedings. The statute also
7 preserves the integrity of child-welfare proceedings by limiting dissemination of
8 sensitive information regarding family circumstances, allegations, and evidence.
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11 The statutory restriction on file inspection, permitting access only to parties and
12 authorized persons, or upon express court order, reflects a legislative judgment that TPR
13 proceedings involve matters of such sensitivity and consequence that they warrant
14 heightened confidentiality protections beyond those applicable to ordinary civil
15 litigation. The requirement that any order permitting inspection must be entered upon a
16 petition setting forth the reasons therefore further demonstrates that the legislature
17 contemplated a case-by-case analysis in which the party seeking access must
18 affirmatively justify departure from the default rule of confidentiality.¹¹
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22 **C. ONJ HAS NOT DEMONSTRATED GROUNDS SUFFICIENT TO OVERCOME THE**
23 **STATUTORY MANDATE OF CONFIDENTIALITY.**

24 ONJ's Motion to Unseal seeks three forms of relief: 1.) Unsealing the entire case
25 file including JAVS videos; 2.) Restoring public access to court indices; and
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¹¹ NRS 128.090(7)(b).

1 3.) Electronic coverage at hearings. None of these requests is supported by a showing of
2 reasons sufficient to justify an express court order under NRS 128.090(7)(b). ONJ has
3 also circulated its own Coverage Policies stating it will redact parents and children
4 generally but will not redact Father under a futility exception, and it will delete unedited
5 footage within 72 hours.¹² These policies are not a Court Order and do not comply with
6 the statutory requirement that access to court files and records be granted only upon an
7 express court order entered upon a petition setting forth reasons.
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10 ONJ's assertion of a futility exception is a unilateral determination by a nonparty
11 media organization, not a judicial finding. The statute vests authority to permit
12 inspection of court files and records exclusively in the Court, upon petition and upon a
13 showing of reasons; ONJ's self-imposed redaction and deletion protocols do not
14 substitute for the court's exercise of this statutory authority. Put another way, ONJ's
15 motion fails to articulate an actual benefit to the public beyond a boilerplate statement;
16 saying there is a public interest does not simply make it so.
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20 **D. ONJ'S ARGUMENT THAT NO SEALING ORDER EXISTS MISCHARACTERIZES**
21 **THE STATUTORY FRAMEWORK**

22 ONJ may contend that because no prior sealing order has been entered by this
23 Court, the files and records are presumptively open. That argument misreads NRS
24 128.090. The statute does not require the court to enter an *affirmative* sealing order to
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¹² See Exhibit A; RESP_001.

1 establish confidentiality; rather, confidentiality is the default rule established by NRS
2 128.090. The statute provides that files and records are not open to inspection by any
3 person except upon specified conditions. This language establishes confidentiality as the
4 baseline, not as a condition requiring affirmative judicial action. Nevertheless, to
5 eliminate any ambiguity and to ensure compliance with the statute's protective purposes,
6 the Court should enter an express order here to confirm that the case file, JAVS videos,
7 and court indices remain sealed and confidential pursuant to NRS 128.090 and directing
8 the Clerk of the Court to restrict access and indices accordingly.
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12 **E. THE STATUTORY CONFIDENTIALITY MANDATE APPLIES TO ALL**
13 **COMPONENTS OF ONJ'S REQUEST**

14 ONJ seeks unsealing of the entire case file, including JAVS videos. JAVS videos
15 are records of the court proceedings and are therefore subject to the statutory restriction
16 on file inspection. ONJ has not petitioned the court or set forth reasons justifying an
17 order permitting inspection of these sensitive materials. The videos contain raw evidence
18 and testimony regarding allegations affecting minor children. Permitting ONJ to access
19 and disseminate these materials would directly contravene the statutory purpose of
20 protecting minors and preserving the integrity of child-welfare proceedings.
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23
24 ONJ seeks to restore public access to court indices. Court indices are records of
25 the court and are subject to the same confidentiality protections as the underlying case
26 file. NRS 125.090 provides that files and records are not open to inspection except upon
27 specified conditions. Restoring public access to indices would effectively circumvent the
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1 statutory confidentiality mandate by allowing members of the public to identify the
2 parties, track the proceedings, and potentially access sealed materials through other
3 means.
4

5 ONJ seeks electronic coverage at the scheduled hearings. The statute mandates
6 that hearings be held in closed court without the admittance of any person other than
7 those specifically enumerated, except by order of the court.¹³ Electronic coverage would
8 constitute a form of admittance and dissemination that is not authorized by the statute
9 absent an express court order. ONJ's unilateral coverage policies do not constitute such
10 an order.
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14 **F. THE PRESUMPTION OF OPENNESS IN CIVIL AND FAMILY PROCEEDINGS**
15 **MUST YIELD TO THE COMPELLING STATE INTEREST IN PROTECTING**
16 **MINOR CHILDREN IN TPR PROCEEDINGS**

17 While Nevada recognizes a presumption of openness in civil and family
18 proceedings, this presumption is not absolute and must yield where compelling
19 governmental interests are at stake.¹⁴ Termination of parental rights proceedings occupy
20 a uniquely sensitive category within family law because the minor children are not
21 merely incidental parties but are the central subjects whose fundamental privacy interests
22 and welfare are directly implicated.
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27 ¹³ NRS 128.090(5).

28 ¹⁴ *Nester v. The Eighth Judicial District Ct. in the State of Nevada (and Cody Gamble)*, 141 Nev.
Adv. Op. No. 4, 562 P.3d 1071 (2025).

1 **i. TERMINATION OF PARENTAL RIGHTS PROCEEDINGS PRESENT**
2 **COMPELLING GOVERNMENTAL INTERESTS DISTINCT FROM**
3 **DIVORCE AND OTHER FAMILY LAW CASES**

4 ONJ's motion relies on cases involving divorce proceedings and trust records is
5 factually and legally distinguishable from the present TPR context. In divorce and
6 custody disputes, the children are typically parties or subjects whose interests are
7 represented through counsel or guardians *ad litem*, but the proceeding itself concerns the
8 dissolution or modification of the marital relationship between adults. By contrast, in a
9 TPR proceeding, the minor children are the central subjects whose fundamental rights,
10 including the right to family privacy, and protection from public exposure, are directly at
11 issue. The children are not merely incidental to the proceeding; they are the focal point
12 of the State's intervention and the subject of the Court's determination regarding their
13 future custody, care, and welfare. The privacy interests of these children are therefore
14 substantially more acute than in proceedings where minors are peripheral parties in
15 something like a divorce.
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20 Nevada's statutory scheme governing TPR proceedings in NRS 128 provides
21 strong evidence of the State's compelling interest in protecting the privacy and welfare of
22 minor children in these proceedings. This statutory framework is not merely procedural;
23 it reflects a deliberate legislative judgment that TPR proceedings involve interests
24 sufficiently sensitive to warrant confidentiality as a default rule. The existence of this
25 statutory framework demonstrates that Nevada has identified a compelling governmental
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1 interest in protecting the privacy of minor children in TPR proceedings and has tailored
2 its procedural rules accordingly.

3
4 Even the *Falconi* court recognized that while family law proceedings are
5 presumptively open across the nation, courts addressing parental rights termination
6 proceedings have held that those proceedings cannot be automatically closed but that the
7 court must consider the circumstances of each individual case in determining if closure
8 is appropriate.¹⁵ This recognition demonstrates that even under the presumption of
9 openness framework, TPR proceedings warrant individualized analysis and may justify
10 closure based on the specific circumstances presented.
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14 **ii. ONJ’S REQUESTED RELIEF IS NOT NARROWLY TAILORED TO**
15 **SERVE ANY LEGITIMATE INTEREST**

16 ONJ seeks unsealing of the entire case file, including JAVS videos, restoration of
17 public indices, and electronic coverage of three specific hearings for a possible
18 termination of parental rights. This sweeping request is not narrowly tailored to any
19 legitimate public interest. The request encompasses not merely written orders or minute
20 entries but audiovisual recordings of the proceedings themselves, recordings that would
21 capture the voices, appearances, and testimony of witnesses in a case involving minor
22 children who are the central subjects of this TPR proceeding. The request to restore
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¹⁵ *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev., Adv. Op. 8 at 14-15, (2024).

1 public indices would render the case readily identifiable and accessible to the general
2 public, including through internet searches and media databases.

3
4 ONJ's stated internal Coverage Policies reveal a critical flaw in any assumption
5 that unsealing would result in responsible, protective handling of the materials. ONJ has
6 announced that it will not redact the father under a futility exception. This policy choice
7 is significant because it demonstrates ONJ's intent to identify and publicly associate the
8 father with this TPR proceeding. Through the father's identity (which ONJ intends to
9 publish), and the detailed factual allegations contained in the case file. The children's
10 privacy would be compromised not through direct identification by ONJ but through the
11 inevitable inference and association that would result from ONJ's publication of the
12 father's identity in connection with a TPR proceeding involving named children.

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15
16 ONJ claims it will redact children and delete unedited footage within 72 hours.
17 However, this promise provides no meaningful protection once materials are unsealed
18 and made available to the public. Once JAVS videos and case files are publicly
19 accessible, any member of the public—not merely ONJ—may copy, download, and
20 redistribute these materials. The 72-hour deletion window applies only to ONJ's own
21 files and does not prevent copying or redistribution by others who access the materials
22 during the period of public availability. Moreover, digital materials, once published or
23 made publicly accessible, are effectively permanent. Screenshots, copies, and
24 redistributions can proliferate across the internet and social media platforms beyond the
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1 control of any single media organization. ONJ's deletion policy therefore does not
2 constitute a meaningful safeguard against the foreseeable harm to the minor children.

3
4 **iii. THE STATE'S COMPELLING INTEREST IN PROTECTING MINOR**
5 **CHILDREN JUSTIFIES CONTINUED CLOSURE**

6 The State has a fundamental interest in protecting the welfare of minor children
7 through its *Parens Patriae* power. This interest is distinct from and potentially stronger
8 than the general interest in judicial transparency in proceedings affecting adults. Here, in
9 the context of TPR proceedings, the privacy interests at stake are not limited to the
10 children's identities or the details of their family circumstances. Rather, the interests
11 encompass the children's fundamental right to develop free from public scrutiny, to be
12 protected from the stigma and psychological harm that may result from public exposure
13 of their family dissolution, and to have their welfare determined in a confidential setting
14 where the focus remains on their best interests rather than on media coverage or public
15 attention.
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20 Public identification of the children and their family circumstances in parental
21 rights termination proceedings could cause significant harm to the children, including:
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- 23 1. Stigmatization and social ostracism due to public knowledge of parental rights
24 termination;
- 25 2. Harassment by peers and community members;
- 26 3. Psychological harm from public exposure of sensitive family information;
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- 1 4. Interference with the children's ability to move forward with their lives and
2 establish new family relationships;
3 5. Risk of identification through social media or other means, even if the children's
4 names are redacted in the broadcast.
5

6 **G. ELECTRONIC MEDIA COVERAGE SHOULD BE PROHIBITED IN THIS**
7 **TERMINATION OF PARENTAL RIGHTS PROCEEDING**
8

9 Electronic media coverage is not coextensive with the public's constitutional or
10 common law right to attend court proceedings or inspect records. Rather, it constitutes a
11 separate privilege governed by specific rules and the Court's inherent authority to
12 manage its courtroom and protect vulnerable parties on a case-by-case basis.¹⁶
13

14 **i. THE NATURE OF THE PROCEEDING AND SENSITIVE EVIDENCE**
15 **WARRANT PROHIBITIONS**
16

17 Termination of parental rights proceedings are fundamentally different from
18 typical civil or criminal matters. These cases necessarily involve intimate details of
19 family life, child welfare, parental fitness, and sensitive information about minors'
20 physical, emotional, and psychological conditions. The evidence and testimony
21 presented will include facts that, if broadcast or published, could expose the minor
22 children to identification, embarrassment, and potential harm.
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¹⁶ See *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev., Adv. Op. 8 at 14-15, (2024).

1 The sensitive nature of the evidence in this case—which will necessarily address
2 child-related facts—creates a compelling reason to restrict electronic coverage. Unlike
3 proceedings involving only adult parties whose privacy interests may be outweighed by
4 the public's interest in access, termination cases involve the fundamental interests of
5 children who cannot consent to public exposure and who may suffer lasting harm from
6 identification and dissemination of sensitive information about their family
7 circumstances.
8
9

10 **ii. RISK OF IDENTIFICATION AND HARM TO MINORS**
11

12 Electronic media coverage substantially increases the risk that minor children will
13 be identified and harmed. Even with redaction policies in place, the combination of
14 visual coverage, audio recording, and the specific facts presented in testimony creates
15 multiple pathways to identification. A viewer who knows the family, attends school with
16 the children, or lives in the community may readily identify the minors based on context,
17 appearance, voice, or other identifying characteristics visible or audible in broadcast or
18 published footage.
19
20
21

22 ONJ's own internal policies acknowledge this risk by providing for redactions of
23 parents and children generally. The very fact that ONJ has deemed redactions necessary
24 demonstrates that identifying and sensitive information will be captured during the
25 proceedings. This acknowledgment undermines any argument that electronic coverage
26 can be conducted safely without substantial risk to the minors' privacy and safety.
27
28

1 **iii. THE FUTILITY EXCEPTION FOR RESPONDENT DEMONSTRATES**
2 **INADEQUATE PROTECTION**

3 ONJ's stated policy to refrain from redacting Respondent under a futility
4 exception is particularly troubling. If Respondent's face, voice, and identity are
5 broadcast or published, the minor children are substantially more likely to be identified
6 by association. Viewers who know Respondent will recognize him, and from that
7 identification, will readily identify his children. This exception renders ONJ's redaction
8 policy for minors largely illusory and demonstrates that ONJ anticipates capturing and
9 disseminating identifying information that will facilitate identification of the children.
10

11
12 The futility exception reveals that ONJ's coverage policies are inadequate to
13 protect the minors' interests. It shows that ONJ has prioritized its own editorial judgment
14 about what constitutes educational coverage over the protection of vulnerable children.
15 The Court should not permit coverage under policies that ONJ itself recognizes will
16 result in the dissemination of identifying information about the children.
17
18

19
20 **iv. CHILLING EFFECT ON TESTIMONY AND IMPAIRMENT OF JUSTICE**

21 The presence of cameras and the knowledge that testimony will be broadcast or
22 published may chill candid testimony from witnesses, including family members, social
23 workers, and other witnesses whose testimony is essential to the proper administration of
24 justice. Witnesses may be reluctant to provide full and honest testimony if they know
25 their words and appearance will be disseminated to the public.
26
27
28

Moreover, the administration of justice in termination proceedings depends on the ability of the Court to conduct proceedings in an atmosphere conducive to careful deliberation and protection of vulnerable parties. Electronic media coverage transforms the proceeding from a forum focused on the best interests of the children into a public spectacle, potentially diverting attention from the substantive issues and the children's welfare to matters of public interest or media narrative.

v. **ALTERNATIVE MEASURES TO ACCOMMODATE LEGITIMATE ACCESS INTERESTS**

Should the Court determine that some degree of public access is required, the following narrowly tailored alternatives would accommodate any legitimate public interest while protecting the minor children's privacy and welfare:

1. Maintain sealing of substantive filings and videos. Seal all substantive pleadings, affidavits, and JAVS recordings. These materials contain detailed factual allegations and testimony that directly implicate the children's privacy interests.
2. Limit access to parties and counsel. Permit access to the complete case file only to the parties, their attorneys, and other persons entitled to notice under Nevada law. This preserves the ability of the parties to prepare their cases and to ensure fairness in the proceeding.
3. Public access to limited materials only. If any public access is deemed necessary, limit such access to non-identifying minute entries or a redacted written order that describes the Court's ruling without disclosing the children's names, identifying details, or factual allegations.

- 1 4. Prohibit dissemination of audiovisual recordings. Prohibit the dissemination,
2 publication, or broadcast of any audiovisual recordings of the proceedings. This
3 prevents the capture and public exposure of testimony and evidence.
4
5 5. Use of initials or pseudonyms. Require that all public documents refer to the
6 minor children by initials or pseudonyms rather than by their full names. This
7 reduces the risk of identification while preserving the ability of the public to
8 understand the general nature of the Court's rulings.
9

10 In-camera review. Require that any person seeking access to sealed materials
11 submit a written request explaining the purpose of the request. The Court may then
12 conduct an in-camera review of the requested materials and determine whether access is
13 appropriate based on the specific purpose articulated.
14

15
16 **IV. CONCLUSION**

17 WHEREFORE, BRAD BELLISARIO requests that the Court award relief consistent
18 with the requests made herein.
19

20 DATED June 3rd, 2026.

21 ONELLO LAW GROUP

22 /s/ Chase R. Banton, Esq.

23 Nevada Bar No. 16797

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28 Attorney for BRAD BELLISARIO

DECLARATION OF COUNSEL IN SUPPORT OF OPPOSITION & COUNTERMOTION.

1. I have read the preceding document, and I have personal knowledge of the facts contained therein, unless stated otherwise. Further, the factual averments contained therein are true and correct to the best of my knowledge, except those matters based on information and belief, and as to those matters, I believe them to be true.
2. The factual averments contained in the preceding filing are incorporated herein as if set forth in full.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 USC § 1746), that the foregoing is true and correct.

DATED this June 3rd, 2026.

/s/ Jason Onello, Esq., o/b/o
BRAD BELLISARIO, *Respondent*