



1 Alexander M. Falconi
2 153 Sand Lake St.
3 Henderson, NV 89074
4 admin@ournevadajudges.com
5 702-374-3530
6 *For Our Nevada Judges*

7 EIGHTH JUDICIAL DISTRICT
8 CLARK COUNTY, NEVADA

9 [REDACTED]
10 Plaintiff,
11
12 vs.
13 [REDACTED],
14 Defendant.

Case No.: D [REDACTED] C
Dept. No.: I

MOTION TO UNSEAL

* NO HEARING REQUESTED *

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

22 COMES NOW, Alexander Falconi of Our Nevada Judges¹, appearing in proper person,
23 and hereby files a motion to unseal. This motion is based upon the following memorandum of
24 points and authorities and all pleadings on file herein.

25 DATED THIS 24 day of February, 2022.



26
27
28 _____
Alexander M. Falconi
Our Nevada Judges
Administrator

¹ Alexander M. Falconi owns, operates, and controls the Our Nevada Judges organization, including but not limited to the website, YouTube, Facebook, and Twitter platforms.

1 **Memorandum of Points and Authorities**

2 **I. Standing**

3 Municipal Court Judge Mark Stevens has allowed² comprehensive electronic coverage of
4 the domestic violence matter scheduled before him in the Henderson Municipal Court, docket no.
5 19-CR-011543. Our Nevada Judges ('ONvJ') would appreciate the opportunity to monitor these
6 proceedings as well. The sealing of this case interferes with monitoring and potential electronic
7 coverage. For these several reasons, this motion follows. SRCR 4(2) (authorizing "a named party
8 or another person" to file motion to unseal).
9

10 **II. Sealing of Entire File Prohibited**

11 SRCR 3(5)(c) states clearly, "[u]nder no circumstances shall the court seal an entire
12 court file." ONvJ is requesting this Court direct the Clerk of the Court to unseal the file so that
13 ONvJ can monitor for upcoming hearing dates and times.
14

15 Without further direction by this Court, the Court Information Officer and Clerk will not
16 release the mandatory minimum information. Exhibit 1.

17 ONvJ has also noticed a number of other domestic relations matters with sealing that do
18 appear on the docket as mandated by SRCR 3(5)(c). To the extent this matter may have
19 inadvertently or mistakenly been sealed in its entirety, ONvJ would request an order to the
20 Clerk directing the Clerk to correct the issue such that the matter appears on the docket, with the
21 bare minimum information required by SRCR 3(5)(c) made available.
22

23 **III. Inability to Cite & Contest Existing Findings Supporting Sealing**

24 The Court Information Officer and Clerk are refusing to disclose the findings supporting
25 sealing, as required by SRCR 3(7)(a)(3). To the extent Parties and counsel are frustrated by this
26

27 _____
28 ² <https://www.youtube.com/watch?v=U3Io9Cq4dnM>
<https://www.youtube.com/watch?v=SpIqWM6VLEs>

1 motion as there may be unique circumstances warranting consideration, ONvJ can only express
2 same frustration given the findings, which should be made available to the public, are being
3 concealed by District 8 personnel in violation of SRCR 3(7)(a)(3). Exhibit 1. ONvJ does not
4 blame District 8 personnel for doing so, as they need direction from this Court to reveal the
5 requested information. SRCR 4(1).
6

7 **IV. Camera Access, Generally**

8 At this time, no SCR 230(1) request is pending. If Parties are opposed to electronic
9 coverage, a separate opportunity to object will arise if and when an SCR 230(1) is filed. *Solid v.*
10 *Eighth Judicial Dist. Court*, 133 Nev. 118, 393 P.3d 666 (2017).
11

12 **V. Coverage of Domestic Relations Matters, Generally**

13 It is not out of the norm for ONvJ to monitor and cover domestic relations matters. Family
14 Division District Court Judges Dawn Throne³, David Gibson Jr.⁴, Heidi Almase, Tamatha
15 Schreinert⁵, Cynthia Lu⁶, and Shell Mercer⁷, are currently allowing comprehensive electronic
16 coverage of their family court proceedings, including NRS 432B proceedings.

17 The Court of Appeals and Supreme Court has also authorized⁸ appellate coverage of
18 domestic relations matters or cases stemming from domestic relations matters.

19 SCR 240 expressly states consent of participants is not required, especially attorneys.
20 *Abrams v. Sanson*, 458 P.3d 1062, 1066 (2020) (attorney courtroom conduct is a matter of public
21 interest).
22
23
24

25 ³ <https://youtu.be/yeoJ8pfZaes>

26 ⁴ <https://youtu.be/QVCN0oeLLxs>

27 ⁵ <https://youtu.be/FBQz0Xt1cTk>

28 ⁶ <https://youtu.be/rtB4dSVrh-I>

⁷ https://youtu.be/GCW_9BrQ4cE

⁸ <https://www.youtube.com/watch?v=Swx2bRo1MMA>

1 **VI. Conclusion**

2 This Court should make available the case number, docket codes, date of action
3 commencement, party names, counsel, case type and causes of action, the order sealing and
4 specifically the “written findings”, as well as the identity of person who moved to seal this matter.
5 SRCR 3(5)(c) (mandating the availability of this bare minimum of information).
6

7 This Court also has the authority to, on its own motion, unseal. SRCR 4(2).

8 **AFFIRMATION:** This document does not contain a social security number of any person.

9 DATED THIS 24rd day of February, 2022.

10 

11 _____
12 Alexander M. Falconi
13 Our Nevada Judges
14 Administrator

14 **DECLARATION OF ALEXANDER FALCONI**

15 I, Alexander M. Falconi, state that I have read this *Motion* and that the contents are true
16 and correct of my own personal knowledge, except for those matters I have stated that are not of
17 my own personal knowledge, but that I only believe them to be true, and as for those matters, I do
18 believe they are true.

19 ***I declare⁹ under penalty of perjury that the foregoing is true and correct.***

20 EXECUTED this 24rd day of February, 2022.

21 

22 _____
23 Alexander M. Falconi
24 153 Sand Lake St.
25 Henderson, NV 89074
26 Our Nevada Judges
27 Administrator
28 admin@ournevadajudges.com

28 ⁹ NRS 53.045 (declaration in lieu of affidavit).

1 **List of Exhibits**

2 **Exhibit 1: Emails**
3 Pages: 4

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

EXHIBIT 1

EXHIBIT 1



Alexander Falconi <admin@ournevadajudges.com>

Request for Sealing Order in D [REDACTED] C

Alexander Falconi <admin@ournevadajudges.com>

Tue, Feb 8, 2022 at 10:38 AM

To: [REDACTED]

Cc: Luke Busby [REDACTED]

Good morning [REDACTED]

The case I'm hoping to unseal is D [REDACTED] C. I already have camera access to the Henderson Municipal Court domestic violence jury trial and I'm hoping to unseal the child custody case and get access to that too.

I was successful in doing this with Judges Schreinert and O'Neill (District 2, Reno Muni) but the defendant died before trial and I'm hoping to eventually be able to cover this one instead.

I cc:ed our First Amendment counsel, Luke Busby, as he'll be the one helping with this if it looks feasible.

Hi Mr. Busby, this is [REDACTED] for District 8. She's going to see if she can get us the sealing order.

--

Alexander Falconi

Administrator

| *Those who fear the darkness have never seen what the light can do.*

<https://www.ournevadajudges.com>



2 attachments

Media Request SIGNED Unredacted.pdf
101K

Media Request Henderson Muni.pdf
28K



Alexander Falconi <admin@ournevadajudges.com>

Request for Sealing Order in D-[REDACTED] C

Luke Busby [REDACTED]
To: Alexander Falconi <admin@ournevadajudges.com>
Cc: [REDACTED]

Tue, Feb 8, 2022 at 10:56 AM

[REDACTED]

It's a pleasure to meet you. PLease let me know if you have any questions for me.

Cheers!
[Quoted text hidden]
--
Cheers!

Luke Busby, Esq.
[REDACTED]

This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

Disclaimer Required by IRS Rules of Practice: Any discussion of tax matters contained herein is not intended or written to be used, and cannot be used, for the purpose of avoiding any penalties that may be imposed under Federal tax laws.



Alexander Falconi <admin@ournevadajudges.com>

Request for Sealing Order in D-[REDACTED] C

Tue, Feb 8, 2022 at 10:57 AM

[REDACTED]
To: Alexander Falconi <admin@ournevadajudges.com>
Cc: Luke Busby [REDACTED]

Based on your prior email, I was unaware that this was a custody matter. For clarification, I will look into your inquiry and provide a response.

From: Alexander Falconi <admin@ournevadajudges.com>
Sent: Tuesday, February 8, 2022 10:38 AM
To: [REDACTED]
Cc: Luke Busby [REDACTED]
Subject: Request for Sealing Order in [REDACTED]

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

[Quoted text hidden]



Alexander Falconi <admin@ournevadajudges.com>

Request for Sealing Order in [REDACTED]

Thu, Feb 10, 2022 at 10:10 AM

[REDACTED]
To: Alexander Falconi <admin@ournevadajudges.com>
Cc: Luke Busby [REDACTED]

Good morning,

The case was sealed in 2020 under Order 99.

From: Alexander Falconi <admin@ournevadajudges.com>
Sent: Tuesday, February 8, 2022 10:38 AM
To: [REDACTED]
Cc: Luke Busby [REDACTED]
Subject: Request for Sealing Order in [REDACTED]

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Good morning [REDACTED]

[Quoted text hidden]