

MOT

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Attorney for Our Nevada Judges, Inc.

**DISTRICT COURT
CLARK COUNTY, NEVADA
FAMILY DIVISION**

XXXXXXXXXXXXXXXXXX,

Plaintiff,

vs.

DOUGLAS ANSELL;

Defendant.

_____/

CASE NO: D-15-XXXXXX-D

DEPT NO: SENIOR JUDGE

NO HEARING REQUESTED

MOTION TO UNSEAL CASE FILE

NOTICE: YOU MAY FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT A HEARING PRIOR TO THE SCHEDULED HEARING DATE.

COMES NOW, Our Nevada Judges, Inc., a Nevada non-profit corporation, by and through the undersigned counsel, and hereby files the following *Motion to Unseal Case File*.

1 This motion is based upon the following memorandum of points
2 and authorities, and the exhibits attached hereto.

3
4 DATED this Oct 12, 2026

5
6 By: /s/LukeBusby
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MEMORANDUM OF POINTS AND AUTHORITIES

A non-party news reporter may file a motion to unseal. SRCR 4(2). The case is monitored for news coverage by Our Nevada Judges, Inc. (hereinafter 'ONJ'). Litigation involving Mr. Ansell has pervaded the Eighth Judicial District Court, and ONJ has begun monitoring and reporting on case numbers 98C149438¹, A-14-703865-B², A-16-741444-C³, A-18-773880-C⁴, A-17-753116-C⁵, A-18-777318-C⁶, A-19-792105-B⁷, G-19-XXXXXX-M, A-23-876523-C⁹, including publication of 280 J.A.V.S. videos, consistent with its serial and clustered coverage models.

District Court Judge Bryce Duckworth unsealed the entire divorce on August 30, 2017, denouncing efforts to undermine the administration

¹ Eighth Jud. Dist. Ct., 98C149438: Doug Ansell was prosecuted and convicted of a sex offense relevant and raised in this action, including A-18-778260-A, A-19-799885-C, and A-16-735078-C.

² Eighth Jud. Dist. Ct., A-14-703865-B: Doug Ansell sued a business partner and subjected Ms. Ansell to discovery related to this action.

³ Eighth Jud. Dist. Ct., A-16-741444-C: Incorp sued in connection to a lis pendens entered on property at issue in this divorce.

⁴ Eighth Jud. Dist. Ct., A-18-773880-C: Doug Ansell sued XXXXX Ansell for defamation.

⁵ Eighth Jud. Dist. Ct., A-17-753116-C: Haojia sued over property interests implicated in this divorce.

⁶ Eighth Jud. Dist. Ct., A-18-777318-C: Doug Ansell sued over the disclosure of medical records related to this divorce.

⁷ Eighth Jud. Dist. Ct., A-19-792105-B: Haojia sued in connection to a lis pendens entered on a property at issue in this divorce.

⁸ Eighth Jud. Dist. Ct., G-19-051029-M: A guardianship action over the common child.

⁹ Eighth Jud. Dist. Ct., A-23-876523-C: Doug Ansell sued over records held by the child's guardian *ad litem*.

1 of justice, and urging an investigation. The Las Vegas Review Journal
2 published Judge Duckworth's oral pronouncement from the bench
3 articulating his concerns regarding ex parte communications in detail.
4 Exhibit 1.

5
6 At a later date, and on several occasions, Senior Justice Nancy
7 Saitta sealed the entire file for this case, i.e. Case No. D-15-521960-D,
8 through various orders, the most recent dated August 13, 2019.

9
10 Judge Duckworth explained that efforts to improperly influence the
11 Court constitute "corruption," and make transparency necessary to
12 preserve public confidence in the judicial system. The civil cases
13 ancillary to the divorce represent the blast radius of ONJ's ongoing
14 reporting regarding what ONJ refers to as the "Ansel Saga."

15
16 Without understanding the source of the other cases ONJ is
17 covering, the public and press will be left guessing as to what lies at the
18 root of a divorce that spread throughout the Eighth Judicial District
19 Court. Understanding the operation of the family court is as critical as
20 understanding the operation of the rest of the district. Lawyer conduct in
21 proceedings are a matter of public interest. *Abrams v. Sanson*, 136 Nev.
22 83, 87, 458 P.3d 1062, 1067 (2020). Likewise, "[t]he operations of the
23 courts and the judicial conduct of judges are matters of utmost public
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1 concern." *Del Papa v. Steffen*, 112 Nev. 369, 374, 915 P.2d 245, 249
2 (1996). See also *Estate of Hearst*, 67 Cal. App. 3d at 784 ("If public court
3 business is conducted in private, it becomes impossible to expose
4 corruption, incompetence, inefficiency, prejudice, and
5 favoritism...Anglo-American jurisprudence distrusts secrecy [] and favors a
6 policy of maximum public access[.]")
7
8

9 In 2024, the Legislature recognized NRS 125.110 violated the First
10 Amendment and passed S.B. 432, which repealed NRS 125.110 and
11 replaced it with NRS 121.110. Yet, the Clerk is refusing to release filings
12 and requested J.A.V.S., because the sealed filings are in a state of flux.
13 Exhibit 2. The problem is that NRS 121.110(1)(b)(3) only bars from public
14 inspection those filings which are sealed consistent with the
15 requirements of the First Amendment and the strict scrutiny test. NRS
16 121.110(3). ONJ initially requests the unsealing of pleadings, motions,
17 oppositions, and replies, as well as all J.A.V.S. videos. If no opposition is
18 filed, ONJ is willing to defer an NRS 121.110(3) analysis as it may be
19 able to adequately rely upon the requested filings and J.A.V.S. alone.
20 Otherwise, ONJ urges this Court to proceed with the strict scrutiny
21 analysis as required by *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev.,
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1 Advance Op. 8 (2024) and *NY Times Co. v. Dist. Ct.(Doe 1 trust)*, 141
2 Nev. Adv. Op. 71 (Dec. 23, 2025).

3
4 The *NY Times Court* held:

5 Weeks later, this court decided *Falconi*, in which we
6 held that civil proceedings, and family court
7 proceedings specifically, are presumptively open to the
8 public under the First Amendment. 140 Nev., Adv. Op.
9 8, 543 P.3d 92. We determined that NRS 125.080 and
10 certain local court rules, which applied to either
11 automatically close divorce proceedings or require
12 closure and sealing of documents on a party's request,
13 were unconstitutional. *Id.* at 100. We reasoned that the
14 statute and rules improperly prevented the district
15 court from exercising discretion to determine whether
16 compelling privacy interests warrant closure and
17 outweigh the First Amendment presumption of public
18 access. *Id.*

19 "The public's right of access extends beyond simply the ability to attend
20 open court proceedings" and encompasses "a pervasive common law
21 right to inspect and copy ... judicial records and documents." *Id.* citing *In*
22 *re Cendant Corp.*, 260 F.3d 183, 192 (3d Cir. 2001) (internal quotation
23 marks omitted); see also *Grae v. Corr. Corp. of Am.*, 134 F.4th 927,
24 931-33 (6th Cir. 2025) (applying the common law right of access where a
25 press entity sought access to sealed documents two years after the
26 parties entered a class-action settlement resolving the case). This Court
27
28

1 is empowered to conduct this analysis under NRS 121.110(1)(b) under
2 the “good cause” exception.
3

4 Even if this Court came to the conclusion that certain
5 interpretations of the “good cause” standard could allow banning press
6 access to records and filings absent the necessary exercise of
7 discretion, this Court must adopt the interpretation that is constitutional.
8 This is because “when the language of a statute admits of two
9 constructions, one of which would render it constitutional and valid and
10 the other unconstitutional and void, that construction should be adopted
11 which will save the statute.” *State v. Castaneda*, 126 Nev. 478, 481, 245
12 P.3d 550, 553 (2010). In other words, before the Court are two (2) paths:
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16 a) NRS 121.110(1)(b) does not allow the discretion necessary to
17 conduct the strict scrutiny analysis on filings, empowering this Court to
18 declare it unconstitutional and void, consistent with the *Falconi Court’s*
19 holding; or,
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22 b) NRS 121.110(1)(b) does allow the discretion necessary to conduct
23 the strict scrutiny analysis, in which case this Court should proceed to
24 conduct it.
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1 One way or another, this Court is empowered to conduct the strict
2 scrutiny analysis, and must exercise its discretion to do so in order to
3 determine what records may be sealed.
4

5 "It is not unrealistic even in this day to believe that public inclusion
6 affords citizens a form of legal education and hopefully promotes
7 confidence in the fair administration of justice." *State v. Schmit*, 273
8 Minn. 78, 87-88, 139 N. W. 2d 800, 807 (1966). "Instead of acquiring
9 information about trials by firsthand observation or by word of mouth
10 from those who attended, people now acquire it chiefly through the print
11 and electronic media. In a sense, this validates the media claim of
12 functioning as surrogates for the public." *Richmond Newspapers*, 448 U.
13 S. 525, 573 (1980). "The free press is the guardian of the public interest,
14 and the independent judiciary is the guardian of the free press." *Id.*
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19 "[S]ecret judicial proceedings pose [a threat] to public confidence in
20 this court and the judiciary" because "secrecy encourages
21 misunderstanding, distrust, and disrespect for the courts." *Del Papa v.*
22 *Steffen*, 112 Nev. 369, 374, 915 P.2d 245, 249 (1996). For these several
23 reasons, ONJ hereby requests the Court order unsealed all pleadings,
24 motions, oppositions, replies, and J.A.V.S. videos; and, for such further
25 relief as the Court deems necessary and just. To the extent this Court
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1 finds a compelling interest to seal a filing or J.A.V.S. video, the Court
2 must narrowly tailor such a restriction such that it serves the compelling
3 interest; in other words, by redaction, not wholesale sealing of court
4 records.
5

6
7 **NRS 239B.030(4) AFFIRMATION**

8 *Pursuant to NRS 239B.030 the undersigned hereby affirms that this*
9 *document does not contain the social security number of any person.*
10

11 **DATED** this Oct 12, 2026

12 By: /s/Luke Busby
13 LUKE A. BUSBY, ESQ.
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1 DECLARATION OF ALEXANDER FALCONI

2 I, Alexander M. Falconi, declare that I have read the foregoing
3 *Motion* and that the contents are true and correct of my own personal
4 knowledge, except for those matters I have stated that are not of my
5 own personal knowledge, but that I only believe them to be true, and as
6 for those matters, I do believe they are true.
7

8
9 ***I declare under penalty of perjury that the foregoing is true and***
10 ***correct.***
11

12 EXECUTED this Oct 12, 2026

13 
14

15
16 _____
17 Alexander M. Falconi
18 205 N. Stephanie St.
19 Suite D#170
20 Henderson, NV 89074
21 Our Nevada Judges, Inc.
22 Founding Director
23 admin@ournevadajudges.com
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that on the date shown below, I caused service to be completed of a true and correct copy of the foregoing document by:

_____ personally delivering;

_____ delivery via Reno/Carson Messenger Service;

_____ sending via Federal Express (or other overnight delivery service);

_____ depositing for mailing in the U.S. mail, with sufficient postage

affixed thereto; or,

 x delivery via electronic means (fax, eflex, NEF, etc.) to:

Marshal Willick, Esq.

John Jones, Esq.

DATED this Oct 12, 2026

By: /s/ Alexander Falconi

List of Exhibits

Exhibit 1: Las Vegas Review Journal

Pages: 7

Exhibit 2: Email

Pages: 1

EXHIBIT 1

EXHIBIT 1

Family Court judge accuses agitator Steve Sanson of intimidation



Judge Bryce Duckworth, left and Steve Sanson, right. (Las Vegas Review-Journal)

By Rachel Crosby Las Vegas Review-Journal

September 9, 2017 - 9:31 am



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Updated September 9, 2017 - 5:37 pm

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A respected Family Court judge recently recused himself from a case after accusing Steve Sanson, a controversial figure in Nevada politics, of trying to “influence and intimidate” him.

Judge Bryce Duckworth strongly condemned Sanson, president of Veterans in Politics International, in an order filed Tuesday in a pending divorce and child custody case. At an earlier court hearing in the case, Duckworth said the matter should be investigated.

“This Court reiterates that it is inappropriate to communicate with a judicial officer off the record about a pending case — at any time and under any circumstances,” the judge said in his written order. “Mr. Sanson’s attempts to deflect blame to the Court are appalling.”

The order came days after Sanson filed an ethics complaint against Duckworth with the Nevada Commission on Judicial Discipline. The complaint cited the earlier hearing in the divorce case, during which Duckworth similarly accused Sanson of interference.



Family Court Judge Bryce Duckworth's statements to Steve Sanson during Aug. 30 hearing

Sanson, who is a Marine veteran, has said the purpose of Veterans in Politics is to “expose corruption and unethical behaviors.”

He frequently criticizes judges and attorneys and has interviewed political candidates and office holders on his organization's online radio show. His organization previously endorsed Duckworth.

Sanson also is behind a Facebook page called [“WAR Declared on Clark County Family Court System.”](#)

Text message exchange

During the earlier hearing and in his order of recusal, Duckworth cited a series of text messages Sanson sent to the judge's personal cellphone:

On May 11, Sanson texted: “Judge I need to speak with you.”

On May 12, Duckworth responded: “What do you need to talk about?”

On May 12, Sanson texted: “Call me at your convenience or we can grab a cup of tea.”

After the last text, Duckworth called Sanson. During their conversation, according to the judge's order, Sanson asked, “Why do you allow Marshal Willick to get away with so much ‘crap’ in Doug Ansell's case?”

Willick is an attorney in the Ansell case — the ongoing divorce case from which Duckworth has recused himself. Willick also has sued Sanson separately for defamation.

“If Mr. Sanson's sole motivation was merely to attack Mr. Willick in general and not to influence the Court about a specific case, he could have done so,” Duckworth wrote.

“Although such communication remains improper, it is more egregious that Mr. Sanson knowingly and intentionally identified Doug Ansell's case.”

Sanson's lawyer, Maggie McLetchie, who also represents the Las Vegas Review-Journal, maintained Friday that Sanson did nothing wrong.

“Steve is not a litigant in that case. Steve is not an attorney. Steve is not a judge,” McLetchie said. “He wasn't trying to intimidate anybody, and his comments to Duckworth only pertained to Willick's general behavior in the courtroom. He wasn't calling for any particular outcome or decision in the case.”

Question of free speech

McLetchie defended Sanson in a separate case in which another Family Court lawyer, Jennifer Abrams, sued Sanson for defamation. A judge [tossed out the case in court](#), noting it targeted and chilled free speech. Abrams is appealing that decision.

“Regardless of what anybody thinks about Mr. Sanson and Veterans in Politics, he has an absolute right to comment on courtroom behavior, including that of powerful and prominent attorneys,” McLetchie said.

Sanson noted the text messages in question were sent months ago and already had been addressed in court.

“What we’re trying to do is have both judges and the attorneys follow the law,” Sanson told the Review-Journal on Friday, referring to Veterans in Politics as a watchdog organization.

In his order, Duckworth suggested that Sanson’s mission was disingenuous.

“Mr. Sanson proudly proclaims that he has ‘declared war’ on the Family Court,” the order reads. “There is no doubt that the courts are under attack and that the entire judiciary of this great State of Nevada is on notice that, behind that false banner of ‘justice and corruption’ is an individual and group who seek to manipulate, intimidate and control.”

In the Review-Journal’s most recent Judicial Performance Evaluations, which allowed attorneys to rate judges, Duckworth had the highest retention scores of any Family Court judge.

In 2011, 94 percent of lawyers recommended Duckworth for retention. In 2013, 93 percent said he should keep his job.

Contact Rachel Crosby at rcrosby@reviewjournal.com or 702-380-8135. Follow [@rachelacrosby](#) on Twitter.

MORE STORIES



Family court judicial candidates clouded by disciplinary past



Primary vote leader denied judicial appointment, leaving Family Court seat to be decided in November



Incumbent judge, prosecutor clash in Department 8 race



Family Court rematch pits former judge against incumbent



Judge Jerry Wiese faces Joshua Santeramo in November election



Family Court challenger Marilyn Caston calls for 'new blood' in race against Judge Bill Henderson

Family Court Judge Bryce Duckworth made some strong statements to Steve Sanson during an Aug. 30 hearing. The statements were captured on courtroom video:

— "Hey, stop it, OK, let the record reflect that the witness [Steve Sanson] is scowling at counsel, directing his venom and anger at counsel, which is completely inappropriate. That behavior is not tolerated in the courtroom."

— "I find that there has been an effort to influence this court outside of the four walls of this courtroom, and given these influences, I find that complete transparency of these proceedings is in the public interest to maintain confidence in the judicial system."

— "When Mr. Sanson says that he was court monitoring, what he means is he was calling and recruiting disgruntled litigants without any regard for the truth. After all,

why let the truth get in the way of a good story? True justice requires the participation of all parties involved in litigation."

— "This matter should be investigated. We should be doing that here. It is the height of hypocrisy to decry corruption and then engage in the very practice you claim to be attacking and shedding light on. Communication with a judicial officer, about a specific case inclusive with veiled threats, is corrupt."

— "It is important that everyone here understands the magnitude of what we are dealing with. This is more than just this case or this court. In 26 years of combined practice and sitting on the bench, I have never been exposed to anything like what has happened in this case. This is about outside interference in the administration of justice through intimidation, threats and improper influence. This is an attack on our system of justice in which an individual seeks to remove the symbolic blindfold of lady justice. This matter should be investigated."

EXHIBIT 2

EXHIBIT 2



Alexander Falconi <admin@ournevadajudges.com>

Video Request for Ansell D-15-521960-D

2 messages

Video Requests, Attorney <videoa@clarkcountycourts.us>

Thu, Jan 22, 2026 at 8:09 AM

To: Alexander Falconi <admin@ournevadajudges.com>, "Video Requests, Attorney" <videoa@clarkcountycourts.us>

Good morning,

I hope all is well.

This case is sealed.

As of today, I do not see your agency listed as a party on the case yet.

Do you have a release order? Please email us a copy.

Thank you.

From: Alexander Falconi <admin@ournevadajudges.com>

Sent: Wednesday, January 21, 2026 8:43 PM

To: Video Requests, Attorney <videoa@clarkcountycourts.us>

Subject: Records Request

Please find the attached records request.

--

Alexander Falconi

Founding Director

<https://www.ournevadajudges.com>



Our Nevada Judges, Inc. is a [non-profit corporation](#) recognized by the [IRS](#) as a [Section 501\(c\)\(3\)](#) organization.

Alexander Falconi <admin@ournevadajudges.com>

Fri, Jan 23, 2026 at 12:42 PM

To: "Video Requests, Attorney" <videoa@clarkcountycourts.us>

I wasn't sure if the new statute altered how it works in D-cases.

It's okay for now, we might or might not file a motion to unseal.

[Quoted text hidden]