



1 **OBJ**

2 **JULIE HAMMER**

3 [REDACTED]

4 [REDACTED].com

5 *Self-Represented*

6 **EIGHTH JUDICIAL DISTRICT COURT**

7 **FAMILY DIVISION**

8 **CLARK COUNTY, NEVADA**

9  
10 *In the matter of the petition of*  
11 **MARY JOHANNA RASMUSSEN,**

Case No.: D-12-[REDACTED]-C

Dept.: N

Honorable Paul Gaudet

Hearing Date: **March 19, 2024**

Time: **11:00am**

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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.

21 **OBJECTION TO ORDER ISSUED FEBRUARY 20, 2024 REGARDING**  
22 **ALEXANDER FALCONI'S MEDIA REQUEST (NOTICE TO UNSEAL);**  
23 **AND TO STRIKE THE UNSIGNED PAPER UNDER RULE 11(a); AND**  
24 **DENY HIS MEDIA REQUEST.**

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Julie Hammer, in proper person, hereby objects to the order issued February 20, 2024 regarding Alexander Falconi's Media Request (Notice to Unseal); And to strike the unsigned notice as well as the resulting February 20, 2024 order and

1 deny his media request *in toto*. This objection is brought upon the pleadings and  
2 papers on file and the declaration of Movant, JULIE HAMMER, and any exhibits  
3 attached to this motion.  
4

5 **DATED** this 27<sup>TH</sup> day of February 2024.

6 RESPECTFULLY SUBMITTED BY:

7  
8 /s/ Julie Hammer  
9 **JULIE HAMMER**

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12 **NOTICE OF HEARING**

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14 TO: Petitioner, MARY RASMUSSEN, and her attorney(s) JOHN D. JONES,  
15 ESQ. and, LAURA A. DEETER, ESQ.

16 TO: ALEXANDER FALCONI of FACEBOOK'S *OUR NEVADA JUDGES*

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18 **PLEASE TAKE NOTICE** that a hearing on this objection will be held before  
19 the Eighth Judicial District Court of the Regional Justice Center, Department N, at  
20 601 North Pecos Road, Las Vegas, NV 89155 **OR** via BlueJeans Video  
21 Conferencing application on **March 19, 2024 at 11:00am.**

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24 **DATED** this 27<sup>TH</sup> day of February 2024.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**  
3 **PROCEDURAL HISTORY**

4 This court issued an Order Re: Media Request on February 20, 2024 stemming  
5 from Mr. Falconi’s Notice of Intent to Unseal; And did so within 48 hours of his  
6 notice being filed into this case. It is a huge concern he was **not** required to obtain  
7 permission to enter the case before he **served** an unsigned document in the case.  
8 He was also not required to file a motion seeking the case be unsealed or for media  
9 coverage. However, this Court issued an order, sua sponte.  
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12 Mr. Falconi has had an obsession with all cases relating to Julie Hammer and  
13 her daughter XXXXXXXXXX Point in fact, he broadcasted this case (before it was  
14 sealed on September 17, 2020) as well as the related criminal proceedings on his  
15 Facebook and youtube channels. He has profited from these proceedings and  
16 admits receiving \$5000.00 from the State Bar of Nevada. Mr. Falconi even went so  
17 far as to restrict access to Julie Hammer on his Facebook page as well as anyone  
18 who supported her so that she could not defend herself. He claims to “educate” the  
19 public but imposes his legal opinions which may or may not be consistent with  
20 Nevada law.  
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25 **FACTS AND ARGUMENT**

26 In this Court’s February 20, 2024 ruling, it noted **Supreme Court Rule 230(2)**.  
27 The factors it shall consider and make particularized findings on the record as to  
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1 whether or not electronic coverage will be allowed at a proceeding. The factors are  
2 as follows:

- 3 a) The impact of coverage upon the right of any party to a fair trial;
- 4 b) The impact of coverage upon the right of privacy of any party or witness;
- 5 c) The impact of coverage upon the safety and well-being of any party, witness  
6 or juror;
- 7 d) The likelihood that coverage would distract participants or would detract  
8 from the dignity of proceedings;
- 9 e) The adequacy of the physical facilities of the court for coverage; and
- 10 f) Any other factor affecting the fair administration of justice.

11 This Court has no authority to even entertain the factors under Supreme Court  
12 Rule 230(2) because Nevada's paternity and adoption statutes already prohibit Mr.  
13 Falconi's access to these "closed" proceedings. **NOTE: The court already**  
14 **maintains electronic coverage in the form of a video recording.** If you are a  
15 litigant then you can order a copy of the video.  
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17  
18 **A. OBJECTION 1: Restricted by statute**

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20 **Nevada statutes exclude the public from certain cases such as paternity and**  
21 **adoption, as follows,**

22  
23 **NRS 125C.004** Award of Custody to a person other than parent.

24 **3.** The court may exclude the public from any hearing on this issue.  
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26 Considering this court awarded custody to an unrelated married woman, the  
27 court has authority to exclude the public, including Falconi, on this statute alone.  
28

1 FURTHER, EXISTING NEVADA LAW MANDATES THAT ALL  
2 PATERNITY PROCEEDINGS [NRS 126] AS WELL AS ADOPTION  
3 PROCEEDINGS [NRS 127] ARE NOT FOR PUBLIC CONSUMPTION  
4 AND SEALED TO PROTECT THE RIGHTS OF THE MINOR CHILDREN  
5 INVOLVED IN THE CASE.  
6

7  
8 **ADOPTION**

9 **NRS 127.140** Confidentiality of hearings, files and records.

10 1. Except as otherwise provided in NRS 239.0115, **all hearings held**  
11 **in proceedings under this chapter are confidential and must be held in**  
12 **closed court**, without admittance of any person other than the petitioners,  
13 their witnesses, the director of an agency, or their authorized representatives,  
14 attorneys and persons entitled to notice by this chapter...

15 **PATERNITY**

16 **NRS 126.211** provides that any hearing or trial held under Chapter 126,  
17 **Parentage MUST BE HELD IN A CLOSED COURT**, without  
18 admittance of any person other than those necessary to the action or  
19 proceeding.

20 This case is not open to the public as prescribed by NRS 126.211 and NRS  
21 127.140. Even though Mrs. Rasmussen is seeking adoption of a child under NRS  
22 126 and not NRS 127, neither statute has been declared unconstitutional nor have  
23 they been nullified. Therefore, this Court has a duty to FOLLOW THEM.

24  
25 **Here, we have Mr. Falconi using a Nevada Supreme Court ruling to bully**  
26 **the court into circumventing Nevada's Paternity statutes as well as Adoption**  
27 **statutes in the same fashion that Mrs. Rasmussen bullied the court into**  
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1 creating mythical statutes to sua sponte award her paternity rights stolen  
2 from Julie Hammer and Gonzalo Galindo-Milan. Mr. Falconi's request  
3 essentially seeks to put his business interests on Facebook's *Our Nevada*  
4 *Judges* and Youtube.com as superior to the rights of the minor child. In

6 conclusion, Mr. Falconi's NSC advanced opinion has NO effect on the Nevada  
7 Revised Statutes listed above.

9 **B. OBJECTION 2: This matter is res judicata.**

10 Mary's petition was already sealed as mandated by statute in 2020, yet, Falconi  
11 believes he has a right to take a second bite at the apple. If he feels Nevada's  
12 paternity and adoption statutes are "unconstitutional", he is free to challenge them  
13 in federal court. Mr. Falconi has no authority to bamboozle the court into granting  
14 his media request or to unseal this case. It is clear that Mr. Falconi is engaging in  
15 abuse of process and should be deemed vexatious. Further this Court should  
16 remind him to remove any and all case information from his social media  
17 platforms in compliance with Supreme Court Rule 240, as follows,

22 **Supreme Court Rule 240. Limitations (consent of parties).**

23 1. Consent of participants. The consent of participants to coverage is  
24 not required. The judge, however, in the exercise of sound discretion,  
25 may prohibit the filming or photographing of any participant who does  
26 not consent to being filmed or photographed. This is in recognition of the  
27 authority reposing in the judge, upon the exercise of sound discretion, to  
28 hold certain judicial proceedings, or portions thereof in camera and in

1 recognition of the fact **that certain proceedings or portions thereof are**  
2 **made CONFIDENTIAL BY LAW.**

3 In this case, Judge Harter already issued an order sealing this action on  
4 September 17, 2020 based upon existing Nevada law and the request of the  
5 parties, not only is this matter res judicata, but today, 17-year-old [REDACTED] is  
6 also requesting the case remain sealed. See her February 26, 2024 affidavit  
7 filed to the record.  
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12 **C. OBJECTION 3: NRCP Rule 11(a)**

13 **N.R.C.P. RULE 11(a)**

14 (a) Signature. Every pleading, written motion, and other paper must be  
15 **signed** by at least one attorney of record in the attorney's name-or by a  
16 **party personally if the party is unrepresented.** The paper must state the  
17 signer's address, email address, and telephone number. Unless a rule or  
18 statute specifically states otherwise, a pleading need not be verified or  
19 accompanied by an affidavit. **The court must strike an unsigned paper**  
20 unless the omission is promptly corrected after being called to the attorney's  
or party's attention.

21 Falconi is neither an attorney nor a party in this case. Therefore, his "notice" is  
22 of no force or effect. His is notice is harassment and the court should sanction  
23 him. This rule, NRCP 11(a), requires the Court to strike the unsigned paper as  
24 well as the resulting order issued February 20, 2024.  
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27 **D. OBJECTION 4: Nevada Rules Governing Sealing & Redacting Court**  
28 **Records.**

1           **RULE 4. Process and grounds for unsealing court records.**

2           1. **Scope.** Court records that are sealed, whether or not pursuant to  
3           this rule, may be examined by the public only after entry of a court order  
4           allowing access to the record in accordance with this rule.

5           2. **Motion; service.** A sealed court record in a civil case **shall be**  
6           **unsealed only upon stipulation of all the parties, upon the court’s**  
7           **own motion, or upon a motion filed by a named party or another**  
8           **person. A motion to unseal a court record must be served on all**  
9           **parties to the action in accordance with NRCP 5.**

10           First, there is no legal requirement to give notice to unseal a case, however, **a**  
11           **motion must be filed.** It is concerning Falconi was given a ruling without being  
12           required to comply with Nevada’s sealing rules.

13           **E. OBJECTION 4: Financial Interest & Intrusion into Personal Seclusion.**

14           This is not about access to the court, this is about whether or not Falconi can  
15           have access to the court to make money on family court cases because his internet  
16           channels are a business. Mr. Falconi uses his Facebook and Youtube channels to  
17           earn money because these platforms pay money for the volume of views. He freely  
18           broadcasted the case before Judge Harter sealed it.

19           Mr. Falconi unilaterally decided to attach his name to this service list in a sealed  
20           case. No Nevada law or court procedure allows him to do this. In doing so, he has  
21           violated privacy by intrusion into personal seclusion. Even in “open” cases not  
22           sealed by statute, he is required to go to the courthouse to obtain documents. He  
23           wants to be automatically be served when he is **NOT** a litigant or an attorney in  
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1 this matter. This court cannot allow such intrusion into the rights of the minor  
2 child. **Cases are sealed to protect the rights of the minor children.**

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4 **IN CONCLUSION**, this court must deny Mr. Falconi because Nevada's  
5 paternity and adoption statutes do not allow him to proceed. This court should also  
6 reprimand Mr. Falconi for his vexatious litigation and order him to remove all  
7 material regarding this case from all social media platforms including Facebook  
8 and youtube.com. It is obscene the biological parents cannot obtain a decree of  
9 paternity based upon DNA findings for 12 years, yet a stranger such as Mr. Falconi  
10 can crash into this case and leverage an order by simply filing a notice of intent to  
11 unseal the case in violation of Nevada's statutes and Nevada's sealing rules. This  
12 matter is res judicata because the prior court has already ruled on this issue for the  
13 same reasons presented in this objection.  
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17 **DATED** this 27<sup>th</sup> day of February 2024.

18  
19 RESPECTFULLY SUBMITTED BY:

20 /s/ Julie Hammer

21 **JULIE HAMMER**

22 [REDACTED]

23 [REDACTED]

24 [REDACTED].com

