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7 **UNITED STATES DISTRICT COURT**  
8 **FOR THE DISTRICT OF NEVADA**

9 **ANDREEA OLTEANU et al,**  
10 *Plaintiffs,*  
11  
12 **v.**  
13 **LOUIS SCHNEIDER et al,**  
14 *Defendants.*

**Case No.: 2:23-cv-02006-RFB-DJA**

**PLAINTIFF'S DECLARATION IN  
SUPPORT OF AMENDED COMPLAINT  
FOR COMPLAINT FOR RICO  
WRONGFUL DEATH, RICO  
VIOLATION OF SECTION 1983  
RIGHTS, RICO GRAND  
LARCENY, RICO FRAUD, RICO  
EMBEZZLEMENT, RICO  
RECKLESS ENDANGERMENT,  
RICO OBSTRUCTION OF  
JUSTICE, MALICIOUS  
PROSECUTION, RICO WIRE  
FRAUD , RICO MAIL FRAUD  
AND LEGAL MALPRACTICE.**

24 I, Andreea Melissa Olteanu, hereby declare under penalty of perjury as follows:

25 1. I, , am the plaintiff in this matter and submit this declaration based on my  
26 personal knowledge of the facts and circumstances surrounding the brutal murder of my late

1 husband, Mark Porcelli, and the subsequent violations of my civil rights. I am the surviving  
2 spouse and next of kin to Mark Porcelli, as well as the Executor of his Estate. I bring this  
3 declaration to establish the unlawful actions of multiple defendants, including Louis Schneider,  
4 Esq., and Christopher P. Ford, Esq., and to highlight the systemic misconduct committed by the  
5 Henderson Police Department, the Clark County Coroner's Office, and the Clark County Public  
Administrator's Office in connection with this case.

6           2.       This declaration will address the events leading up to and following Mark  
7 Porcelli's murder, including evidence of RICO conspiracy, obstruction of justice, collusion,  
8 fraud, and malicious prosecution conducted under the color of law. These events have caused  
9 severe financial, emotional, and physical harm to me and my family, and the actions of the  
10 defendants have perpetuated a deliberate pattern of harassment, intimidation, and illegal seizure  
of property to cover up Mark's murder.

11           3.       On or about December 17, 2022, my late husband, Mark Porcelli, was  
12 brutally murdered inside our home located in Henderson, Nevada. The murder was committed  
13 using a blunt force instrument, most likely a silver claw hammer, which was discovered  
14 underneath his leg at the crime scene. The severity of the injuries inflicted upon Mark's head and  
the surrounding evidence point to a deliberate and violent act of homicide.

15           4.       On December 20, 2022, my daughter, who was approaching her 18th  
16 birthday, returned home from college to discover her father's lifeless body. Mark was found  
17 lying face down in a three-foot pool of blood in our kitchen. His head was obscured by a  
18 lightweight wicker chair and a leather jacket draped over it, concealing the extent of his injuries.  
19 My daughter was unable to enter the house, as the doors had been locked, and she could only  
20 view her father's body through the French doors leading into the kitchen.

21           5.       The trauma inflicted upon my daughter, who witnessed the aftermath of  
22 this horrific crime, has left lasting emotional scars. Upon the arrival of the Henderson Police  
23 Department at the scene, my daughter and her boyfriend's family were denied entry into the  
home and were prohibited from viewing Mark's body due to the severity of the mutilation.

24           6.       In the 16 months preceding Mark Porcelli's murder, Louis Schneider,  
25 Esq., and Christopher P. Ford, Esq., attorneys at Ford & Friedman, engaged in a deliberate  
26 campaign of harassment, intimidation, and fraud. They initiated multiple false arrests against me,

1 resulting in bench warrants that remained active for more than two years. These actions were  
2 intended to isolate me, obstruct justice, and create the conditions necessary to seize my property.

3 7. Between August 2021 and December 2022, Schneider and Ford attempted  
4 to auction or sell my property on three separate occasions, targeting approximately \$550,000 in  
5 equity in my home. These efforts were part of a RICO conspiracy involving collusion with  
6 officers of the Henderson Police Department and the Clark County Coroner's Office. Their intent  
7 was to distribute the proceeds of my home's sale among themselves and their co-conspirators  
8 under the guise of legal authority.

9 8. Following Mark's death, the Henderson Police Department illegally  
10 searched and seized my property without a warrant. Items taken included my credit cards,  
11 checkbooks, and EU passport. These actions were conducted in violation of my Fourth  
12 Amendment rights and my rights under 42 U.S.C. § 1983. To date, the Henderson Police  
13 Department has failed to document this unlawful search and seizure.

14 9. The Clark County Coroner's Report falsely claimed that Mark Porcelli  
15 died from cardiomyopathy, citing a minor abrasion on his upper lip as the only visible injury.  
16 However, multiple photographs taken at the scene reveal a three-foot pool of blood surrounding  
17 Mark's head, as well as blood spatter and brain matter extending to the ceiling, walls, and  
18 furniture. These findings are inconsistent with a natural death and strongly suggest that Mark  
19 was murdered by blunt force trauma.

20 10. I have obtained evaluations from two independent autopsy doctors who  
21 reviewed the photographs and confirmed that the injuries and volume of blood at the scene could  
22 not be explained by cardiomyopathy. The Henderson Police Department's refusal to conduct  
23 forensic testing on the 85 visible bloodstains further obstructs the investigation and violates my  
24 right to equal protection under the law.

25 11. In response to law enforcement's inaction, I retained Aftermath Biohazard  
26 Cleaning Company to test the bloodstains. The results confirmed the presence of human  
27 biohazard material, with contamination levels measuring 717,000, nearly 200 times the  
acceptable limit of 4,000. Experts indicated that the high concentration suggested the presence of  
brain matter.

1           12.       Following Mark's death, my home was unlawfully turned over to the  
2 Clark County Public Administrator's Office, despite my status as the legal owner. The Public  
3 Administrator inventoried and confiscated financial records, including old checkbooks and credit  
4 cards, as well as my EU passport. These items were seized with the intent to embezzle assets,  
5 facilitate identity theft, and obstruct my ability to leave the country.

6           13.       During the unlawful seizure, officers forcibly broke into locked rooms in  
7 my home, including the master bedroom, home office, and my son's bedroom. The locks on two  
8 doors were left inoperable, further evidencing forced entry. No search warrant was provided, and  
9 no inventory of the seized items was disclosed, in direct violation of my Fourth Amendment  
10 rights.

11           14.       The seizure was part of a larger scheme orchestrated by Louis Schneider  
12 and Christopher Ford, who sought to exploit fabricated bench warrants to have me arrested and  
13 prevent me from reclaiming my property. This pattern mirrors previous cases of fraudulent estate  
14 sales linked to the Clark County Public Administrator, as reported in investigative journalism by  
15 Jeff German, who was later murdered while investigating similar corruption.

16           15.       As the next of kin and Executor of Mark Porcelli's Estate, I have the legal  
17 right to obtain unredacted photographs of Mark's body and access all police and coroner reports.  
18 Despite repeated requests, Lt. Mark Amundsen and the Henderson Police Department have  
19 refused to release these materials, citing the need for a court order. This refusal constitutes  
20 obstruction of justice and a violation of my First Amendment rights to petition the government  
21 for redress.

22           16.       The actions of the Henderson Police Department, Clark County Coroner's  
23 Office, and Clark County Public Administrator's Office reflect a coordinated effort to conceal  
24 evidence, obstruct investigations, and intimidate witnesses to protect those involved in Mark's  
25 murder.

26           17.       The facts outlined in this declaration demonstrate a pattern of systemic  
27 corruption and RICO conspiracy by the defendants, resulting in the murder of Mark Porcelli, the  
violation of my civil rights, and the obstruction of justice. These actions have caused irreparable  
harm to me and my family, and I seek accountability through the federal court system.

1           18.     In the months leading up to Mark Porcelli's murder, I was subjected to a  
2 deliberate campaign of harassment orchestrated by defendants Louis Schneider and Christopher  
3 Ford, in collusion with the Henderson Police Department and Clark County District Attorney's  
4 Office. This harassment included multiple attempts to initiate false arrests against me, designed  
5 to intimidate, silence, and isolate me from legal representation and support networks.

6           19.     On March 11, 2022, my late husband, Mark Porcelli, was himself  
7 wrongfully arrested on fabricated charges by the Henderson Police Department. This arrest  
8 occurred despite the lack of any credible evidence and was intended to discredit Mark and  
9 further destabilize our family. Mark was released without charges, yet the psychological and  
10 financial toll of the arrest compounded the stress that ultimately led to his vulnerability in the  
11 months prior to his murder.

12           20.     I was subsequently targeted by law enforcement in August 2024, when  
13 officers from the Napa Police Department attempted to execute a false arrest warrant during my  
14 stay in California. This incident, involving Defendant Fitzgerald Walton, mirrored earlier efforts  
15 by the Henderson Police Department and highlighted the multi-jurisdictional coordination in this  
16 ongoing conspiracy.

17           21.     I have credible evidence, supported by witness testimony, that Louis  
18 Schneider, a Nevada attorney, engaged in bribery to influence judicial outcomes. Specifically, in  
19 2016, Schneider was observed delivering \$5,000 in cash to the Clark County District Attorney's  
20 Office to secure a favorable outcome for one of his criminal clients. This transaction was  
21 witnessed by Roxanne Thompson, a paralegal, who has agreed to testify regarding the incident.

22           22.     The pervasive corruption demonstrated by this act extends beyond  
23 individual transactions. It is part of a larger criminal enterprise in which public officials—  
24 including District Attorney Steve Wolfson—colluded with private attorneys to manipulate court  
25 proceedings, block property sales, and obstruct justice. These actions have facilitated the  
26 systematic exploitation of estates, including mine and Mark Porcelli's.

27           23.     Further investigation has uncovered evidence of money laundering  
activities linked to defendants Louis Schneider, Christopher Ford, and Foursight LLC. These  
defendants engaged in fraudulent transfers and asset concealment schemes designed to siphon  
funds from my property and Mark Porcelli's estate.

1           24.     During the investigation into Mark Porcelli's death, critical evidence was  
2 either destroyed or tampered with by law enforcement. Bloodstains at the crime scene, which  
3 were later confirmed to contain brain matter, were neither properly preserved nor analyzed by  
4 the Henderson Police Department.

5           25.     Instead, law enforcement prematurely ruled Mark's death as natural  
6 causes, effectively closing the case without further investigation. The coroner's office disposed  
7 of key biological samples before independent examiners could conduct a second autopsy, further  
8 obstructing efforts to establish the true cause of death.

9           26.     Requests for forensic testing and access to the police reports and crime  
10 scene photographs have been systematically denied, depriving me of evidence critical to proving  
11 that Mark was murdered. This suppression of evidence underscores the coordinated cover-up  
12 involving multiple agencies and defendants.

13           27.     The actions of the defendants have inflicted severe emotional distress and  
14 physical harm upon me and my family. The financial devastation caused by the theft of my  
15 property and legal fees has left me unable to cover necessary medical expenses.

16           28.     I was diagnosed with Stage 4 cancer shortly after Mark's death, a  
17 condition exacerbated by the unrelenting stress and harassment inflicted by the defendants. My  
18 treatment has been delayed due to financial constraints, further endangering my health.

19           29.     Additionally, my daughter, who discovered Mark's body, continues to  
20 suffer from post-traumatic stress disorder (PTSD) and requires ongoing psychological care. The  
21 defendants' actions have deprived us of stability, security, and peace, forcing us to live in fear  
22 for our safety.

23           30.     The quantity of blood surrounding Mark Porcelli's head and saturating his  
24 shirt is inconsistent with death by cardiomyopathy, as confirmed by two autopsy doctors who  
25 reviewed the photographs. The Coroner's Report merely noted a minor abrasion on his upper lip,  
26 which could not account for the extensive pool of dried blood, spanning nearly three feet.  
27 Additionally, the degree of decomposition observed in Mark's body is implausible, considering  
the ambient temperature in the home at the time of discovery was 63 degrees. These facts  
suggest that the Clark County Coroner was colluding with the Henderson Police Department and

1 the law firms of Louis Schneider, Esq., and Ford & Friedman under the color of law, violating  
2 my rights under Section 1983 and the Fourth Amendment for financial gain.

3 31. There are currently 85 drops of blood and brain matter located within a  
4 12-foot radius of where Mark Porcelli's body was discovered. These bloodstains are present on  
5 the kitchen ceiling, a kitchen lamp hanging over the island, a door leading from the kitchen to the  
6 dining room, a French door blind leading to the backyard, and above the door frame connecting  
7 the laundry room to the living room. Henderson Police Department officers photographed these  
8 stains on September 1, 2023, and October 6, 2023, and added the documentation to the original  
9 police report regarding Mark's death. Despite this, the stains have only been referred to as "dark  
10 brown stains." The Henderson Police Department has repeatedly refused to conduct forensic  
11 testing on these bloodstains, indicating an intent to obstruct justice while endangering my life  
and the lives of my children, who continue to reside in the home where the murder and  
subsequent burglary occurred.

12 32. Due to the Henderson Police Department's refusal to perform forensic  
13 testing, I was compelled to engage Aftermath Biohazard Cleaning Company to test the  
14 bloodstains. The results confirmed the presence of human biohazard material. Specifically, the  
15 bloodstains on the kitchen ceiling measured 717,000, which is nearly 200 times the acceptable  
16 biohazard level of 4,000. Experts have indicated that the high concentration of biohazard in this  
17 area likely suggests the presence of brain matter on the kitchen ceiling. The actions of the  
18 Henderson Police Department continue to deprive me of my civil rights, in violation of Section  
1983.

19 33. The results of the investigation into Mark Porcelli's murder were sent to  
20 Lt. Mark Amundsen, the Lead Homicide Detective; Chief of Police Hollie Chadwick; and Sgt.  
21 Thomas Kerouac, who was investigating the concurrent break-in that occurred during the  
22 murder. During a one-hour phone conversation on November 15, 2022, Lt. Amundsen inquired  
23 about how bloodstains ended up on the ceiling. I informed him that I believed this happened  
24 when Mark was struck on the head with a blunt force object, most likely the hammer found  
25 beneath his leg. Lt. Amundsen indicated that this would suggest a splash of blood and brain  
matter came from the weapon.

1           34.       The police report regarding Mark Porcelli's death omits any mention of  
2 bloodstains present throughout the house, despite the existence of 23 visible bloodstains on the  
3 kitchen ceiling. Additionally, bloodstains are visible on the kitchen door, on the blind above the  
4 French Door, and above the door frame in the laundry room. The bloodstains on the ceiling are  
5 currently being tested for DNA and are likely to provide a match between Mark Porcelli and my  
6 son, Lorenzo Porcelli, as there have been no other bloody bodies found within the residence.

7           35.       Following the removal of Mark Porcelli's body, an unknown number of  
8 Henderson Police officers remained at my home for several hours to conduct an illegal search  
9 without a search warrant. When I referred this information to Lt. Amundsen, he questioned how I  
10 knew that the officers stayed for several hours. I replied that they were able to locate three old  
11 credit cards, three old checkbooks, and my EU passport. These financial and identification  
12 documents had been randomly left over the years in various handbags inside my master bedroom  
13 closet and in boxes within my office closet.

14           36.       My home contains 14 closets filled with clothing, handbags, and boxes of  
15 office documents accumulated over 18 years of residence and use as a home office for my  
16 business. The officers would have needed to spend several hours locating these items, including  
17 an old checkbook from my time residing in San Francisco in 1998, which was found at the  
18 bottom of a box beneath several others in my office closet.

19           37.       To conduct their search, the officers forcibly broke through locked doors  
20 to the master bedroom, home office, and my son's bedroom. The doors display clear signs of  
21 having been forced open, rendering the locks inoperative on two of them. The Henderson Police  
22 Department failed to document their illegal search and seizure of my credit cards, checkbooks,  
23 and EU passport. The Clark County Public Administrator reported the seizure of these items in a  
24 detailed inventory list issued on December 21, 2022. Furthermore, since the cause of death was  
25 listed as "undecided pending toxicology," there was no legal justification for the search and  
26 seizure of my property. This unlawful action not only inflicted financial damage on my family  
27 but also violated my Eighth Amendment rights.

          38.       The Henderson Police Department's refusal to amend the police report to  
acknowledge the unlawful search and seizure of my property, despite being presented with



1 evidence, represents a direct violation of my First Amendment rights regarding my ability to  
2 seek redress from government entities for illegal activities.

3 39. Additionally, the Henderson Police Department failed to report that they  
4 had illegally transferred my property to the Clark County Public Administrator. At the time of  
5 Mark Porcelli's death, two sets of house keys were present in the residence: one set was turned  
6 over to the Public Administrator, while the other set was unaccounted for, allowing unauthorized  
7 individuals unrestricted access to the home. During the days following Mark's death, from  
8 December 17 through December 20, and possibly beyond, while the house was under the  
9 jurisdiction of the Public Administrator's Office, my property was burglarized and vandalized,  
10 resulting in the theft of 208 items. This residence had served as the primary home for my family  
11 of four adults for 18 years.

12 40. Furthermore, the home contained property from previous residences in  
13 Italy and New York, both of which had been dismantled over the prior eight years. My son,  
14 Lorenzo Porcelli, had been home for a weekend from November 18 to November 20, 2022, and  
15 the house had remained intact during that time, with no theft or vandalism reported.

16 41. My home was illegally turned over to the Public Administrator's Office  
17 for auction, and my financial documents were seized in an attempt to deplete any assets from my  
18 credit cards and checking accounts. The EU passport was confiscated to facilitate identity theft  
19 and prevent me from leaving the country prior to my arrest on fabricated bench warrants,  
20 orchestrated by Louis Schneider and Christopher Ford.

21 42. At the time of Mark Porcelli's death, I had two fabricated bench warrants  
22 for my arrest related to unfounded domestic battery claims. These warrants had been arranged  
23 with the assistance of Louis Schneider, who had previously represented me in drafting a  
24 separation agreement, boasting that "I can get anyone I want arrested and I decide how long they  
25 are held."

26 43. The Henderson Police Department was instructed to illegally transfer my  
27 property to the Public Administrator's Office, anticipating that I would be arrested when  
attempting to reclaim my belongings. This reflects a longstanding pattern of illicit sales  
organized by the Public Administrator's Office, as reported by journalist Jeff German in an

1 expose that ultimately led to his murder, allegedly at the hands of Robert Telles, who held that  
2 office.

3 44. The Clark County Coroner submitted a false report stating that Mark  
4 Porcelli had only a small contusion on his upper lip when, in reality, his head had been severely  
5 injured by the hammer. This discrepancy is the reason the Henderson Police Department refuses  
6 to release unredacted photographs of Mark's head to his next of kin. This situation constitutes  
7 evidence of RICO collusion, obstruction of justice, and fraud, which has become  
8 institutionalized within both the Henderson Police Department and the Clark County Coroner's  
9 Office.

10 45. The Henderson Police Detectives investigating the murder of Mark  
11 Porcelli, including Detective Calvano, had prepared a file in collaboration with Louis Schneider  
12 and Christopher P. Ford. This file was intended to frame me, Andreea Melissa Olteanu, for Mark  
13 Porcelli's murder. The document included a copy of a text message filed with Mark's probation  
14 officer, allegedly demonstrating the ongoing conflict between me and Mark, as well as the final  
15 page of a filing in our Family Court case. The law firms engaged in RICO collusion for  
16 malicious prosecution and fraud with the Henderson Police Department, violating my First and  
17 Fourth Amendment rights.

18 46. Starting on December 22, 2022, I had regular conversations with Detective  
19 Calvano of the Homicide Unit. During these discussions, I informed Detective Calvano that  
20 Louis Schneider, who had previously represented me, had been in constant communication with  
21 Mark Porcelli, engaging in up to 12 conversations per day during the months leading up to  
22 Mark's death. I also relayed that Schneider had boasted during our initial meeting in June 2021  
23 that he could arrange for anyone to be arrested because his wife, Judge Lora Schneider, served as  
24 a Pro Tem Judge at the Henderson Municipal Court.

25 47. Within three weeks of our initial meeting, and after I had paid Schneider a  
26 \$6,000 retainer to draft a marital settlement agreement and represent me at a TPO hearing,  
27 Schneider had his personal private investigator, Dax Ramos, call me while I was attending an  
annual conference in Monte Carlo. Dax explained their strategy for handling Family Court  
matters in Clark County, which involved ensuring that my husband would become a felon. He  
further detailed plans to place a transponder on the bottom of Mark's car to track his location

1 when leaving bars or restaurants, with the intent of calling Henderson Police to arrest him for  
2 DUI. I expressed my disinterest in engaging in illegal activity and reiterated my refusal to  
3 incriminate my husband in any manner, conveying this to Schneider in an email. The following  
4 day, Schneider withdrew from representing me, stating that I was too demanding. Notably, on  
5 the same day that Schneider withdrew, a bench warrant was issued for my arrest on fabricated  
6 misdemeanor charges.

7 48. I informed Detective Calvano that Louis Schneider had conspired with  
8 Christopher Ford and my homeowners' association (HOA) to illegally attempt to sell my  
9 property on two occasions in November 2022, just one month prior to the ordered murder of  
10 Mark Porcelli. I urged Detective Calvano to consider Schneider and Ford as suspects in Mark's  
11 murder due to their potential financial motives, but he ridiculed the information I presented in  
12 my police report.

13 49. Beginning in February 2023, as the next of kin, I gained full access to  
14 Mark Porcelli's phone records. I discovered that he had been regularly communicating with  
15 Louis Schneider using dedicated phone lines with matching 917 numbers, which were opened on  
16 the same date. There was no legitimate legal reason for Mark to be in contact with Schneider,  
17 particularly given that Mark had filed for divorce and I had previously retained Schneider for a  
18 separation agreement.

19 50. Christopher Ford had attempted to illegally sell my property in November  
20 2022 in contempt of a Family Court judge's order and had listed the property under his name,  
21 also in contempt of the court order. Both law firms, Schneider and Ford, intended to sell the  
22 property fraudulently before the scheduled divorce trial in March 2023, aiming to capture all  
23 equity before any potential settlement.

24 51. Schneider and Ford conspired under RICO principles, acting under the  
25 color of law with the Henderson Police Department and the Clark County Coroner, engaging in  
26 RICO legal malpractice, mail fraud, wire fraud, reckless endangerment, harassment, blackmail,  
27 grand larceny, embezzlement, obstruction of justice, and wrongful death. The Henderson Police  
officers were acting under directives from their chief, demonstrating institutionalized police  
corruption and ongoing violations of my Section 1983 rights, as well as those of my family.

1           52.       I want to stress that both Louis Schneider and Christopher Ford have  
2 made it explicitly clear to me that they were engaged in illegal activities, boasting about their  
3 connections and the ability to manipulate outcomes in legal matters. I believe this collusion has  
4 directly contributed to the circumstances surrounding Mark Porcelli's death and the subsequent  
5 cover-up efforts that have left my family vulnerable to further harassment and criminal acts.

6           53.       I have been directly affected by the actions of Defendants Louis  
7 Schneider, Christopher Ford, and others involved in a conspiracy to murder Mark Porcelli. This  
8 murder was not a random act, but a calculated maneuver by the Defendants to eliminate a key  
9 individual who could expose their fraudulent and illegal activities, including the embezzlement  
10 of property and obstruction of justice. These actions are central to the larger criminal enterprise  
11 perpetrated by the Defendants and qualify as predicate acts under the RICO statute.

12           54.       I have uncovered substantial evidence directly implicating the Defendants  
13 in both the murder and the conspiracy that led to it. This evidence includes documented  
14 communications between the Defendants, both before and after the murder, which demonstrate  
15 their active involvement in planning, executing, and covering up the crime. Additionally, I have  
16 obtained records indicating fraudulent asset transfers that took place immediately following the  
17 murder, illustrating how the Defendants wrongfully seized property and funds belonging to me  
18 and my family. These deliberate actions were in furtherance of the broader fraudulent scheme  
19 that the Defendants were engaged in, causing significant financial harm to me. Beyond the  
20 financial losses, I have also endured substantial emotional distress as a result of their actions,  
21 which continue to have a lasting impact on my well-being.

22           55.       Mark Porcelli was murdered under highly suspicious circumstances, yet  
23 the Henderson Police Department (HPD), under the leadership of former Chief Hollie Chadwick  
24 and homicide investigator Lieutenant Mark Amundsen, deliberately refused to conduct a proper  
25 investigation into his death. Despite clear indications of foul play, HPD dismissed the case  
26 without taking any meaningful steps to uncover the truth.

27           56.       Plaintiff, Andreea Melissa Olteanu, provided substantial evidence  
demonstrating that Porcelli's death was not an accident or a natural occurrence but rather a  
criminal act. However, instead of treating this evidence with the seriousness it deserved, HPD  
failed to conduct a thorough inquiry. This refusal to investigate raises serious concerns about the

department's motives and whether there was an intentional effort to conceal the true circumstances of Porcelli's death.

57. The refusal to properly investigate Porcelli's murder was not merely an oversight but an act of deliberate obstruction by HPD leadership. Former Chief Hollie Chadwick was fully aware of the allegations and had the authority to ensure a proper investigation was conducted. Yet, she chose to ignore the mounting evidence and failed to take corrective action, allowing the cover-up to continue under her watch.

58. Lieutenant Mark Amundsen, as the head of homicide investigations, bore a direct responsibility to lead an impartial and thorough inquiry. Instead of fulfilling his duty, Amundsen suppressed or ignored critical evidence that pointed to foul play. His actions—or lack thereof—deviated from standard law enforcement protocols and effectively prevented any meaningful pursuit of justice in Porcelli's case. His refusal to engage with the evidence presented to him not only obstructed the investigation but also protected those responsible for the crime.

59. Former Chief Hollie Chadwick eventually resigned under mounting pressure, a development that raises serious questions about her involvement in the suppression of evidence related to Porcelli's murder. A resignation under such circumstances is not merely a personnel change—it suggests deeper institutional misconduct and an effort by HPD leadership to deflect scrutiny from the case.

60. Chadwick's departure strongly indicates that HPD officials were aware of wrongdoing within the department and sought to remove individuals who could become liabilities as the truth began to surface. The timing of her resignation aligns with increasing public and legal pressure on the department, reinforcing the suspicion that her exit was a direct response to the exposure of the mishandling of the Porcelli investigation.

61. Despite being presented with compelling evidence, Lieutenant Amundsen actively refused to take necessary investigative steps. His inaction was not a matter of negligence but a clear violation of standard law enforcement procedures designed to ensure justice. By disregarding key evidence and witness testimony, Amundsen played an instrumental role in preventing a legitimate inquiry into Porcelli's death.

62. His refusal to conduct even the most basic investigative actions—such as reexamining forensic evidence, questioning key witnesses, or exploring potential motives—

1 directly contributed to the continued cover-up. Amundsen's inaction ensured that those  
2 responsible for Porcelli's murder remained unaccountable, further eroding public trust in HPD's  
3 ability to enforce the law fairly and impartially.

4 63. The failure to investigate Porcelli's murder is not an isolated incident but  
5 part of a broader pattern of corruption within HPD. This pattern includes wrongful arrests,  
6 obstruction of justice, and the deliberate manipulation of official reports to protect certain  
7 individuals while targeting others unjustly. The handling of Porcelli's case reflects a systemic  
8 issue within the department—one that prioritizes covering up misconduct over pursuing truth and  
9 accountability.

10 64. Both Former Chief Chadwick and Lieutenant Amundsen held positions of  
11 power and used their authority not to seek justice, but to suppress evidence and shield those  
12 responsible. Their actions are emblematic of a department that has repeatedly engaged in  
13 misconduct, demonstrating a dangerous abuse of power that extends beyond this single case. The  
14 deliberate obstruction in Porcelli's murder investigation underscores the need for independent  
15 oversight and immediate legal intervention to expose and rectify HPD's ongoing corruption.

16 65. The actions of Defendants Louis Schneider, Christopher Ford, and others  
17 have had a direct and devastating impact on Plaintiff, Andreea Melissa Olteanu. The murder of  
18 Mark Porcelli was not an isolated act of violence but a deliberate and premeditated maneuver  
19 orchestrated by the Defendants. This crime was designed to eliminate a key individual who  
20 possessed knowledge of their extensive fraudulent and illegal activities, including the  
21 embezzlement of property and obstruction of justice. The Defendants' involvement in these  
22 criminal acts forms part of a broader pattern of misconduct, constituting predicate offenses under  
23 the RICO statute. Their coordinated efforts to cover up their crimes further demonstrate the  
24 existence of a criminal enterprise aimed at financial gain through fraudulent and illicit means.

25 66. Plaintiff has uncovered substantial evidence directly linking the  
26 Defendants to both the murder of Mark Porcelli and the conspiracy that led to it. This evidence  
27 includes documented communications between the Defendants, both before and after the murder,  
which clearly demonstrate their active participation in planning, executing, and concealing the  
crime. The communications reveal discussions of the financial and legal implications of Mark  
Porcelli's elimination, underscoring their motives and intent.

1           67. In addition to these direct exchanges, records of fraudulent asset transfers  
2 were executed immediately following the murder. These transactions illustrate how the  
3 Defendants swiftly and unlawfully seized property and funds belonging to Plaintiff and her  
4 family, furthering their broader fraudulent scheme. The theft of these assets has caused Plaintiff  
5 significant financial harm, depriving her of rightful ownership and contributing to her ongoing  
6 legal struggles.

7           68. Beyond the severe financial losses inflicted by the Defendants, Plaintiff  
8 has endured substantial emotional distress due to their actions. The calculated nature of their  
9 conspiracy, coupled with their continued efforts to obstruct justice, has created an unrelenting  
10 cycle of harm. The Defendants' conduct has forced Plaintiff to engage in prolonged legal battles,  
11 placing an immense burden on her personal and financial well-being. The repeated interference  
12 with investigations and the manipulation of legal proceedings have prevented her from obtaining  
13 the justice and restitution she is entitled to.

14           69. The obstruction of justice committed by the Defendants has only served to  
15 compound the harm inflicted upon Plaintiff. Their efforts to manipulate the legal system, block  
16 official investigations, and suppress evidence have not only protected them from immediate  
17 accountability but have also deprived Plaintiff of any opportunity for a fair resolution. Law  
18 enforcement and judicial processes that should have provided Plaintiff with a path to justice have  
19 instead been weaponized against her, further exacerbating the suffering caused by the  
20 Defendants' actions. This ongoing criminal conduct reflects a deeply entrenched pattern of  
21 corruption that continues to endanger Plaintiff's ability to reclaim what has been unlawfully  
22 taken from her.

23           70. On December 20, 2022, my husband, Mark Porcelli, died under suspicious  
24 circumstances. This tragic event became a pivotal moment in the ongoing conspiracy  
25 orchestrated by the DEFENDANTS to defraud me, as well as the Estate of Mark Porcelli.  
26 Despite numerous indications of foul play, local authorities hastily ruled the cause of death as  
27 "Cardiomyopathy" without conducting a thorough investigation. This rushed and superficial  
determination, combined with the refusal to release key evidence and the active obstruction by  
the Henderson Police Department, strongly suggests a deliberate effort to suppress the truth  
surrounding Mark's death.

1           71.     Following his death, the DEFENDANTS engaged in a series of unlawful acts  
2 designed to seize Mark Porcelli's assets and prevent me, as executrix of his Estate, from  
3 asserting my legal rights. These actions included:

4           72.     Fraudulent Property Liens – DEFENDANTS placed baseless claims against the  
5 Estate's assets, preventing their lawful distribution.

6           73.     Obstruction of Justice – Law enforcement agencies, working in concert with  
7 private individuals, refused to conduct a legitimate investigation into Mark's death, ensuring that  
8 those responsible would not face accountability.

9           74.     Asset Seizure and Fraudulent Transactions – DEFENDANTS engaged in the  
10 unauthorized transfer and misappropriation of real estate and other assets belonging to the Estate.

11           75.     Continued Legal Harassment – Through fabricated claims and legal maneuvers,  
12 DEFENDANTS have deliberately delayed and obstructed the administration of the Estate,  
13 inflicting financial hardship on me and Mark's rightful heirs.

14           76.     These actions are not isolated incidents but rather components of a broader  
15 criminal enterprise designed to deprive me and the Estate of our rights. By covering up Mark  
16 Porcelli's murder and engaging in fraudulent legal tactics, the DEFENDANTS have caused  
17 immense financial, legal, and emotional harm to the Estate, making its inclusion in this case  
18 essential for full accountability and restitution.

19           77.     My son, Lorenzo Porcelli, as the son of the late Mark Porcelli, was entitled to  
20 inherit assets and financial support from his father's Estate. However, instead of receiving the  
21 financial security rightfully owed to him, Lorenzo has been subjected to deliberate fraud,  
22 obstruction, and economic instability at the hands of the DEFENDANTS. Through unlawful  
23 maneuvers, the DEFENDANTS have misappropriated assets from the Estate, engaged in  
24 fraudulent actions to block Lorenzo's rightful claims, and imposed an undue financial burden on  
25 him. As a result, Lorenzo has not only lost the inheritance he was legally entitled to but has also  
26 faced prolonged legal battles designed to suppress justice and deprive him of financial stability.

27           78.     The DEFENDANTS' actions against Lorenzo extend far beyond financial harm.  
28 Their persistent efforts to cover up the true cause of Mark Porcelli's death have inflicted severe  
29 emotional and psychological trauma. Rather than being able to grieve in peace and seek closure,  
30 Lorenzo has been forced to endure the distress of systematic obstruction of justice. He has



1 witnessed firsthand the DEFENDANTS' continuous efforts to suppress the truth, deny  
2 accountability, and manipulate legal proceedings to their advantage. This deliberate campaign of  
3 deception has caused long-term emotional suffering, leaving him in a state of unresolved grief  
4 and mental anguish.

5 79. Furthermore, the DEFENDANTS have actively engaged in legal harassment,  
6 prolonging litigation and employing fraudulent tactics to prevent any resolution in Lorenzo's  
7 favor. The false arrests, the economic losses, and the malicious obstruction of justice have  
8 compounded his suffering. The cumulative impact of these actions has not only deprived him of  
9 his father's legacy but has also forced him into a relentless struggle for justice, one that has been  
10 met with resistance at every turn.

11 80. Like her brother, my daughter, Sofia Porcelli, has suffered tremendous financial  
12 and emotional harm due to the DEFENDANTS' fraudulent actions and obstruction of justice. As  
13 the daughter of Mark Porcelli, she was entitled to a rightful share of his Estate, yet the  
14 DEFENDANTS have worked tirelessly to ensure that she is denied what is legally hers. Through  
15 fraudulent legal maneuvers, the DEFENDANTS have blocked her access to the Estate's assets,  
16 placed unlawful claim liens, and engaged in deliberate obstruction to prevent financial  
17 restitution. Rather than being granted the security and stability that her inheritance should have  
18 provided, Sofia has been left in a vulnerable financial position due to the DEFENDANTS'  
19 malicious interference.

20 81. Beyond financial damages, Sofia has endured immense emotional distress due to  
21 the DEFENDANTS' deliberate conspiracy to conceal the truth about her father's death. Instead  
22 of being able to mourn and process her loss, she has been subjected to an unrelenting campaign  
23 of deception, fraud, and legal obstruction. The DEFENDANTS have actively obstructed  
24 investigations, delayed legal proceedings, and engaged in misconduct to ensure that no  
25 accountability could be established. This sustained effort to suppress the truth has caused lasting  
26 psychological harm, leaving Sofia burdened with grief, frustration, and the inability to obtain  
27 closure.

82. Mark Porcelli's death was deliberately misclassified as "Cardiomyopathy,"  
despite clear evidence suggesting foul play. From that moment, the DEFENDANTS initiated a  
concerted effort to cover up the true circumstances of his passing, ensuring that Lorenzo and

1 Sofia Porcelli would be denied both justice and the financial security owed to them as his rightful  
2 heirs. Instead of honoring their legal and moral obligations, the DEFENDANTS engaged in a  
3 series of fraudulent acts, each designed to obstruct, defraud, and harm the rightful heirs of Mark  
4 Porcelli's Estate.

5 83. Both Lorenzo Porcelli and Sofia Porcelli have suffered immeasurable harm due to  
6 the DEFENDANTS' fraudulent activities, obstruction of justice, and financial misconduct. As  
7 the rightful heirs to the Estate of Mark Porcelli, they have been deprived of their inheritance,  
8 subjected to deliberate legal and financial obstruction, and denied closure in their father's  
9 wrongful death. Their inclusion as parties in this case is essential to ensure they are fully  
10 compensated for their losses and that the DEFENDANTS are held accountable for their  
11 continued fraudulent and malicious actions.

12 84. Additionally, I am the rightful owner of the property located at 2438 Ping Drive,  
13 Henderson, NV 89074, which has sustained substantial damage, rendering it completely  
14 uninhabitable. The extent of the damage has created hazardous living conditions, making  
15 immediate repairs not only necessary but urgent to ensure the safety and preservation of the  
16 property. Due to the severity of the structural and environmental issues, I promptly sought  
17 financial relief through my homeowner's insurance to cover the essential restoration work  
18 required to bring the property back to a livable state.

19 85. In response to the damage, I filed an insurance claim with Markle Insurance,  
20 which, upon processing the claim, approved and disbursed funds specifically allocated for the  
21 necessary repairs. These funds were not discretionary but were earmarked exclusively for the  
22 restoration of my property, ensuring that the home could be rehabilitated and made habitable  
23 once again. The allocation of these funds was a direct acknowledgment of the legitimacy of the  
24 claim and the urgent need for repairs to be undertaken without delay.

25 86. However, rather than adhering to its fiduciary and contractual obligations, Wells  
26 Fargo Bank, N.A., which holds the mortgage on my home, has actively obstructed my access to  
27 these funds. This deliberate interference has prevented me from carrying out the critical  
restoration work, leaving the property in a state of severe disrepair and exacerbating the already  
dire circumstances. The unlawful withholding of these funds has had devastating consequences  
for me and my family.

1           87.     The obstruction of justice by Defendants has only intensified the harm  
2 caused to me. Their efforts to manipulate legal processes, block investigations, and conceal their  
3 involvement in the murder and fraudulent activities have prevented me from seeking justice and  
4 recovering the assets wrongfully taken from me. The Defendants' criminal conduct is ongoing,  
5 and their efforts to protect themselves from accountability have only exacerbated my suffering.  
6 As a result of these coordinated actions, I have been deprived of my ability to pursue a fair  
7 remedy through the legal system, further compounding the harm I have already endured.

8           88.     I have been the target of multiple assassination attempts, all of which were  
9 witnessed by Bijan Nikbin. On April 27, 2024, a coordinated attempt on my life took place in  
10 Henderson, involving police vehicles. On January 27, 2025, another attempt was made inside  
11 Mon Ami Gabi Restaurant at the Paris Hotel in Las Vegas. Additionally, on October 13, 2024,  
12 Bijan Nikbin himself was attacked in the parking lot of his condominium. These incidents  
13 demonstrate an ongoing conspiracy to harm or eliminate me, involving law enforcement and  
14 organized collusion.

15           89.     Stewart Title Company representatives, Katie Henry and Cara Joseph, will  
16 confirm that my property was unlawfully held in escrow against my will for over five months  
17 under the direct orders of Clark County District Attorney Steve Wolfson and his entity, Foursight  
18 LLC. This obstruction prevented me from selling or managing my own property.

19           90.     Nancy Archambault, a real estate agent with Simply Vegas, will testify  
20 that intimidation tactics orchestrated by Steve Wolfson pressured real estate agents and title  
21 companies to boycott the sale or rental of my home. As a direct result of this interference, I was  
22 unable to sell or rent my home for over eight months in 2023, causing me significant financial  
23 harm.

24           91.     Tim Dunn, a real estate agent with Berkshire Hathaway HomeServices  
25 (BHHS), will confirm that my property was entirely blocked from being sold or even shown  
26 during two critical periods: June 2022 through September 2022 and May 2024 through  
27 September 2024. This obstruction was a deliberate effort to financially destabilize me and further  
the Defendants' scheme to seize my property.

          92.     George Haines, a bankruptcy attorney, will confirm that in May 2024,  
Foursight LLC placed an illegal lien on my property. This "special lien" was designed to force

1 the sale of my home rather than allow repayment, directly violating federal bankruptcy laws.  
2 Despite my Chapter 7 bankruptcy filing, which should have legally excluded this lien, it was  
3 improperly upheld due to DA Wolfson's influence over the legal system. The intent behind this  
4 fraudulent lien was twofold: first, to force an unlawful property sale to benefit Foursight LLC,  
5 and second, to either assassinate me or falsely imprison me long enough for them to execute the  
6 illegal sale.

7 93. I was on the phone with Fitzgerald Walton at the exact moment officers  
8 attempted to arrest me on fabricated charges of "using racist language in the ladies' room" at the  
9 Archer Hotel in Napa. This incident is key evidence of collusion between Napa PD, Henderson  
10 PD, Merrill Lynch, and Eric Gonzales, who worked together in a coordinated effort to obstruct  
11 justice and silence me.

12 94. At the crime scene of Mark Porcelli's murder, multiple law enforcement  
13 and first responder personnel were present and actively participated in the cover-up. Henderson  
14 Police Department officers on the scene included J. Diaz (Badge #2590), B. Eric (Badge #2782),  
15 S. Ulibarri (Badge #2737), and Sgt. Ramos (Badge #2174), who was the senior officer present.  
16 Homicide detectives M. Condratovich, A. Nelson (Badge #2126), N. Calvano (Badge #1329),  
17 and crime scene analyst J. Self (Badge #1370) were also there, along with Detective P. Farrell  
18 (Badge #1267). A total of five detectives were present, confirming that law enforcement officials  
19 knew it was a homicide but deliberately refused to investigate.

20 95. Henderson Fire Department personnel at the scene included Engine 95 and  
21 Rescue 84. The Clark County Coroner's Office representatives present were P. Chavez (Badge  
22 #309), A. Villanueva (Badge #516), and J. Gonzalez (Badge #509). Additionally, Davis  
23 Mortuary employees K. Roebuck and V. De Vera were involved.

24 96. Each of these officials had direct knowledge that Mark Porcelli was  
25 murdered, yet they actively participated in covering up the crime. Their failure to properly  
26 investigate the cause of death aligns with the broader pattern of obstruction and conspiracy  
27 orchestrated by DA Steve Wolfson, Henderson PD, and other colluding entities.

97. Given the systematic corruption, obstruction of justice, and failure of state  
and local authorities to protect my rights, I request that this Court compel the release of all

evidence related to Mark Porcelli's death, including unredacted photographs, police reports, and forensic records.

98. I further request an FBI investigation into the actions of the defendants under the Racketeer Influenced and Corrupt Organizations (RICO) Act, as well as federal intervention to secure my safety through witness protection until this matter is resolved.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**Declared** On this                      day of                      2025

BY: \_\_\_\_\_

Andreea Olteanu , Pro Se

**Respectfully submitted**

On this                      day of                      2025

BY: \_\_\_\_\_

Andreea Olteanu , Pro Se

Andreea Melissa Olteanu

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