

EXHIBIT P

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BY _____
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Code:
ELOISA BESADA FURER
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Defendant in Pro Per

IN THE FAMILY DIVISION
IN THE SECOND JUDICIAL DISTRICT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

ANDREW EARL FURER,
Applicant,
vs.

ELOISA BESADA FURER,
Adverse Party

Case No.: FV04-04071
Dept. No: DM3

ELOISA FURER, ADVERSE PARTY OBJECTION AND REQUEST FOR RECONSIDERATION AND STAY OF THE EXTENDED TEMPORARY PROTECTION ORDER AND TO SANCTION APPLICANT, ANDREW FURER FOR PERJURY

Mrs. Furer, Adverse Party, of the above entitled case requests this Court for reconsideration and Stay of the Extended Order of Protection on the ground that Applicant, Andrew Furer, committed multiple perjurious statements on his application and on the same ground to sanction Mr. Furer under Rule 11.

INTRODUCTION

Mrs. Furer states the following facts under penalty and perjury.

On July 13, 2007, while I was at the Court house to pick up the tapes during my divorce trial of July 9 to 11, 2007, a Court Clerk tried to serve me with some document described to me as a

1 Temporary Protection Order that Mr. Furer had filed against me. I did not accept the documents, and left
2 the Court house after the Court hearing tapes were given to me.

3 On August 3, 2007, I received some documents by facsimile from the Office of Kent
4 Robison, one of Mr. Furer's attorneys. The documents faxed were the following:

- 5 1. Ordering Shortening Time for Applicant, Andrew Furer to take Telephonic Depositions to
6 Preserve Testimony for Hearing on Extended Protected Order.
- 7 2. Order for Hearing to Extend, Modify or Dissolve the Protection Order – (This order I learned
8 from the Court on August 14, 2007 was Denied.)
- 9 3. Temporary Order for Protection Against Violence – which was issued on July 13, 2007 to
10 expire on August 12, 2007. On August 6th, I received a notice from the Court, Order Vacating
11 Hearing and Resetting Hearing for August 14, 2007.

12 Mrs. Furer did not get the following documents for review before the hearing (but was
13 given just before the hearing started).

- 14 1. Application for Temporary and/or Extended Order for Protection Against Domestic Violence
- 15 2. Brief for Hearing on Extended Temporary Protective Order (TPO)
- 16 3. Order Denying Applicant's Motions for Modifications
- 17 4. Telephone Deposition of Merritt McKeon

18
19 **POINTS AND AUTHORITY**

20
21 Mrs. Furer, Adverse Party, had read all the documents pertaining to the Extended
22 Protection Order issued by the Court.

23 Mrs. Furer has also read the APPLICATION for the Extended Temporary Protection Order
24 that was filed by her estranged husband, Andrew Furer.

25 On July 13, 2007, Andrew Furer, filed his Application for Extended Protection Order signed
26 and Certified Under Penalty of Perjury under the Laws of the State of Nevada.

1 Mr. Furer committed perjury by lying in his Application for Extended Protection Order and
2 Brief for Hearing and Extension of TPO on five (5) occasions:

- 3 1. Item #10 in the signed Application, specifically asks the question, "***Have you ever been arrested***
4 ***or charged with domestic violence, or any other crime committed against your spouse,***
5 ***partner or children***" Mr. Furer's answer was **NO** by affixing an 'X' on the box. (See Exhibit A -
6 Application.)
- 7
- 8 2. In Item #2 of the Application, Mr. Furer stated that the Title of his Reno residence at 2130
9 Greentree Lane, is held under "**THE ANDREW AND ELOISA FURER TRUST**". This is
10 inconsistent with the Real Property Assessment Data. (See Exhibit B – True Copy of Real
11 Property Assessment Data from the Washoe County Assessor printed on August 23, 2007)
- 12
- 13 3. Page 4, Lines 3-6 of the Application – Mr. Furer had stated in his Application for Extended
14 Temporary Protection that "Mrs. Furer said to her son, "***I am going to kill your Dad because I am***
15 ***not going to receive 50% of the assets in our pending divorce case.***" (See Exhibit C – Page 4
16 of Application.) *SEE*
- 17
- 18 4. Mr. Furer also committed perjury in his Brief for Hearing on Extension of TPO. Mr. Furer's
19 statement – "***Mr. Furer filed for divorce from Mrs. Furer in July 2004, and since then the***
20 ***parties have been in a long and bitter legal battle***". This statement is contrary to the truth. (See
21 Exhibit D – Brief for Hearing on Extension of TPO)
- 22
- 23 5. Mr. Furer committed perjury in his statement page 2, lines 4 -7 on his Brief of Hearing on The
24 Extension of the TPO - *SEE EXHIBIT D + C*
- 25

26 **FACTS**

- 27 1. Mr. Furer committed perjury in his Application that he had not been ever arrested or charged with
28 domestic violence or committed crime against his spouse.

1 On June 30, 2004, Mr. Furer was jailed for at least eighteen (18) hours at the Washoe
2 Count Jail for battery on Mrs. Furer. Mrs. Furer applied for a TPO on June 30, 2004 (Case
3 # FV04-02499). Mrs. Furer dropped the TPO after two weeks, feeling sorry for Mr. Furer.
4 After the hearing in April 2005, where witnesses and Mrs. Furer had testified, and after the
5 Judge had seen the photograph of the bruised and swollen leg of Mrs. Furer. The District
6 Attorney's Office decided to drop the case for various *suspicious and senseless* reasons.
7 According to the evidence, Mr. Furer should have been convicted of the battery. Earlier
8 during the divorce case, Mrs. Furer's former attorney had approached the DA's office for a
9 civil compromise. The District Attorney, Mr. Gammick, told Mrs. Furer's attorney that
10 whether there is a dollar or \$100 Million dollars in a case, his office does not drop battery
11 cases. Mrs. Furer was willing to drop the battery case due to the coercive and extortionist
12 demands of Mr. Furer, that – Mrs. Furer will only get her personal property and her
13 benefits under the MSA, conditioned upon dismissal or acquittal of Mr. Furer on the
14 criminal charges, that if Mr. Furer was not absolved of the charges, Mrs. Furer will simply
15 receive the benefits under the PNA. The Court had declared the PNA invalid, due to fraud
16 and over reaching by Mr. Furer, in the November 14, 2006 decision.

17 Mr. Furer should be sanctioned for committing perjury. (See Exhibit A - Application)

- 18
- 19 2. Mr. Furer had committed perjury in Item #2 in his signed application for TPO. Mr. Furer had stated
20 that his residence at 2130 Greentree Lane in Reno, Nevada is titled under the Andrew and Eloisa
21 Furer Trust. This is inconsistent with the Real Property Assessment Data. (See Exhibit B – True
22 Copy of Real Property Assessment Data from the Office of Washoe County.)
- 23
- 24 3. Mr. Furer had committed **perjury** when he stated in his Application for Extended Temporary
25 Protection that Mrs. Furer stated to their son **"I AM GOING TO KILL YOUR DAD BECAUSE I AM**
26 **NOT GOING TO RECEIVE 50% OF THE ASSETS IN OUR PENDING CASE."**
- 27

28 Mrs. Furer's frustration that day, the reason why she said what she said was because Mr. Furer
had stated various **LIES** in Court during the trial, which are the following:

1 (But NOT because of the alleged statement "because I am not going to receive 50% of the
2 assets—" as stated in his Application.)
3

4 a. When Mr. Furer came back to the Incline home on August 10, 2004 (after the
5 restraining order against him), he lied to the Court that the items Mrs. Furer had
6 declared missing from her personal property, were no longer in the Incline home
7 when he came back. Mr. Furer practically accused Mrs. Furer of stealing her own
8 property. Mr. Furer lied in Court because there was an aborted move on the
9 retrieval Mrs. Furer's personal property on Sept. 28, 2004. Mr. Furer had declared
10 several items disputed, therefore, Mrs. Furer could not pack them. Items declared
11 disputed by Mrs. Furer including but not limited to the 20, oriental antique
12 Martaban jars, Mrs. Furer's cookbook collection that Mr. Furer had told Mrs. Furer
13 it was his money used to acquire them, the artwork (drawings) of their son from
14 kindergarten to 3rd grade, that Mrs. Furer had kept and had not been seen by Mr.
15 Furer for 15 years, Mrs. Furer's medical reference books, some of the Feng Sui
16 books that were mixed up with the cookbook collection, (some of the Feng Sui
17 books of Mrs. Furer were already in one of the cars), and several more items that
18 Mrs. Furer thought was not worth arguing with.
19

20 If Mr. Furer had noticed their sons drawings and the rest of the items he declared
21 disputed, how come Mr. Furer missed the -expensive Ming Dynasty oriental Asian
22 antiques prominently displayed in the residence when he came back on August
23 10, 2004, until the aborted packing and move on Sept. 27 and 28, 2004
24

25 The value declared of the missing items is approximately \$78,000, ^{INCLUDING JARS.} Mr. Furer was
26 alone in the marital home after he threw Mrs. Furer out of their marital home on
27 August 3, 2004, thru an exclusive possession of the marital home, motion filed in
28 Court by Mr. Furer. **Deborah Schumacher**, the recused Judge granted the
Exclusive Possession before ~~RA~~ Ratification (Trial and Approval) of the PNA. Judge

1 Schumacher had made biased decisions against Mrs. Furer. Judge Schumacher
2 should have recused from the case voluntarily being married to Meador's Partner
3 at Woodburn and Wedge. Schumacher had done illegal decisions towards Mrs.

4 Furer before she was asked to recuse herself from the case. *W+W were*
5 *the parties lawyers during the 2002 Trust*
6 *Agreement when MR. Schumacher was a partner at W+W*
7 *SCHUMACKER SHOULD BE REMOVED FROM THE BENCH*

8 b. Mr. Furer lied on the Court stand that he had checked Mrs. Furer's closet for her
9 fully hand embroidered gowns and cocktail dresses made of the pineapple fiber,
10 and they were not there, that Mrs. Furer had left these clothing in the Philippines.
11 Mr. Furer never ever opened Mrs. Furer's wardrobe closet for the entire length of
12 their long marriage, why would he check Mrs. Furer's clothing now?

13 c. Mr. Furer also had lied when he stated in Court that the 28 boxes packed on Sept.
14 28, 2004 during the aborted move were not unpacked, repacked. As shown in the
15 video tapes the contents of the 28 boxes that Mrs. Furer had supervised the
16 packing on Sept. 28, 2004 packing were packed properly. The labels outside of
17 the boxes corresponded to the contents of the boxes. During the retrieval of Mrs.
18 Furer's property on May 16-19, 2007, the video tapes showed the written labels
19 outside of the originally packed boxes in 2004, did not match the content that were
20 in the boxes at this time. Furthermore, expensive Ming and Sung Dynasty pieces
21 were packed with wooden plate stands and junks including Mylanta bottles, used
22 soap, toilet paper, a nail packed with a whole sheet of packing paper.

23 d. Mr. Furer also perjured himself in Court on July 11, 2007 by stating that he already
24 forwarded all of Mrs. Furer's photographs that he held hostage or had thrown
25 away in spite of the five Court Orders. Mr. Furer had stated in a former hearing
26 that he had forwarded to Mrs. Furer a pallet worth of pictures which is a big lie.
27 Ninety to ninety percent of the photos have not yet been forwarded TO Mrs. Furer
28 up to the present.

1 e. Mr. Furer and his detective have perjured themselves during the July 11, 2007
2 hearing by insisting that Mrs. Furer was screaming outside of the Incline home to
3 be let in. This had been motioned before and verified by a Food and Beverage
4 Manager of the Biltmore that she was with Mrs. Furer on the time and date of the
5 incident. Mr. Furer should be sanctioned.
6

7 4. The Parties have been married for approximately 26 years. The parties have been engaged in a
8 long and bitter legal battle regarding their respective rights and obligations upon divorce and prior
9 thereto. The divorce case is currently pending in this Court in front of the Honorable Judge Weller.
10

11 As documented in the Divorce Case DV04-01626, Dept. 11, Mrs. Furer, Defendant in the divorce
12 case, asked Plaintiff, Andrew Furer for a divorce on January 2004. Mr. Furer then cried; begged
13 the Defendant not to divorce him, as he loves her; can't live without her; I don't have friends; why
14 ruin the family for our son's sake; I can not "TRUST ANYONE with OUR MONEY, etc. Mrs. Furer
15 had pondered for some time whether to divorce or not, because of his threat to humiliate Mrs.
16 Furer. Prior to the celebration in Manila, Philippines where Mrs. Furer was going to be the
17 Hermana Mayor, the Plaintiff, Mr. Furer had told Mrs. Furer **that the money she was spending**
18 **for the celebration**, Mrs. Furer was stealing from Mr. Furer **as she has no money of her own**,
19 that if Mrs. Furer invites a certain person to the celebration, Mr. Furer would announce from the
20 stage that Mrs. Furer was indeed stealing money from him.
21

22 But because Mrs. Furer felt sorry for Mr. Furer, she agreed not to divorce him. Mr. Furer then
23 suggested that they execute a Post Nuptial Agreement (PNA). The PNA wordings stated that the
24 purpose of the PNA was "**to remove areas of conflict between them in order to Maximize the**
25 **odds of Reconciling and Allowing the parties to restore marital harmony and remain**
26 **married. From and after the date of execution of this agreement, the parties shall continue**
27 **to live together as man and wife for as long as they mutually desire to do so.**"
28

1 What Mrs. Furer did not know because of her trust in her husband of 24 years, is that Mr. Furer did
2 not intend to be married to Mrs. Furer after May 5, 2004 when the parties signed the PNA. Mr.
3 Furer invited women to the marital home sixteen (16) hours after the signing of the PNA; thirty (30)
4 minutes after Mrs. Furer left for Las Vegas to continue to look for "**our home**" so they can sell the
5 Incline home in the summer. When Mrs. Furer came back from Las Vegas, she found traces of Mr.
6 Furer's infidelity. In his deposition, Mr. Furer had blatantly admitted that "**he did not have to**
7 **sanitize the marital home as it was his according to the PNA**" – THIS IS THE REASON why
8 the parties are in this bitter Divorce, NOT "**since Mr. Furer had filed for divorce from Mrs.**
9 **Furer**" – Still in litigation is the Division of the Community Property of the parties where Mr. Furer
10 in the MSA and PNA is trying **to give Mrs. Furer as little money as he can get away with – 20%**
11 **of the over \$80 Million Dollars assets.**

12
13 It is true Mr. Furer had filed for Divorce in August 5, 2004, **but only** after Mrs. Furer rescinded and
14 revoked the grossly uneven distribution of assets in the agreements. Mrs. Furer had threatened
15 Mrs. Furer that if she did not sign the MSA, he will make sure that the PNA is validated giving Mrs.
16 Furer only \$15 Million from the parties over \$80 Million Asset and that Mr. Furer will make sure the
17 litigation will take years and "**you will spend all your money on lawyers fees, and you will live**
18 **like my father, a pauper in his old age.**" Mr. Furer was referring to his father when he had
19 litigation against Paine Webber. His father did not take Paine Webber's offer of settlement to him,
20 instead litigated the case and lost.

21
22 4. Mr. Furer and Meador perjured themselves in their statements all throughout their Brief of Hearing
23 on Extension of TPO. (Page 2, lines 4 – 7 of Exhibit D)

24 The statement of Mr. Furer in this paragraph is false. The TPO against Mrs. Furer in this incident
25 was due to the cut and paste death threat letter that Mr. Furer had accused Mrs. Furer of sending
26 to him. NOT based on MRS. FURER'S STATEMENT TO THE RENO POLICE THAT SHE
27 WANTED TO "HURT" MR. FURER. During the hearing on November 2004, Judge Schumacher
28 could not attribute this piece of pasted up death threat letter to Mrs. Furer. She said so during the
trial. There was no evidence that Mrs. Furer had sent this to Mr. Furer.

1
2 In Mrs. Furer's opinion Mr. Furer or his attorney had done it themselves to get even with Mr. Furer
3 going to jail on June 30, 2004.
4

5 This blatant lie of Mr. Furer is to insult the intelligence of the Court as this matter had been brought
6 up during the Phase II and III hearings. This is an act of desperation of Mr. Furer. He should be
7 sanctioned for perjury as Judge Weller may have noticed during the Phase III trial, Mr. Furer's lies
8 are catching up with him. Mr. Furer thinks that he can fool and manipulate the Judge like he did to
9 Mrs. Furer.
10

11 Mr. Furer's statement that he was physically shaken and could not drive anymore is a very well
12 orchestrated exaggeration. Mr. Furer did not shake or get terrified at anything during his marriage
13 to Mrs. Furer.
14

15 It is possible that he does now, because he is carrying all the guilt for what he has done to his
16 wife of 26 years. Mr. Furer is afraid of HIS OWN GHOST. All the calculated manipulations of Mr.
17 Furer will not work. Judge Weller is an intelligent person who knows what is and has been
18 happening in his Courtroom. Mrs. Furer may have had outbursts in the Courtroom, but that is Mrs.
19 Furer. She is a truthful person and will not hide her true emotions or feeling of frustrations toward
20 any one. According to her lawyer, Ms. Throne on July 11, 2007, "**Mrs. Furer is not a violent**
21 **person. It is her mouth that is violent.**" Mrs. Furer admits that she will say to anyone what is in
22 her mind, but Mrs. Furer has NEVER IN HER 66 YEARS OF LIFE – been ever accused of being
23 physically violent.
24

25 It was Mr. Furer who went to jail on June 30, 2004, for a battery assault on Mrs. Furer.
26 Ms. Throne's testimony during the TPO hearing was a "sour grapes". Ms. Throne did not hear Mrs.
27 Furer's conversation with her son. Ms. Throne was fired by Mrs. Furer during the trial for being
28 incompetent. Her testimony in Court was an act of vengeance on Mrs. Furer. According to the

1 documents on this hearing Ms. Throne was supposed to be on a Telephonic Deposition, but she
2 purposely came to Court to vindicate herself from being fired by Mrs. Furer.

3
4 Ms. Throne is trying to bill Mrs. Furer \$140,000.00 for her representation of Mrs. Furer for 60
5 working days. Ms. Throne is an incompetent lawyer. The third ^{PHASE} brief of Mrs. Furer was not filed in
6 Court by Ms. Throne until the day of the trial in spite of her billing statements that she had been
7 preparing trial brief since early June. Ms. Throne was not prepared during the trial. It was so
8 visible during the cross examination in Court on July 11, 2007, trial t ...

9
10
11 Mrs. Furer will not dignify Meador's lies and false allegations throughout his brief with an answer.
12 Mrs. Furer trusts that the Court knows what kind of person Meador is. Throughout his brief he
13 claims that testimony of my former lawyer are NOT HEARSAY because it does suit him. Get
14 Meador the same situation in a Court the other way – Meador will cry "Hearsay" in his every breath.
15 Meador litigation tactics is abusive, illegal and unethical. Mr. Meador can not even write motions.
16 All his motions are badmouthing the other side to fill up pages and pages of paper as he does me,
17 which means that he is not a smart and an intelligent lawyer. Maybe Mr. Meador should go back to
18 Law School to learn ethics. I have heard from several lawyers that Meador is the least respected
19 attorney in Reno. To quote one "He has good form in Court when he argues, his every movement
20 with his hands and dancing motion are all practical ^{ed} in front of a mirror to distract the Judge and the
21 opponents so they won't be able to know what he is saying is shallow, quotes and writes cases
22 even in motions that are not correct, the contents of his arguments are always shallow. He is a
23 shallow person". MR. HEADOR SHOULD BE SANCTIONED BY THE COURT
24 FOR PERJURY IN IN HIS LIFE REGARDING STATEMENT ON
THE TPO EXTENSION OF NOVEMBER, 2004 AS HIS STATEMENT IS NOT TRUE

25 Mr. Furer and his detective have perjured themselves during the July 11, 2007 hearing by insisting
26 that Mrs. Furer was screaming outside of the Incline home to be let in. This had been motioned
27 before and verified by a Food and Beverage Manager of the Biltmore that she was with Mrs. Furer
28 on the time and date of the incident. Mr. Furer should be sanctioned.

1 NOTE: All of the above statements have been documented in the Divorce Case.
2
3

4 CONCLUSION
5

6 Mr. Furer had been trying for over three years now to get Mrs. Furer in jail for retaliation of Mr.
7 Furer's going to jail for 18 hours when he battered Mrs. Furer.
8

9 Mr. Furer should be sanctioned for all the above perjury and award Mrs. Furer an appropriate
10 amount for damages for her suffering and appropriate punitive damages.
11

12 Mrs. Furer admits that out of frustration of Mr. Furer's lies in Court on July 9-11, 2007, during the
13 trial Mrs. Furer told her son that she would kill Mr. Furer. What Mrs. Furer does not understand is why
14 everyone had made a big deal of an expression out of frustration. If indeed Mrs. Furer wanted to kill Mr.
15 Furer, why would she tell her son to call the police? Mrs. Furer's statement was a typical form of
16 expression Filipinos often use to emote their feelings of disgust and frustration.
17

18 According to the Telephonic Deposition of Ms. McKeon, Mrs. Furer's former attorney, when asked
19 by Mr. Robison about Mrs. Furer's demeanor before and during the representation of Mrs. Furer, "Well,
20 Ellie was very upset about everything that was going on. She was very upset. Ellie didn't have a violent
21 murderous demeanor. She wasn't like that. She didn't have a batterer-type demeanor. She had more of
22 a victim-type demeanor."

23 "She just struck me as someone who had really been pushed over the edge by whatever had
24 happened in the proceedings, in other words, like....I'm not going to take it anymore."

25 Mr. Robison: "Didn't it appear to you that Mrs. Furer, during that telephone conversation, was
26 angry?"

27 Ms. McKeon: "NO. She seemed more like she was just – she was fed up and had it and felt
28 powerless. That was more – she felt like she had no other way toyou know, -- she just sounded like
beyond."

1 **CODE 1255**

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6 **IN THE FAMILY DIVISION**
7 **OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,**
8 **IN AND FOR THE COUNTY OF WASHOE**

9 Andrew Furer

10 **Applicant,**

11 vs.

12 Case No. FV04-04071

13 Dept. No. DM3

14 Eloisa B Furer

15 **Adverse Party.**

16 **APPLICATION FOR A TEMPORARY AND/OR EXTENDED ORDER FOR PROTECTION AGAINST**
17 **DOMESTIC VIOLENCE**

18 Applicant states the following facts under penalty of perjury:

19 Applicant Date of Birth: 2/21/1953 Adverse Party Date of Birth: 9/5/1941

20 1. My relationship to the Adverse Party is (for example, current/former husband, current/former wife,
21 current/former boyfriend, current/former girlfriend, father, mother, brother, sister, etc.):

22 Former Wife

23 ♦ Length of relationship: 25 years

24 ♦ Have you ever lived together? Yes or No yes. If so, how long? 23 years

25 ♦ Are you living together now? Yes or No no

26 ♦ Date of Separation: 6/30/2004

27 ♦ We have child(ren) **TOGETHER**: Yes or No yes. If yes, where and with
28 whom are these child(ren) living? Our adult son lives in New York

2. My address is: CONFIDENTIAL, (If confidential do not write address here)
 or, if not confidential list 2130 Greentree Lane
 City Reno, State NV Zip Code 89511 Phone 851-0838
 I own rent this residence. Lease/title is held in all the following name(s):
The Andrew E. Furer Trust

I have been living in this residence for 1 year, 4 months

3. Adverse Party's address is: 9812 Winter Palace Drive
 City Las Vegas State NV Zip Code 89145 Phone 7022288553

Adverse Party has been living in this residence for 2.5 years

4. My employment is: CONFIDENTIAL, (If confidential do not write address here)
 or, if not confidential, state place of employment Retired
 Address: n/a Phone: n/a
 City n/a County n/a State n/a

5. Adverse Party's employment is: Retired
 Address: n/a Phone n/a
 City n/a County n/a State n/a

6. (a) The name(s) and dates of birth of minor child(ren) who I am the parent of, or who live in my home, are as follows.

NAME (first and last)	Date of Birth	APPLICANT'S CHILD (YES/NO)	ADVERSE PARTY'S CHILD (YES/NO)	WHO CHILD LIVES WITH
1. none		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
2.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
3.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
4.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
5.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	

(b) Have you or the Adverse Party ever been awarded custody of the minor child(ren) that you have in common by Court order? Yes No
 Who was awarded custody? Applicant Adverse Party
 By what Court? n/a Case No. _____

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7. Please check the appropriate box, IF YOU or the ADVERSE PARTY has ever filed a case in any Court for a Divorce, Custody, Paternity, Child Support, Guardianship, Order for Protection, Stalking/Harassment Order. Please indicate when and where the case was filed, and list the case numbers. Second Judicial District Court Case Nos. DV04-01626, FV04-0407, FV04-02499, DV04-01560

8. Has CHILD PROTECTIVE SERVICES (CPS) ever been contacted regarding any member of the household in the past five year? Yes No. Is CPS currently involved with this family? Yes No.
If yes to the question, give details, including the caseworker's name: n/a

9. I have been or reasonably believe I will become a victim of domestic violence committed by the Adverse Party.
 My child(ren) have been or are in danger of being a victim of domestic violence committed by the Adverse Party.

1 In the following space, state the facts which support your application. Be as specific as you can,
2 starting with the most recent incident. Include the approximate dates, how long it has gone on, and
whether law enforcement or medical personnel have been involved.

3 I initially sought a TPO in July of 2007, stemming from an incident that occurred just after my divorce
4 trial. My son called and told me that his mother just called him and said that she was going to kill me.

5 This threat was overheard by Ms. Furer's former attorneys. Shortly thereafter, Ms. Furer also contacted
6 two other former attorneys and stated that she was going to kill me. I immediately called 911 and filed
7 a TPO. On August 14, 2007, an Extended Protective Order was entered by this Court. At the
8 hearing, Ms. Furer exhibited erratic behavior and ran out of the courtroom.

9 On February 11, 2008, my attorney Shawn Meador received a call from Credit Suisse Bank's attorney,
10 Colby Allsbrook, who informed Mr. Meador that Ms. Furer had made at least two other calls to another
11 Credit Suisse employee, Julius Simonini, and stated on more than one occasion that she intended to kill
12 me, Mr. Meador and Judge Weller. She also stated that she was in Reno and had a gun. One of Ms.
13 Furer's telephone calls containing the threats was made to both Mr. Simonini and another Credit Suisse
14 employee, Michelle Baran. Thereafter, the representatives of Credit Suisse Bank reported these threats
15 to the FBI. The FBI met with Ms. Furer on February 14, 2008 where she admitted to threatening Mr.
16 Furer and Mr. Meador, but denied threatening the Judge. Later that day, we participated in a telephone
17 status conference with Judge Weller, wherein Ms. Furer substantially confirmed these admissions.

18 It is clear that Ms. Furer is unstable and violent. I am fearful for my safety and that of my fiance'
19 Earlene Douglas. I strongly desire the additional protection that a new protection order will provide
20 since the original Extended Protection Order expires in August 2008.

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28 ***Please do not write on the backs of any pages.***

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10. Have YOU ever been arrested or charged with domestic violence, or any other crime committed against your spouse, partner, or child(ren)? Yes No. If yes, WHEN and where?

No.

11. To your knowledge, has the ADVERSE PARTY ever been arrested or charged with domestic violence, or any other crime committed against his/her spouse, partner, or child(ren)? Yes

No. If yes, WHEN and where?
No.

12. An emergency exists, and I need a TEMPORARY ORDER FOR PROTECTION AGAINST DOMESTIC VIOLENCE issued immediately without notice to the Adverse Party to avoid irreparable injury or harm. I request that it include the following relief (please check all the choice(s) that apply to you):

(a) Prohibit the Adverse Party, either directly or through an agent, from threatening, physically injuring or harassing me and/or my minor child(ren).

(b) Prohibit the Adverse Party from any contact with me whatsoever.

(c) Exclude the Adverse Party from my residence and order the Adverse Party to stay at least 100 yards away from my residence.

(d) Obtain law enforcement assistance to accompany me to the following residence,

_____, or to accompany the

Adverse Party, to the following residence, _____

_____ to obtain personal property.

(e) Grant temporary custody of the minor child(ren) to me.

(f) Order that custody, visitation, and support of the minor child(ren) remain as ordered in the Decree of Divorce/Order entered in Case Number _____ in the

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_____ Court of the State of _____

(g) Order the Adverse Party to stay at least 100 yards away from the minor child(ren)'s school, or day care, located at CONFIDENTIAL, (if confidential do not write address here) or, if not confidential list _____

Address: _____

City _____ County _____ State _____

(h) Order the Adverse Party to stay at least 100 yards away from my place of employment.

(i) Order the Adverse Party to stay at least 100 yards away from places which I or my minor child(ren) frequent regularly: CONFIDENTIAL, (if confidential do not write address here) or, if not confidential list My Residence _____

Address: 2130 Greentree Lane

City Reno County Washoe State Nevada

(j) I further request the following other conditions; That Ms. Furer be prohibited from threatening, physically injuring or harassing me, including all threats or harassing comments made to 3rd parties which are reasonable likely to be communicated to me in any manner; that Ms. Furer not be permitted to be in possession of any handgun or firearm; that Ms. Furer's agents be subject to all restrictions to the same extent as Ms. Furer; and that my fiance', Earlene Douglas, be protected by the Order to the fullest extent possible.

IF YOU WISH TO APPLY FOR A HEARING FOR AN EXTENDED ORDER

FOR PROTECTION COMPLETE THE FOLLOWING INFORMATION

13. I request the Court hold a hearing for an EXTENDED ORDER FOR PROTECTION AGAINST DOMESTIC VIOLENCE (which could be in effect for up to one year), and at that hearing the Court issue an Extended Order for Protection Against Domestic Violence and that it include the following relief (please check all the choice(s) that apply to you):

(a) Prohibit the Adverse Party, either directly or through an agent, from threatening, physically injuring or harassing me and/or my minor child(ren).

(b) Prohibit the Adverse Party from any contact with me whatsoever.

(c) Exclude the Adverse Party from my residence and order the Adverse Party to stay at least 100 yards away from my residence.

(d) Grant temporary custody of the minor child(ren) to me.

(e) Grant the Adverse Party visitation with the minor child(ren).

(f) Order the Adverse Party to pay support and maintenance of the minor child(ren).
(You may be required to file an affidavit of financial condition prior to the hearing.)

(g) Order the Adverse Party to pay the rent or make payments on a mortgage or pay towards my support and maintenance.

(h) Order that custody, visitation, and support of the minor child(ren) remain as ordered in the Decree of Divorce/Order entered in Case Number _____

in the _____ Court of the State of _____.

(i) Order the Adverse Party to stay at least 100 yards away from the minor child(ren)'s school, or day care, located at: CONFIDENTIAL, (If confidential do not write address here) or, if not confidential list _____

1 Address: _____

2 City _____ County _____ State _____

3
4 (j) Order the Adverse Party to stay at least 100 yards away from my place of
5 employment.

6
7 (k) Order the Adverse Party to stay at least 100 yards away from places which I or
8 my minor child(ren) frequent regularly: CONFIDENTIAL (if confidential do not
9 write address here) or, if not confidential list My residence

10 Address: 2130 Greentree Lane

11 City Reno County Washoe State Nevada

12 (l) I further request the following other conditions: That all of the additional
13 conditions and protections requested in the application for the
14 Temporary Order be continued to the Extended Order to the same
15 extent; and that my fiance', Earlene Douglas, be protected by the
16 Extended Order to the fullest extent possible.

17
18 **I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE**
19 **STATE OF NEVADA THAT I HAVE READ THE STATEMENTS CONTAINED IN**
20 **THIS APPLICATION, KNOW THE CONTENTS THEREOF, AND BELIEVE THEM**
21 **TO BE TRUE AND CORRECT**

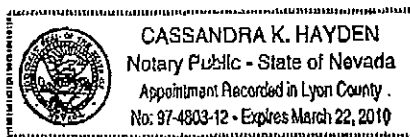
22 Dated: 3-21-08

23 *Andrew E. Furer*
Signature of Applicant

24 ANDREW E. FURER
Applicant's Name (Please Print)

25 SUBSCRIBED and SWORN before me
26 this 21st day of March 2008.

27 *Cassandra K. Hayden*
NOTARY PUBLIC/DEPUTY COURT CLERK



1 Ms. Mahan's testimony did not conclude that Mrs. Furer was a violent person either. Mrs. Furer
2 called her son as she is the only one she feels she could air her frustration with.

3 Mrs. Furer apologizes for leaving prior to the conclusion of the hearing of August 15, 2007. Mrs.
4 Furer was frustrated with Meador. Mrs. Furer feels that she can not be in the same Court room with
5 Meador due to his abusive, unethical and reprehensible litigation tactics. Mrs. Furer did not want to hear
6 more lies from Meador.

7 Due to the above verified true statement of Mrs. Furer, Mrs. Furer respectfully requests the Court
8 to reconsider and stay the Extended Temporary Order.

9 DATED this 24th August, 2007.
10

11
12 Respectfully Submitted:

13
14 

15 ELOISA B. FURER

16 Defendant Pro Per
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AFFIDAVIT OF ELOISA B. FURER

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, ELOISA B. FURER, do hereby swear and affirm under the penalty of perjury, that each and every assertion contained within this Affidavit is true and:

1. That I have read the foregoing ,
) know the contents thereof; and,
2. That I have written the above Objection and Reconsideration Motion to Stay on the Extended Temporary Protection Order and know the contents thereof;
and,
3. That the same is true of my knowledge except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

DATED this 24th day of August, 2007

Eloisa B. Furer
ELOISA B. FURER

SUBSCRIBED and SWORN to before
Me this 24 day of August, 2007

Lindsey Macauley
NOTARY PUBLIC



ORIGINAL

FILED

2007 JUL 13 PM 2:18

RONALD A. LONGTIN, JR.
BY: *[Signature]*
DEPUTY

FV04-04071
ANDREW E. FURER vs. ELOISA B. FURER
District Court Washoe County NV
DC-9900001255-159
ELOISA B. FURER
07/13/2007 02:18 PM
1255
FNHUTCHER

CODE 1255

IN THE FAMILY DIVISION
OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF WASHOE

ANDREW E. FURER

@175356 Applicant,

vs.

Case No. FV04-04071
Dept. No. DM

ELOISA B. FURER

@175355 Adverse Party.

APPLICATION FOR A TEMPORARY AND/OR EXTENDED ORDER FOR PROTECTION AGAINST
DOMESTIC VIOLENCE

Applicant states the following facts under penalty of perjury:

Applicant Date of Birth: 2/21/1953 Adverse Party Date of Birth: 9/5/1941

1. My relationship to the Adverse Party is (for example, current/former husband, current/former wife, current/former boyfriend, current/former girlfriend, father, mother, brother, sister, etc.):

The adverse party is my estranged wife.

- ◆ Length of relationship: 25 years
- ◆ Have you ever lived together? Yes or No Yes. If so, how long? 23 years
- ◆ Are you living together now? Yes or No No
- ◆ Date of Separation: June 30, 2004
- ◆ We have child(ren) TOGETHER: Yes or No Yes, one. If yes, where and with whom are these child(ren) living? Our adult son is moving to New York City

2. My address is: CONFIDENTIAL, (If confidential do not write address here)
 or, if not confidential list 2130 Greentree Lane
 City Reno State Nevada Zip Code 89511 Phone 851-0838

I own rent this residence. Lease/title is held in all the following name(s):
 ↘ The Andrew and Eloisa Furer Trust

I have been living in this residence for 8 months

3. Adverse Party's address is: 9812 Winter Palace Drive
 City Las Vegas State Nevada Zip Code 89145 Phone 702.228.8553

Adverse Party has been living in this residence for 2 years

4. My employment is: CONFIDENTIAL, (If confidential do not write address here)
 or, if not confidential, state place of employment Retired
 Address: N/A Phone: N/A
 City N/A County N/A State N/A

5. Adverse Party's employment is: Retired
 Address: N/A Phone N/A
 City N/A County N/A State N/A

6. (a) The name(s) and dates of birth of minor child(ren) who I am the parent of, or who live in my home, are as follows.

NAME (first and last)	Date of Birth	APPLICANT'S CHILD (YES/NO)	ADVERSE PARTY'S CHILD (YES/NO)	WHO CHILD LIVES WITH
1. None	N/A	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	N/A
2.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
3.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
4.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	
5.		Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	Circle one <input type="checkbox"/> Yes <input type="checkbox"/> No	

(b) Have you or the Adverse Party ever been awarded custody of the minor child(ren) that you have in common by Court order? Yes No
 Who was awarded custody? Applicant Adverse Party
 By what Court? N/A Case No. N/A

1 In the following space, state the facts which support your application. Be as specific as you can,
2 starting with the most recent incident. Include the approximate dates, how long it has gone on, and
3 whether law enforcement or medical personnel have been involved.

4 At 5:02 p.m. on July 11, 2007, I received a telephone call from my son informing me that his mother
5 Mrs. Furer had called him and told him: "Call the police. I am going to kill your dad because I am not
6 going to receive 50% of the assetsⁿ in our pending divorce case." Mrs. Furer and I had just finished the
7 trial in our divorce case that afternoon. After my son's call, I was gravely concerned and terrified that
8 my life was in imminent danger, and I became shaken physically. I reported the incident to the Reno
9 police immediately. While I was on the telephone with the police, Merritt McKeon, one of Mrs. Furer's
10 former attorneys, called the Reno police to report that she had received a telephone call from Mrs. Furer
11 stating that she was going to kill me and that she had a gun in her possession. After receiving Mrs.
12 Furer's telephone call, Ms. McKeon called 911, the Reno police, the Douglas County sheriff's office,
13 my attorney Shawn Meador's office, and the clerk for the judge who is handling our divorce. That same
14 evening, on July 11, 2007, Mrs. Furer visited the office of another one of her prior attorneys, Bonnie
15 Mahan. Mrs. Furer demanded that Ms. Mahan give her a handgun that Ms. Mahan has been keeping
16 in her possession because Mrs. Furer has been ordered by the court not to be in possession of any
17 firearms. Ms. Mahan refused to give Mrs. Furer the gun, but while Mrs. Furer was there, she told
18 Ms. Mahan that justice would never be done until "he" was gone, later clarifying that it is me she
19 wants to hurt. Ms. Mahan telephoned my attorney Shawn Meador and informed him of Mrs. Furer's
20 visit, demands, and threats. Ms. Mahan also e-mailed Mr. Meador and told him to advise me to
21 leave town. Mr. Meador was also advised by Mrs. Furer's most recent attorneys that they had overheard
22 Mrs. Furer talking on the telephone to our son on July 11, 2007, when she told him to call the police
23 because she was going to kill me. Mrs. Furer is an angry person with an uncontrollable temper. She is a
24 wealthy woman with the motive and means to kill me herself or by an agent. I am afraid for my life.
25
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Please do not write on the backs of any pages.

1 10. Have YOU ever been arrested or charged with domestic violence, or any other crime
2 committed against your spouse, partner, or child(ren)? Yes No. If yes, WHEN and
3 where?
4

5
6 11. To your knowledge, has the **ADVERSE PARTY** ever been arrested or charged with domestic
7 violence, or any other crime committed against his/her spouse, partner, or child(ren)? Yes
8 No. If yes, WHEN and where? _____
9

10 12. An emergency exists, and I need a **TEMPORARY ORDER FOR PROTECTION AGAINST**
11 **DOMESTIC VIOLENCE** issued immediately without notice to the Adverse Party to avoid
12 irreparable injury or harm. I request that it include the following relief (please check all the
13 choice(s) that apply to you):

14 (a) Prohibit the Adverse Party, either directly or through an agent, from threatening,
15 physically injuring or harassing me and/or my minor child(ren).

16 (b) Prohibit the Adverse Party from any contact with me whatsoever.

17 (c) Exclude the Adverse Party from my residence and order the Adverse Party to stay
18 at least 100 yards away from my residence.

19 (d) Obtain law enforcement assistance to accompany me to the following
20 residence,
21 _____, or to accompany the

22 _____, or to accompany the
23 Adverse Party, to the following residence, _____

24 _____ to obtain personal property.

25 (e) Grant temporary custody of the minor child(ren) to me.

26 (f) Order that custody, visitation, and support of the minor child(ren) remain as ordered
27 in the Decree of Divorce/Order entered in Case Number _____ in the
28 _____

1 _____ Court of the State of _____

- 2 (g) Order the Adverse Party to stay at least 100 yards away from the minor
3 child(ren)'s school, or day care, located at CONFIDENTIAL, (If confidential do not
4 write address here) or, if not confidential list _____

5 Address: _____

6 City _____ County _____ State _____

- 7 (h) Order the Adverse Party to stay at least 100 yards away from my place of
8 employment.

- 9 (i) Order the Adverse Party to stay at least 100 yards away from places which I or my
10 minor child(ren) frequent regularly: CONFIDENTIAL, (If confidential do not write
11 address here) or, if not confidential list other residence

12 Address: 949 Lakeshore Boulevard

13 City Incline Village County Washoe State Nevada

- 14 (j) I further request the following other conditions: that Mrs. Furer
15 be prohibited from threatening, physically injuring, or
16 harassing me, including all threats or harassing
17 comments made to third parties which are reasonably likely
18 to be communicated to me; that Mrs. Furer be prohibited from
19 communicating with me in any manner; that Mrs. Furer not
20 be permitted to be in possession of any handgun or other
21 firearm; that Mrs. Furer's agents be subject to all restrictions
22 to the same extent as Mrs. Furer; and that my fiancée
23 Earlene Douglas be protected by the order to the fullest
24 extent possible.

25 **IF YOU WISH TO APPLY FOR A HEARING FOR AN EXTENDED ORDER**

1 **FOR PROTECTION COMPLETE THE FOLLOWING INFORMATION**

2
3
4 13. I request the Court hold a hearing for an EXTENDED ORDER FOR PROTECTION
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6 that hearing the Court issue an Extended Order for Protection Against Domestic
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17 (You may be required to file an affidavit of financial condition prior to the hearing.)

18 (g) Order the Adverse Party to pay the rent or make payments on a mortgage or
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20 (h) Order that custody, visitation, and support of the minor child(ren) remain as
21 ordered in the Decree of Divorce/Order entered in Case Number _____
22 in the _____ Court of the State of _____.

23 (i) Order the Adverse Party to stay at least 100 yards away from the minor
24 child(ren)'s school, or day care, located at: CONFIDENTIAL (If confidential do
25 not write address here) or, if not confidential list _____
26
27
28

1 Address: _____
2 City _____ County _____ State _____
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5 (j) Order the Adverse Party to stay at least 100 yards away from my place of
6 employment.

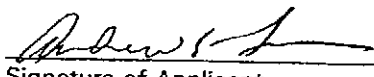
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12

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14 conditions and protections requested in the application
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16 order to the same extent; and that my fiancé
17 Earlene Douglas be protected by the extended order to
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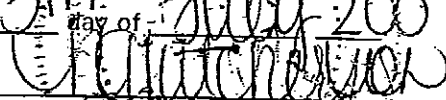
19 **I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE**
20 **STATE OF NEVADA THAT I HAVE READ THE STATEMENTS CONTAINED IN**
21 **THIS APPLICATION, KNOW THE CONTENTS THEREOF, AND BELIEVE THEM**
22 **TO BE TRUE AND CORRECT**

23 Dated: July 13, 2007

24 
25 Signature of Applicant

26 Andrew E. Furer
27 Applicant's Name (Please Print)

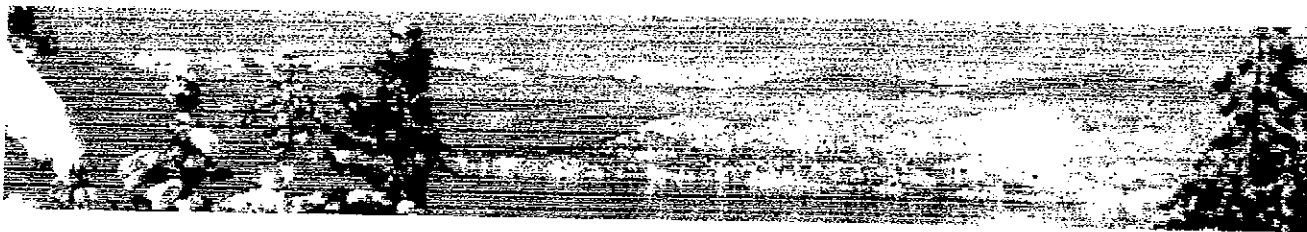
28 SUBSCRIBED and SWORN before me

29 this 13th day of July 2007
30 
31 NOTARY PUBLIC/DEPUTY COURT CLERK

COUNTY SITE MAP

PRINT FRIENDLY

COUNTY



(pictured) Shot of Lake

County Home => Assessor's Office => Property Assessment Data => Parcel Summary Overview



Office of the Washoe County Assessor

Real Property Assessment Data

[New Search](#)

[Parcel Summary](#) | [Taxable Value History](#) | [View Map](#)

Parcel Summary is a compilation of ownership, legal, building, land, sales, and valuation data with links for additional information

Real Property Results for APN # 040-411-07 Card Number 1 of 1

02130 GREEN TREE LN

Current Owner Mailing Address:

Owner 1

FURER, ANDREW E TR

Owner 2

FURER, ANDREW E TRST

Mailing Address

2130 GREEN TREE LN

RENO NV, 89511

Tax Cap Status: 3 PCT Qualified Primary Occupancy [List of Codes](#)

[Click here to check for additio](#)

Most Recent Property Sales, Document Recording, or Transfer Information

Document Date	Value/Sale Price	VCode	Document #	Grantor(Seller)/Assoc Name
11/03/2006	0	3BCT	03459402	FURER,ANDREW E

[Click here for additional sales/recorded document](#)

VCodes are an indication of the analysis for the Assessor's Office use only. Further verification may be necessary.

Most Recent Property Assessment

Assessed Value is 35% of Taxable Value per

Fiscal Year	Land Area	Current Property Use
2007	2.721Ac	020 - Single Family Residence

Taxable Building Value	Taxable Land Value	Total Taxable Value	Personal Property Value	Supplemental New Cc
439,485	303,160	742,645	0	0

Taxable Values ma

[Click here for tax information from the Treasu](#)

[Click here for additional assessm](#)

Narrative Description

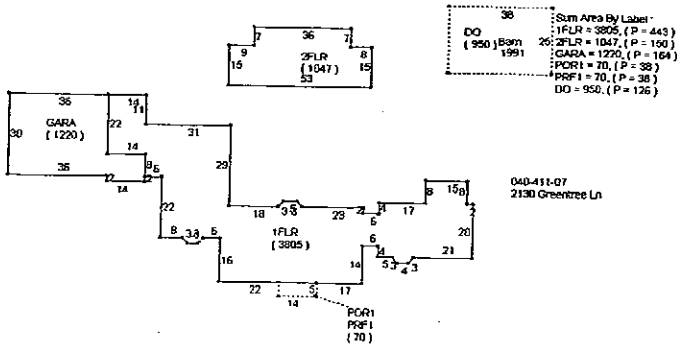
This property contains 2.721 Ac of land mainly classified as Single Family Residence. There is(are) 1 Record Card(s) Parcel. Record Card number 1 has a(n) Sgl Fam Res style building, built about 1966 , having primary SIDING exteri COMP SHINGLE roof cover, with 1 unit(s), 4 total bedroom(s), 3 total bath(s), 1 total half bath(s).

PM 2288 LT 1

Legal Description (May not be full legal description)

CLICK ON THE PARCEL SUMMARY LINK FOR ADDITIONAL DATA

Click Property Images to Enlarge



040-41
4/25/02

If the property sketch is not available on-line you can obtain a copy by calling (775) 328-2277 or send an email to assessor@washoecounty.us with 'Sketch Request' in the subject line. Please include the APN.

1 In the following space, state the facts which support your application. Be as specific as you can,
2 starting with the most recent incident. Include the approximate dates, how long it has gone on, and
whether law enforcement or medical personnel have been involved.

3 At 5:02 p.m. on July 11, 2007, I received a telephone call from my son informing me that his mother
4 Mrs. Furer had called him and told him: "Call the police. I am going to kill your dad because I am not
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7 my life was in imminent danger, and I became shaken physically. I reported the incident to the Reno
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Please do not write on the backs of any pages.