



CASE NO: A-19-794098-C
Department 16

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DISTRICT COURT

CLARK COUNTY, NEVADA

ANABEL SARABIA, as an Individual and
Administratrix and Personal Representative of
THE ESTATE OF ANGELINA ERIVES;
ANABEL SARABIA, on behalf of DAYANARA
ERIVES, a minor child; ALBERTO SARABIA
JR. and ANABEL SARABIA on behalf of
BELLA ROSE SARABIA, a minor child;
ALBERTO SARABIA JR., an Individual,

CASE NO.:

DEPT NO.:

COMPLAINT

Plaintiff,

v.

PLATINUM PROPERTY MANAGEMENT,
LLC, a Nevada Limited Liability Company;
NICKLIN PROPERTY MANAGEMENT &
INVESTMENTS, INC., a Nevada Corporation;
TRADITIONS HOMEOWNERS
ASSOCIATION, a Nevada Non-Profit
Corporation; XIAOJING ZHANG, an Individual;
XIAOXIN YANG, an Individual; DOES I-X; and
ROE BUSINESS ENTITIES XI-XX, inclusive,

Defendants.

CLAGGETT & SYKES LAW FIRM
4101 Meadows Lane, Suite 100
Las Vegas, Nevada 89107
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1 Plaintiffs, ANABEL SARABIA, as an Individual and as Administratrix and Personal
2 Representative of the ESTATE OF ANGELINA ERIVES; ANABEL SARABIA on behalf of
3 DAYANARA ERIVES, a minor child; ANABEL SARABIA and ALBERTO SARABIA JR., on
4 behalf of BELLA ROSE SARABIA, a minor child; and ALBERTO SARABIA, JR., by and through
5 their attorneys of record, CLAGGETT & SYKES LAW FIRM, bring their and the Estate’s causes of
6 action against Defendants PLATINUM PROPERTY MANAGEMENT, LLC; NICKLIN
7 PROPERTY MANAGEMENT & INVESTMENTS, INC., TRADITIONS HOMEOWNERS
8 ASSOCIATION; XIAOJING ZHANG; XIAOXIN YANG; DOES I through X; and ROE BUSINESS
9 ENTITIES XI through XX, and each of them, and alleges as follows:

10 1. Anabel Sarabia (hereinafter “Plaintiff” or “Anabel”) was at all times relevant a resident
11 of Clark County, Nevada. Anabel is Angelina Erive’s (“Angelina”) mother and an heir to Angelina’s
12 Estate. Anabel is also the Administratrix and Personal Representative of Angelina’s Estate. Angelina
13 was at all times relevant to this litigation a resident of Clark County, Nevada.

14 2. Alberto Sarabia Jr. (hereinafter “Plaintiff” or “Alberto”) was at all times relevant a
15 resident of Clark County, Nevada. Alberto is married to Anabel.

16 3. Dayanara Erives (hereinafter “Dayanara”) was at all times relevant a minor child and
17 a resident of Clark County, Nevada. Dayanara is the sister of Angelina. Anabel is Dayanara’s mother
18 and brings Dayanara’s claims on her behalf.

19 4. Bella Rose Sarabia (hereinafter “Bella Rose”) was at all times relevant a minor child
20 and a resident of Clark County, Nevada. Bella Rose is the sister of Angelina. Anabel and Alberto are
21 Bella Rose’s parents and bring Bella Rose’s claims on her behalf.

22 5. Plaintiffs are informed and believe and thereon allege that at all times relevant herein,
23 Defendant Platinum Property Management, LLC (hereinafter “Defendant” or “Platinum”), was and is
24 a limited liability company formed and existing under the laws of the State of Nevada and doing
25 business in Clark County, Nevada.

26 6. Plaintiffs are informed and believe and thereon allege that at all times relevant herein,
27 Defendant Nicklin Property Management & Investments, Inc. (hereinafter “Defendant” or “Nicklin”),
28

1 was and is a corporation formed and existing under the laws of the State of Nevada and doing business
2 in Clark County, Nevada.

3 7. Plaintiffs are informed and believe and thereon allege that at all times relevant herein,
4 Defendant Traditions Homeowners Association (hereinafter “Defendant” or “Traditions HOA”), was
5 and is a non-profit corporation formed and existing under the laws of the State of Nevada and doing
6 business in Clark County, Nevada.

7 8. Plaintiffs are informed and believe and thereon allege that at all times relevant herein,
8 Defendant Xiaojing Zhang (hereinafter “Defendant” or “Zhang”), was and is a resident of the State of
9 California, but owns real property in Clark County, Nevada, and does business in Clark County
10 Nevada by renting out said real property.

11 9. Plaintiffs are informed and believe and thereon allege that at all times relevant herein,
12 Defendant Xiaojin Yang (hereinafter “Defendant” or “Yang”), was and is a resident of the State of
13 California, but owns real property in Clark County, Nevada, and does business in Clark County
14 Nevada by renting said real property.

15 10. That the true names or capacities, whether corporate, associate, individual or otherwise,
16 of Defendants and Does I through X, inclusive, are unknown to Plaintiffs who, therefore, sue said
17 Defendants by such fictitious names. Plaintiffs are informed and believe, and thereon allege, that each
18 of the Defendants designated herein as Doe is legally responsible in some manner for the events and
19 happenings herein referred to and proximately caused injury and damages thereby to Plaintiffs as
20 hereinafter alleged. Plaintiffs will seek leave of the Court to amend this Complaint to insert the true
21 names and capacities of Does I through X when the same have been ascertained and to join such
22 Defendants in this action.

23 11. That the true names or capacities of Defendants, Roe Business Entities XI through XX,
24 inclusive, are unknown to Plaintiffs who, therefore, sue said Defendants by such fictitious names.
25 Defendants designated herein as Roe Business Entities XI through XX, and each of them, are
26 predecessors-in-interest, successors-in-interest, and/or agencies otherwise in a joint venture with,
27 and/or serving as an alter ego of, any and/or all Defendants named herein; and/or are entities
28 responsible for the supervision of the individually named Defendants at the time of the events and

1 circumstances alleged herein; and/or are entities employed by and/or otherwise directing the
2 individual Defendants in the scope and course of their responsibilities at the time of the events and
3 circumstances alleged herein; and/or are entities otherwise contributing in any way to the acts
4 complained of and the damages alleged to have been suffered by the Plaintiffs herein. Plaintiffs are
5 informed and, on that basis believe and thereon allege, that each of the Defendants designated as Roe
6 Business Entity is in some manner negligently, vicariously, and/or statutorily responsible for the
7 events and happenings referred to and caused damages to Plaintiffs as herein alleged. Plaintiffs will
8 seek leave of the Court to amend this Complaint to insert the true names of such Defendants when the
9 same have been ascertained.

10 **GENERAL ALLEGATIONS COMMON TO ALL CLAIMS**

11 12. Plaintiffs repeat and reallege the allegations as contained in the preceding paragraphs
12 herein and incorporate the same herein by reference.

13 **Section 8 Housing Voucher Program**

14 13. The Southern Nevada Regional Housing Authority (“SNRHA”) is a housing authority
15 that serves Clark County.

16 14. SNRHA owns public housing units and manages over 10,000 Section 8 Housing
17 Choice Vouchers (“Section 8 vouchers”) in southern Nevada.

18 15. Section 8 vouchers provide assistance for low income families, the elderly, and the
19 disabled, to afford decent, safe, and sanitary housing in the private market.

20 16. Section 8 houses are owned by private owners who rent to tenants who must meet
21 Section 8 standards.

22 17. To stay in compliance with the Section 8 voucher program, tenants must abide by terms
23 in the lease agreement and homeowner’s association rules and regulations.

24 **6709 Courtney Michelle Street – The Property**

25 18. In 2012, Defendants Xiaojing Zhang and Xiaoxin Yang purchased the real property
26 located at 6709 Courtney Michelle Street, North Las Vegas, 89086 (the “Property”).

27 19. Zhang and Yang own at least six (6) properties in Clark County, Nevada.

28 20. The Property is a 3,800 square foot, 5-bedroom, 4 ½-bathroom, single-family home.

1 21. The Property is located in the Traditions Homeowners Association community.

2 22. Defendant Nicklin Property Management & Investments, Inc., is the property manager
3 for Traditions HOA.

4 23. Section 10.03 of the Traditions HOA common community rules and regulations
5 (“CC&R”) govern the rental or lease of any property in the community and give the HOA the right,
6 after notice to the owner of the property, to evict the tenant if within a 12-month period the tenant
7 commits three or more material violations of the CC&Rs, HOA articles, bylaws, or regulations.

8 24. The Traditions HOA CC&Rs define a nuisance as:

9 No noxious, illegal, or offensive activity shall be carried out on or upon any Lot of any
10 part of the Property, nor shall anything be done thereon that may be or may become an
11 annoyance or nuisance, public or private, to the neighborhood, that shall in any way
12 Interfere with the quiet enjoyment of each of the Owners of their respective Lots, or
13 that shall in any way increase the rate of Insurance for the Association or the Owners.

14 25. At some point, Defendants Zhang and Yang applied to be landlords in SNRHA’s
15 Section 8 Housing Voucher program and were accepted.

16 26. Traditions HOA community rules and regulations (“CC&Rs”) provide that the HOA
17 can evict tenants if there are three or more nuisance violations during a 12-month period.

18 **Zhang and Yang Rent the Property to Section 8 Tenants**

19 27. Upon information and belief, in 2013, Defendants Zhang and Yang rented the Property
20 to tenants through the Section 8 voucher program.

21 28. Upon information and belief, the tenants would not have been able to afford to purchase
22 or rent the Property without the assistance of Section 8 vouchers.

23 29. Upon information and belief, there were up to 20 people living at the house at different
24 times.

25 30. Upon further information and belief, some of the persons residing at the property were
26 known gang members.

27 31. Upon further information and belief, there were numerous complaints about the
28 Property and the tenants from other Traditions HOA members.

1 32. Upon further information and belief, the Property has been visited, and even raided, by
2 the police on multiple occasions and was a known gang house to the police.

3 **November 1, 2018**

4 33. On November 1, 2018, a group of five gang members drove into the Traditions
5 community with the intent to shoot at a rival gang member's house in retaliation for an earlier shooting.

6 34. The intended target was the Property.

7 35. Two houses next to the Property was 6705 Courtney Michelle.

8 36. 6705 Courtney Michelle was owned by 32-year old Alberto Sarabia, who purchased
9 the home in 2006.

10 37. Alberto lived at the home with his wife, 32-year old Anabel Sarabia, Anabel's 14-year
11 old daughter Dayanara, Anabel's 11-year old daughter Angelina, and Alberto and Anabel's 6-year old
12 daughter Bella Rose.

13 38. On November 1, 2018, the family of five sat around the kitchen table.

14 39. Three of the gang members exited their car and stood on the sidewalk and/or street to
15 shoot at the Property

16 40. The gang members were confused and instead of shooting at the Property, shot into
17 6705 Courtney Michelle.

18 41. As bullets entered the home one of them struck 11-year old Angelina, fatally wounding
19 her.

20 **FIRST CLAIM FOR RELIEF**

21 **(Wrongful Death)**

22 **Anabel Sarabia as Administratrix and Personal Representative of the Estate of Angelina**
23 **Erives and as Heir of Angelina Erives Against Defendants Xiaojing Zhang; Xiaojin Yang; and**
24 **Platinum Property Management, LLC**

25 42. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs
26 herein and incorporate the same herein by reference.

27 43. Plaintiff brings this wrongful death claim based on the negligence of Defendants
28 Xiaojing Zhang, Xiaojin Yang, and Platinum Property Management, LLC.

1 44. As Angelina’s mother, Anabel is the heir of Angelina.

2 45. Anabel brings this cause of action pursuant to NRS 41.085(4), as heir of Angelina.

3 46. Anabel is also the administratrix and personal representative of Angelina’s Estate.

4 47. Anabel also brings this claim pursuant to NRS 41.085(5) as the personal representative

5 of Angelina’s Estate.

6 48. Defendants Zhang and Yang owned the Property and rented the Property to tenants.

7 49. Defendant Platinum Management was the property manager for the Property.

8 50. Defendants Zhang and Yang owed a duty of care to act reasonably as homeowners, as

9 landlords, and/or as Section 8 landlords. These duties include, but are not limited to, ensuring that the

10 tenants of the Property abided by the provisions of the lease, of the CC&Rs for the community, and

11 with Section 8 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others

12 in the community.

13 51. Upon information and belief, Defendants Zhang and Yang breached their duties by

14 allowing known gang members, and upwards of 20 people, to reside at the Property, and/or by

15 otherwise failing to act as reasonable homeowners, landlords, and/or Section 8 landlords.

16 52. Defendant Platinum Property Management owed a duty of care to act as a reasonable

17 property management company. These duties include, but are not limited to, ensuring tenants of the

18 Property abided by the provisions of the lease, of the CC&Rs for the community, and with Section 8

19 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others in the

20 community.

21 53. Upon information and belief, Defendant Platinum Property Management breached its

22 duties by allowing known gang members, and upwards of 20 people, to reside at the Property, and/or

23 by otherwise failing to act as a reasonable property management company.

24 54. The breach of these duties was a substantial factor in causing injuries that led to the

25 death of Angelina.

26 55. As a direct and proximate or legal result of Defendants’ negligence and/or wrongful

27 acts, which caused Angelina’s injuries and death, Anabel has sustained damages consisting of the loss

28 of Angelina’s love, companionship, comfort, affection, society, and moral support, and has suffered

1 great emotional and psychological loss, all in amount in excess of Fifteen Thousand Dollars
2 (\$15,000.00). As Angelina’s heir, Anabel seeks these damages pursuant to NRS 41.085(4).

3 56. As a further direct and proximate or legal result of Defendants’ negligence and/or
4 wrongful acts, Angelina endured pain, suffering, and/or disfigurement. As Angelina’s heir, Anabel
5 seek general damages for this pain, suffering, and/or disfigurement pursuant to NRS 41.085(4) in an
6 amount in excess of Fifteen Thousand Dollars (\$15,000.00).

7 57. As a further direct and proximate or legal result of Defendants’ negligence and/or
8 wrongful acts, Angelina’s estate incurred special damages, to include medical expenses and funeral
9 expenses, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00). As personal
10 representative of Angelina’s Estate, Anabel seeks these special damages pursuant to NRS 41.085(5).

11 58. Defendants’ conduct in not screening tenants for the Property and, upon information
12 and belief, allowing gang members to reside at the Property was despicable and so contemptible that
13 it would be looked down upon and despised by ordinary decent people and was carried on by
14 Defendants with willful and conscious disregard for the safety of anyone in the Traditions community.

15 59. Defendants’ outrageous and unconscionable conduct warrants an award of exemplary
16 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
17 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina’s
18 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

19 60. To the extent NRS 42.007 is applicable as to Platinum Property Management, LLC,
20 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
21 conduct of its employees, agents, and/or servants, as set forth herein.

22 61. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
23 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
24 attorney’s fees and costs of suit.

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SECOND CLAIM FOR RELIEF

(Wrongful Death)

Anabel Sarabia as Administratrix and Personal Representative of the Estate of Angelina Erives and as Heir of Angelina Erives Against Defendants Traditions Homeowners Association and Nicklin Property Management & Investments, Inc.

62. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs herein and incorporate the same herein by reference.

63. Plaintiff brings this wrongful death claim based on the negligence of Defendants Traditions Homeowners Association and Nicklin Property Management & Investments, Inc.

64. As Angelina's mother, Anabel is the heir of Angelina.

65. Anabel brings this cause of action pursuant to NRS 41.085(4), as heir of Angelina.

66. Anabel is also the administratrix and personal representative of Angelina's Estate.

67. Anabel also brings this claim pursuant to NRS 41.085(5) as the personal representative of Angelina's Estate.

68. Defendant Traditions HOA owed a duty of care to act as a reasonable homeowners association. These duties include, but are not limited to, ensuring that tenants renting homes in the Traditions community abided by CC&Rs and ensuring tenants and properties were not a danger or nuisance to the community. Defendant also owed a duty to enforce remedies provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more material violations of the CC&Rs within a 12-month period.

69. Defendant Nicklin Property Management owed a duty of care to act as a reasonable property management company. These duties include, but are not limited to, ensuring that tenants renting homes in the Traditions community abided by CC&Rs and ensuring tenants were not a danger or nuisance to the community. Defendant also owed a duty to assist the HOA in enforcing remedies provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more material violations of the CC&Rs within a 12-month period.

1 70. Upon information and belief, Defendant Traditions HOA breached its duty by failing
2 to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a
3 reasonable homeowners association.

4 71. Upon information and belief, Defendant Nicklin Property Management breached its
5 duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to
6 act as a reasonable property management company.

7 72. The breach of these duties was a substantial factor in causing injuries that led to the
8 death of Angelina.

9 73. As a direct and proximate or legal result of Defendants' negligence and/or wrongful
10 acts, which caused Angelina's injuries and death, Anabel has sustained damages consisting of the loss
11 of Angelina's love, companionship, comfort, affection, society, and moral support, and has suffered
12 great emotional and psychological loss, all in amount in excess of Fifteen Thousand Dollars
13 (\$15,000.00). As Angelina's heir, Anabel seeks these damages pursuant to NRS 41.085(4).

14 74. As a further direct and proximate or legal result of Defendants' negligence and/or
15 wrongful acts, Angelina endured pain, suffering, and/or disfigurement. As Angelina's heir, Anabel
16 seek general damages for this pain, suffering, and/or disfigurement pursuant to NRS 41.085(4) in an
17 amount in excess of Fifteen Thousand Dollars (\$15,000.00).

18 75. As a further direct and proximate or legal result of Defendants' negligence and/or
19 wrongful acts, Angelina's estate incurred special damages, to include medical expenses and funeral
20 expenses, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00). As personal
21 representative of Angelina's Estate, Anabel seeks these special damages pursuant to NRS 41.085(5).

22 76. Defendants' conduct in not enforcing the CC&Rs, allowing gang members to reside at
23 the Property, and allowing the Property to become a danger to the community was despicable and so
24 contemptible that it would be looked down upon and despised by ordinary decent people and was
25 carried on by Defendants with willful and conscious disregard for the safety of anyone in the
26 Traditions community.

27 77. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
28 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an

1 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina’s
2 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

3 78. To the extent NRS 42.007 is applicable as to Traditions Homeowners Association,
4 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
5 conduct of its employees, agents, and/or servants, as set forth herein.

6 79. To the extent NRS 42.007 is applicable as to Nicklin Property Management &
7 Investments, Inc., Defendant is vicariously liable for punitive damages arising from the outrageous
8 and unconscionable conduct of its employees, agents, and/or servants, as set forth herein.

9 80. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
10 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
11 attorney’s fees and costs of suit.

12 **THIRD CLAIM FOR RELIEF**

13 **(Negligence)**

14 **Anabel Sarabia as Administratrix of the Estate of Angelina Erives Against Defendants**
15 **Xiaojing Zhang; Xiaojin Yang; and Platinum Property Management, LLC**

16 81. Plaintiffs repeat and reallege the allegations as contained in the preceding paragraphs
17 herein and incorporate the same herein by reference.

18 82. Anabel brings this claim as administratrix of Angelina’s Estate pursuant to NRS
19 41.100.

20 83. Defendants Zhang and Yang owned the Property and rented the Property to tenants.

21 84. Defendant Platinum Management was the property manager for the Property.

22 85. Defendants Zhang and Yang owed a duty of care to act reasonably as homeowners, as
23 landlords, and/or as Section 8 landlords. These duties include, but are not limited to, ensuring that the
24 tenants of the Property abided by the provisions of the lease, of the CC&Rs for the community, and
25 with Section 8 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others
26 in the community.

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1 86. Upon information and belief, Defendants Zhang and Yang breached their duties by
2 allowing known gang members, and upwards of 20 people, to reside at the Property, and/or by
3 otherwise failing to act as reasonable homeowners, landlords, and/or Section 8 landlords.

4 87. Defendant Platinum Property Management owed a duty of care to act as a reasonable
5 property management company. These duties include, but are not limited to, ensuring tenants of the
6 Property abided by the provisions of the lease, of the CC&Rs for the community, and with Section 8
7 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others in the
8 community.

9 88. Upon information and belief, Defendant Platinum Property Management breached its
10 duties by allowing known gang members, and upwards of 20 people, to reside at the Property, and/or
11 by otherwise failing to act as a reasonable property management company.

12 89. The breach of these duties was a substantial factor in causing injuries that led to the
13 death of Angelina.

14 90. As a direct and proximate or legal result of Defendants' negligence and/or wrongful
15 acts, Angelina was injured and later passed away. Angelina thereby experienced great pain, and
16 anxiety to her body and mind. Angelina sustained injuries and damages in an amount in excess of
17 Fifteen Thousand Dollars (\$15,000.00), for which Anabel, as administratrix of Angelina's Estate, now
18 seeks recovery pursuant to NRS 41.100.

19 91. Defendants' conduct in not screening tenants for the Property and, upon information
20 and belief, allowing gang members to reside at the Property was despicable and so contemptible that
21 it would be looked down upon and despised by ordinary decent people and was carried on by
22 Defendants with willful and conscious disregard for the safety of anyone in the Traditions community.

23 92. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
24 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
25 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina's
26 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

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1 99. Upon information and belief, Defendant Traditions HOA breached its duty by failing
2 to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a
3 reasonable homeowners association.

4 100. Upon information and belief, Defendant Nicklin Property Management breached its
5 duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to
6 act as a reasonable property management company.

7 101. The breach of these duties was a substantial factor in causing injuries that led to the
8 death of Angelina.

9 102. As a direct and proximate or legal result of Defendants' negligence and/or wrongful
10 acts, Angelina was injured and later passed away. Angelina thereby experienced great pain, and
11 anxiety to her body and mind. Angelina sustained injuries and damages in an amount in excess of
12 Fifteen Thousand Dollars (\$15,000.00), for which Anabel, as administratrix of Angelina's Estate, now
13 seeks recovery pursuant to NRS 41.100.

14 103. Defendants' conduct in not enforcing the CC&Rs, allowing gang members to reside at
15 the Property, and allowing the Property to become a danger to the community was despicable and so
16 contemptible that it would be looked down upon and despised by ordinary decent people and was
17 carried on by Defendants with willful and conscious disregard for the safety of anyone in the
18 Traditions community.

19 104. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
20 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
21 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina's
22 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

23 105. To the extent NRS 42.007 is applicable as to Traditions Homeowners Association,
24 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
25 conduct of its employees, agents, and/or servants, as set forth herein.

26 106. To the extent NRS 42.007 is applicable as to Nicklin Property Management &
27 Investments, Inc., Defendant is vicariously liable for punitive damages arising from the outrageous
28 and unconscionable conduct of its employees, agents, and/or servants, as set forth herein.

1 115. The breach of these duties was a substantial factor in causing injuries that led to the
2 death of Angelina. Anabel witnessed her daughter get shot and pass away.

3 116. Anabel was also a direct victim in that she could have easily been shot herself.

4 117. As a direct and proximate or legal result of seeing her daughter shot and killed, which
5 was a direct and proximate or legal result of Defendants' conduct, Anabel suffered emotional and/or
6 physical distress resulting in physical injury or illness.

7 118. As a direct and proximate or legal result of almost being shot, which was a direct and
8 proximate or legal result of Defendants' conduct, Anabel suffered emotional and/or physical distress
9 resulting in physical injury or illness.

10 119. The actions of Defendants, and each of them, directly and proximately or legally caused
11 Anabel damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00).

12 120. Defendants' conduct in not screening tenants for the Property and, upon information
13 and belief, allowing gang members to reside at the Property was despicable and so contemptible that
14 it would be looked down upon and despised by ordinary decent people and was carried on by
15 Defendants with willful and conscious disregard for the safety of anyone in the Traditions community.

16 121. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
17 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
18 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina's
19 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

20 122. To the extent NRS 42.007 is applicable as to Platinum Property Management, LLC,
21 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
22 conduct of its employees, agents, and/or servants, as set forth herein.

23 123. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
24 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
25 attorney's fees and costs of suit.

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SIXTH CLAIM FOR RELIEF

(Negligent Infliction of Emotional Distress)

Anabel Sarabia Against Defendants Traditions Homeowners Association and Nicklin Property Management & Investments, Inc.

124. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs herein and incorporate the same herein by reference.

125. Defendant Traditions HOA owed a duty of care to act as a reasonable homeowners association. These duties include, but are not limited to, ensuring that tenants renting homes in the Traditions community abided by CC&Rs and ensuring tenants and properties were not a danger or nuisance to the community. Defendant also owed a duty to enforce remedies provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more material violations of the CC&Rs within a 12-month period.

126. Defendant Nicklin Property Management owed a duty of care to act as a reasonable property management company. These duties include, but are not limited to, ensuring that tenants renting homes in the Traditions community abided by CC&Rs and ensuring tenants were not a danger or nuisance to the community. Defendant also owed a duty to assist the HOA in enforcing remedies provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more material violations of the CC&Rs within a 12-month period.

127. Upon information and belief, Defendant Traditions HOA breached its duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a reasonable homeowners association.

128. Upon information and belief, Defendant Nicklin Property Management breached its duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a reasonable property management company.

129. The breach of these duties was a substantial factor in causing injuries that led to the death of Angelina. Anabel witnessed her daughter get shot and pass away.

130. Anabel was also a direct victim in that she could have easily been shot herself.

1 131. As a direct and proximate or legal result of seeing her daughter shot and killed, which
2 was a direct and proximate or legal result of Defendants' conduct, Anabel suffered emotional and/or
3 physical distress resulting in physical injury or illness.

4 132. As a direct and proximate or legal result of almost being shot, which was a direct and
5 proximate or legal result of Defendants' conduct, Anabel suffered emotional and/or physical distress
6 resulting in physical injury or illness.

7 133. The actions of Defendants, and each of them, directly and proximately or legally caused
8 Anabel damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00).

9 134. Defendants' conduct in not enforcing the CC&Rs, allowing gang members to reside at
10 the Property, and allowing the Property to become a danger to the community was despicable and so
11 contemptible that it would be looked down upon and despised by ordinary decent people and was
12 carried on by Defendants with willful and conscious disregard for the safety of anyone in the
13 Traditions community.

14 135. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
15 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
16 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina's
17 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

18 136. To the extent NRS 42.007 is applicable as to Traditions Homeowners Association,
19 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
20 conduct of its employees, agents, and/or servants, as set forth herein.

21 137. To the extent NRS 42.007 is applicable as to Nicklin Property Management &
22 Investments, Inc., Defendant is vicariously liable for punitive damages arising from the outrageous
23 and unconscionable conduct of its employees, agents, and/or servants, as set forth herein.

24 138. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
25 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
26 attorney's fees and costs of suit.

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SEVENTH CLAIM FOR RELIEF

(Negligent Infliction of Emotional Distress)

**Alberto Sarabia Jr. Against Defendants Xiaojing Zhang; Xiaojin Yang; and Platinum
Property Management, LLC**

139. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs herein and incorporate the same herein by reference.

140. Defendants Zhang and Yang owned the Property and rented the Property to tenants.

141. Defendant Platinum Management was the property manager for the Property.

142. Defendants Zhang and Yang owed a duty of care to act reasonably as homeowners, as landlords, and/or as Section 8 landlords. These duties include, but are not limited to, ensuring that the tenants of the Property abided by the provisions of the lease, of the CC&Rs for the community, and with Section 8 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others in the community.

143. Upon information and belief, Defendants Zhang and Yang breached their duties by allowing known gang members, and upwards of 20 people, to reside at the Property, and/or by otherwise failing to act as reasonable homeowners, landlords, and/or Section 8 landlords.

144. Defendant Platinum Property Management owed a duty of care to act as a reasonable property management company. These duties include, but are not limited to, ensuring tenants of the Property abided by the provisions of the lease, of the CC&Rs for the community, and with Section 8 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others in the community.

145. Upon information and belief, Defendant Platinum Property Management breached its duties by allowing known gang members, and upwards of 20 people, to reside at the Property, and/or by otherwise failing to act as a reasonable property management company.

146. The breach of these duties was a substantial factor in causing injuries that led to the death of Angelina.

147. Alberto is Angelina's step-father and witnessed Angelina get shot and pass away.

148. Alberto was also a direct victim in that he could have easily been shot himself.

1 157. Defendant Traditions HOA owed a duty of care to act as a reasonable homeowners
2 association. These duties include, but are not limited to, ensuring that tenants renting homes in the
3 Traditions community abided by CC&Rs and ensuring tenants and properties were not a danger or
4 nuisance to the community. Defendant also owed a duty to enforce remedies provided for in the
5 CC&Rs, up to and including eviction, of tenants who committed three or more material violations of
6 the CC&Rs within a 12-month period.

7 158. Defendant Nicklin Property Management owed a duty of care to act as a reasonable
8 property management company. These duties include, but are not limited to, ensuring that tenants
9 renting homes in the Traditions community abided by CC&Rs and ensuring tenants were not a danger
10 or nuisance to the community. Defendant also owed a duty to assist the HOA in enforcing remedies
11 provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more
12 material violations of the CC&Rs within a 12-month period.

13 159. Upon information and belief, Defendant Traditions HOA breached its duty by failing
14 to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a
15 reasonable homeowners association.

16 160. Upon information and belief, Defendant Nicklin Property Management breached its
17 duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to
18 act as a reasonable property management company.

19 161. The breach of these duties was a substantial factor in causing injuries that led to the
20 death of Angelina.

21 162. Alberto is Angelina's step-father and witnessed Angelina get shot and pass away.

22 163. Alberto was also a direct victim in that he could have easily been shot himself.

23 164. As a direct and proximate or legal result of seeing his step-daughter shot and killed,
24 which was a direct and proximate or legal result of Defendants' conduct, Alberto suffered emotional
25 and/or physical distress resulting in physical injury or illness.

26 165. As a direct and proximate or legal result of almost being shot, which was a direct and
27 proximate or legal result of Defendants' conduct, Alberto suffered emotional and/or physical distress
28 resulting in physical injury or illness.

1 166. The actions of Defendants, and each of them, directly and proximately or legally caused
2 Alberto damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00).

3 167. Defendants' conduct in not enforcing the CC&Rs, allowing gang members to reside at
4 the Property, and allowing the Property to become a danger to the community was despicable and so
5 contemptible that it would be looked down upon and despised by ordinary decent people and was
6 carried on by Defendants with willful and conscious disregard for the safety of anyone in the
7 Traditions community.

8 168. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
9 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
10 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina's
11 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

12 169. To the extent NRS 42.007 is applicable as to Traditions Homeowners Association,
13 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
14 conduct of its employees, agents, and/or servants, as set forth herein.

15 170. To the extent NRS 42.007 is applicable as to Nicklin Property Management &
16 Investments, Inc., Defendant is vicariously liable for punitive damages arising from the outrageous
17 and unconscionable conduct of its employees, agents, and/or servants, as set forth herein.

18 171. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
19 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
20 attorney's fees and costs of suit.

21 **NINTH CLAIM FOR RELIEF**

22 **(Negligent Infliction of Emotional Distress)**

23 **Anabel Sarabia on Behalf of Dayanara Erives Against Defendants Xiaojing Zhang; Xiaojin**

24 **Yang; and Platinum Property Management, LLC**

25 172. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs
26 herein and incorporate the same herein by reference.

27 173. Defendants Zhang and Yang owned the Property and rented the Property to tenants.

28 174. Defendant Platinum Management was the property manager for the Property.

1 175. Defendants Zhang and Yang owed a duty of care to act reasonably as homeowners, as
2 landlords, and/or as Section 8 landlords. These duties include, but are not limited to, ensuring that the
3 tenants of the Property abided by the provisions of the lease, of the CC&Rs for the community, and
4 with Section 8 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others
5 in the community.

6 176. Upon information and belief, Defendants Zhang and Yang breached their duties by
7 allowing known gang members, and upwards of 20 people, to reside at the Property, and/or by
8 otherwise failing to act as reasonable homeowners, landlords, and/or Section 8 landlords.

9 177. Defendant Platinum Property Management owed a duty of care to act as a reasonable
10 property management company. These duties include, but are not limited to, ensuring tenants of the
11 Property abided by the provisions of the lease, of the CC&Rs for the community, and with Section 8
12 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others in the
13 community.

14 178. Upon information and belief, Defendant Platinum Property Management breached its
15 duties by allowing known gang members, and upwards of 20 people, to reside at the Property, and/or
16 by otherwise failing to act as a reasonable property management company.

17 179. The breach of these duties was a substantial factor in causing injuries that led to the
18 death of Angelina.

19 180. Dayanara is Angelina's older sister and witnessed Angelina get shot and pass away.

20 181. Dayanara was also a direct victim in that she could have easily been shot herself.

21 182. As a direct and proximate or legal result of seeing her sister shot and killed, which was
22 a direct and proximate or legal result of Defendants' conduct, Dayanara suffered emotional and/or
23 physical distress resulting in physical injury or illness.

24 183. As a direct and proximate or legal result of almost being shot, which was a direct and
25 proximate or legal result of Defendants' conduct, Dayanara suffered emotional and/or physical distress
26 resulting in physical injury or illness.

1 184. The actions of Defendants, and each of them, directly and proximately or legally caused
2 Dayanara damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00). As
3 Dayanara’s mother, Anabel brings this claim on behalf of Dayanara, a minor child.

4 185. Defendants’ conduct in not screening tenants for the Property and, upon information
5 and belief, allowing gang members to reside at the Property was despicable and so contemptible that
6 it would be looked down upon and despised by ordinary decent people and was carried on by
7 Defendants with willful and conscious disregard for the safety of anyone in the Traditions community.

8 186. Defendants’ outrageous and unconscionable conduct warrants an award of exemplary
9 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
10 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina’s
11 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

12 187. To the extent NRS 42.007 is applicable as to Platinum Property Management, LLC,
13 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
14 conduct of its employees, agents, and/or servants, as set forth herein.

15 188. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
16 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
17 attorney’s fees and costs of suit.

18 **TENTH CLAIM FOR RELIEF**

19 **(Negligent Infliction of Emotional Distress)**

20 **Anabel Sarabia on Behalf of Dayanara Erives Against Defendants Traditions Homeowners**
21 **Association and Nicklin Property Management & Investments, Inc.**

22 189. Plaintiffs repeat and reallege the allegations contained in the preceding paragraphs
23 herein and incorporate the same herein by reference.

24 190. Defendant Traditions HOA owed a duty of care to act as a reasonable homeowners
25 association. These duties include, but are not limited to, ensuring that tenants renting homes in the
26 Traditions community abided by CC&Rs and ensuring tenants and properties were not a danger or
27 nuisance to the community. Defendant also owed a duty to enforce remedies provided for in the
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1 CC&Rs, up to and including eviction, of tenants who committed three or more material violations of
2 the CC&Rs within a 12-month period.

3 191. Defendant Nicklin Property Management owed a duty of care to act as a reasonable
4 property management company. These duties include, but are not limited to, ensuring that tenants
5 renting homes in the Traditions community abided by CC&Rs and ensuring tenants were not a danger
6 or nuisance to the community. Defendant also owed a duty to assist the HOA in enforcing remedies
7 provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more
8 material violations of the CC&Rs within a 12-month period.

9 192. Upon information and belief, Defendant Traditions HOA breached its duty by failing
10 to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a
11 reasonable homeowners association.

12 193. Upon information and belief, Defendant Nicklin Property Management breached its
13 duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to
14 act as a reasonable property management company.

15 194. The breach of these duties was a substantial factor in causing injuries that led to the
16 death of Angelina.

17 195. Dayanara is Angelina's older sister and witnessed Angelina get shot and pass away.

18 196. Dayanara was also a direct victim in that she could have easily been shot herself.

19 197. As a direct and proximate or legal result of seeing her sister shot and killed, which was
20 a direct and proximate or legal result of Defendants' conduct, Dayanara suffered emotional and/or
21 physical distress resulting in physical injury or illness.

22 198. As a direct and proximate or legal result of almost being shot, which was a direct and
23 proximate or legal result of Defendants' conduct, Dayanara suffered emotional and/or physical distress
24 resulting in physical injury or illness.

25 199. The actions of Defendants, and each of them, directly and proximately or legally caused
26 Dayanara damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00). As
27 Dayanara's mother, Anabel brings this claim on behalf of Dayanara, a minor child.

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1 tenants of the Property abided by the provisions of the lease, of the CC&Rs for the community, and
2 with Section 8 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others
3 in the community.

4 209. Upon information and belief, Defendants Zhang and Yang breached their duties by
5 allowing known gang members, and upwards of 20 people, to reside at the Property, and/or by
6 otherwise failing to act as reasonable homeowners, landlords, and/or Section 8 landlords.

7 210. Defendant Platinum Property Management owed a duty of care to act as a reasonable
8 property management company. These duties include, but are not limited to, ensuring tenants of the
9 Property abided by the provisions of the lease, of the CC&Rs for the community, and with Section 8
10 safety guidelines, and ensuring that the tenants were not a nuisance or danger to others in the
11 community.

12 211. Upon information and belief, Defendant Platinum Property Management breached its
13 duties by allowing known gang members, and upwards of 20 people, to reside at the Property, and/or
14 by otherwise failing to act as a reasonable property management company.

15 212. The breach of these duties was a substantial factor in causing injuries that led to the
16 death of Angelina.

17 213. Bella Rose is Angelina's younger sister and witnessed Angelina get shot and pass
18 away.

19 214. Bella Rose was also a direct victim in that she could have easily been shot herself.

20 215. As a direct and proximate or legal result of seeing her sister shot and killed, which was
21 a direct and proximate or legal result of Defendants' conduct, Bella Rose suffered emotional and/or
22 physical distress resulting in physical injury or illness.

23 216. As a direct and proximate or legal result of almost being shot, which was a direct and
24 proximate or legal result of Defendants' conduct, Bella Rose suffered emotional and/or physical
25 distress resulting in physical injury or illness.

26 217. The actions of Defendants, and each of them, directly and proximately or legally caused
27 Bella Rose damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00). As
28 Bella Rose's parents, Anabel and Alberto bring this claim on behalf of Bella Rose, a minor child.

1 renting homes in the Traditions community abided by CC&Rs and ensuring tenants were not a danger
2 or nuisance to the community. Defendant also owed a duty to assist the HOA in enforcing remedies
3 provided for in the CC&Rs, up to and including eviction, of tenants who committed three or more
4 material violations of the CC&Rs within a 12-month period.

5 225. Upon information and belief, Defendant Traditions HOA breached its duty by failing
6 to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to act as a
7 reasonable homeowners association.

8 226. Upon information and belief, Defendant Nicklin Property Management breached its
9 duty by failing to enforce the CC&Rs as to the Property and its tenants and/or by otherwise failing to
10 act as a reasonable property management company.

11 227. Bella Rose is Angelina's younger sister and witnessed Angelina get shot and pass
12 away.

13 228. Bella Rose was also a direct victim in that she could have easily been shot herself.

14 229. As a direct and proximate or legal result of seeing her sister shot and killed, which was
15 a direct and proximate or legal result of Defendants' conduct, Bella Rose suffered emotional and/or
16 physical distress resulting in physical injury or illness.

17 230. As a direct and proximate or legal result of almost being shot, which was a direct and
18 proximate or legal result of Defendants' conduct, Bella Rose suffered emotional and/or physical
19 distress resulting in physical injury or illness.

20 231. The actions of Defendants, and each of them, directly and proximately or legally caused
21 Bella Rose damages for emotional distress in excess of Fifteen Thousand Dollars (\$15,000.00). As
22 Bella Rose's parents, Anabel and Alberto bring this claim on behalf of Bella Rose, a minor child.

23 232. Defendants' conduct in not enforcing the CC&Rs, allowing gang members to reside at
24 the Property, and allowing the Property to become a danger to the community was despicable and so
25 contemptible that it would be looked down upon and despised by ordinary decent people and was
26 carried on by Defendants with willful and conscious disregard for the safety of anyone in the
27 Traditions community.

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1 233. Defendants' outrageous and unconscionable conduct warrants an award of exemplary
2 and punitive damages pursuant to NRS 42.005, in an amount appropriate to punish and make an
3 example of Defendants, and to deter similar conduct in the future. As administrator of Angelina's
4 estate, Plaintiff seeks punitive damages pursuant to NRS 41.085(5).

5 234. To the extent NRS 42.007 is applicable as to Traditions Homeowners Association,
6 Defendant is vicariously liable for punitive damages arising from the outrageous and unconscionable
7 conduct of its employees, agents, and/or servants, as set forth herein.

8 235. To the extent NRS 42.007 is applicable as to Nicklin Property Management &
9 Investments, Inc., Defendant is vicariously liable for punitive damages arising from the outrageous
10 and unconscionable conduct of its employees, agents, and/or servants, as set forth herein.

11 236. The actions of Defendants have forced Plaintiffs to retain counsel to represent them in
12 the prosecution of this action, and they are therefore entitled to an award of a reasonable amount as
13 attorney's fees and costs of suit.

14 WHEREFORE, ANABEL SARABIA, as an Individual and as Administratrix and Personal
15 Representative of the ESTATE OF ANGELINA ERIVES; ANABEL SARABIA on behalf of
16 DAYANARA ERIVES, a minor child; ANABEL SARABIA and ALBERTO SARABIA JR., on
17 behalf of BELLA ROSE SARABIA, a minor child; and ALBERTO SARABIA, JR., expressly
18 reserving their rights to amend this Complaint at the time of trial, to include all items of damage not
19 yet ascertained, demand judgment against Defendants, PLATINUM PROPERTY MANAGEMENT,
20 LLC; NICKLIN PROPERTY MANAGEMENT & INVESTMENTS, INC., TRADITIONS
21 HOMEOWNERS ASSOCIATION; XIAOJING ZHANG; XIAOXIN YANG; DOES I through X; and
22 ROE BUSINESS ENTITIES XI through XX, and each of them, as follows:

- 23 1. General damages, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00), to
24 be set forth and proven at the time of trial;
- 25 2. Special damages in an amount in excess of Fifteen Thousand Dollars (\$15,000.00), to
26 be set forth and proven at the time of trial;
- 27 3. For exemplary and punitive damages, in an amount to be set forth and proven at the
28 time of trial;

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- 4. Reasonable attorney’s fees;
- 5. Costs of suit incurred; and
- 6. For such other relief as to the Court seems just and proper.

DATED this 2nd day of May 2019.

CLAGGETT & SYKES LAW FIRM

/s/ Sean Claggett

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